

Housing and Planning Scrutiny Select Committee

03 December 2024

Part 1 - Public

Recommendation to Cabinet – Non-Key Decision



Cabinet Member	Cllr Mike Taylor - Cabinet Member for Planning
Responsible Officer	Eleanor Hoyle – Director of Planning, Housing and Environment
Report Author	Kelly Sharp – Planning Policy Manager

Local Plan Engagement Strategy and estimated Local Plan budget

1 Summary and Purpose of Report

- 1.1 Following the Government's consultation (July – September 2024) on updates to the National Planning Policy Framework (NPPF) and Planning Reform, the Council has been progressing a number of workstreams following the consultation and the September 2024 HPSCC, where a number of agenda items were identified for future HPSCC meetings.
- 1.2 A revised NPPF has not been published to date, therefore the focus of this report relates to the Local Plan Engagement and Consultation Strategy (item VII from the September HPSCC proposed agenda), with a brief update on our understanding of the emerging Local Plan budget requirements. It is not possible to report on the other noted future agenda items until a revised NPPF is published.
- 1.3 The Local Plan Engagement and Consultation Strategy builds on the current Statement of Community Involvement (SCI) that was adopted in September 2022. The Engagement Strategy 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.

2 Corporate Strategy Priority Area

- 2.1 The report will contribute to the following corporate priorities:
 - Efficient services for all our residents, maintaining an effective council.
 - Sustaining a borough which cares for the environment.

- Improving housing options for local people whilst protecting our outdoor areas of importance.
- Investing in our local economy.

2.2 The Local Plan once progressed to adoption will be the key planning document for TMBC, setting out the Council's strategy for land use. Engagement is an essential and critical part of the plan-making process providing an opportunity for members, communities, partners and stakeholders to be involved, having a say in how to shape the places in which we live. It is also important for consultation and engagement to be effective.

3 Recommendations

HPSSC is asked to recommend to Cabinet the:

- 3.1 APPROVAL of the Local Plan Engagement and Consultation Strategy.
- 3.2 Endorse the Engagement Programme set out at Annex 2.
- 3.3 NOTE the updates provided in relation to the Local Plan including the likely increase in the annual allocation to the Local Plan reserve that will be required to progress a Local Plan under a revised NPPF.

4 Introduction and Background

- 4.1 At the 24th of September 2024 meeting of this Committee, Members noted the draft response to the Government's NPPF and planning reform consultation that took place from 30th July – 24th September 2024. Members also noted a number of annexes to the report including a summary of the implications of the draft NPPF provided as part of the Government's consultation on plan-making and implications of this on the local plan work programme and local plan evidence gathering.
- 4.2 A commitment was made at the September HPSSC to bring a number of agenda items to future HSPSSC, if it was possible to do so, considering the date of publication of a revised NPPF and time to consider the revisions and the implications of these. To date a revised NPPF has not been published by the Government and therefore it is only possible to bring one agenda item to this committee, that being a Local Plan Engagement and Consultation Strategy. However, we have also provided a brief interim update in relation to the Local Plan work we are progressing ahead of a revised NPPF.

5 Engagement and Consultation Strategy

- 5.1 Engagement is an essential and critical part of the plan-making process providing an opportunity for members, communities, partners and stakeholders to be involved, having a say in how to shape the places in which we live. It is also

important for consultation and engagement to be effective. The extended time provided by the transitional arrangements for Local Plan submission provides an opportunity to consider the most effective ways for local plan engagement and consultation.

