



EXECUTIVE SERVICES

Chief Executive

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NB - This agenda contains proposals, recommendations and options. These do not represent Council policy or decisions until they have received proper consideration through the full decision making process.

Contact: Democratic Services
committee.services@tmbc.gov.uk

10 July 2023

To: MEMBERS OF THE HOUSING AND PLANNING SCRUTINY SELECT COMMITTEE

(Copies to all Members of the Council)

Dear Sir/Madam

Your attendance is requested at a meeting of the Housing and Planning Scrutiny Select Committee to be held in the Council Chamber, Gibson Drive, Kings Hill on Tuesday, 18th July, 2023 commencing at 7.30 pm.

Members of the Committee are required to attend in person. Other Members may attend in person or participate online via MS Teams.

Information on how to observe the meeting will be published on the Council's website.

Yours faithfully

JULIE BEILBY

Chief Executive

A G E N D A

1. Guidance for the Conduct of Meetings

5 - 6

PART 1 - PUBLIC

2. Apologies for absence
3. Notification of Substitute Members 7 - 8
4. Declarations of interest 9 - 10

Members are reminded of their obligation under the Council's Code of Conduct to disclose any Disclosable Pecuniary Interests and Other Significant Interests in any matter(s) to be considered or being considered at the meeting. These are explained in the Code of Conduct on the Council's website at [Code of conduct for members – Tonbridge and Malling Borough Council \(tmbc.gov.uk\)](https://www.tmbc.gov.uk/code-of-conduct-for-members).

Members in any doubt about such declarations are advised to contact Legal or Democratic Services in advance of the meeting.

5. Minutes 11 - 14

To confirm as a correct record the Notes of the meeting of the Housing and Planning Scrutiny Select Committee held on 7 June 2023.

6. Member Briefing on Housing Allocations Scheme Verbal Report

This is a verbal update on the new Housing Allocations Scheme.

Matters for Recommendation to the Cabinet

7. Regulation 18 Consultation 15 - 56

Building upon the initial results presented to the Committee of 6 December 2022, this report sets out the full consultation analysis from Regulation 18 consultation and seeks Members' approval to note the output of the consultation.

Annex 2 – to be published as a supplement due to its size

Annex 3 – can be viewed [here](#)

8. Housing Strategy Update and Draft Year 2 Action Plan 57 - 70

The Housing Strategy 2022 – 2027, adopted in July 2022, sets out our priorities and strategic approach to housing in the borough and outlines objectives for each priority, which will be delivered and monitored through annual action plans. This report provides a progress update about delivery of the year 1 action plan and proposes a draft year 2 action plan for approval.

Matters submitted for Information

9. Work Programme 2023/24 71 - 72

The Work Programme setting out matters to be scrutinised during 2023/24 is attached for information. Members can suggest future items by liaising with the Chair of the Committee.

10. Urgent Items 73 - 74

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive

Matters for consideration in Private

11. Exclusion of Press and Public 75 - 76

The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

PART 2 - PRIVATE

12. Urgent Items 77 - 78

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

MEMBERSHIP

Cllr D A S Davis (Chair)
Cllr D W King (Vice-Chair)

Cllr L Athwal
Cllr Mrs S Bell
Cllr G C Bridge
Cllr R W Dalton
Cllr D Harman
Cllr P M Hickmott

Cllr M A J Hood
Cllr A Mehmet
Cllr W E Palmer
Cllr R V Roud
Cllr D Thornewell

GUIDANCE ON HOW MEETINGS WILL BE CONDUCTED

- (1) All meetings of the Borough Council will be livestreamed to YouTube here, unless there is exempt or confidential business be discussed:

<https://www.youtube.com/channel/UCPp-IJISNgoF-ugSzxjAPfw/featured>
- (2) There are no fire drills planned during the time a meeting is being held. For the benefit of those in the meeting room, the fire alarm is a long continuous bell and the exits are via the doors used to enter the room. An officer on site will lead any evacuation.
- (3) Should you need this agenda or any of the reports in a different format, or have any other queries concerning the meeting, please contact Democratic Services on committee.services@tmbc.gov.uk in the first instance.

Attendance:

- Members of the Committee/Advisory Board are required to attend in person and be present in the meeting room. Only these Members are able to move/ second or amend motions, and vote.
- Other Members of the Council can join via MS Teams and can take part in any discussion and ask questions, when invited to do so by the Chairman, but cannot move/ second or amend motions or vote on any matters. Members participating remotely are reminded that this does not count towards their formal committee attendance.
- Occasionally, Members of the Committee/Advisory Board are unable to attend in person and may join via MS Teams in the same way as other Members. However, they are unable to move/ second or amend motions or vote on any matters if they are not present in the meeting room. As with other Members joining via MS Teams, this does not count towards their formal committee attendance.
- Officers can participate in person or online.
- Members of the public addressing an Area Planning Committee can participate in person or online. Please contact committee.services@tmbc.gov.uk for further information.

Before formal proceedings start there will be a sound check of Members/Officers in the room. This is done as a roll call and confirms attendance of voting Members.

Ground Rules:

The meeting will operate under the following ground rules:

- Members in the Chamber should indicate to speak in the usual way and use the fixed microphones in front of them. These need to be switched on when speaking or comments will not be heard by those participating online. Please switch off microphones when not speaking.
- If there any technical issues the meeting will be adjourned to try and rectify them. If this is not possible there are a number of options that can be taken to enable the meeting to continue. These will be explained if it becomes necessary.

For those Members participating online:

- please request to speak using the 'chat or hand raised function';
- please turn off cameras and microphones when not speaking;
- please do not use the 'chat function' for other matters as comments can be seen by all;
- Members may wish to blur the background on their camera using the facility on Microsoft teams.
- Please avoid distractions and general chat if not addressing the meeting
- Please remember to turn off or silence mobile phones

Voting:

Voting may be undertaken by way of a roll call and each Member should verbally respond For, Against, Abstain. The vote will be noted and announced by the Democratic Services Officer.

Alternatively, votes may be taken by general affirmation if it seems that there is agreement amongst Members. The Chairman will announce the outcome of the vote for those participating and viewing online.

Housing and Planning Scrutiny Select Committee – Substitute Members (if required)

	Conservative	Liberal Democratic	Green	Ind. Kent Alliance	Labour
1	Robert Cannon	Bill Banks	Kath Barton		Angus Bennison
2	Sarah Hudson	Tim Bishop	Anna Cope		Wayne Mallard
3	Alex McDermott	Frani Hoskins	Steve Crisp		
4	Mark Rhodes	Anita Oakley	George Hines		
5	Keith Tunstall	Michelle Tatton	Bethan Parry		

Members of Cabinet cannot be appointed as a substitute to this Committee

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Declarations of interest

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TONBRIDGE AND MALLING BOROUGH COUNCIL

HOUSING AND PLANNING SCRUTINY SELECT COMMITTEE

MINUTES

Wednesday, 7th June, 2023

Present: Cllr D A S Davis (Chair), Cllr D W King (Vice-Chair),
Cllr L Athwal, Cllr G C Bridge, Cllr D Harman,
Cllr M A J Hood, Cllr A Mehmet, Cllr W E Palmer,
Cllr R V Roud, Cllr D Thornewell and Cllr M R Rhodes
(substitute)

In attendance: Councillors M D Boughton, A G Bennison, J Clokey, S Crisp,
Mrs T Dean, F A Hoskins, K B Tanner, Mrs M Tatton and
M Taylor were also present pursuant to Council Procedure
Rule No 15.21.

Virtual: Councillor B A Parry participated via MS Teams in
accordance with Council Procedure Rule No 15.21.

Apologies for absence were received from Councillors
Mrs S Bell and R W Dalton.

HP 23/8 NOTIFICATION OF SUBSTITUTE MEMBERS

Notification of substitute Members were recorded as set out below:

- Councillor M R Rhodes substituting for Councillor Mrs S Bell

In accordance with Council Procedure Rules 17.5 to 17.9 these
Councillors had the same rights as the ordinary member of the
committee for whom they were substituting.

HP 23/9 DECLARATIONS OF INTEREST

There were no declarations of interest made in accordance with the
Code of Conduct.

HP 23/10 MINUTES

RESOLVED: That the notes of the meeting of the Housing and
Planning Scrutiny Select Committee held on 21 March 2023 be
approved as a correct record and signed by the Chair.

MATTERS FOR RECOMMENDATION TO THE CABINET

HP 23/11 NEW LOCAL DEVELOPMENT SCHEME

The report of the Director of Planning, Housing and Environmental Health set out the new Local Development Scheme (LDS) timetable for the preparation of the Local Plan to enable the deadlines to be met once the Levelling Up and Regeneration Bill was enacted and recommendation was sought from Members on the timetable and the associated budgets and costs of this work.

Members had regard to the key dates set out in the new LDS timetable, next stages in the preparation of the Local Plan, the legal implications and the financial and value for money consideration detailed in the report. Identified risks and issues and recommendations for mitigation were listed in Annex 2 and a full cost breakdown was set out in Annex 3. In respect of the proposed one-off injection of £330,000 to the reserve, it was noted that the majority of the additional spend related to the new requirement to produce borough-wide design codes which was not previously budgeted for.

Clarity was sought around the inclusion of the additional 57 identified sites as part of the Regulation 18 consultation and potential changes to the National Planning Policy Framework (NPPF), with particular reference made to the Green Belt and housing targets. In response Members were advised that these additional sites would be treated in the same way as the other sites identified through the previous Call for Sites exercise and all the sites would be considered as a whole set during the second round of the Regulation 18B consultation. Members were further advised that there was potential for the housing delivery target to be set not directly by the Objectively Assessed Needs and potential for a different approach to Green Belt boundaries subject to proposed changes to the NPPF being adopted.

Positive political engagement and collaboration between Officers and Members throughout the Local Plan process was regarded key in securing its successful adoption and Members were assured that Officers were monitoring and managing progress closely with ongoing reassurance support from Audit.

RECOMMENDED*: That

- (1) the new Local Development Scheme and timetable, as set out at Annex 1, be adopted; and
- (2) the additional budget requirements of the Local Plan and the need for further financial provision in future budget setting process be noted.

*** Referred to Cabinet**

HP 23/12 HOUSING STANDARDS IN RENTED PROPERTIES IN ENGLAND

(Decision Notice D230052MEM)

Members were updated on the Government focus on improving housing standards in rented properties and how the Borough Council had responded to the requests of the Secretary of State for Levelling Up, Housing and Communities in respect of damp and mould issues affecting privately rented properties in the borough and enforcement of housing standards.

A copy of the Borough Council's initial response was attached at Annex 1 and a full response was subsequently submitted via online survey with a focus on Housing Health and Safety Rating Scheme. It was highlighted from both responses that the Borough Council already had a robust approach to dealing with damp and mould complaints/issues within the borough, however it was recognised that a jointly agreed formal approach to damp and mould complaints needed to be developed with Clarion Housing Group, being the main housing provider in the borough.

In addition, Members were updated on how Clarion Housing Group were responding on this important issue and noted the Borough Council's intention to work with them in a more formal manner to ensure social housing in the borough was of an acceptable standard and to develop a targeted repairs monitoring framework with them to ensure the Borough Council were regularly updated on the condition of their housing stock and could offer support when needed to. Members expressed concern in respect of the performance of Clarion Housing Group in dealing with damp and mould repair and treatment issues and quality of the works and requested that these be included as part of the KPI monitoring.

RECOMMENDED*: That

- (1) a written request be sent from the Cabinet Member for Finance and Housing to Clarion Housing Group to seek their cooperation in agreeing a Memorandum of Understanding on how property condition complaints would be dealt with by both parties; and
- (2) a monitoring framework be adopted and reported on regularly, including to the Housing Association Liaison Panel.

*** Decision Taken by Cabinet Member**

MATTERS SUBMITTED FOR INFORMATION

HP 23/13 KEY PERFORMANCE INDICATORS

Members received a list of Key Performance Indicators (KPIs) that were relevant to the committee. A baseline covering April to June 2022 had been used, with the data for January to March 2023 representing the most up-to-date available statistics in most instances. The KPIs would be monitored on a quarterly-annual basis and would be made available on an ongoing basis.

Members were requested to submit any questions regarding the KPIs to the relevant Director at least two days in advance of the meeting in order to ensure that a suitable response could be provided at the meeting.

HP 23/14 WORK PROGRAMME 2023/24

The Work Programme setting out matters to be scrutinised during 2023/24 was attached for information. Members were invited to suggest future matters by liaising with the Chair of the Committee.

MATTERS FOR CONSIDERATION IN PRIVATE

HP 23/15 EXCLUSION OF PRESS AND PUBLIC

There were no matters considered in private.

