

Annex 1: Officer Level Comments in Respect of Tunbridge Wells Borough Council Local Plan (Issues and Options) Consultation (sent 12th June 2017)

Dear Planning Policy Team,

Please find below some officer level comments on the above consultation on behalf of Tunbridge and Malling Borough Council. These will be subject to Member endorsement in due course.

These comments are of a more general nature than the specific set questions laid out in the response form. Therefore unless indicated otherwise, please assume they relate to Question 19 in the main.

Since there are no potential yields for each of the proposed development strategies going forward, it is difficult to provide a view on a preferred option or combination of options. The document is heavily caveated in respect of the challenges of fully meeting the objectively assessed needs over the Plan period, suggesting that none of the options will be sufficient, but the consultee has no indication whether one option or combination of options will meet more or less of the need than the others.

Whilst acknowledging that there is a second round of Call for Sites running in parallel to the current consultation and therefore it may be premature to include sites at this stage, it does beg the question whether a second round of consultation will be necessary when the sites are known. If this is required, then the current timetable may need to be extended.

Clearly from a neighbouring Local Planning Authority's point of view, located within the same housing market area, the options that could deliver more of the identified need would be preferable to those that will deliver less. There is a risk in carrying out the consultation without the benefit of potential yields could result in the most productive options being rejected before they have been fully considered.

Notwithstanding the overall capacity issues of the proposed options, there is also the matter of maintaining a five year supply of housing land. As there is no assessment of the phasing of each of the options, again preferences expressed at this stage could undermine the ability of a future strategy to deliver sufficient housing numbers across the Plan period. For example, while a new settlement may provide a significant proportion of the total need and therefore be an attractive option on the face of it, it will inevitably take some years before such a site could deliver housing and even then only provide 1-200 units a year. An approach more likely to succeed would be to have a mixed portfolio of small to large sites. This has also been supported in the Housing White Paper.

Those options promoting a northern extension to the Limits to Built Development north of Tunbridge Wells itself and option 4 which explores a development corridor approach along the A21 would clearly have cross boundary impacts on the local highway network, community infrastructure and air quality. Should these options be

taken forward we would welcome the opportunity to work closely with TWBC as TMBC also brings forward future development proposals in the vicinity of south Tonbridge.

The references to the Duty to Cooperate are acknowledged and we welcome the recognition of the positive cross-boundary liaison on strategic planning matters so far and the opportunity to continue to do so. As noted in those meetings, Tonbridge and Malling in preparing its own Local Plan is striving to meet locally identified needs where they arise and in doing so, particularly for the West Kent Housing Market Area that we share with Tunbridge Wells, are addressing similar constraints and challenges.

I hope these brief comments are of assistance. I will confirm when our Members have endorsed these views and any additional comments they may wish to add.

Yours Sincerely,

Ian Bailey

Planning Policy Manager

TMBC