- 5.2 The Council has a duty under the Town and Country Planning (Local Planning)(England) Regulations 2012 (as amended) to consult with a number of different groups, as set out in the Regulations, at key stages of the local plan preparation process. In addition, under the Localism Act 2011 the Council has a legal duty to engage constructively, actively and on an on-going basis with duty to cooperate bodies to maximise the effectiveness of local plan preparation relating to strategic cross-boundary matters. The Engagement Strategy provides further detail on this.
- 5.3 The Council's adopted Statement of Community Involvement (SCI) (2022) sets out the Council's approach to engaging the community in the planning process. The Local Plan Engagement and Consultation Strategy has been prepared to expand on the Council's SCI and to set out the approach that we will take to consulting and engaging on the next stages of our emerging Local Plan. The document sets out the engagement process that we will take both internally and externally, with Council Members, officers in other relevant Council services, external partners and stakeholders, Parish Council's and communities. Setting this out ensures that the process that we take is transparent with the aim of increasing awareness and levels of participation in the Local Plan process.
- 5.4 The Engagement and Consultation Strategy is provided at **Annex 1**. It sets out the consultation details against each of the key local plan stages, sets out who will be engaged at the various stages and also the engagement and consultation methods that will be used.
- 5.5 Work has also been undertaken to devise a Council Member, Council officer and Parish Council engagement programme. This is not presented in detail within the engagement strategy given that the document is a high-level and public facing document. However, further detail of our Local Plan engagement programme is presented in Annex 2. Please note that this is draft, timescales or dates for meetings have not been provided as these partly rely on the publication of a revised NPPF. There may also need to be a change in the order of the programme, taking into account timescales for obtaining evidence to support plan-making. Notwithstanding this, **Annex 2** sets out the fundamental aspects of member and officer engagement.

6 Interim Local Plan update

- 6.1 It was reported to the 24th September HPSSC Committee that one of the main implications of a revised NPPF will be the requirement to update or revise the emerging Local Plan position to meet new national policy requirements to ensure a robust Local Plan. This includes the consideration of meeting a higher housing

target as well as a consideration of new national policy and guidance in relation to the Green Belt, amongst other changes.

- 6.2 Based on our current understanding of likely revisions to the NPPF, work has been undertaken to understand Local Plan requirements more fully, allowing a programme of work to be understood and costs to be identified over the plan production period. Although work has been undertaken, we are unable to confirm the exact Local Plan timetable or estimated costs until the Government provide a response to the NPPF consultation and publish a new NPPF, providing us with greater certainty. The Local Plan programme of work and the estimated budget requirements will therefore be presented to HPSSC early next year.
- 6.3 However, ahead of this, we would like Members to note that a revised NPPF, should this include the changes made as per those in the consultation draft, will require an increase to the annual allocation of funds into the Local Plan reserve. Further detail on the estimated Local Plan budget will be provided at a future HPSSC meeting once a revised NPPF is published, which will provide added certainty in relation to the Local Plan timetable and costs required.
- 6.4 In considering costs, it is likely that the evidence base requirements will be the largest cost. The Council has progressed certain evidence bases to support the 2022 consultation stage and also the consultation stage that was due to take place this year before pausing the Local Plan at the end of July 2024. Progressing a Local Plan under a revised NPPF will incur costs associated with updating the emerging evidence to support the next Regulation 18 consultation as well as progressing further evidence to support the new Regulation 18 and subsequent Regulation 19 consultation stage. Evidence gathering has been and will continue to be a key and essential part of the Local Plan process and it will be critical for any updated or revised evidence to feed into the emerging Local Plan to ensure that it is found sound at examination.
- 6.5 In light of a revised NPPF, particularly around green belt policy and increased development requirements, evidence that was not previously budgeted for will be required. This includes landscape evidence such as a borough-wide landscape character study, landscape sensitivity assessments for the borough and also for potential sites and a landscape sensitivity assessment for renewable energy. This will be required given that national policy for Green Belt will be weakened including where we cannot demonstrate a 5-year housing land supply. This work will assist in Local Plan policy formulation and in identifying suitable sites to deliver sustainable development by ensuring that the most valued landscapes are protected. It will also assist in planning application considerations and decisions. To meet Local Plan timescales, it is essential to progress this work now, using the current Local Plan budget.
- 6.6 Other evidence base work that has been progressed to-date will either require updates or will need to be re-run / re-considered against the requirements of a revised NPPF and the emerging Local Plan, for example, Green belt evidence,

transport modelling, Sustainability Appraisal and Habitats Regulations Assessment. It will also be necessary to update other evidence including that relating to housing, the economy, infrastructure and the environment to account for national policy changes and / or an increase in housing / employment requirements. The level of updates required and their associated costs will vary for different evidence bases.

