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**Local Plan**

**Engagement and Consultation Strategy**

**November 2024**

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# 1. Introduction

- 1.1 Tonbridge and Malling Borough Council (TMBC) have begun the process of preparing a new local plan. The Local Plan will cover a minimum 15-year period, setting out a vision for and a range of strategic objectives for the Borough. The plan will set out housing and employment requirements and identify the locations where this will be located, and if possible, will address any unmet housing and employment needs from neighbouring authorities. The Local Plan will also address a number of other important matters, setting out the Council's planning strategy and policies in relation to climate change, protecting and enhancing the natural and historic environment, design principles for development, as well as identifying the physical and community infrastructure that will be required to be delivered in order to support growth in the Borough.
- 1.2 The involvement of communities and stakeholders is an essential and critical part of the plan-making process, where providing the opportunity to be involved in shaping the places that we live through meaningful engagement, will contribute to the success of the plan and the delivery of the strategy.
- 1.3 A Local Plan has multiple audiences including communities, developers, agents, infrastructure and service providers as well as other Council services. It is a technical document for the purposes of decision making, however, it is also a strategy that requires visionary thinking and creativity to address local issues that reflect community aspirations. Problem solving is key, both in the way the plan is produced as well as within the plan itself.
- 1.4 An early consultation (Regulation 18) on the Local Plan has already been undertaken. This took place between 22<sup>nd</sup> September and 3<sup>rd</sup> November 2022. This Engagement and Consultation Strategy therefore sets out our approach to consulting and engaging the community and a range of different stakeholders on the next stages of our emerging Local Plan.
- 1.5 The principles that we set out in this Engagement and Consultation Strategy are consistent with the Council's Statement of Community Involvement (SCI), which was last updated in September 2022. This document provides further detail in relation to the engagement process that we will take both internally within the Council including other council services and with Council Members, as well as externally with stakeholders and our communities.
- 1.6 A vital aspect of plan-making is how we maintain effective cooperation with neighbouring authorities and other key partners when planning for wider strategic cross boundary matters. The Engagement Strategy will also set out how we will continue to engage to meet the legislative 'duty to cooperate' requirements.
- 1.7 Over the last few years, local plan engagement has been considered in numerous Government papers with a focus on making it easier and simpler for people to engage in the planning process, including through the use of more accessible and digital tools. The aim is to make it easier for communities and stakeholders to contribute their views. This is also something we will address in this strategy.

## 2 Local Plan preparation stages

- 2.1 The process of producing a Local Plan involves working towards a number of key stages, with each key stage requiring consultation with communities and stakeholders. The key stages for the TMBC Local Plan are set out below and the timetable for Local Plan preparation is set out in the Council's Local Development Scheme (LDS).

Table 1: Key Local Plan stages

| Key stage  | Consultation details   |
|--|--|
| Regulation 18 consultation   | A period of evidence gathering and early stage and on-going consultation with communities and stakeholders.<br><br>We are currently working towards our second Regulation 18 consultation.   |
| Regulation 18 Consultation   |  |
| Regulation 19 Publication of the pre-submission local plan           | Statutory public consultation period. This is the final stage when representations can be made on the local plan.  |
| Regulation 20 Consultation on the pre-submission local plan          |  |
| Regulation 22 Submission of the local plan to the Secretary of State | A copy of the proposed Local Plan and associated documents are submitted to the Secretary of State for examination.  |
| Regulation 24 Independent Examination in Public                      | An Independent Inspector is appointed to examine the soundness of the Local Plan.  |
| Regulation 25 Publication of Inspectors Report                       | The Inspector provides a report of the examination and decides what changes (if any) need to be made. Once this report is received, the Council have to amend the Local Plan in line with the recommendations and consult on these as necessary. |
| Local Plan Adoption  | The Local Plan is adopted by the Council.  |

- 2.2 It is a statutory requirement for a Local Authority to consult on a local plan for a minimum of six weeks. Should the consultation period fall within school holidays, it is good practice to extend the consultation to either seven or eight weeks. Additional consultation may be undertaken to aid plan making, as long as the Regulation 18 and 19 legislative requirements are met.

### Regulation 18 Consultation Stage

- 2.3 In general terms, the Regulation 18 stage is about developing the emerging Local Plan and providing an early opportunity for communities and stakeholders to comment and provide feedback on any of the Local Plan emerging policies or proposals before the plan is considered further and then finalised for publication at the Regulation 19 stage.

