



Nicolas Heslop

**Borough Councillor for Cage
Green, Tonbridge**

Leader of The Council

**TONBRIDGE & MALLING
BOROUGH COUNCIL**

The Rt Hon Robert Jenrick MP
Secretary of State for Housing, Communities and Local Government

By Email: psrobertjenrick@communities.gov.uk and
TechnicalPlanningConsultation@communities.gov.uk

30 September 2020

Dear Robert,

Following the organisation of an extraordinary meeting of our Planning & Transportation Advisory Board, which we decided to hold given the strength of feeling amongst our Members and community stakeholders, we have submitted a response to the consultation on Changes to the Current Planning System. However, the nature of the consultation questions is such that we felt it necessary to send this letter to you in addition, as there was strong feeling amongst our Members that we were not able to fully explain our concerns in that format.

TMBC has delivered extremely well against government housing targets and previous targets set by former regional planning bodies and county Structure Plans and it now seems as though our strategic approach to utilising sustainable brownfield sites and considering the spread of our developments is resulting in us being penalised with unachievable targets.

The Council's latest Housing Land Supply position as of 31st March 2019 illustrates this. The Local Development Framework Core Strategy was adopted in 2007 and sought to deliver 6,375 dwellings over a 15 year plan period or an average of 425 per year. In the first five years 2006/7 to 2010/11 3,210 homes were built, an average of 642 a year or 151% of the target. In the following five years 2011/12 to 2015/16 2,845 were built or an average of 569 per year (+134%). The reduction explained in part by the effects of the global economic recession that began in 2008. In the current five year period 2016/17 to 2020/21, we only have figures for the first three years 2016/17 to 2018/19, during which 2,451 homes were completed or an average of 817 per year. This illustrates that housing delivery has been consistently strong in Tonbridge and Malling, despite being within an area of constraint.

https://www.tmbc.gov.uk/data/assets/pdf_file/0003/926760/Housing_Land_Supply_Position_2018-19_Final.pdf (see Table 1)

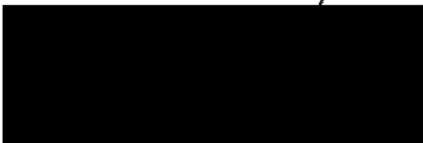
The sheer scale of the increase required for TMBC, which would see our annual figure rise from 696 (as part of the transitional arrangements under which we submitted our Local Plan, which has its hearing stages in the next few months) to around 1440, is simply unsustainable. When coupled with a potential reduction in contributions due to the small site exemption threshold being raised, our already challenged local transport, health, education and community infrastructure will not be able to sustainably meet the needs of existing and new residents.

We also recognise concerns from other local authorities who have seen their numbers reduced who would like to see more growth in their areas because there is economic gain to be had that their area is in need of. There might be potential for some regional discussions about housing numbers but there is no discussion of this in the consultation document.

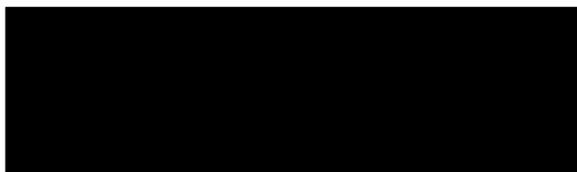
This potential increase in housing delivery requirements then has a significant impact on how achievable the zonal planning approach mentioned in the White Paper, which we will be responding to separately, is going to be. An initial assessment suggests that with the constraints we have including 71% Green Belt and 2 AONBs and their settings means that our current annual OAN of 696 will only be achieved through very careful strategic planning, but a target of double that will not be possible utilising a zonal system that restricts development significantly in some areas whilst still having a meaningful approach to strategic planning. We are by no means the only local planning authority to be in this position. We would favour a full review of measures to protect the best of our countryside and biodiversity whilst allowing sustainable development to occur.

We also have concerns about the First Homes proposals, which will not provide more of the most needed types of affordable housing. The nature of areas such as Tonbridge and Malling, within easy commuting distance of London, will make the very short timescale in which the properties can be restricted for local buyers at a larger discount a sales disincentive for developers, who will potentially limit their marketing and wait for the opportunity to sell to buyers moving out of London who can meet the costs at the national standard 30% discount only.

Yours sincerely,



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Borough Councillor, Cage Green Ward
Leader & Cabinet Member for Economic Regeneration
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David Lettington
Borough Councillor, Snodland West and Holborough Lakes Ward
Cabinet Member for Strategic Planning and Infrastructure
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