- 6.7 It will be necessary to engage certain consultants as soon as possible, particularly in relation to work associated with the Green Belt and also Sustainability Appraisal. Procurement will need to be progressed for this work utilising the existing Local Plan budget.
- 6.8 It is worth noting that much of the evidence base work already undertaken would require updating without a revised NPPF due to the iterative process of plan-making, however, a revised NPPF will require changes to methodologies, consideration of new national policy or a consideration of national policy in a different way. This means that certain evidence bases that have already been progressed will not meet a revised NPPF or will require additional work to ensure that they are policy compliant.
- 6.9 We would also like Members to note that submitting a Local Plan no later than December 2026 which is the current timeframe outlined in the NPPF consultation, will be tight. We will therefore be taking a report to General Purposes Committee in January 2025 to request a moderate boost to the planning policy staff resource on a permanent basis to help deliver the new Local Plan within the timescales provided by the Government. Please note that staffing is a separate Council budget, therefore permanent staff costs will not be included in Local Plan budget considerations.

7 Financial and Value for Money Considerations

- 7.1 Whilst we are awaiting the revised NPPF to be published, it is worth noting now that there will be direct financial and value for money considerations associated with Local Plan preparation beyond that which was originally identified before the 30th July 2024 NPPF consultation and the pausing of the Local Plan.
- 7.2 The Government are clear that LPAs at the early stages in plan-making will be required to take plans forward in accordance with a revised NPPF once this is published. Members will be aware that Local Plan expenditure is funded from the Council's earmarked reserve. Given the fundamental changes proposed and the implications of these, this report notes that an increase in the annual allocation to the Local Plan reserve will be required to deliver a Local Plan that meets policy changes that will be included in a revised NPPF. The estimation of costs will be confirmed once a revised NPPF is published. In the meantime, table 1 below details Local Plan actual spend between 1st April 2020 – 31st March 2024. This is provided to identify to members the cost of preparing a Local Plan so far and to also identify the available budget for 2024/25.

Table 1: Local Plan (actual) budget (1st April 2020 – 31st March 2024)

Local Plan budget (1st April 2020 – 31st March 2024)	Actual Spend			
	2020/21 £	2021/22 £	2022/23 £	2023/24 £
Opening balance	34,908	220,725	938,300	834,798
Local Plan top up contribution	377,193	830,000	80,000	80,000
External spend - supplies and services	(191,376)	(112,425)	(175,465)	(295,644)
Additional Staffing	0.00	0.00	(8,037)	(45,000)
Closing balance	220,725	938,300	834,798	574,154

7.3 Following a contribution to the reserve of £425,000, the available balance for the 1st April 2024/25 was £999,154. Expenditure during the course of the financial year results in a closing balance as of the end of October 2024 of £827,034.

Table 2: Local Plan (actual) budget (1st April 2024 – 31st October 2024)

Local Plan budget (1st April 2024 – 31st October 2024)	2024/25 £
Opening balance	574,154
Local Plan top up contribution	425,000
External spend - supplies and services	(172,120)
Closing balance	827,034

7.4 As set out above, to meet the December 2026 Local Plan submission deadline it is critical to procure certain workstreams to get consultants in place for when a revised NPPF is published. The existing budget will be utilised to reduce risks later on down the line to meeting the Local Plan timetable.

7.5 A report has recently been taken to Finance, Regeneration and Property Scrutiny Select Committee setting out the Medium-Term Financial Strategy (MTFS). This report notes the current annual contribution of £80k to the Local Plan budget and provides an interim increase to £160k, taking into account that the current annual contribution of £80k is likely to be insufficient to meet the requirements of a new NPPF and submission timescales. Given the work that will be required to produce a national policy compliant Local Plan, it is likely that additional funds beyond the £160k currently identified in the MTFS will be required. Further updates to the figure presented in the MTFS will be considered as soon as it is possible to do so in line with the publication of a revised NPPF.

- 7.6 As relevant to the Engagement Strategy, there will also be financial and value for money considerations and these will be included in the budget considerations presented in this report.

8 Risk Assessment

- 8.1 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. The Government are clear within the consultation that it is unacceptable for LPAs to not make a Local Plan and are considering updating the intervention criteria given the criticality of local plans to the Government's housing and economic development agenda. The Government are also clear that plans should continue to be progressed under the existing planning system without delay and have provided transitional arrangements to achieve this where all plans will need to be submitted no later than December 2026.
- 8.2 A number of Corporate Risks are relevant including staffing challenges in planning services and a corporate risk directly associated with the Local Plan. An updated Risk Assessment was provided as an Annexe to the 24th of September 2024 HPSCC report. This is again relevant here and has been provided in Annex 3. An additional risk has been added which relates to the delivery of the Local Plan should Members not agree to the Local Plan budget once this is presented in the new year.