The meeting ended at 8.50 pm

TONBRIDGE & MALLING BOROUGH COUNCIL

HOUSING AND PLANNING SCRUTINY SELECT COMMITTEE

18 July 2023

Report of the Director of Planning, Housing and Environmental Health

Part 1- Public

Matters for Recommendation to Cabinet - Key Decision

1 REGULATION 18 CONSULTATION

1.1 This report sets out the full consultation analysis from Regulation 18 consultation. This builds upon the initial results presented to the 6 December meeting (see Annex 5).

1.2 Background

1.2.1 The Council consulted upon the Regulation 18 Local Plan between 22 September and 3 November 2022. In total over 4,000 representations were received. At the 6 December 2022 meeting of this committee members were presented with the initial findings of the Regulation 18 consultation. This included analysis of the online responses only, plus some summary information from key stakeholders.

1.2.2 This report now sets out the full and updated analysis, including responses received by email and letter. These responses will be utilised and drawn upon in preparing the next Regulation 18B document for Spring 2024.

1.3 Questionnaire responses

1.3.1 **Annex 1** includes the updated outputs of the questionnaire. These figures provide an update to that presented in December 2022. In total 2228 people responded to the questionnaire, and therefore the proportions below relate to this figure. The key messages from the questionnaire were:

- 71% of responses disagreed with the established settlement hierarchy
- 68% of responses preferred spatial strategy option 1 (outside the Green Belt and AONB boundaries)
- 79% disagreed with 'exceptional circumstances' for release of Green Belt land and 62% supported Green Belt extension
- 90% of responses preferred meeting objectively assessed needs only
- 54% of responses agreed with the windfall allowance methodology

- With reference to Tonbridge 93% preferred option 1 (maximising delivery within the town centre)
- 92% of responses supported seeking more than 10% biodiversity net gain (if viable).

- 1.3.2 The questionnaire contained 12 questions with free text answers with summaries as below. The full text answers are also included within **Annex 2**.
- 1.3.3 Question 4 asked about the reasons for selecting the spatial strategy option. Given the scale of support for option 1 it is unsurprising that Green Belt and countryside protection were cited as key reasons. Specific matters relating to the implications of the various options on settlements were also raised.
- 1.3.4 Question 6 asked the reasons for selecting the quantum option, as above (Question 5) 90% of respondents favoured meeting the OAN only. Given the support for option 1 the reasoning was largely around the need to reflect national planning policy and more localised issues such as character protection and infrastructure support.
- 1.3.5 Question 26 asked the reasons for the Tonbridge strategy. Responses focussed on the need to protect the Green Belt and the availability of land within the town centre for intensification.
- 1.3.6 Question 29 asked how planning policy should guide town centre development. A considerable number referred to support for the redevelopment of the sites and car parks within the centre in the vicinity of the Angel Centre.
- 1.3.7 Question 43 asked reasons for selecting Green Belt strategy option. Responses included support for Green Belt extension, particularly within the vicinity of Kings Hill, but others expressed concern that Green Belt extension could mean a loss elsewhere. Other concerns relate to a prevention of urban sprawl more generally.
- 1.3.8 Question 48 asked reasons for selecting climate change measures. Responses focussed most specifically upon energy, carbon reduction, flood risk and biodiversity and habitat protection.

1.4 Consultation responses

- 1.4.1 In addition to the questionnaire, comments were received against sections of the local plan document. All responses are now included within the [link](#) provided to **Annex 3** of this report. This includes the consultation comment and officer response. The level of detail provided on these responses reflect the early stage in plan-preparation.
- 1.4.2 For data protection purposes this includes the respondent ID and comment only. It should be noted that respondents who provided an email address alongside their response will be alerted through our consultation portal of their ID reference.

There were also 501 responses which did not provide an email address, of which 114 had no postal address or contact details, therefore a letter will be sent to 387 respondents also providing their user ID. The full responses by Chapter are available within **Annex 3**, where respondents will be able to find and view their comment. The following sections set out the key matters raised against each chapter of the local plan.

1.5 Introduction and Local Context

- 1.5.1 Comments expressed concern in relation to the form and format of the consultation and the extent of community awareness of the consultation. Additional comments focused on how comments will be taken into consideration in future versions of the local plan. Reference was also made to the role of the withdrawn local plan and how/whether this has been widely publicised.
- 1.5.2 Respondents also highlighted the wider strategic nature of the Green Belt and the implications of this for the local plan. Comments highlighting the role of the NPPF and the need to adhere to national policy in relation to the approach to housing numbers taken within the borough. A series of responses also highlighted the need for further background evidence to support the settlement hierarchy, and that continuation of the previous approach would not be sufficient without this. General comments in relation to the level and extent of infrastructure provision and road capacity within the borough and the capacity to absorb further growth.
- 1.5.3 Comments relating to local context highlighted demographic changes with more elderly people who need appropriate housing and support, and a need to increase social/affordable housing provision. However, the scale of new housing proposed was cited as being disproportionate to the borough. Others highlighted infrastructure provision issues including that bus provision is inadequate, local roads are overcrowded and greater provision for pedestrians and cyclists and connectivity through public rights of way networks should be made. Other comments focussed on a need to support the retention of good quality agricultural land.

1.6 Vision

- 1.6.1 Comments focused upon the enhanced protection of the rural and historic character of the borough, including through Green Belt, landscape and green space protection. Conversely comments also supported the elements of the vision as identified, but with a need to provide for housing needs through appropriate growth.

1.7 Spatial Distribution

- 1.7.1 Many of the comments in this section referred to specific elements of national planning policy and how the council is required to adhere to this. Specifically the role of Objectively Assessed Needs, and whether this should be met or exceeded, with comments against this section of the plan broadly split. Related to this, some

comments suggested that the SA should have tested a lower than OAN figure, and conversely an OAN plus of up to 20%.

- 1.7.2 These comments also referred to the role of each of the proposed five spatial options, with differing opinions of preference. Option 1 received the greatest level of support, citing concerns about building within the Green Belt. The next most cited option was option 4, in relation to a dispersed pattern of growth with comments relating to utilising brownfield land across all settlements as a preference. Options 2 and 3 had relatively low levels of first preference. The potential for and realism around option 5 (new settlement) was generally questioned, citing concerns around timescale of delivery and likely success.
- 1.7.3 Further comments in this section referred to the role of the settlement hierarchy and the role of settlements including questioning whether Kings Hill or Borough Green should be lower down within the hierarchy. As above, comments highlighted the need for further background to the hierarchy, and how this will influence decisions on the proposed spatial strategy in due course.
- 1.7.4 Similar to other sections, concerns around the infrastructure capacity of the borough as a whole, and the ability to support further growth were questioned. Comments relating to specific infrastructure issues across the borough were raised, including relating to social infrastructure, water and flood risk, transport and accessibility as well as communications capacity. Concern was highlighted in relation to the capacity of Kings Hill.

1.8 Housing

- 1.8.1 While some comments highlighted a need to meet assessed need and boost to housing delivery, with likely shortfall in delivery in early plan period, others contested the detailed calculations/assumptions behind housing provision and affordable housing calculations. The amount of new housing was also identified as disproportionate and unrelated to available infrastructure, including in relation to how housing need also includes need arising from in-borough migration from e.g. London.
- 1.8.2 In terms of location comments focussed upon avoiding placing housing development where this involves green belt/open land loss and coalescence of settlements and ensuring that new development does not overwhelm existing settlements and infrastructure.
- 1.8.3 Support was also provided for delivery on sites ranging for small to large for different household sizes and building types, while others cited that very large new sites should be avoided and that small scale growth for each settlement and higher densities would be more appropriate. Support was provided for a wide variety of suitable/deliverable sites and a flexible mix of types to meet need. Comments also highlighted a need to link new housing to local employment

provision and accessibility, and to recognise the contribution of SME builders as in NPPF.

- 1.8.4 Comments within this section also included support for the provision of additional affordable housing, more social and not for profit housing, self and custom-build provision and new housing for groups including older persons. Support was also provided for re-establishing council house building. Appearance, build quality and environmental performance of new housing were also cited as in need of improvement.

1.9 Economic Development

- 1.9.1 Comments frequently highlighted a lack of employment land, reduction in industrial stock and imbalance of demand for employment against supply, and how this must be addressed by the emerging Local Plan. The labour supply scenario within part 1 of the Economic Development Needs Study was also supported. Support for free or reduced parking charges was also suggested as an incentive to shop locally whereas a lack of investment in strategic and local infrastructure also attracted comments.

- 1.9.2 Other comments highlighted a loss of local employment and businesses from a potential loss of golf course and agricultural land. The importance of the rural economy was also emphasised, including viticulture which should be supported through policies.

1.10 Transport

- 1.10.1 A good level of support was expressed for the transport challenges outlined. However, significant concerns about highway and junction capacity and related congestion that could be created by further development, affecting specific junctions. Related concerns about rat running, the maintenance of roads and that this could worsen with increased traffic and road safety especially for vulnerable road users. Other concerns related to the potential implications of additional traffic upon local air quality, especially within designated AQMA's.
- 1.10.2 Support was provided for improvements for walking, cycling and public transport improvements, in preference to additional road capacity. Where these are provided, they need to be well connected, sensitively designed and delivered at an early stage in the development process. However, others questioned the ability to shift travel behaviour away from car usage.
- 1.10.3 Many comments highlighted the recent reduction in bus services serving Peters Village and Kings Hill and the lack of a frequent bus service from Kings Hill to West Malling station and no bus service between Kings Hill and Tonbridge. The rising cost and availability of home-school bus travel options and need for better integration of bus and rail timetables were also highlighted. Regarding rail, concern was expressed about the connectivity and frequency of services on the main line via Maidstone East and Swanley and that the new hourly service to

London Bridge is at the expense of the peak only Blackfriars service. Support was also expressed for more services and enhanced station facilities.

- 1.10.4 Comments also highlighted insufficient quantity of residential parking in new developments which causes issues including pavement parking and support for more electric vehicle charging points in public car parks.

1.11 Tonbridge

- 1.11.1 Comments in this section focussed on opportunities to increase development within the town centre and that the open car parking is a poor use of space, and a preference for option 1 (densification). Support was also provided for further independent and local businesses within the town centre. Others highlighted the need to promote Tonbridge and its green and heritage assets. Generally public transport connectivity was highlighted as being good, but more could be done to provide mode integration at the station, bus and cycle.

1.12 Retail

- 1.12.1 Comments highlighted issues with the quality, quantity and distribution of retail, particularly in Tonbridge High Street, where retail offer is lacking. Respondents highlighted that to undertake 'quality shopping' they need to go outside the borough. Other comments queried the existing town centre hierarchy, specifically district centre / rural retail centre for Borough Green and Hildenborough.
- 1.12.2 Other comments highlighted that parking is expensive and limited, suggesting removal or reduction in parking charges to entice people to shop locally. Opposition to drive thru restaurants and fast-food outlets also highlighted.

1.13 Community facilities

- 1.13.1 Within this section respondents generally expressed concerns in relation to water supply, sewer capacity, gas, electricity, roads, doctors' appointment availability, bus/rail services and school places. Other comments stated that the definition of infrastructure should also include amenities and assets, green spaces and corridors and not just sports fields. Similarly, that health infrastructure provision should include hospices. Comments also highlighted a diminished sense of community due to loss of facilities and businesses.
- 1.13.2 Specific comments also relate to the role of NHS land and property and the ability to grow and expand on existing NHS sites and on land across the borough. Infrastructure requirements should consider approved but not yet built applications. Support for adding further evidence in relation to open space and indoor sport and recreation facilities. Comments relating to affording education infrastructure key prioritisation in the list of funding requirements as there are evidenced pressures in the North of the Borough.

1.14 Natural Environment

- 1.14.1 Comments against this section expressed concerns in relation to the loss of agricultural land to development, and the impact this could have on food production and food supplies. Several sites were also suggested for designation as Local Green Spaces including East Malling playing field, Westwood Green (59525) and Carnation Green (59449).
- 1.14.2 A lot of the comments focussed on whether the council should be sticking with 10% Biodiversity Net Gain (BNG), as per the Environment Act, or seeking to exceed this. Majority of responses do not support exceeding 10% due to viability concerns. There is general support for allocating sites for BNG in the Local Plan. Incorporating biodiversity into the design of new developments was also generally supported. Other concerns related to the loss of Green Belt and impact of development in the AONBs.

1.15 Built Environment

- 1.15.1 Comments tended to highlight how the built and historic environment is vitally important, but all design aspects are equally important. The historic environment is integral to the built environment. Comments also highlighted how the preparation of a heritage strategy is positive and would be welcomed when published.

1.16 Green Belt

- 1.16.1 As highlighted in other sections the fundamental message related to safeguarding the Green Belt and preventing further development within these locations. Comments also identified the need to retain the openness around and preserve the character of individual settlement places. Similarly, others highlighted the role Green Belt protection can play in protecting visual quality, agriculture, nature conservation and ameliorating pollution impacts.
- 1.16.2 Support was also provided for the expansion of the Green Belt in various places, including in East Peckham and around East Malling. Other comments highlighted that other land is available without building on the GB and new homes in current urban areas should be prioritised.
- 1.16.3 Conversely, others highlighted that exceptional circumstances include the need to deliver housing as brownfield land supply is not currently sufficient.