- 2.4 There is considerable flexibility in how the initial Regulation 18 stage of local plan production is carried out. This is as long as any formal consultation complies with the Town and Country Planning Regulations 2012, along with meeting the commitments set out within a local authorities SCI.
- 2.5 Although it isn't required, many local authorities, often choose to undertake two Regulation 18 stage consultations and this is the approach that we are taking to plan-making and consultation at TMBC given that engagement is key to preparing a local plan.

### TMBC's first Regulation 18 consultation (2022)

- 2.6 Our first Regulation 18 consultation document provided a high-level and early consultation exercise where we were able to learn about our communities and stakeholder's aspirations for the Borough. The responses have been considered and were reported to the Council's Housing and Planning Scrutiny Select Committee on the 6<sup>th</sup> December 2022<sup>1</sup> and also 18<sup>th</sup> July 2023<sup>2</sup> including a number of recommendations as to how the local plan should progress.

### TMBC's second Regulation 18 consultation

- 2.7 Whilst delayed due to the July 2024 Government consultation on reforms to the planning system and a revised NPPF, we are now progressing a second Regulation 18 Local Plan document for consultation. This consultation will set out the Council's preferred strategy for growth and will include draft planning policies and proposals.
- 2.8 Setting out our detailed draft policies and our preferred spatial strategy and any options that may require further testing will provide an opportunity for communities and stakeholders to respond to a targeted consultation, whilst the plan is still in its formative stage. A second consultation therefore provides a further engagement opportunity in which communities and stakeholders can shape the direction of the plan, its policies and proposals prior to the Council undertaking any further information and evidence gathering and publishing our Pre-Submission Local Plan.

### Regulation 20 consultation stage

- 2.9 The Regulation 20 consultation stage on the Pre-Submission Local Plan is different to that at Regulation 18. At this stage, the Council will consult on its Pre-Submission Local Plan where communities and stakeholders are asked whether they consider the Local Plan to be 'legally compliant' and whether it meets the 'tests of soundness i.e. Has the Local Plan been positively prepared? Is it justified? Is it effective and is it consistent with national policy?
- 2.10 At this stage, the Local Authority does not have an opportunity to make significant changes to the Pre-Submission Local Plan unless it decides to carry out further consultation. Following the Regulation 20 consultation, it is for the authority to consider the representations made and decide whether it still considers the Local Plan to be sound and whether the Local Plan should be submitted to an independent Planning Inspector. Where there is a decision to submit the Local Plan, the representations made and all other documentation will be submitted for examination.

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<sup>1</sup> Housing and Planning Scrutiny Select Committee – 6th December 2022  
<https://democracy.tmbc.gov.uk/ieListDocuments.aspx?Cid=465&Mid=5293&Ver=4>

<sup>2</sup> Housing and Planning Scrutiny Select Committee – 18<sup>th</sup> July 2023 -  
<https://democracy.tmbc.gov.uk/ieListDocuments.aspx?Cid=465&Mid=5524&Ver=4>

## Examination of the Local Plan by a Planning Inspector

- 2.11 The Secretary of State will appoint an independent Inspector (from the Planning Inspectorate) to consider the ‘soundness’ of the Draft Submission Local Plan, as part of a public examination. The Inspector will consider the representations received during the Regulation 20 consultation and individuals or stakeholders who submitted representations will be invited by the Inspector to appear at the Examination in Public.
- 2.12 Following the Examination in Public, the Inspector will produce a report to determine whether or not the plan is considered to be ‘sound’ and /or ‘legally compliant’. This report may include changes to the Draft Local Plan where the Inspector feels that these are necessary to ensure that the Plan is sound. Any modifications suggested by the Inspector will be consulted on for a period of six weeks. Any consultation responses received will be considered by the Inspector prior to the publication of the final report.

## Adoption

- 2.13 The final stage in the plan making process is the formal adoption of a Plan. In accordance with the Council’s Constitution, the adoption of the Local Plan must take place at a meeting of Full Council. Following adoption, the Local Plan will become the main document against which decisions on planning applications will be made.