9 Legal Implications

- 9.1 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.

10 Consultation and Communications

- 10.1 Subject to approval by Cabinet, the Engagement and Consultation Strategy can be published on the Council's Local Plan webpages and the approaches set out progressed at the various Local Plan stages.

11 Implementation

- 11.1 The Local Plan is on-going work. The LDS will be brought before HSPCC early next year setting out the timelines of the Local Plan and other relevant documents. Having an agreed budget for 2025-2028 which will be presented to Members early next year will be key to progressing and achieving an adopted Local Plan.

12 Cross Cutting Issues

12.1 Climate Change and Biodiversity

12.1.1 Adaptation and resilience have been considered.

12.1.2 Climate change advice has not been sought in the preparation of the options and recommendations in this report. Climate change has been considered in devising the engagement strategy through methods of consultation, such as providing information and exhibitions online during consultation to reduce car use. The remainder of the report provides an update to budgetary requirements and therefore has minimal relevance.

12.2 Equalities and Diversity

12.2.1 Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The decisions recommended through this paper directly impact on end users.

12.2.2 The Engagement and Consultation Strategy provides further detail to that provided in the Council's adopted Statement of Community Involvement and both documents ensure that engagement and consultation at the various Local Plan stages are accessible to all.

12.2.3 The impact of this report has been considered and does not vary between groups of people.

12.3 Other If Relevant

- Business Continuity / Resilience
- Data Protection

12.3.1 The above selected options are relevant to this report for the following reasons:

Business Continuity / Resilience

12.3.2 Once progressed, identifying an estimated budget will assist with the Council's business continuity / resilience. Whilst we are awaiting the publication of a revised NPPF, noting that an increase in the annual allocation to the Local Plan reserve is useful to enable the Council to plan for the additional budget required including risk assessments.

Data protection

12.3.3 The engagement strategy sets out how we will consult with communities and stakeholders including the use of software platforms. Data protection is a key consideration within the work we do. The Council holds information within databases to enable us to consult on the Local Plan as well as gather information for the Council's Local Plan evidence, such as the Land Availability Assessment. and data protection consultation process. Databases are kept up to date and used to keep registered individuals, organisations and groups informed on the production of any planning policy documents. In order to accord with the requirements of the General Data Protection Regulations (GDPR) 2018, those wishing to be contacted in relation to community engagement and updates to the Local Plan, must register with TMBC. In compliance with GDPR, contact details cannot be shared.

Background Papers	None
Annexes	Annex 1 – Local Plan Engagement and Consultation Strategy Annex 2 - Engagement Programme Annex 3 – Local Plan Risk Register

This page is intentionally left blank



Local Plan

Engagement and Consultation Strategy

November 2024

Contents

Section	Page
1. Introduction	1
2. Local Plan Preparation Stages	2
3. Local Plan production	4
4. Engagement and Consultation	5
5. Consultation methods	10
6. Engagement methods at each stage of consultation	11
7. Local Plan consultations	12
8. Local Plan Engagement and Consultation Strategy	13

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 22nd September and 3rd 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. 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 6th December 2022¹ and also 18th July 2023² 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.

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

² Housing and Planning Scrutiny Select Committee – 18th 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"> • Adjoining Local Planning Authorities, County Councils, Parish and Town Councils • The Police and Crime Commissioners • The Coal Authority • The Environment Agency • Historic England • Marine Management Organisations • Natural England • Network Rail • Highways England • Relevant telecommunications companies • Relevant Clinical Commissioning Groups • NHS Commissioning Board • Relevant gas and electricity companies • Relevant water and sewerage companies • The Homes and Communities Agency 	<ul style="list-style-type: none"> • Nature conservation / countryside bodies • Environmental groups • Infrastructure and service providers • Interest and amenity groups • Resident’s associations • Property, trade and business associations • Neighbourhood Plan Steering Groups • Learning agencies • Recreation bodies • Local Nature Partnership • Disability groups • Minority groups, for example those relating to race, sex, disability, religion or those with caring responsibilities • Voluntary groups • Residents • Local businesses • Landowners <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"> • Kent County Council and adjacent County Councils including Surrey and East Sussex • Gravesham Borough Council • Maidstone Borough Council • Medway Council • Tunbridge Wells Borough Council • Sevenoaks District Council 	<ul style="list-style-type: none"> • Environment Agency • Historic England • Natural England • Civil Aviation Authority • Homes and Communities Agency • Clinical Commissioning Groups • National Health Service • Network Rail • National Highways • Highways Authority and Transport for London • Marine Management Organisation • Local Enterprise Partnerships