1.17 Climate Change

- 1.17.1 Comments supported a focus on climate change which should be a positive aspect of the plan. A flexible approach is needed on mitigation/adaptation methods to address climate change. Tree coverage/planting would be difficult to impose a set policy on due to viability factors. Modern methods of construction

(MMC's) would be difficult to impose a specific policy on this as its very much market driven and not appropriate at every site.

1.18 Appendix B Sites

1.18.1 Since a majority of the comments received were in relation to appendix B it is unsurprising that they tended to raise site specific matters. Table 1 below sets out the key topics raised for each ward (please note old ward boundaries were in place at the time).

Table 1- Appendix B comments

Aylesford	<ul style="list-style-type: none"> • Technical detail and other site-specific issues relating to flood risk • Comments relating to infrastructure provision and minerals extraction licences at sites
Barming and Teston	<ul style="list-style-type: none"> • Site specific issues, including relating flood risk
Borough Green and Long Mill	<ul style="list-style-type: none"> • Site specific issues, including loss of Green Belt, AONB, green spaces, and wildlife and infrastructure demands of development within the ward • Concerns over disproportionate size of development, increase in traffic on rural roads, infrastructure demands, shortage of parking and merging of settlements. • Loss of high-grade agricultural land
Burham and Wouldham	<ul style="list-style-type: none"> • Site specific issues, including relating to potential loss of agricultural land and traffic issues • Site specific issues, including relating flood risk
Cage Green	<ul style="list-style-type: none"> • Site specific issues relating to access and traffic, infrastructure provision • Issues relating to the role and value of green spaces and the impacts of potential loss
Castle	<ul style="list-style-type: none"> • Site specific issues relating to the role and value of green spaces and local sports facilities • Site specific issues relating to the Green Belt designation in this area and the influence on sites
Ditton	<ul style="list-style-type: none"> • Site specific issues, including relating to infrastructure demands of development within the ward • Clarification relating to the form of employment proposed on site
Downs and Mereworth	<ul style="list-style-type: none"> • Development within the Greenbelt and loss of countryside. • Loss of biodiversity and wildlife. • Additional impact on infrastructure where the existing cannot already cope.

	<ul style="list-style-type: none"> • Loss of agricultural land • Impact on countryside access and loss of footpaths and bridleways • Loss of ancient woodland • Poor access and congestion to local roads
East Malling	<ul style="list-style-type: none"> • Site specific issues relating to loss of Green Belt, agricultural land, open space and biodiversity, impact on heritage assets and aquifer. • Concerns over increase in traffic on rural roads, infrastructure demands and merging of settlements. • Local Green Space sites identified for potential designation including 59450, 59448 and 59449 • Technical issue relating to management costs for some green spaces (59448, 59450) being paid by existing property owners as part of the Tile deeds.
Hadlow and East Peckham	<ul style="list-style-type: none"> • Site specific issues relating to loss of Green Belt and access • Substantial site-specific flooding and surface water drainage issues raised
Higham	<ul style="list-style-type: none"> • Site specific issues relating to infrastructure provision, flood risk, traffic and protected species • Comments relating to the need to adhere to national planning policy, in relation to the Green Belt • Issues relating to the role and value of green spaces and the impacts of potential loss
Hildenborough	<ul style="list-style-type: none"> • Site specific matters in relation to the loss of green and amenity spaces • Site specific comments relating to flood risk in particular locations as well as local facilities, infrastructure, access and traffic issues • Infrastructure issues including the existence of the large oil pipeline which runs through particular sites and how this relates to development potential • Issues relating to Green Belt designations for sites and how these impact upon the form and character of Hildenborough, and questioning of the 'exceptional circumstances' • Comments relating to air quality and the need for AQMA • Need for a separation from Tonbridge and to protect a separate identity
Judd	<ul style="list-style-type: none"> • Comments focusing on particular sites and the impact of potential loss in play space or green space • Site specific issues relating to infrastructure provision, in particular schools, road access and traffic movements • Technical detail and other site-specific issues relating to

	<p>flood risk</p> <ul style="list-style-type: none"> • Comments relating to the extent of potential development within Tonbridge
Kings Hill	<ul style="list-style-type: none"> • Loss of green and amenity spaces and the effect this has on both health/well-being and biodiversity/wildlife • Loss of ancient woodland • Objections to building on or near Local Nature Reserve. Harm to conservation area • Concern regarding the potential loss of golf course • Infrastructure issues including pressures on parking, traffic, doctors' surgeries and school places • Kings Hill is already overdeveloped.
Larkfield North	<ul style="list-style-type: none"> • Site specific matters in relation to the loss of green and amenity spaces and the impacts of loss of car parking
Larkfield South	<ul style="list-style-type: none"> • Site specific matters in relation to the loss of green and amenity spaces and the impacts of loss of car parking • Comments relating to the lack of social infrastructure provision to support any new development within this location
Medway	<ul style="list-style-type: none"> • Comments relating to the role of the Green Belt and infrastructure provision, including access, highway capacity and traffic issues • Technical site-specific issues relating to flood risk
Snodland East and Ham Hill	<ul style="list-style-type: none"> • Site specific issues relating to green infrastructure, infrastructure provision and flood risk • Technical site-specific issues relating to flood risk • Identified site deemed unavailable
Snodland West and Holborough Lakes	<ul style="list-style-type: none"> • Site specific issues relating to green infrastructure and infrastructure provision • Identified site deemed unavailable
South Aylesford	<ul style="list-style-type: none"> • Technical site-specific issues relating to flood risk
Trench	<ul style="list-style-type: none"> • Site specific comments relating to the role of the Green Belt and the evidence required for any potential release • Site specific matters in relation to the loss of green and amenity spaces • Comments highlighting innovation and how this should be required in placemaking, e.g. through use of technology • Site specific comments including access, highway capacity and traffic issues
Vauxhall	<ul style="list-style-type: none"> • Site specific matters in relation to the loss of green spaces and sports grounds, and car parking • Comments relating to access and traffic issues

Wateringbury	<ul style="list-style-type: none"> • Concerns regarding the capacity of infrastructure including doctor's surgeries and schools and local facilities • Air quality issues at the detriment to wellbeing of residents • Comments relating to the Green Belt and support for brownfield development in advance of greenfield, and concern about loss of high value agricultural land • Comments relating to the role of Kings Hill in the settlement hierarchy given the number of facilities present • Site specific comments, with some support for smaller sites, but objection to the scale of larger sites, including for the impact on the character of the area • Site specific comments relating to the potential loss of the golf course • Site specific issues relating to traffic, access and highway capacity and harm to conservation areas • Site specific flooding and surface water drainage issues and potential harm to aquifers, and concerns around water supply
West Malling and Leybourne	<ul style="list-style-type: none"> • Site specific issues relating to loss of Green Belt, green space, AONB, impact on Conservation Areas. • Concerns over increase in traffic on rural roads, infrastructure demands and merging of settlements. • Lack of infrastructure concerns • Loss of agricultural land
Wrotham, Ightham and Stansted	<ul style="list-style-type: none"> • Site specific issues, including relating to AONB, transport and access and flooding issues • Comments relating to the role of the Green Belt in this locations, including prevention of settlement coalescence

1.19 Sustainability Appraisal responses

1.19.1 In addition to the above, over 2500 comments were received against the Sustainability Appraisal. Where relevant, these comments are in the process of being analysed by the consultants, who will then amend the Sustainability Appraisal document where required. These comments will form part of the SA appendix report and/or the local plan consultation statement alongside Regulation 18B.

1.19.2 Many responses queried the scoring of individual sites against the SA objectives, rather than commenting on the options, highlighting perceived inconsistencies in site scoring, and limited justification to explain these. Some respondents indicated the SA was too complicated and unwieldy, while others felt it was too simplistic and not based on sufficient evidence. Other responses considered that an option for delivering below OAN should have been tested, that the Green Belt was not considered when scoring sites or that the frequency transport services has not been factored into the assessment.

- 1.19.3 Other comments included loss of high-quality agricultural land, and the resulting impact on food production was not given sufficient weight in the SA. Concerns that the SA doesn't factor in existing infrastructure deficiencies or that climate change was not given sufficient weight in the SA. Others highlighted some inaccuracies in the data/assessment e.g. where a doctor's surgery had recently closed.
- 1.19.4 Other responses related more to the local plan, with some support for Spatial Strategy Option 1 and support for preventing the coalescence of settlements outside the Green Belt.

1.20 Next Steps

- 1.20.1 As above it is proposed that the team communicate with all respondents to inform them of their respondent IDs to allow them to search for the council response. The team will also be working with the Communications team to communicate that the outcomes of the Regulation 18 consultation are available to view, the next steps and the new local plan timetable.

1.21 Financial and Value for Money Considerations

- 1.21.1 There will be direct financial and value for money considerations associated with local plan preparation. To be able to meet deadlines within the proposed transition period (set out within the government's NPPF consultation) for the preparation of the local plan this means that there will be increased spend over the next five years. This was reported to members at the June meeting of this committee.

1.22 Legal Implications

- 1.22.1 Local Planning Authorities are required to prepare and keep an up-to-date development plan for their area. The Planning and Compulsory Purchase 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) set out the requirements and the statutory process for the preparation of a Local Plan.

1.23 Risk Assessment

- 1.23.1 The preparation of the new local plan will provide the council with an up-to-date Local Plan on adoption. This will alleviate the current risks associated with not having an up-to-date development plan in place, however current government proposals within the Levelling Up and Regeneration Bill would mean that the penalties of not having a plan in place may be weakened. There are reputational risks should the local plan programme not be delivered on time.
- 1.23.2 **Annex 4** shows the current local plan risks and issues, which includes two high risk items where risk escalation measures have been triggered. These relate to changes in political direction or delay to procurement or amendment of scope of the Green Belt study, including in light of NPPF consultation outcomes.

1.24 Equality Impact Assessment

1.24.1 The decisions recommended through this report have relevance to the substance of the Equality Act 2010. The stages in plan preparation will be undertaken in accordance with the new Statement of Community Involvement which ensures that planning policy consultations are accessible to all, irrespective of protected characteristics. An Equalities Impact Assessment is being undertaken alongside the preparation of the next stages of the Local Plan.

1.25 Recommendations

HPSSC is asked to recommend to Cabinet:

1.25.1 NOTE the output of the Regulation 18 consultation.

Background papers:

Annex 1- Full questionnaire outcomes

Annex 2- Questionnaire text answers

Annex 3- [Link](#) to Full consultation response documents

Annex 4- Current risks and issues

Annex 5- HPSSC December 2022 report

contact: Gudrun Andrews
Planning Policy Manager

Eleanor Hoyle

Director of Planning, Housing and Environmental Health

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Annex 1- Full Questionnaire analysis

Question 1

Which elements should feature in the vision for the borough in 2040? (Select as many as applicab



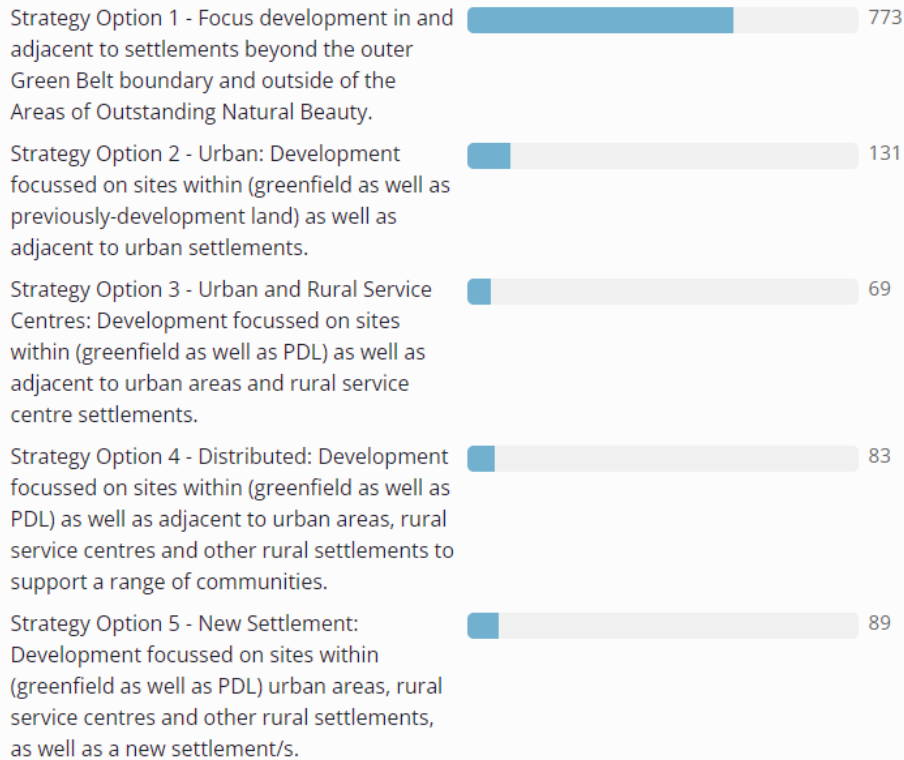
Question 2

Do you agree that this settlement hierarchy should be retained and inform the spatial strategy for the Local Plan?