## 3. Local Plan production

- 3.1 In developing a Local Plan, it is important to recognise that it provides the spatial dimension for delivering the Council’s ambitions for the Borough. To achieve this successfully a number of considerations are required throughout the process. In summary and in no particular order, considerations include:
- **Considering the Corporate context** – Understanding what the Local Plan should support in a wider perspective and bringing together strategies, for example, those relating to housing, the economy or other political commitments.
  - **National policy and legislation** – Plan-making is enshrined in law where we are required to meet numerous legislative requirements. We are also required to take into account the National Planning Policy Framework (NPPF) in preparing a local plan.
  - **Evidence gathering** - The NPPF requires local plan policies to be underpinned by relevant and up to date (less than five years old) evidence, which is adequate and proportionate, focused on supporting and justifying policies and taking into account market signals.
  - **Working with other authorities and agencies** – Understanding the plans and strategies of other local authorities and stakeholders and ensuring that other plans and strategies do not have any implications to our strategy or vice-versa and ensuring that plans and strategies align.
- 3.2 In relation to evidence gathering, certain evidence base studies will have cross boundary implications, and some studies will be more key than others in understanding the deliverability of our spatial strategy. When gathering evidence, we will carry out both formal and informal engagement with a range of relevant stakeholders to obtain information, knowledge and advice and to also check and challenge the outputs, where this is required.
- 3.3 In developing our Local Plan, it will be the combination of the above four points alongside consultation with our communities and stakeholders that will inform our Local Plan.

- 3.4 We are also required to undertake a Sustainability Appraisal and Habitats regulations Assessment as part of plan-making and consult on these documents with statutory consultees including Natural England, the Environment Agency and Historic England.

## 4. Engagement and Consultation

### Consultation general principles

- 4.1 The Councils SCI sets out a number of general principles to consultation and these principles have been considered in devising this Engagement and Consultation Strategy. The principles are provided below:

- We will work with parish councils and elected Members to achieve consensus;
- We will make full use of community information networks, including local publications to disseminate information and seek views;
- We will seek views of interested and affected parties as early as possible;
- We will continue to co-operate with neighbouring boroughs and public bodies to ensure that strategic matters are appropriately addressed;
- Involvement will be open to all regardless of gender, faith, race, disability, sexual orientation, age etc.;
- We will consult local community and voluntary bodies;
- We will choose consultation processes which balance appropriately cost and time constraints, community impact and available resources;
- We will publish all consultation documents and response forms on the website;
- We will seek to maximise the use of electronic communication methods when contacting stakeholders and the community;
- Consultation publications will be clear and concise and avoid unnecessary jargon, without understating the complexities of any decisions; and
- We will inform those who respond to a consultation of any outcomes and of later stages in the process.

- 4.2 In addition to the above, we consider that transparency is key, and we will achieve this by providing open and clear communication, by being clear on how and who we will consult and by setting up regular communications with stakeholders, setting out the local plan process and how stakeholders can be involved. Transparency will help us build and maintain trust with our stakeholders and communities and it will also reduce risk to the new Local Plan.

### Who are we required to consult?

- 4.3 The Town and Country Planning Regulations 2012 (as amended) at paragraph (2) sets out who we are required to consult as part of the local plan process. This includes both specific and general consultation bodies, including residents, businesses and landowners in our local authority area. The table below sets out both our specific and general consultees. This includes a number of hard-to-reach groups to ensure that we engage across all sectors of our community.

Table 2: Specific and general local plan consultation bodies

| Specific Consultation Bodies   | General Consultation Bodies and other interested groups   |
|--|---|
| <ul style="list-style-type: none"> <li>• Adjoining Local Planning Authorities, County Councils, Parish and Town Councils</li> <li>• The Police and Crime Commissioners</li> <li>• The Coal Authority</li> <li>• The Environment Agency</li> <li>• Historic England</li> <li>• Marine Management Organisations</li> <li>• Natural England</li> <li>• Network Rail</li> <li>• Highways England</li> <li>• Relevant telecommunications companies</li> <li>• Relevant Clinical Commissioning Groups</li> <li>• NHS Commissioning Board</li> <li>• Relevant gas and electricity companies</li> <li>• Relevant water and sewerage companies</li> <li>• The Homes and Communities Agency</li> </ul> | <ul style="list-style-type: none"> <li>• Nature conservation / countryside bodies</li> <li>• Environmental groups</li> <li>• Infrastructure and service providers</li> <li>• Interest and amenity groups</li> <li>• Resident’s associations</li> <li>• Property, trade and business associations</li> <li>• Neighbourhood Plan Steering Groups</li> <li>• Learning agencies</li> <li>• Recreation bodies</li> <li>• Local Nature Partnership</li> <li>• Disability groups</li> <li>• Minority groups, for example those relating to race, sex, disability, religion or those with caring responsibilities</li> <li>• Voluntary groups</li> <li>• Residents</li> <li>• Local businesses</li> <li>• Landowners</li> </ul> <p>Other miscellaneous bodies</p> |

### Duty to Cooperate and partnership working

- 4.4 The Localism Act 2011 places a duty on the Council to cooperate with neighbouring local planning authorities and other prescribed bodies on strategic cross boundary matters. Therefore, the identification of, and planning for, strategic cross boundary matters and positively engaging on these matters to find workable solutions will be an essential element of our plan making process. Capturing the outcomes of this engagement will be critical to achieving a successful Local Plan and Statements of Common Ground (SoCG) will provide a written record of progress made, showing where cooperation is and is not happening.
- 4.5 SoCG’s will be used at examination to demonstrate that the plan is deliverable, is based on effective joint working and that the duty to cooperate has been complied with. The approach for developing SoCG is set out in national policy and as these are developed, we will make these publicly available throughout the plan-making process to provide transparency.