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

- **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"> • 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. • Engage with consultants to update evidence bases as required. • Hold regular meetings to discuss emerging evidence and preferred policy options as per an agreed programme with: 	<ul style="list-style-type: none"> • Understanding and confirmation from stakeholders about the key issues facing the borough and also opportunities to address these. • An up-to-date evidence base that addresses both national, strategic and local priorities. • 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.

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

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

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

TMBC.GOV.UK
Serving our community

Tonbridge and Malling Borough Council
Gibson Building
Gibson Drive
Kings Hill
West Malling
Kent
ME19 4LZ

This page is intentionally left blank

Annex 2: TMBC Member, Officer and Parish Council Engagement Plan

A local plan Engagement and Consultation Strategy has been prepared to provide further detail in relation to how we will engage and consult both internally and externally on the local plan as we progress through the various local plan stages. The Strategy sets out that we will engage internally within the Council, including other Council services and with Council Members, as well as with Parish Councils. The Engagement Strategy is a high-level report building on the Council's adopted Statement of Community Involvement and detail about internal engagement programming is not included within this document. The purpose of this report is to set out the further detail on the programme of engagement for Officers, Members and the Parish Councils.

Member Engagement

The Engagement Strategy sets out that a Local Plan Member's Advisory Group (LPMAG) will be established. The LPMAG will be a confidential informal meeting and all Council Members will be invited to attend. The LPMAG will have no delegated decision-making powers.

The purpose of the LPMAG will be to:

- Discuss local plan issues and opportunities;
- Share local plan evidence base documents prior to publication; and
- Provide informal feedback on draft policies / documentation and help build consensus on local plan direction to assist officers in the production of the local plan.

A programme of meetings is proposed as below. The meetings will provide an opportunity to discuss the local plan on a topic-by-topic basis. Please note that dates will be provided for these meetings in due course. This is partly dependent on when a revised NPPF will be published. Therefore, the below is an early draft proposal at this time and may be subject to change to allow sufficient time to prepare policies based on a revised NPPF and any associated guidance.

LPMAG	Topics
January	Local Plan Vision
	Sustainable Settlements Study
February	Natural and Built Environment
	Climate Change
March	Housing
	Local Economy
April	Infrastructure
	Mop up session for any remaining areas or policies
May (In person)	Site allocations and spatial strategy

Meeting information

- Meetings will generally be held on MS teams to facilitate and maximise attendance. However, in person meetings may be appropriate from time-to-time, particularly for those sessions where the spatial strategy and / or potential sites for development will be discussed. Extraordinary meetings may be required from time-to-time also.
- Meetings will be arranged with adequate notice provided.
- Information will be shared electronically with Members on a confidential basis one week ahead of the meeting. Please note that confidentiality relates to ALL information shared. It is advised for Members to read this information ahead of the meeting to ensure informed discussions.
- Members should consider whether they have any interests to declare and take advice on their action as necessary.
- The LPMAG will be supported by the Planning Policy team and both Senior and planning officers will be in attendance as relevant.
- Meeting minutes will not be taken. This is to facilitate both free and open speech.
- Instead, key actions will be identified, confirmed and agreed throughout the meeting, taken away and considered by officers.
- Feedback on key actions will be provided to political party leaders for information and for further dissemination as relevant. Feedback may include an update to confirm that suggested changes have been made to draft documentation / draft policies, or where updates are not possible, feedback will be provided to explain why.

Parish Council engagement

The Engagement Strategy sets out that engagement with Parish Council's will be through the quarterly Parish Panel meetings. An additional set of meetings are also identified to be held during the next Regulation 18 consultation to 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.

Given that there are 34 Parish Council's and two town wards it is proposed to split the borough up into geographical areas to allow smaller group discussion. The groupings will be considered at a later date.