Question 3

Which spatial strategy option do you prefer?



Question 4

What are your reasons for selecting this particular spatial strategy option for the Local Plan (outline briefly (max. 6000 characters))?

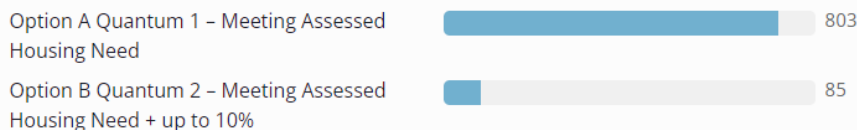
This question has been answered 1061 times.

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Question 5

Which quantum options for the spatial strategy do you prefer?



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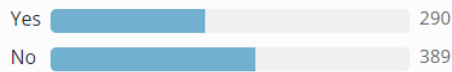
Question 6

What are your reasons for selecting this particular quantum option for the Local Plan (outline briefly (max. 6000 characters))?

This question has been answered 794 times.

Question 7

Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report?



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Question 8

Do you agree with the findings of the individual site assessments in Annex 1 of the Interim Sustainability Appraisal Report?

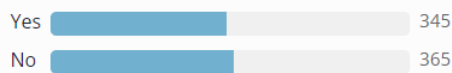


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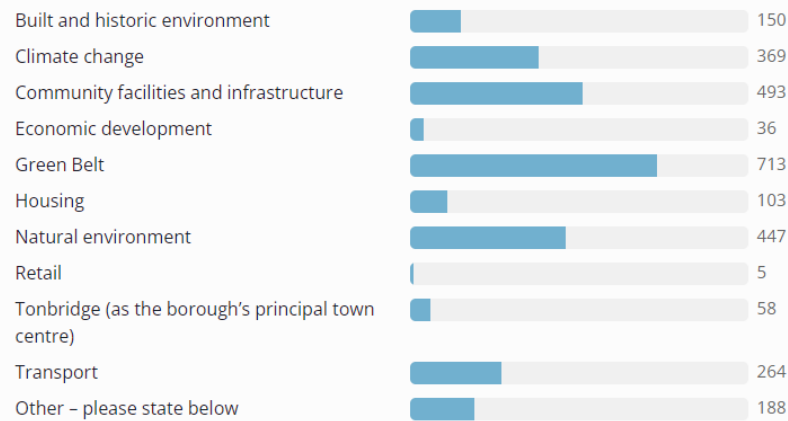
Question 9

Do you agree with this set of strategic matters?



Question 10

Which strategic matters should be priorities in the Local Plan?



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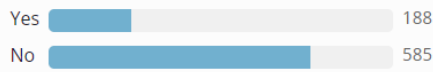
Question 11

What are your reasons for selecting these particular strategic matters as priorities for the Local Plan (outline briefly (max. 6000 characters))?

This question has been answered 717 times.

Question 12

With reference to your answers to questions 5 and 6 do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?



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Question 13

Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period?

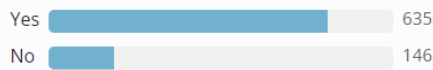


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Question 14

Do you agree that the Local Plan should require a specified mix of dwelling types (e.g. flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs?

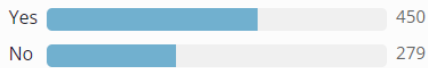


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Question 15

Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building?



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Question 16

Do you agree that the Local Plan should require a proportion of homes on large development sites to be Build-to-Rent products?



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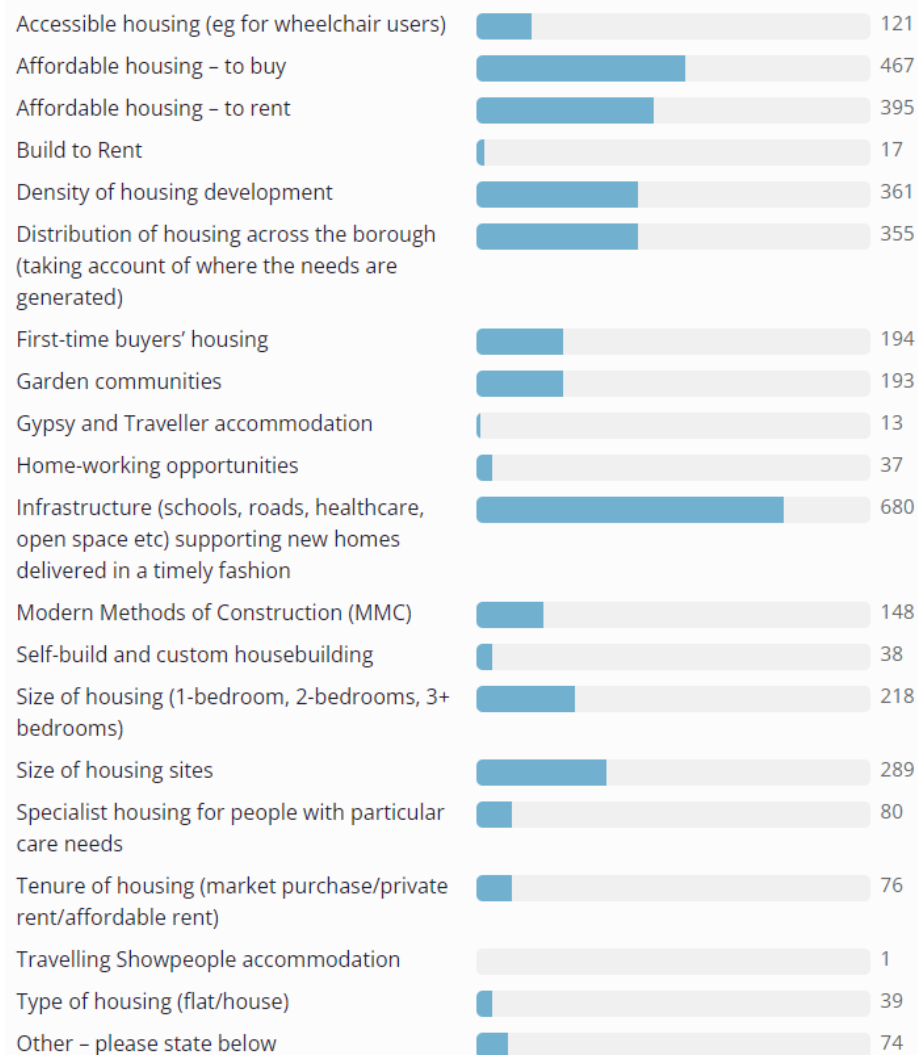
Question 17

Do you agree with the windfall allowance methodology?



Question 18

Which housing matters are most important to you?



Question 19

What are your reasons for selecting these particular housing matters as priorities for the Local Plan (outline briefly (max. 6000 characters))?

This question has been answered 559 times.

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Question 20

Do you agree with the key economic development issues identified above?

Yes  400

No  168

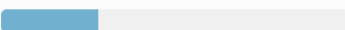
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Question 21

Do you agree with the key transport issues identified above?

Yes  503

No  200

Question 22

Which transport issues matter the most to you?

Bus services – linking developments to services and places  547

Cycle routes – safe links between homes and schools, other service, places and public transport  334

Pedestrian infrastructure – safe links between homes and schools, other services, places and public transport  564

Rail – improving station access and links with cycling and walking routes  283

Roads including junction improvements  481

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Question 23

What are your reasons for selecting these particular transport matters as priorities for the Local Plan (outline briefly) (max. 6000 characters)?

This question has been answered 590 times.

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Question 24

Would you support the implementation of cycling and walking schemes where a reduction in road space including on-street parking may be required in some instances, to provide a network of high-quality urban cycle routes?

Yes  382

No  352

Question 25

What is your preferred strategy option for Tonbridge?

Strategy Description

Consequence for the need for additional development land

Option 1 Optimise densities on development sites within Tonbridge, particularly on those sites within the town centre, maximising their potential for residential and mixed-use development.

Minimise the need for the release of green field sites beyond the outer edge of Tonbridge, in the Green Belt, primarily for residential development.

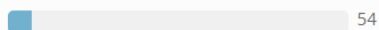
Option 2 Conservative densities on development sites within Tonbridge, minimising the intensification of existing built-up areas for residential and mixed-use development.

Increase the need for the release of green field sites at and beyond the outer edge of Tonbridge, in the Green Belt, primarily for residential development.

Option 1 - Optimise densities on development sites within Tonbridge, particularly on those sites within the town centre, maximising their potential for residential and mixed-use development.



Option 2 - Conservative densities on development sites within Tonbridge, minimising the intensification of existing built-up areas for residential and mixed-use development.



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Question 26

What are your reasons for selecting this particular strategy option for Tonbridge (outline briefly (max. 6000 characters))?

This question has been answered 583 times.

Question 27

What should be the main role of Tonbridge Town Centre moving forward? Should the priority be for shopping or for leisure, social and cultural uses or a balance of these? (max. 6000 characters)

This question has been answered 569 times.

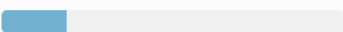
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Question 28

Should the Local Plan include a more flexible policy framework for Tonbridge to allow the Town to respond to future market investment opportunities for a range of land uses and developments?

Yes  461

No  109

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Question 29

Do you have other thoughts about how planning policy should guide development in and around the town centre? (max. 6000 characters)

This question has been answered 384 times.

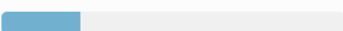
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Question 30

Do you agree with the key retail issues identified above?

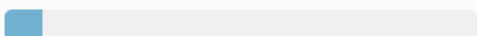
Yes  410

No  121

Question 35

Should the Council be seeking more than 10% Biodiversity Net Gain, if viable?

Yes  627

No  55

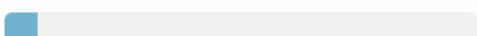
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Question 36

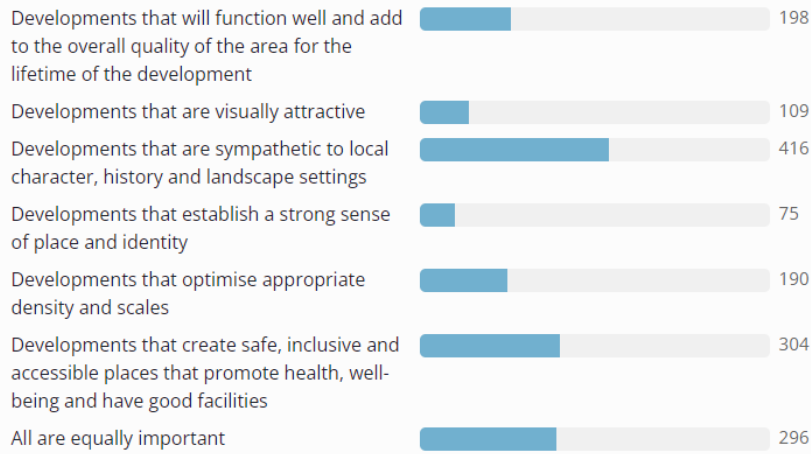
Should the Council allocate sites specifically for Biodiversity Net Gain within the Local Plan?

Yes  620

No  49

Question 37

Which design matters are most important to you? (Select 3)



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Question 38

What are your reasons for selecting these particular design matters as priorities for the Local Plan (outline briefly (max. 6000 characters))?

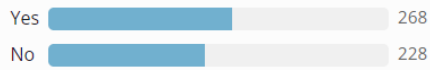
This question has been answered 334 times.

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Question 39

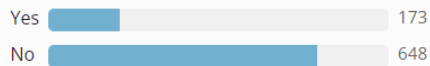
Are there any other locally significant built, historic issues or sites which you consider are important to the borough and should be addressed in the Local Plan?



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Question 40

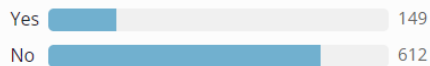
Do you agree that there are exceptional circumstances, at the strategic level, for altering Green Belt boundaries (in principle) to help address assessed development needs?



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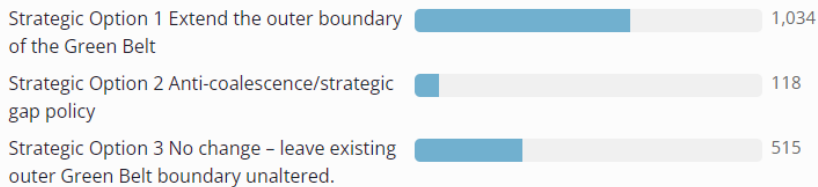
Question 41

Do you agree that the set of factors listed in para. 5.11.7 should be used to determine if exceptional circumstances exist to justify alterations to Green Belt boundaries?