4.6 Our main ‘duty to cooperate’ partners and ‘prescribed bodies’ are provided in the table below:

Table 3: TMBC’s duty to cooperate partners and other prescribed bodies

| Local Authority Duty to Cooperate partners   | Other prescribed bodies  |
|--|--|
| <ul style="list-style-type: none"> <li>• Kent County Council and adjacent County Councils including Surrey and East Sussex</li> <li>• Gravesham Borough Council</li> <li>• Maidstone Borough Council</li> <li>• Medway Council</li> <li>• Tunbridge Wells Borough Council</li> <li>• Sevenoaks District Council</li> </ul> | <ul style="list-style-type: none"> <li>• Environment Agency</li> <li>• Historic England</li> <li>• Natural England</li> <li>• Civil Aviation Authority</li> <li>• Homes and Communities Agency</li> <li>• Clinical Commissioning Groups</li> <li>• National Health Service</li> <li>• Network Rail</li> <li>• National Highways</li> <li>• Highways Authority and Transport for London</li> <li>• Marine Management Organisation</li> <li>Local Enterprise Partnerships</li> </ul> |

4.7 The NPPF identifies the strategic matters that may need to be addressed and include:

- housing (including affordable housing), employment, retail, leisure and other commercial development;
- infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- community facilities (such as health, education and cultural infrastructure); and
- conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

4.8 The requirements of the duty to cooperate will be met through:

- regular engagement with partners;
- working iteratively and collaboratively on SoCG;
- working with partners on evidence bases, as relevant, including on joint or shared evidence bases or by agreeing methodologies in which evidence should be collated;
- gaining advice as necessary from the Planning Advisory Service (PAS) and / or critical friend advice;
- working closely with infrastructure partners to test and model development scenarios and agreeing Memorandums of Understanding (MoU) or SoCG, as relevant, to aid local plan production and to demonstrate the deliverability of the local plan at examination.

4.9 It will also be important to engage with other partners and organisations, ensuring that we engage at the right time. Other key partnerships will include but will not be limited to the following:

- Kent Downs National Landscape Joint Advisory Committee
- High Weald National Landscape Officer Steering Group

- Medway Flood Partnership
- Medway Estuary and Swale Strategy Group (MEASS)
- Transport for the Southeast Partnership Board and Senior Officer Group
- Enhanced Bus Partnership Schemes Monitoring Group for West Kent
- Kent Planning Policy Forum
- Kent and Medway Economic Partnership
- Kent Nature Recovery Partnership

## Corporate priorities and issues

- 4.10 As mentioned in section 3.1, it is really important for the Local Plan to be aligned with other Council strategies, both existing and emerging, given the Local Plan timeline. Although we are one Council, there are many different departments who deliver a range of services to our communities including housing, waste, building control, development management, leisure services, environmental health and climate change.
- 4.11 Officers who work in other Council departments have a wealth of knowledge across many specialisms that are relevant to many policy areas of the Local Plan and we consider that cross department liaison will be key to ensuring that corporate priorities and challenges experienced in the borough are addressed, where it is possible and relevant to do so.
- 4.12 To facilitate this, the Planning Policy Team will liaise with officers from other teams including through working groups where information and knowledge can be shared and issues, challenges, opportunities and policy options to address these can be discussed to help inform the Council's policy approach.

## Engaging with TMBC Councillors

- 4.13 The Borough of Tonbridge and Malling is currently served by 44 Councillors, representing 19 Parish wards. Local Councillors are elected by the community to decide how the Council should carry out its various activities including plan-making. Councillors have regular contact with the communities that they serve which provides an opportunity for Councillors to understand planning issues on the ground, whilst also recognising these issues within the wider planning context of the borough and feed into the process.
- 4.14 Engagement with Councillors will take place throughout the local plan making process through a Local Plan Member's Advisory Group (LPMAG). Through the LPMAG we will share information including the evidence base as this becomes available and we will discuss local plan issues and emerging policy. The meetings will provide an opportunity for Councillors to provide informal feedback to assist officers in formulating the emerging Local Plan.
- 4.15 A programme of meetings will be established on a topic-by-topic basis and meetings will be attended by Borough Councillors and senior officers and planning officers as appropriate and as relevant to the LPMAG agenda. To facilitate good attendance the LPMAG will be a virtual meeting. However, from time-to-time it may be appropriate for meetings on certain topic areas to be held in person. Where necessary extraordinary meetings may also be arranged in addition to those identified in the programme of LPMAG meetings.