Regulation 18 consultation Parish Council meeting information

- Meetings will be held on MS teams to facilitate attendance and will be held in the first three weeks of consultation to help facilitate Parish Council consultation response timetabling.
- The meetings will be supported by the Planning Policy team and both Senior and planning officers will be in attendance as relevant.

- Meeting minutes will not be taken.

Officer engagement

The Engagement Strategy notes the importance of cross department liaison to ensure that corporate priorities and challenges experienced in the borough can be addressed where it is relevant to do so in the local plan. The Engagement Strategy states that internal liaison will take place through a Local Plan Officer Working Group(s) (LPOWG).

Purpose of the working group

The purpose of the LPOWG will be to:

- Discuss local plan issues, challenges and opportunities;
- Discuss evidence base requirements / outputs and facilitate cross team working to ensure Council priorities can be considered and addressed through policy, where it is possible and relevant to do so;
- Share experience and provide informal feedback on draft policies / documentation to assist officers in the production of the local plan.

Form of LPOWG

In considering the approach for the LPOWG, we have been mindful of the time that will likely be required by officers to participate and engage in the local plan process. Membership of the LPOWG will require officers to read documentation provided, attend meetings and provide meaningful feedback. The same programme is proposed as that provided for members, however, the programme will work one month ahead to enable officers to feed into the process prior to providing policies / documentation to members. This is set out below:

LPOWG	Topics
January	Natural and Built Environment
	Climate Change
February	Housing
	Local Economy
March	Infrastructure
	Mop up session for any remaining areas or policies

Membership of the LPOWG

Membership of the LPOWG will consist of officer(s) from the below teams, as agreed by the relevant Managers.

- Planning Policy
- Development Management
- Building Control
- Housing
- Environmental Health

- Climate change
- Waste
- Leisure Services
- Economic and regeneration
- Tonbridge Town Centre Manager
- Conservation and Design (External)

Officers should be of sufficient seniority to input into the process including making decisions on proposed policy options that will contribute to Council priorities.

Meeting information

- Meetings will be held either via MS Teams to facilitate attendance or will be held in person / hybrid.
- A LPOWG Teams channel will be created and documentation / draft policies will be shared with LPOWG members. Information will be shared on a confidential basis. Such information will be draft and must not be used in any other Council business.
- Meetings will be arranged with adequate notice provided and meetings will be held ahead of the relevant topic meeting with Members, to ensure that all services have had an opportunity to feed into draft policies and are satisfied with them.
- Information will be provided as soon as this is practically possible and no later than one week ahead of a meeting.
- Comments will be invited on draft policies once these are shared and officers will be encouraged to provide any comments on these 3 working days ahead of the meeting to ensure informed discussions.
- Information provided will be split on a topic-by-topic basis to allow for input and effective time management alongside other Council duties.
- The LPOWG will be supported by the Planning Policy team.
- Meeting minutes will not be taken. Instead, key actions will be identified throughout the meeting, taken away and considered by officers.
- Feedback on key actions will be provided within the shared documentation within Teams. Feedback may include an update to confirm that suggested changes have been made to draft documentation / draft policies, or where updates are not possible, feedback will be provided to explain why.

Development Management

Throughout local plan production it will be important to work closely with the Council's Development Management team. This is because planning officers have direct experience of using existing local plan policies and will be aware of the

effectiveness of these, alongside understanding the issues that the Council faces when considering whether development is or can be made acceptable in planning terms.

Given the tight local plan timetable alongside limits on officer time and overall staff resource, it will not be possible for the planning policy team to engage with all DM officers. Instead, Team Leaders will represent development management on the LPOWG representing their respective teams and sharing information and feedback as relevant.

Local Plan DM Forum (LPDMF)

In addition to the above, it will be helpful in the formulation of planning policy to have a forum to discuss specific planning matters. This may include topics such as the Green Belt, housing land supply, landscape, heritage, design, validation lists for example.

It is envisaged that a separate forum will be set up to facilitate such discussions and for meetings and liaison to occur as the need arises. A separate forum consisting of experienced planning officers will allow the LPOWG to run more efficiently, allowing the LPWOG to focus on specific corporate issues by taking specific and potentially complex planning matters to an alternate forum.