Question 42

Please indicate your preferred strategic policy option for the area beyond the outer Green Belt boundary



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Question 43

What are your reasons for selecting this policy option for the area beyond the outer Green Belt boundary (outline briefly (max. 6000 characters))?

This question has been answered 1473 times.

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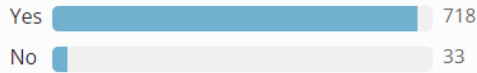
Question 44

Do you agree that the Local Plan should set requirements for a certain proportion of development on major sites to be built using MMC?



Question 45

Do you agree that the Local Plan should set a minimum requirement for tree canopy coverage on new developments?



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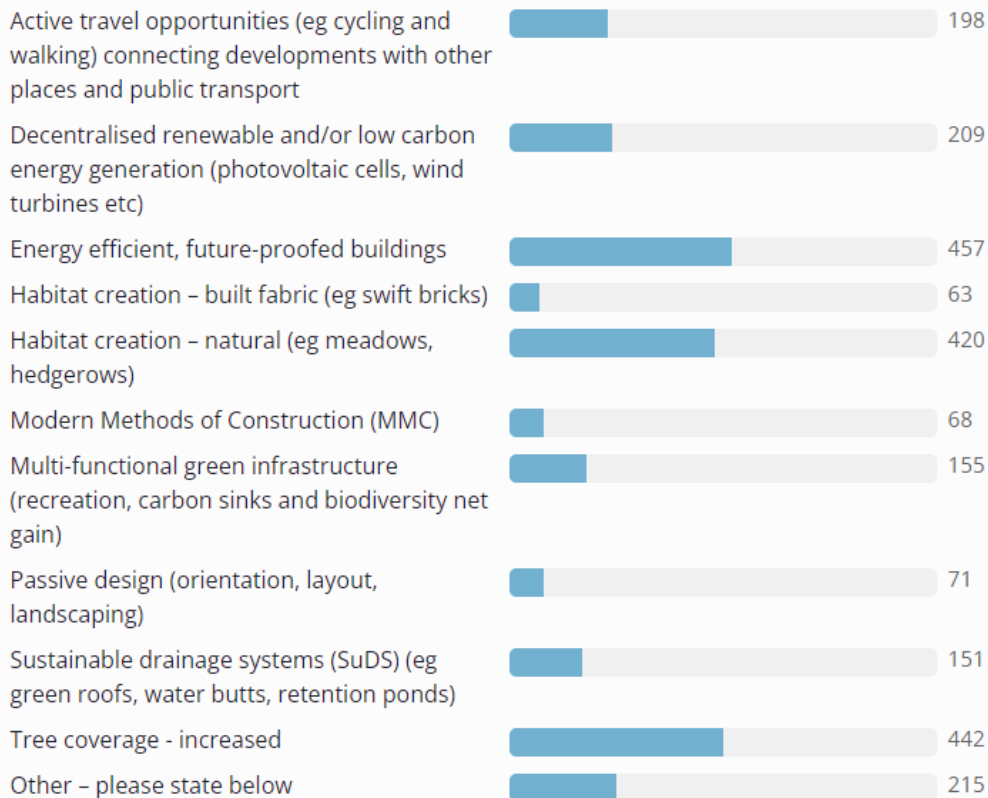
Question 46

Do you agree that new developments should integrate into the fabric of buildings habitat space for wildlife, such as migratory birds?



Question 47

Which climate change measures are most important to you?



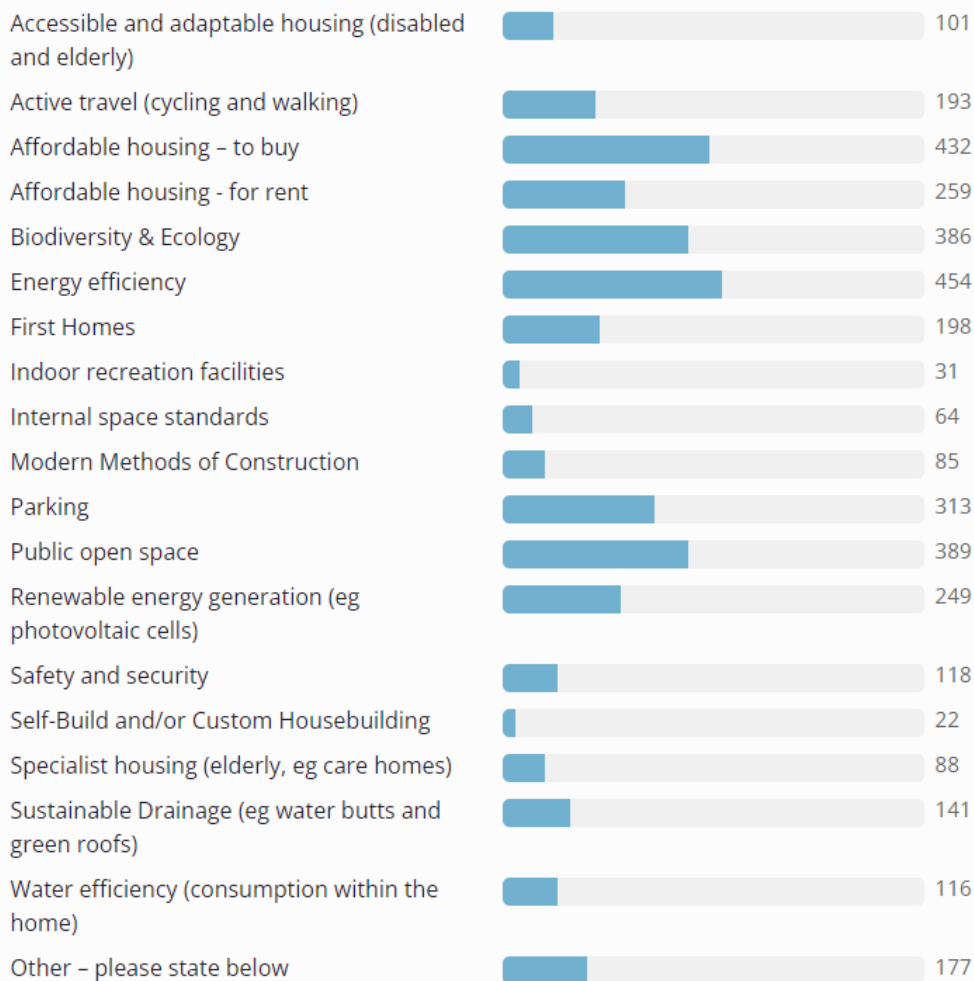
Question 48

What are your reasons for selecting these particular climate change measures as priorities for the Local Plan (outline briefly (max. 6000 characters))?

This question has been answered 515 times.

Question 49

Which local policy requirements are most important to you?



Question 50

What are your reasons for selecting these particular local requirements as priorities for the Local Plan (outline briefly (max. 6000 characters))?

This question has been answered 501 times.

Annex 2 – to be published as a supplement due to its size – To Follow

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Annex 4 Risks and Issues

No	Risk Title	Consequences	Likelihood Score	Impact score	Overall inherent risk score	Mitigating actions to achieve desired risk score
1	Green Belt - Evidence	Delay to the critical path of evidence production and resulting impact upon local plan production and consultation process. Including any delays to the procurement process or changes in scope of the work, resulting from direction or outcomes of NPPF consultation. Including development of evidence base options with differing implications for the outputs of the work in relation to spatial strategy decisions and local plan options.	5	4	20	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met
2	Change in political administration or direction from administration	Delay or revisiting key aspects of the local plan, failure to meet the 'transitional arrangements' as proposed within the Levelling Up and Regeneration Bill	5	3	15	Working with all members to gain understanding and awareness of the local plan and the process. Regular member briefings.
3	Project management-timetable for local plan document, evidence and supporting documentation slips	Delay to the local plan consultation and failure to meet deadlines	3	4	12	Regular project management meetings between PPM and PPOs; regular updates of timetable
4	Staffing- further changes in staff numbers or loss of hours; unexpected absences	Delay to timetable, health and wellbeing implications for team	3	4	12	Regular team meetings, 1:1s, effective file management and installation of a 'buddy' system, risk management escalation; utilising contractor staff

5	DTC issues	Failure to demonstrate DTC at examination or other issues raised prior to in consultations; issues with neighbouring boroughs	3	4	12	Developing a robust PM system, new DTC grid and legal compliance toolkit at an early stage
6	Planning reforms-delay to NPPF or significant changes. Ministerial statements and internal discussions within government on-going.	Current proposed reforms scrapped or new taken forward	3	4	12	Continue to liaise with members to keep them informed of any changes and timescales for reform; ensure flexibility within new evidence base commissions and budgets.
7	Consultation database, GDPR and privacy notice issues	Failure of management of the database	3	4	12	Liaising with legal, keeping them informed of current process, setting dates/timeframes for consultation database review/refresh
8	Lack of design/conservation support	Lack of dedicated internal staff offering this support could lead to matters being missed in local plan, design code or decision-making compromised	4	3	12	Continual review of and flagging of matters relating to conservation and design- review of the design code work programme and resource requirements
9	Lower Thames Crossing	Stepping outside alignment with the KCC position either existing or new administration	4	3	12	Raising awareness across the organisation and regular briefings on the LTC situation
10	HRA, AQ Evidence-Evidence	Delay to the critical path of evidence production and resulting impact upon local plan production and consultation process	3	4	12	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met

11	SA	Delay to the critical path of evidence production and resulting impact upon local plan production and consultation process	3	4	12	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met
12	EDNS - Evidence	Delay to the local plan production and consultation process; lack of consultant support, failure to deliver the study to time	4	3	12	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met
13	SFRA, L1 and L2- - Evidence	Delay to the local plan production and consultation process; Not PPG compliant as data is not available; not yet known the number of sites to be assessed which could extend cost or length or work programme. With impacts on other workstreams.	3	4	12	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met
14	HCA- Evidence delay	Delay to the critical path of evidence production and resulting impact upon local plan production and consultation process	3	4	12	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met
15	Spatial Strategy	Delay to the critical path of evidence production and resulting impact upon local plan production and consultation process	3	4	12	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met
16	Transport Modelling	Delay to the critical path of evidence production and resulting impact upon local plan production and consultation process	3	4	12	Project management approach, regular evidence base check ins,

						ensuring consultants and internal deadlines are met
17	Amended or escalating costs of evidence base	Changes to the scope, timing or number of iterations of the evidence base requirements incurring additional costs; or amended requirements of national policy	4	3	12	Regular financial management procedures, ensuring contracts are in place, strict project management controls

Issues

No	Risk Title	Issue Detail	Impact and Implication	Severity	Issue Mitigation
1	Change in political administration/direction, including in relation to housing numbers and approach to the Green Belt	Change in political direction or Members decide to await further clarification on planning reforms in particular in relation to housing numbers and the Green Belt	Change in content, timing or emphasis within local plan	High	Working will all members to gain understanding and awareness of the local plan and the process. Member briefings ahead of the June 7 HPSSC. Continue to liaise with members and keep them informed of local plan progress and need for a plan to be in place. Member briefings on implications of NPPF consultation implications. Utilising risk and issues management template for each senior staff or member engagement process- escalation of risks
2	Currently proposed planning reforms	Current NPPF proposed reforms scrapped or new taken forward;	Need to review work programme in light of changes; potential to not meet the transitional deadlines, financial loss, reputational loss	High	Continue to liaise with members to keep them informed of any changes and timescales for reform Utilising risk and issues management template for each senior staff or member engagement process- escalation of risks

3	NDMP content and scope	Content of NDMP requiring a review of work to date	Delay to timetable and alignment with new approach; potential not to meet the transitional deadline, reputational and financial loss	High	Continue to liaise with members to keep them informed of any changes and timescales for reform Utilising risk and issues management template for each senior staff or member engagement process- escalation of risks
4	Legal advice, lack of	Delay, absence of lack of legal advice on key issues; lack of contracts in place for critical pieces of evidence	Lack of legal process and compliance and ultimately failure of local plan	High	Continue to liaise and chase responses; initiate discussions about support; discuss with legal re options; send out priorities Utilising risk and issues management template for each senior staff or member engagement process- escalation of risks
15	Monitoring systems	Failure to have up to date monitoring inputs	5 year housing land supply and other data not being available should an appeal by lodged; input of quality data into new studies	High	working with IT on options, identifying a budget to take forward as a separate project Utilising risk and issues management template for each senior staff or member engagement process- escalation of risks

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TONBRIDGE & MALLING BOROUGH COUNCIL
HOUSING AND PLANNING SCRUTINY SELECT COMMITTEE

06 December 2022

Report of the Director of Planning, Housing and Environmental Health

Part 1- Public

Matters for Recommendation to Cabinet - Key Decision

1 REGULATION 18 LOCAL PLAN: INITIAL OUTPUTS

1.1 Background

- 1.1.1 The Council has recently concluded the consultation on its Regulation 18 Local Plan and the Interim Sustainability Appraisal of the Local Plan. The consultation took place between 22 September and 3 November 2022.
- 1.1.2 The consultation took place in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It was the first of two prescribed consultation processes and sought a wide range of views from communities and stakeholders on what the new local plan should contain.
- 1.1.3 Consultation on the Interim Sustainability Appraisal is not required to take place at the same time as the Regulation 18 consultation, but it is best practice to do so. The consultation on this document took place under the Environmental Assessment of Plans and Programmes Regulations, 2004 on the Interim draft Sustainability Appraisal (SA).
- 1.1.4 Due to tight timescales this report includes high-level summaries and statistics of responses received, and key themes identified. It does not include full summaries or council responses. The full response is proposed to be brought to the HPSSC meeting in March 2023, alongside other initial recommendations.
- 1.1.5 This report seeks a HPSSC recommendation to Cabinet to note the initial outcomes of the consultation and to agree the proposed timetable for bringing further conclusions and key decisions before members.