## Engaging with Town and Parish Councils

- 4.16 As local representatives of Tonbridge and Malling's communities, Parish Councils have an important role to play in developing our local plan. In addition, Parish Councillors have detailed knowledge of

their areas and are aware of any issues facing their communities at a local level and it is important for our Local Plan to ensure that local issues are addressed where this is relevant to plan-making.

- 4.17 Throughout local plan production we will ensure regular dialogue with our Parish Council's through the Parish Partnership Panel meetings. The Local Plan will be a regular agenda item, providing a platform where updates on local plan progress can be provided and local issues on a range of local plan topics can be discussed on a regular basis. The Parish Partnership Panel meetings are held quarterly. However, it will be important for the Parish Panel to meet at key stages in the plan-making process. Where the quarterly meetings don't neatly align with key stages in the plan-making process, extraordinary meetings will be arranged, as relevant, to ensure that the right dialogue can take place at the right time.
- 4.18 During the next Regulation 18 consultation we will hold a set of meetings for Parish Council's to attend. In considering that there are 34 Parish Council wards and two Town wards, we will split the borough up into geographical areas to allow smaller group discussions. Each meeting will provide an opportunity for Parish Council's to ask questions about the consultation and / or the content of the draft local plan or its evidence base to assist in responding to the consultation. Up to Two Parish Councillors will be able to attend the relevant meeting from each Parish Council. These meetings will most likely be virtual to facilitate good attendance.
- 4.19 In addition to the above, we will offer to attend Parish meetings during the consultation period for those Parishes who will receive the largest quantum of strategic development. We will liaise with relevant Parish Council's in relation to the timing of Parish Council meetings and to arrange this.

### **Engaging with Tonbridge Community Forum**

- 4.20 Tonbridge Community Forum consists of a number of environmental, community and sports related organisations. It enables Tonbridge and Malling Borough Council and Tonbridge based organisations to share information, consult and communicate on enhancing the wellbeing of the town through the identification of problems and joint working towards solutions. We will engage with Tonbridge Community Forum throughout the plan-making process in a similar way as that set out for Parish Councils by including the Local Plan as a regular agenda item for the meetings, which occur four times per year and by setting up an extraordinary meeting during the Regulation 18 consultation, should a meeting date not coincide with the start of the consultation period.

### **Neighbourhood Plan Groups**

- 4.21 One of the key matters for a neighbourhood plan is for it to be 'in general conformity' with the strategic policies of a higher-level local plan. It is important therefore for a neighbourhood planning group to be aware of emerging strategic policies in a local plan and how this may affect a neighbourhood plan policy approach.
- 4.22 Where neighbourhood plans are being progressed officers will meet and provide advice to neighbourhood planning groups at relevant stages in both the neighbourhood plan and local plan process. We will also notify and invite each neighbourhood planning group to make comments at each local plan consultation stage, so that the views of our neighbourhood planning groups are considered throughout the evolution of the local plan.

### **Engagement with our communities**

- 4.23 The planning system is an important part of our lives and affects us all in some way; from the homes and streets we live in, the places that we work, the location and types of shops that we shop in, as

well as the outdoor spaces and natural environment that we spend time relaxing in. Engagement with those who live, work or visit the borough is therefore an essential and critical part of the plan-making process and an element that we are committed to so that our communities have an opportunity to be involved and have a say in how to shape the place in which we live.

- 4.24 There are a variety of ways in which our communities and community groups can be involved in the local plan process, and these are set out in more detail in the methods section below and within the Council's SCI.
- 4.25 The local plan website will be the main vehicle for community engagement where we will provide updates to the local plan process and publish our evidence base and other information when this becomes available. Our website will also host our Local Plan consultations and responses to these.
- 4.26 TMBC is committed to engaging with hard-to-reach groups and we are committed to making our local plan consultations accessible to everybody, including (but not limited to) those with a language barrier, those with disabilities, ethnic groups, those on low incomes, those with limited or no access to the internet, Gypsy and Travellers and Travelling Showpeople and both the younger and older generations.
- 4.27 As part of our consultation process, we will ensure that we review and keep-up to date the information we hold to ensure that specific community and seldom heard / hard to reach groups are identified and included within our consultation database (with their agreement) and provided a range of options in which to be contacted and accessible options in which to respond. This will ensure that everyone has the opportunity to take part in our Local Plan consultation and so that everyone's voices have an opportunity to be heard.
- 4.28 With regards to hard-to-reach groups, in addition to the standard contact we make to inform people that consultations are taking place, we will reach out further to ensure that hard to reach groups are aware of the consultation alongside our consultation events and our Local Plan virtual exhibition. This could involve attending organised meetings and offering advice and assistance in relation to taking part in the consultation.

## 5. Consultation methods

- 5.1 As set out in our SCI, there are many methods that we can use to encourage communities and stakeholders to be involved in the preparation of our Local Plan. To achieve wide ranging community and stakeholder participation we will devise a range of methods that are both digitally engaging and innovative alongside more traditional methods. The objective is to provide easy ways for our communities and stakeholders to take part and respond to our consultations. Publicising our consultations is the first step in this process.

### Publicising our consultations

- 5.2 We will publicise our consultations using the following approaches:
- **Consultation database** – The Council holds a database of individuals and organisations who would like to be consulted on local plan matters in Tonbridge and Malling Borough. The database includes those who we have a legal duty to consult but also includes residents, businesses, organisations and hard to reach groups who would like to be involved in the local plan process. We will contact all those on our database at the start of each consultation stage by either email or letter and we will provide details on how to take part in the consultation. Anyone can join the TMBC Local Plan consultation database by emailing [localplan@tmbc.gov.uk](mailto:localplan@tmbc.gov.uk)

- **Social media** – At the start of as well as during, we will publicise the consultation through various social media platforms including facebook, Instagram and X (formally twitter). This will include providing the link to the Council’s consultation platform. Using social media will allow different audiences to be targeted using Built-ID marketing.
  - **TMBC app notification** – The Council has its own app providing information on a range of Council services and will publicise the consultation via the app both at the beginning as well as during the consultation.
  - **Website** – We will promote all Local Plan consultations providing the link to the Council's consultation platform on our website including on both the home page as well as publicising via the Council’s news release webpages.
  - **Posters** – We will provide and distribute posters publicising the Local Plan consultations including QR codes, so that people can easily access the consultation. These will be distributed to Parish Council’s and will be placed on Council owned notice boards.
- 5.3 We will make hard copies of all consultation documents available for those who are unable to access the consultation using the internet. At a minimum, hard copies will be available to view at Kingshill Council offices and Tonbridge Castle. All consultation documents and our evidence base (as completed) will be available electronically. Hard copies of consultation response forms will be made available to consultees upon request to ensure that those without internet access can still take part in the consultation. It will be expected for those with internet access to submit responses / representations via the Council’s consultation system (see below). Support will be provided to residents to complete the consultation forms where this is required.

## 6. Engagement methods at each stage of consultation

### Draft Local Plan consultation (Regulation 18 consultation)

- 6.1 Our next stage in consultation will set out our policies that will shape development in the borough between now and 2042 and will identify locations for future development. We consider it important to engage with as wide a range and as many individuals and organisations who have an interest in the future of the borough as possible to help shape the Plan and to ensure that future development is delivered in a way that meets our communities and stakeholder’s expectations. We will use the following methods for engagement:
- **Consultation / drop in sessions** – We will hold up to three consultation events across the borough. The event(s) will be held in an accessible location, so that the opportunity to attend is maximised. This will provide an opportunity for the community / stakeholders to view information relating to the Local Plan, to find out how to respond to the consultation and to ask any questions to help inform consultation responses.
  - **Virtual exhibition** – We will provide a virtual exhibition, where we can present information about the Local Plan as well as provide all Local Plan information. The virtual exhibition will also host videos and provide a link direct to the consultation. The virtual exhibition will be made available throughout the consultation and can be accessed by the community and stakeholders at any time and from anywhere.
  - **Digital consultation platform** – The Council has obtained a specialist digital platform called ‘Commonplace’ to engage with communities and stakeholders on the Local Plan. The digital platform will provide a ‘one-stop-shop’ for the consultation, providing information that is easy to navigate, making it easy for people to engage with the consultation as well as providing solutions so that all consultation responses can be analysed effectively, using both quantitative and qualitative techniques

as well as understanding the nature of responses spatially. The software also provides an opportunity to keep communities and stakeholders on the Local Plan consultation database up to date on local plan progress and will allow the Council to promote and build awareness of the consultation to increase participation.