1.2 Consultation approach

- 1.2.1 The consultation was publicised in accordance with the above regulations which included making the consultation documents publicly available in hard copy at the council's main office, the website and on the INOVEM [consultation portal](#). All contacts on the local plan consultation database were directly informed of the consultation by email, including a link to the relevant part of the council website. A social media strategy was also adopted to promote the consultation, the results

being that the local plan consultation page was the sixth most visited page in the period.

1.2.2 Below is a breakdown of the responses received.

INOVEM consultation portal ¹	1158 separate questionnaire responses 1643 other comments relating to paragraph or sections of the plan
Email	Approximately 2000 individual responses
Post	Approximately 500 individual responses

1.2.3 By way of comparison Maidstone Borough Council received 550 responses at the first Regulation 18 consultation but over 3000 at the second, and Tunbridge Wells received 551 responses at Regulation 18.

1.2.4 This included 11 responses from statutory consultees, including Natural England, Historic England, the Environment Agency, 4 neighbouring authorities and Kent County Council. Responses were also received from 26 of the 27 parish councils. A majority of the comments were in response to the local plan rather than the interim sustainability appraisal, and key matters raised by the statutory bodies are set out in **Annex 1**. A list landowners, developers and other key bodies who responded to the consultation is also included in **Annex 2**.

1.2.5 The breakdown of the responses could influence the detail of the results. For example, those who submitted comments via the portal were directed to apportion their comment to a particular section or paragraph of the plan and/or answer the specific question. Whereas responses received by email were less structured. However, officers are currently entering email and postal responses into the portal and attributing them to a section or paragraph, or assigning to a 'general' section of the portal. This is to allow the consultation software to be used for further in-depth analysis and to effectively collate responses.

1.3 Early conclusions

1.3.1 Due to the high number of consultation responses received it is only possible at this stage to provide some high-level outputs for the results submitted within the consultation portal. This includes those submitting answers to the specific questions posed and any additional comments, which totals 2801 responses.

1.3.2 As above there were 1158 questionnaire responses through the consultation portal, which is approximately 22% of total responses. These are subject to the

¹ Subject to verification

detailed statistical analysis included in **Annex 3**. The bullets below are percentages of those that answered those particular questions, highlighting:

- A clear preference for Spatial Strategy Option 1 -68% of questionnaire responses) – A focus on settlements outside the Greenbelt and the AONB boundaries
- Disagreement with the strategic case for exceptional circumstances in relation to Greenbelt release (82%)
- A clear preference for meeting Objectively Assessed Needs only (as opposed to OAN+10%)- 92%
- Agreement with the windfall allowance methodology (60%)
- Clear support for the strategy option 1 for Tonbridge (optimising capacity within development sites in the town) (93%)
- 91% disagreed with the conclusions of the Sustainability Appraisal site assessments
- Agreement that the local plan should allocate of mix of site types (small, medium, large) (72%) and provide for a specific mix of housing types (80%)
- Support for requiring more than 10% biodiversity net gain (if viable)- (93%)

1.3.3 It is possible to provide some high-level breakdown of some of these messages by location of respondent, as included in **Annex 3**. This shows that a large proportion of those responding came from Tonbridge. Those from the west of the borough were also more likely to prefer Option 1 to those in the east (although Option 1 was still the preferred strategy). The consultation also included voluntary questions on equalities. This information is also included in **Annex 3**.

1.3.4 As highlighted above an additional 1643 comments were received through the consultation portal relating to particular sections or paragraph numbers of the Regulation 18 Plan. Around 40% of these comments received were made in reference to a particular site identified within Appendix B to the Local Plan. This was the list of sites identified in the previous Call for Sites process, the Urban Capacity Study and the former proposed allocations within the withdrawn local plan. This totalled 664 responses, and a breakdown is provided in **Annex 3** by ward.

1.3.5 It is not yet possible to analyse the results of the emailed or paper responses which relate to over 50% of returns due to the significant resource requirement in reviewing and uploading these to the consultation software. However a significant proportion of these are also in relation to the sites identified within Appendix B, including through adding names and addresses to standard proformas developed

within the community. There were three proformas which were submitted by a significant number of individuals as below:

- Objections to particular sites within King's Hill (8), Downs and Mereworth (1), East Malling (3), West Malling (1) and Watlington (3)- it is estimated this accounted for over 1,500 responses
- 'Stop Borough Green City'- including standard answers to a select number of the consultation questions in the context of Borough Green- it is estimated this accounted for around 100 responses
- Comments in relation to King's Hill and extracts of each site proposed within Appendix B with comments inserted- it is estimated this accounted for around 20 responses

1.3.6 As explained at the HPSSC meeting of September 2022, the Call for Sites process was also reopened alongside the Regulation 18 consultation a result of which 65 new sites were submitted. These additional sites are now being considered against the suitability criteria set out within the Placemaker software as well as the sustainability objectives within the Sustainability Appraisal. Legal advice will be sought to be able to ensure that these are considered in a proper and timely manner and to ensure there is opportunity for these sites to be consulted upon.

1.3.7 In addition to the above members of the team attended a TMBC Youth Forum to promote the local plan consultation. Further feedback was sought from attendee's peers through their schools, and the main comments were:

- The majority supported development, conditional on protecting greenfield land
- The countryside and woodlands around the borough are well liked but very few like Tonbridge town centre.
- Many identified a need for a cinema, cafes and restaurants, and parks and gardens,
- Traffic and air pollution are the greatest concerns about the future of the borough, followed by the loss of natural habitats and wildlife.

1.3.8 The above information is high-level analysis of the online questionnaire responses and key comments on sites. It is likely that the email responses reflect similar sentiments, but this cannot be confirmed, or full outcomes known until all emailed and postal responses have been fully logged. The full analysis will be brought to members, including an officer-level response for March 2023, which will effectively form the full Regulation 18 summary.

GDPR implications

- 1.3.9 Some comments have also been received regarding the appropriateness of the consultation and engagement methods, including the reasoning why all households were not directly informed of the consultation process. As at section 1.2.1, emails were sent to those individuals who had directly registered on the local plan consultation portal. Advice was taken prior to the start of the consultation period on whether other council contacts could also be utilised and added to the consultation database, however this was restricted by the privacy notice.
- 1.3.10 Legal advice was also provided on the broader issue of data handling and GDPR in July 2019 following issues which arose at the local plan examination. This highlights that the 'processing of personal data' should only be progressed if it cannot be fulfilled by other means. On this basis utilising personal data collected for council tax purposes cannot be used for local plan purposes. However, other options are being explored, including how information on the Local Plan and encouraging registration can be disseminated with other council communications such as within the council tax information provided in early 2023.

Progress towards Regulation 19

- 1.3.11 The planning policy team are currently processing the representations received. This includes entering emailed or postal responses into the consultation portal. Due to the high level of response, it will not be possible to assign ID numbers to respondents until this process has been concluded.
- 1.3.12 The team are also conducting more in-depth analysis of results of the Regulation 18 consultation. These full outputs of the consultation will be brought back to the HPSSC meeting of March 2023. This information will also be included within the consultation statement to be published alongside the Regulation 19 local plan in due course. The outcomes of the sustainability appraisal consultation are being passed onto the consultants to be separately analysed for reflection within the sustainability appraisal report.
- 1.3.13 The team are also currently assessing each identified site for suitability and availability. This is being undertaken through a range of methods including meeting with parties who submitted sites or are promoting formerly proposed allocations, and further consideration of site constraints. This process will also include engagement with owners of all of the sites identified in the Urban Capacity Study. This will be fed into a Housing and Employment Land Availability Assessment (HELAA) to identify land availability over the plan period. This will be used alongside the consultation results and other evidence to identify an appropriate spatial strategy, which will be tested within other pieces of evidence. Members will be engaged regarding the spatial strategy as it begins to emerge, via informal and confidential sessions in early 2023. These sessions require confidentiality so that the production of a spatial strategy or early thinking around

site suitability outcomes are not made public until an appropriate time. If made public before key decisions have been made this could require a significant injection of officer resource to manage.

- 1.3.14 Other new and emerging pieces of work which have or are currently being considered include transport modelling, a whole plan Viability Assessment, Landscape Study, Open Space, Playspace and Recreation Study and Greenbelt Study- part 2.
- 1.3.15 The current [Local Development Scheme](#) has Regulation 19 programmed for between August and October 2023.
- 1.3.16 However, this is an ambitious timetable. As highlighted above, ongoing legal advice will be sought on risk management, next steps and timetabling once the full outcomes of the consultation responses, site submissions and resources are known.
- 1.3.17 The next consultation stage will be on the Regulation 19 version of the Local Plan, currently anticipated for Autumn 2023. This will be the plan which the council considers to be 'sound', which will then be submitted to the Secretary of State, via the Planning Inspectorate. To be able to swiftly move between Regulation 19 and Regulation 22 (submission of a local plan) a revised approach to the current consultation portal is likely to be required, including how responses are analysed in an effective and timely manner.

1.4 Duty to Cooperate

- 1.4.1 The planning policy team liaises with neighbouring boroughs on an ongoing basis, updating the Duty to Cooperate grid on a regular basis. Officers conducted bespoke officer and member-level duty to cooperate meetings on the Regulation 18 local plan whilst it was out to consultation. The latest version of this grid is available on member request. **Annex 1** contains a summary of the representations received from neighbouring authorities which will form the subject of the next conversations with each borough.

1.5 Legal Implications

- 1.5.1 Local Planning Authorities are required to prepare and keep up to date development plan for their area. The Planning and Compulsory Purchase 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) set out the requirements and the statutory process for the preparation of a Local Plan.
- 1.5.2 General Data Protection Regulations set out particular requirements in relation to the processing of data. All individual responses will be redacted when outputs are published and no personal data will be shared with outside bodies.

1.6 Financial and Value for Money Considerations

- 1.6.1 There will be direct financial and value for money considerations associated with the commissioning of work and responding to issues raised through the consultation. These costs will be met from existing budgets, which are kept under regular review due to considerations including Member requirements on evidence base and inflationary cost increases for consultancy advice.

1.7 Risk Assessment

- 1.7.1 The preparation of the new local plan will provide the council with an up-to-date Local Plan on adoption (anticipated 2025). This will alleviate the current risks associated with not having an up-to-date development plan in place. There are reputational risks should the local plan programme not be delivered on time.

1.8 Equality Impact Assessment

- 1.8.1 The decisions recommended through this report have relevance to the substance of the Equality Act 2010. The equalities data collected within the Regulation 18 consultation has been processed in accordance with the GDPR and the local plan privacy notice. An Equalities Impact Assessment will be undertaken alongside the preparation of the Regulation 19 Local Plan.

1.9 Recommendations

HPSSC is asked to recommend to Cabinet:

- 1.9.1 **NOTE** the initial outputs of the Regulation 18 consultation on the draft Local Plan and Interim Sustainability Appraisal.
- 1.9.2 **APPROVAL** of the programme for bringing more detailed outputs to members at the March 2023 meeting.
- 1.9.3 **NOTE** the approach to promoting the Local Plan through other council communications, subject to GDPR restrictions.

Background papers:

Annex 1 - Summary of responses from statutory consultees

Annex 2 - Responses from landowners, developers and other bodies

Annex 3 - Initial outcomes of the Regulation 18 consultation

contact: Gudrun Andrews
Planning Policy Manager

Eleanor Hoyle
Director of Planning, Housing and Environmental Health

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TONBRIDGE & MALLING BOROUGH COUNCIL

HOUSING AND PLANNING SCRUTINY SELECT COMMITTEE

18 July 2023

Report of the Director of Planning, Housing and Environmental Health

Part 1- Public

Matters for Recommendation to Cabinet - Non-Key Decision (Decision may be taken by the Cabinet Member)

1 HOUSING STRATEGY UPDATE AND DRAFT YEAR 2 ACTION PLAN

1.1 Summary

1.1.1 The Housing Strategy 2022 – 2027, adopted in July 2022, sets out our priorities and strategic approach to housing in the borough.