- **Digital maps** – The Council has obtained specialist software to help understand the suitability and deliverability of sites for future development. This software will be used to present the Council’s Land Availability Assessment evidence base and will provide an opportunity for landowners, agents and developers to engage in this process, including updating information that the Council may hold and also submitting new sites for consideration. It will be possible to see the outputs of the LAA digitally using this software and this will be made available during consultations.
- **Video log (Vlog)** – We will provide an ‘explainer video’ to introduce the Plan and to let people know what the consultation is about. We can also provide a video guide to help explain how to use the consultation system to help ensure that a high level of responses is received via this medium. These videos will be made available throughout the consultation via various means including our website, the consultation platform, the virtual exhibition and via social media.

## Pre-Submission (Regulation 19) Local Plan

6.2 At this stage the Council is unable to make any changes to the Local Plan before it is submitted to an independent Planning Inspector. The Council will therefore direct its resources towards ensuring that the consultation is publicised as far as possible. This will include the approaches set out in section 5. above, as well as using its commonplace software.

# 7 Local Plan Consultations

## Commenting on our local plan consultation

- 7.1 At Responding to Local Plan consultations via our consultation platform ‘commonplace’ will be encouraged and promoted as the preferred means of receiving responses to our consultation. Using commonplace to respond will be the fastest and the most accurate method in which to record your response as it will allow for responses to be processed quickly and efficiently. It will also record responses under specific questions ensuring that responses are attached to the correct section of the consultation document. Using commonplace to respond will also reduce the administrative burden on the Council and will reduce the likelihood of any errors in recording responses.
- 7.2 Notwithstanding the above, we recognise that not everyone is able to access or use the internet to take part in our consultations. Therefore, paper copies of response forms will be made available on request. Guidance notes will be provided to aid the completion of both the online consultation system and also paper copies.

## Receiving and considering consultation comments, feedback and decision making

- 7.3 For the next Regulation 18 consultation all comments received will be available to view via the consultation system and all comments will be considered and analysed. We will provide a summary of all comments, responses and changes that we propose to the Local Plan (where relevant) in an informal report which will be presented to the Council’s LPMAG, the Housing and Planning Scrutiny Select Committee (HPSSC) and Full Council and will therefore be agreed by Council Members before moving onto the next stage (Regulation 19). Council decisions on the local plan will be made publicly

available on the Council's website.

7.4 The consultation on the Council's Regulation 19 Local Plan will set out the Council's final recommendations and preferred Local Plan including site allocations to deliver development. This consultation stage is more technical and focused. At this stage we ask consultees whether the Local Plan passes the four tests of soundness. This includes whether the Plan is:

- **Positively prepared** - provides a strategy which, as a minimum, seeks to meet our objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** - An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** - Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** - Enabling the delivery of sustainable development in accordance with the policies in this framework and other statements of national planning policy, where relevant.

7.5 At this stage, all representations will be made publicly available via the consultation system as well as to the appointed Planning Inspector (when the local plan is submitted) who will examine the Local Plan.

## 8 Local Plan Engagement and Consultation Strategy

8.1 The table below provides a summary of the Local Plan Engagement and Consultation Strategy and sets out the outcomes that will result from each Local Plan consultation stage.

**Table 4: Summary of Local Plan Engagement and Consultation Strategy**

| Stage of Plan preparation  | Methods of consultation and engagement  | Outcomes  |
|--|---|---|
| Evidence gathering and preparation of the Regulation 18 local plan - ongoing | <ul style="list-style-type: none"> <li>• Discuss evidence base requirements with key Council officers and other stakeholders (as relevant) including Duty to Cooperate partners to understand opportunities for joint commissions / shared methodologies.</li> <li>• Engage with consultants to update evidence bases as required.</li> <li>• Hold regular meetings to discuss emerging evidence and preferred policy options as per an agreed programme with:</li> </ul> | <ul style="list-style-type: none"> <li>• Understanding and confirmation from stakeholders about the key issues facing the borough and also opportunities to address these.</li> <li>• An up-to-date evidence base that addresses both national, strategic and local priorities.</li> <li>• Checking and ensuring that the Local Plan vision and objectives and emerging policies address both corporate and local priorities, issues and opportunities and agreeing these.</li> </ul> |