1.1.2 The Strategy outlines objectives for each priority, which will be delivered and monitored through annual action plans. This report provides a progress update about delivery of the year 1 action plan and a draft year 2 action plan for approval.

1.2 Year 1 action plan

1.2.1 A copy of the year 1 action plan is in **Annex 1** of this report, with a RAG rating to indicate progress.

1.2.2 A full review of the Housing Allocations Policy has been carried out with a new Policy implemented, this was an action for objective 1.1.

1.2.3 The Housing Assistance Policy has been amended, completing an action for objective 1.4.

1.2.4 The Housing Needs Research, an action for objective 3.1, has been completed with a report issued in August 2022. The research report has been included in the evidence for the local plan in September 2022 and staff and member briefings were held by arc4 consultancy in October 2022.

1.2.5 Actions currently showing as in progress or at risk of not being delivered (amber and red) have been considered for inclusion in the year 2 action plan.

1.3 Year 2 draft action plan

1.3.1 A draft year 2 action plan is provided in **Annex 2** of this report outlining actions for each priority of the Housing Strategy.

1.3.2 Key Actions in year 2 include:

- Development of a Homelessness and Rough Sleeper Action Plan
- Develop and implement an Empty Homes Policy
- Investigate occupation levels (under-occupation and overcrowding) to inform projects to encourage and enable downsizing or mutual exchange
- Sustainable Temporary Accommodation delivery options project, through HAP (Housing Advisor Programme) funding and related development of a Temporary Accommodation Delivery Strategy.

1.4 Legal Implications

- 1.4.1 The Homelessness Act 2022 requires local housing authorities to carry out a homelessness review for their district and publish a homelessness strategy based on the results every five years. The Ministry of Housing, Communities and Local Government (MCHLG) Rough Sleeping Strategy 2018 delivery plan requires a rough sleeping element to be included in local authority homelessness strategies, with annual action plans. The draft year 2 action plan includes development of a Homelessness and Rough Sleeping Strategy.

1.5 Financial and Value for Money Considerations

- 1.5.1 Delivery of the action plan will be informed by budgetary considerations.
- 1.5.2 Priorities set out in the Housing Strategy and the agreed actions in the action plan to deliver objectives of the Strategy help focus resources.

1.6 Risk Assessment

- 1.6.1 Not having an up-to-date Homelessness and Rough Sleeping could put TMBC at risk of challenge.

1.7 Policy Considerations

- 1.7.1 Policy work is included in annual action plans to ensure all necessary policies and supporting documents are updated or developed to deliver the strategic objectives of the Strategy. As part of delivery the year 1 action plan the Housing Allocations Policy was reviewed and a Housing Needs report completed.

1.8 Recommendations

- 1.8.1 It is **RECOMMENDED** that Members **NOTE** progress on delivery of the year 1 action plan for the Housing Strategy as summarised in Annex 1 and recommend to Cabinet that the year 2 action plan in Annex 2 is **APPROVED**.

The Director for Planning, Housing and Environmental Health confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and Policy Framework.

Background papers:

contact: Gillian Aylett/Linda
Hibbs

Nil

Eleanor Hoyle
Director of Planning, Housing and Environmental Health

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1 Year 1 Action Plan

TMBC Housing Strategy Action Plan Year 1, 2022-23		
Action	Notes and 2022-23 target	Lead
Priority 1: Making best use of existing homes, improving housing quality and sustainability		
1.1 Ensure efficient use of existing housing stock		
Review Housing Allocations Policy	Policy review to be completed by end of 2022-23	Housing Solutions Manager
Investigate occupation levels (under-occupation and overcrowding) to inform projects to encourage and enable downsizing or mutual exchanges	Analyse information from Registered Providers, the housing register and housing needs research and consider options to address under-occupation. Update members through an information report during 2022-23 and consider in future allocations policy review. Investigate a pilot project in partnership with Clarion and support agency. C/F into 2023/24	Housing Strategy and Enabling Manager and Housing Solutions Manager
Bring empty homes back into use; identify empty homes and use a range of interventions to bring them back into use, using enforcement action where appropriate	Work with Registered Provider partners to understand the extent of empty properties within existing social housing stock and explore options to address this. Agree a performance indicator for empty homes within the engagement framework. Clarion engagement ongoing	Housing Improvement Manager
	Promote the No Use Empty Scheme in partnership with Kent County Council	Housing Improvement Manager
	Consider altering the Council's approach to tackling Empty homes: report exploring the subject of Empty homes and possible changes to approach to be taken to members to provide steer and form the basis for an Empty Homes Policy to be developed. Some initial work completed. Empty Homes Policy to be developed and adopted in year 2 (2023-2024).	Housing Improvement Manager
1.2 Improve property conditions to provide safe, healthy homes		
Develop a programme of targeted interventions to improve standards informed by the stock condition survey	Review the stock modelling report and integrated database to identify the least energy efficient private rented stock to inform priority areas of work and targeted use of resources and enforcement action. Develop an action plan for 2022-2023 to implement programme. Programme not relevant as work ongoing.	Housing Improvement Manager

	Provide advice and assistance to owners of homes that do not reach a minimum energy efficiency standard (MEES) of Energy Performance Certificate band E and take appropriate enforcement action where necessary for rental properties. Work ongoing as part of team.	Housing Improvement Manager
Fulfil requirements under extended HMO licensing scheme	Inspect additional HMO needing licenses as a result of the new scheme and process or enforce as necessary.	Housing Improvement Manager
Use powers to impose financial penalties in line with our Private Sector Housing Enforcement Policy	Each offence will be assessed on a case-by-case basis. The council will seek to impose a financial penalty for a relevant offence, unless there are circumstances relating to the offence that advocate pursuing a criminal prosecution instead.	Housing Improvement Manager
1.3 Improve the energy efficiency of housing stock to alleviate fuel poverty and help address climate change		
Continue to bid for decarbonisation funding to bring investment into improving existing housing stock, in partnership with other local authorities and Registered Providers as appropriate	Continue retrofitting project with Clarion	Housing Improvement Manager
Identify and promote services and initiatives to improve energy efficiency; including warm homes, energy efficiency and retro-fit technologies	Promote services and initiatives through effective media campaigns and proactive targeted promotion as appropriate to maximise the opportunity for take-up.	Housing Improvement Manager
	Work in partnership with the Kent Energy Efficiency Partnership (KEEP) to support and contribute to the delivery of actions in the Fuel Poverty Strategy for Kent.	Housing Improvement Manager
Assist households to improve the energy efficiency of their homes	Help a minimum of 10 households with energy efficiency improvements in line with our commitment in the Climate Change Strategy. Commitment within the CC Strategy has been amended and no longer includes 10 households. Explore and apply for funding opportunities throughout the year to help deliver energy efficiency improvements to existing homes. Work ongoing. CC strategy amended.	Housing Improvement Manager
1.4 Support residents to have a suitable home where they can live independently		
Continue delivery of mandatory Disabled Facilities Grant (DFG)	Maximise use of Disabled Facilities Grants for adaptations to support residents to continue living in their own home. Explore use of trusted assessors. Part of pilot but West Kent will be part of second phase rollout of trusted assessors. Revised Housing Assistance Policy by end of 2022-23, for adoption in Year 2	Housing Improvement Manager

(2023-24). **Policy amended**

Priority 2: Improving housing options and opportunities to prevent homelessness

2.1 Develop a Homelessness and Rough Sleeping Strategy and action plan

Use local intelligence and data to develop a Homelessness and Rough Sleeping Strategy	Strategy and action plan developed and approved by end of 2022-23 C/F to 2023/24	Housing Solutions Manager
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2.2 Provide housing options advice focussing on homeless prevention through a personalised approach

Investigate the use of the Policy and Practice LIFT and Xantura tools within our homelessness prevention work	Prepare a proposal to Management Team by end of December 2022 regarding the use of the prevention tools and the available funding to progress this work. MT report went to MT	Head of Housing and Health
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Continue to develop a focus on homeless prevention services and interventions, and implement ways of working to support this	Embed Prevention Officer roles within the Housing Solutions team Improve online information and advice tools to enable customers to self-serve and help manage expectations	Housing Solutions Manager
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Seek customer feedback to inform service provision and improve customer experience	Ensure people feel supported and listened to when accessing services and that they can access services with ease. Ensure collaborative working across teams to provide consistent efficient services	Housing Solutions Manager
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Maximise use of existing funding and take up new opportunities to help households access the private rented sector	Use funding such as Contain Outbreak Management Fund (COMF), Accommodation for Offenders Funding (AFO), Rough Sleepers Initiative and Discretionary Housing Payments to help households access the private rented sector and sustain tenancies. Links to objective 2.4 below.	Housing Solutions Manager
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Promote and improve awareness of duty to refer and improve monitoring of referrals	Deliver informal training to partners about the duty to refer and promote it through attending meeting for relevant organisations to share and improve understanding of the duty to refer. C/F for 2023/24 for certain partners however partnership work has improved the situation overall. Improve our data collection and monitoring of cases resulting from a duty to refer. C/F to 2023/24	Housing Solutions Manager
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Continue with our commitment for the resettlement of 12 families as part of the UK resettlement scheme and deliver our commitment to the Afghan citizens resettlement scheme and Homes for Ukraine scheme.	Work with KCC to help as many households as we can under both the UK resettlement scheme, Afghan citizens resettlement scheme and Homes for Ukraine scheme.	Housing Solutions Manager
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2.3 Work with voluntary and statutory partners to help rough sleepers off the streets into settled accommodation and prevent rough sleeping		
Continue with and develop our Rough Sleeper action plan and task force meetings	Continue to identify rough sleepers and find ways to move them away from rough sleeping, finding accommodation solutions along with prevention work	Housing Solutions Manager
	Continue collaborative working to tackle rough sleeping using responsive outreach work for any rough sleepers identified.	
	We will continue to monitor rough sleeping and improve our intelligence about rough sleepers in the borough through robust procedures, ensuring people are verified before they are placed in accommodation.	
Expand and continue to develop Housing First	Expand the scheme by another 7 units, to <i>total 14, by [date]</i> in partnership with Look Ahead, Porchlight and Clarion Housing Association.	Housing Solutions Manager
	Work with Jobcentre Plus and other voluntary agencies to explore ways to maximise opportunities for those with complex needs to access education, training and employment or support needs, with a view to enable withdrawal of Housing First tenancy support services for existing cases.	
2.4 Ensure vulnerable groups and those with complex needs have access to support to maintain their tenancy		
Work with partners to ensure vulnerable people have the support they need	Continue to work with KCC homeless connect for tenancy sustainment services <i>KCC Homeless Connect contract ended. New action for 2023/24 regarding ending of transition funding etc</i>	Housing Solutions Manager
	Investigate a pilot project with KCC and the Home Improvement Agency to support our approach to working with hoarding cases. Project proposal to be completed by end of 2022-23. <i>C/F into 2023/24</i>	Housing Improvement Manager
	Continue to use Rough Sleeper Initiative funding for the supported lettings project with Look Ahead	Housing Solutions Manager
2.5 Improve links with landlords in the private rented sector to work together to prevent homelessness and increase housing options		
Continue to develop our Private Landlord offer to make it effective in engaging landlords to work with us to prevent homelessness	Review pilot 'golden hello' incentive and rent guarantee within an options appraisal for the Private Landlord offer. Options report for Landlord Offer to members, March 2023. <i>C/F into 2023/24</i>	Housing Improvement Manager
Develop positive working relationships with local lettings agents and landlords	The Housing Solutions Officers and Accommodation Officers will build relationships with lettings agents and landlords to find tenancy opportunities in line with the Discharge of Duty into the Private Rented Sector Policy <i>Ongoing work</i>	Housing Solutions Manager and Housing Improvement Manager
Improve and extend engagement with private landlords	Continue our work with neighbouring authorities to deliver the West Kent Landlord Forum events and information. <i>Ongoing</i>	Housing Strategy and Enabling Manager