|   |  |   |
|---|--|---|
|   | <ul style="list-style-type: none"> <li>○ Council Management Team;</li> <li>○ Officer Working Group</li> <li>○ LPMAG</li> <li>● Meet regularly with: <ul style="list-style-type: none"> <li>○ Duty to Cooperate partners</li> <li>○ Infrastructure providers</li> <li>○ Parish Panel</li> <li>○ Tonbridge Community Forum</li> <li>○ Other stakeholders (as relevant)</li> </ul> </li> <li>● Provide opportunities for further sites to be submitted as part of the Land Availability Assessment.</li> <li>● Meet with relevant landowners, agents and developers.</li> <li>● Publish evidence base documents on the Council's website as they become available.</li> <li>● Provide Local Plan updates on our website.</li> </ul> <p>Ensure that contact information is up to date for hard to reach and other relevant community groups and include contacts within the consultation database.</p> | <ul style="list-style-type: none"> <li>● Ensure that the Council complies with its duty to cooperate on cross boundary strategic matters with shared evidence bases and methodologies where relevant.</li> <li>● Ensuring that the emerging Local Plan is based on an up-to-date understanding of land availability and deliverability to meet development requirements.</li> <li>● Stakeholder understanding of emerging evidence base.</li> <li>● Agreed outcomes and next steps from engagement sessions.</li> <li>● Agreement on preferred policy options to take forward in the Regulation 18 local plan consultation.</li> <li>● Access to information including local plan updates and evidence once available.</li> </ul> <p>Ensuring that the consultation database includes all community and hard-to-reach groups.</p> |
| <p>Consultation on the draft Local Plan (Regulation 18)</p> | <ul style="list-style-type: none"> <li>● Minimum six-week consultation period.</li> <li>● Send out emails / letters to consultees informing them of the consultation.</li> <li>● Publicise and make the consultation available through the various social media platforms and TMBC app notifications.</li> <li>● Consultation documents to be made available on the Council's website / consultation platform and hard copies made available for inspection at the agreed locations.</li> <li>● Public consultation events held in accessible locations.</li> </ul>  | <ul style="list-style-type: none"> <li>● Community and stakeholder understanding of the evidence base collated to date.</li> <li>● Increase in knowledge and understanding for communities and stakeholders of the likely direction of the Local Plan, its spatial strategy and policies.</li> <li>● Provide information on next steps in plan preparation, and further opportunities to engage with the process.</li> <li>● Receipt of consultation responses to consider and analyse in the next stage of plan-making.</li> </ul>   |



|  |   |   |
|--|---|---|
|  | <ul style="list-style-type: none"> <li>• Meetings with Parish / Town Councils.</li> <li>• Meetings with stakeholders and community groups (as relevant).</li> <li>• Public consultation via a virtual exhibition.</li> <li>• Provision of posters to promote the consultation.</li> </ul> <p>Provide opportunities for further sites to be submitted as part of the Land Availability Assessment.</p>   |   |
| Preparation of the Regulation 19 Local Plan                              | <ul style="list-style-type: none"> <li>• Report on outputs of the Regulation 18 consultation giving full consideration to all responses received.</li> <li>• Engage in further discussions to cover consultation feedback and proposed actions as per an agreed programme with: <ul style="list-style-type: none"> <li>○ Council Management Team;</li> <li>○ Officer Working Group</li> <li>○ LPMAG</li> </ul> </li> <li>• Engage in further discussions with: <ul style="list-style-type: none"> <li>○ Duty to Cooperate partners</li> <li>○ Infrastructure providers</li> <li>○ Parish Panel</li> <li>○ Tonbridge Community Forum</li> <li>○ Other stakeholders (as relevant)</li> </ul> </li> <li>• Engage further with relevant landowners, agents and developers.</li> <li>• Provide local plan updates on our website.</li> </ul> <p>Engage with consultants to update evidence base as required.</p> | <ul style="list-style-type: none"> <li>• Consider and feedback responses from Regulation 18 consultation.</li> <li>• Continue duty to cooperate conversations and prepare Statement of Common Grounds (SoCGs) with duty to cooperate partners and infrastructure providers.</li> <li>• Stakeholder understanding of further emerging evidence base.</li> <li>• Further consider land availability and deliverability to meet development requirements.</li> <li>• Agreement on preferred policies and site allocations.</li> </ul> <p>Access to information including local plan updates and evidence once available.</p> |
| Consultation on the Draft Proposed Submission Local Plan - Regulation 19 | <ul style="list-style-type: none"> <li>• Minimum six-week consultation period.</li> <li>• Send out emails / letters to consultees informing them of the consultation.</li> <li>• Publicise and make the consultation available through the various social</li> </ul>  | Receipt of representations to consider and provide to an Independent local plan examiner.   |

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|--|--|--|
|  | <p>media platforms and TMBC app notifications.</p> <ul style="list-style-type: none"><li>• Consultation documents to be made available on the Council's website / consultation platform and hard copies made available for inspection at the agreed locations.</li></ul> |  |
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