	Host at least 1 event during 2022-23 (online or in person). Landford forum held on 19/3/23 hosted at TMBC.	
	Develop and trial local engagement options such as networking gatherings or workshops; hold local event/s during 2022-23 and gather feedback to inform future approach. C/F into 2023/24 and establish what we use them for.	
2.6 Minimise the use of nightly paid accommodation to manage temporary accommodation costs and seek alternative provision, including property purchase or development		
Research and consider options for alternative provision such as property acquisitions and options to lease properties	<p>Carry out options assessment to establish preferred option/s and provide a report to members by end of 2022-23. Seek Cabinet approval for implementation and required resources, NB this may be in year 2 of this action plan.</p> <p>Some progress made – HAP funding secured. Revised action to carry forward to 2023/24.</p> <p>Secure 30-40 units the Council has control of and access to for use of for temporary accommodation.</p>	Housing Strategy and Enabling Manager
Reduce use of nightly paid Temporary Accommodation	Increase homelessness prevention, in turn reducing use of temporary accommodation. Number of HPO resources increased. Monitoring etc to be further developed.	Housing Solutions Manager
Increase the supply of self-contained homes in council control for use as temporary accommodation	<p>Explore option to lease properties - assess options including a cost benefit analysis, and report to members by end of 2022-23 as above. HAP project to consider.</p> <p>Complete project to alter 4 council owned properties in Tonbridge to provide 2 properties as HMO temporary accommodation and consider outcomes of this to inform approach to remaining 2 properties.</p>	<p>Housing Strategy and Enabling Manager</p> <p>Property Services Team and Housing Services</p>
Priority 3: Delivering the homes our residents need in the places they are needed		
3.1 Understand local housing need with up to date information on affordable and specialist housing need for a range of housing (including type, tenure and location) to inform decision making and priorities		
Research and analyse local housing needs to inform affordable housing delivery.	Carry out Housing Needs Research and report; due to complete June 2022. This research will analyse local housing need across areas of the borough, for a range of tenures and consider affordability thresholds for various tenures including for rented homes and affordable home ownership.	Housing Strategy and Enabling Manager

	Use insight into housing needs provided by the research to inform work towards achieving Priority 3 of this Strategy and inform projects and policy decisions, including the Affordable Housing Statement and new Local Plan. <i>Await development of Local Plan. Protocol updated.</i>	Head of Housing and Health and Housing Strategy and Enabling Manager and Planning team
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3.2 Provide housing choice by encouraging housing of different types, size and tenure in suitable locations, at a range of prices to be within reach of different household financial capacities

Research types of affordable home ownership, for example living rent and rent to buy	Consider options for affordable home ownership other than shared ownership, informed by local housing needs research and information from Registered Providers in the Borough. Present an information report to members by end of 2022-23. <i>C/F into future action plan</i>	Housing Strategy and Enabling Manager
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Monitor the tenure and mix of homes delivered to inform future policy	Monitor delivery through the Annual Authority Monitoring Report and additional monitoring of affordable housing provision, as a percentage of overall delivery and recording tenure and mix information. <i>Action on collation of stats across housing & planning to be considered for 2023/24 – Agile dependent for automation.</i>	Planning Team & Housing Strategy and Enabling Manager
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3.3 Consider options for the Council to influence and take a pro-active role in housing delivery, including through a Local Housing Company.

Consider use of council owned assets for use to deliver affordable housing	Review of council owned assets through the internal Assets Group and consider their use to delivery new affordable housing units through joint working with Registered Providers. Establish an agreed way forward for identified sites that could deliver affordable housing by end of 2022-23. <i>Consider action required for taking into 2023/24 as some work on Council assets completed.</i>	Head of Housing and Health
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Priority 4: Working in partnership

4.1 Work in partnership with local authorities and partner organisations including active membership and engagement in Kent Housing Group to share best practice, learning and resources

Continue our membership to Kent Housing Group	Actively contribute and engage with partners of the Group.	Head of Housing and Health & service representatives of each sub-group
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4.2 Engage with Registered Providers and private developers through regular strategic and management/liaison meetings to ensure efficient and effective delivery of services

Work with Registered Providers to maintain and improve housing management services and joint working with the Council and other agencies	Develop and agree an approach to monitoring and engagement between Registered Providers and the Council; including meetings to share staff and service updates, review specific cases and any areas of concern. <i>Links to Priority 1 objectives C/F into 2023/24</i>	Head of Housing and Health
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	Monitoring will require data, management and performance information, including customer satisfaction and steps being taken to implement the 'Charter for social housing residents' as set out in the Social Housing White Paper 2020. C/F into 2023/24	
Develop an approach for regular engagement with Registered Providers to influence housing delivery in the borough	Set up strategic meetings with Registered Providers: bi-annual meetings with Registered Providers with large amounts of stock in the Borough, and annual meetings with Registered Providers with lower amount of stock. First meetings to be in 2022-23. C/F into 2023/24	Housing Strategy and Enabling Manager
4.3 Work with health colleagues and organisations to ensure preventative focussed work and improve wellbeing through links between services		
Work in partnership with Health Services to provide integrated services taking account of individual needs	Take an active role in partnership working with health providers to address the health needs of residents with more integrated services through representation at the West Kent Integrated Care Partnership and associated health forums.	Head of Housing and Health
Continue to take an active role in cross sector initiatives and projects with Health Services	Work with health partners to ensure that housing continues to play a key role in supporting timely and safe discharge from hospital. Continue to review relevance and focus of the hospital discharge service to inform future commitment.	Housing Improvement Manager
4.4 Maximise our joint working with local commissioned organisations and third sector partners to add value to our housing services		
Work with KCC commissioned services on wellbeing and older persons	Ensure housing related services link into available support through partnership meetings to have an open dialogue and share information. Ongoing.	Head of Housing and Health

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TMBC Housing Strategy Action Plan Year 2, 2023-24		
Action	Notes and 2023-24 target	Lead
Priority 1: Making best use of existing homes, improving housing quality and sustainability		
1.1 Ensure efficient use of existing housing stock		
Investigate occupation levels (under-occupation and overcrowding) to inform projects to encourage and enable downsizing or mutual exchanges	Analyse information from Registered Providers, the housing register and housing needs research and consider options to address under-occupation.	Housing Strategy and Enabling Manager
Design and implement Empty Homes Policy	Update members through an information report during 2023-24. Investigate a pilot project in partnership with Registered Providers and support agency. New Policy agreed and re-start internal corporate empty homes group meetings. Policy to be implemented by March 2024	Housing Improvement Manager
1.2 Improve property conditions to provide safe, healthy homes		
Engage with RP partners to agree a Memorandum of Understanding on how property condition complaints are dealt with	Implement agreed joint working with Registered Provider partners to address complaints relating to property condition.	Housing Improvement Manager
Home Upgrade Grant funding phase 2 (HUG2); provide energy efficiency upgrades and clean heating systems to low-income households.	Participate in the Greater South East Net Zero Hub consortia scheme. Procure a turnkey Managing Agent to deliver HUG2 scheme on behalf of TMBC. Upgrade 15 eligible homes (domestic off-gas grid dwellings with an EPC rating of band D or lower) this financial year under the TMBC scheme.	Housing Improvement Manager
Report considering the impact of the Renters Reform Bill on the private sector housing service	Report to members about the Bill including recommendations to meet new duties or burdens, such as potential introduction of Decent Homes Standard, by March 2024 or sooner if needed in line with progression of the Bill.	Housing Improvement Manager
Review process and approach to licensing of HMOs	Review data relating to HMOs and current process. Implement necessary actions for HMO licensing during 2023-24	Housing Improvement Manager
Priority 2: Improving housing options and opportunities to prevent homelessness		
2.1 Develop a Homelessness and Rough Sleeping Strategy and action plan		
Use local intelligence and data to develop a Homelessness and Rough Sleeping Strategy	Strategy and action plan developed and approved by end of 2023-24	Housing Solutions Manager
2.2 Provide housing options advice focussing on homeless prevention through a personalised approach		
Seek customer feedback to inform service provision and improve customer experience	Ensure people feel supported and listened to when accessing services and that they can access services with ease. Ensure collaborative working across teams to provide consistent efficient services	Housing Solutions Manager
Promote and improve awareness of duty to refer and improve monitoring of referrals	Deliver informal training to less engaged partners about the duty to refer and promote it through attending meetings for relevant organisations to share and improve understanding of the duty to refer. Improve our data collection and monitoring of cases resulting from a duty to refer.	Housing Solutions Manager
2.3 Work with voluntary and statutory partners to help rough sleepers off the streets into settled accommodation and prevent rough sleeping		
Tender for the contract for Rough Sleeper Initiative funding service delivery	Tender and appoint by September 2023.	Single Homeless Projects and Rough Sleeping coordinator
2.4 Ensure vulnerable groups and those with complex needs have access to support to maintain their tenancy		
Work with partners to ensure vulnerable people have the support they need - continue to engage in process of KCC transition funding for support services	Ongoing throughout 2023-24.	Housing Solutions Manager
2.5 Improve links with landlords in the private rented sector to work together to prevent homelessness and increase housing options		
Develop our Private Landlord offer to make it effective in engaging landlords to work with us to prevent homelessness	Continue to develop and improve our Private Landlord offer.	Housing Improvement Manager
Improve and extend engagement with private landlords	Continue our work with neighbouring authorities to deliver the West Kent Landlord Forum events and information Develop and trial local engagement options such as networking gatherings or workshops; hold local event/s during 2023-24 and gather feedback to inform future approach.	Housing Improvement Manager Head of Housing and Health
2.6 Minimise the use of nightly paid accommodation to manage temporary accommodation costs and seek alternative provision, including property purchase or development		
Research and consider options for alternative provision such as property acquisitions and options to lease properties	Use Housing Advisor Programme funding to research options for sustainable temporary accommodation delivery. Use findings to establish preferred option/s through a report to members by end of 2023-24. Use preferred options to formulate a Temporary Accommodation Strategy. Seek Cabinet approval for implementation and required resources, NB this may be in year 3 of this action plan.	Housing Strategy and Enabling Manager
Increase the supply of self-contained homes in council control for use as temporary accommodation	Secure 30-40 units the Council has control of and access to for use of for temporary accommodation.	
Assess options and establish approach for the management of Council controlled Temporary Accommodation provision	Have an agreed approach to management and contract in place by November 2023, with ability to add more units to the arrangement in the future.	Head of Housing and Health
Priority 3: Delivering the homes our residents need in the places they are needed		
3.3 Consider options for the Council to influence and take a pro-active role in housing delivery, including through a Local Housing Company.		
Reflect on findings and recommendations from HAP Sustainable TA delivery options project that are relevant and transferrable to affordable housing delivery more generally	Consider recommendations in the HAP sustainable TA delivery options report relevant to affordable housing delivery and provision, for example, long term action of a local housing company to be taken forward in year 3 action plan.	Head of Health and Housing
Priority 4: Working in partnership		
4.1 Work in partnership with local authorities and partner organisations including active membership and engagement in Kent Housing Group to share best practice, learning and resources		
Engage with colleagues across the region through active participation in main Kent Housing Group and sub-groups	KHOG (Kent Housing Options Group): Finalise implementation of Huume for CBL and active participation in protocols, policy and procedure development and reviews. Main KHG and sub-groups: Contribute to delivery of the Kent and Medway Housing Strategy.	All teams within Housing Service
4.2 Engage with Registered Providers and private developers through regular strategic and management/liaison meetings to ensure efficient and effective delivery of services		
Work with Registered Providers to maintain and improve housing management services and joint working with the Council and other agencies	Develop and agree an approach to monitoring and engagement between Registered Providers and the Council; including meetings to share staff and service updates, review specific cases and any areas of concern. Links to Priority 1 objectives	Head of Housing and Health
Develop an approach for regular engagement and monitoring of Registered Providers to ensure quality service provision and influence housing delivery in the borough	Set up strategic meetings with Registered Providers: bi-annual meetings with Registered Providers with large amounts of stock in the Borough, and annual meetings with Registered Providers with lower amount of stock. First meetings to be in 2023-24.	Housing Strategy and Enabling Manager
4.3 Work with health colleagues and organisations to ensure preventative focussed work and improve wellbeing through links between services		
Work with local authority partners to jointly commission handyperson and hospital discharge schemes, including hoarding support services.	Investigate joint commissioning options with local authority partners for support services, with a report to members to update on proposed approach. Project proposal, commissioning and implementation to be completed by end of 2023-24.	Housing Improvement Manager
Work in partnership with health services to provide integrated services	Utilitise funding opportunities to deliver partnership projects. Continue to engage with the West Kent integrated care partnership.	Head of Housing and Health

4.4 Maximise our joint working with local commissioned organisations and third sector partners to add value to our housing services

Consider scope to commission specialist advice services to households in TA in partnership with the third sector.expertise of third sector partners to deliver financial related advice services commissioned using Housing Support Fund

Explore options for use of the Household Support Fund with Finance for a project to deliver debt advice to households in temporary accommodation.

Head of Housing and Health

Work with CGL to implement Tenancy Sustainment Project (KCC commissioned)

Work with CGL to deliver tenancy sustainment services, including possible hosting, ongoing engagement and referrals. This is a KCC commissioned project, using SMNTR grant.

Housing Solutions Manager

HOUSING AND PLANNING SCRUTINY SELECT COMMITTEE

WORK PROGRAMME 2023/24

Members can suggest future items by liaising with the Chair of the Committee

Meeting Date	Matter for Discussion	Requested by:	Director/Officer
26 September 2023			
	Key Performance Indicators Work Programme		
12 December 2023			
	Key Performance Indicators Work Programme		
19 March 2024			
	Key Performance Indicators Work Programme		

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Agenda Item 10

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

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Agenda Item 11

The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

**ANY REPORTS APPEARING AFTER THIS PAGE CONTAIN EXEMPT
INFORMATION**

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Agenda Item 12

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

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