The purpose of the LPDMF will be to:

- Discuss specific planning matters that are mostly relevant to the development management / planning policy team, for example Green Belt matters, housing land supply, landscape, heritage, design, validation lists;
- Discuss matters relating to the spatial strategy and the suitability of potential development sites;
- Share experience and provide informal feedback on the options and direction of draft policies to assist officers in the production of the local plan.

Meeting information

- Meetings will be held in the office where this is possible or hybrid via MS teams. Meetings relating to the spatial strategy and / or potential site allocations will be held in the office.
- Meetings will be arranged with adequate notice provided. However, it is proposed to set up a meeting every two weeks starting in January 2025 to discuss planning matters, this includes potential site allocations.
- A folder will be created in the LPOWG teams channel to share to facilitate the LPOWG. All LPOWG Members will have access to this information for transparency. Information will be shared on a confidential basis. Such information will be draft and must not be used in any other Council business.

- Where discussions are required in relation to the spatial strategy and / or potential site allocations, information will be shared in a confidential teams channel, given the sensitivities around these matters.
- Information will be provided as soon as this is practically possible and timescales will be agreed for responding to information.
- Information provided will be split on a topic-by-topic basis to allow for input and effective time management alongside other Council duties.
- The LPDMF will be supported by the Planning Policy team.
- Meeting minutes will not be taken. Instead, key actions will be identified throughout the meeting, taken away and considered by officers.
- Feedback on key actions will be provided and liaison will be ongoing.

Further information

As with most local plan work there are often a number of options in how policy can be progressed, and it is not unusual for officers, members or communities to have different views on these. During all meetings, it will be expected for all participants to be respectful and courteous to each other. Where there are conflicts in relation to how to progress policy then decisions will be made at the appropriate level taking into account available information and the ultimate goal of achieving a sound, robust and legally compliant local plan. Where there are matters of difference during Member engagement then these will be taken to political group leaders for resolution.

	Consequences	identified	Score	score	inherent risk score	form completed?	score	desired risk score	escalation date	Owner	closed
ection	Delay or revisiting key aspects of the local plan, failure to meet 'transitional arrangements' as proposed by Government.	01/09/2024	4	4	16	N	Medium	Progress a Local Plan Engagement Strategy setting out how both internal and external engagement will be progressed. Working with members to gain understanding and awareness of the local plan, the process and the direction of the spatial strategy and local plan policies. Regular member briefings. External legal and technical advice obtained and for the outputs to be communicated to members.	n/a	Kelly Sharp	
in and ation	Delay to the local plan consultation and failure to meet deadlines	01/09/2024	3	4	12	N	Medium	Regular project management meetings between PPM and PPOs; regular updates of timetable	n/a	Kelly Sharp	
ges ss of	Delay to timetable, health and wellbeing implications for team.	01/09/2024	3	4	12	N	Medium	Regular team meetings, 1:1s, effective file management and installation of a 'buddy' system, risk management escalation; utilising contractor staff. Smart recruitment policy and investigation of specialist support. Work with recruitment agencies to fill permanent positions including the currently vacant PPO post.	n/a	Kelly Sharp	
	Failure to demonstrate DTC at examination or other issues raised prior to consultations; duty to cooperate issues with neighbouring boroughs including unmet development needs and cumulative infrastructure issues. This may be more critical with NPPF revisions.	01/09/2024	3	4	12	N	Medium	Developing a robust PM system, new DTC grid and legal compliance toolkit and cross boundary issues understood at an early stage. Meeting with DTC partners early.	n/a	Kelly Sharp	

Completed:											
e, ice	Failure of management of the database	01/09/2024	3	4	12	N	Medium	Liaising with legal, keeping them informed of current process, setting dates/timeframes for consultation database review/refresh	n/a	Kelly Sharp	
	Lack of dedicated internal staff offering this support could lead to matters being missed in local plan, design code or decision-making compromised.	01/09/2024	4	3	12	N	Medium	Continual review of and flagging of matters relating to conservation and design-review of the design code work programme and resource requirements. Grant awarded from the Planning Skills and Delivery Fund to progress review of conservation areas. Funding anticipated April/May 24 onwards. Working with Tunbridge Wells Borough Council to implement a new Planning Service Level Agreement to provide advice and guidance in local plan heritage related work.	n/a	Kelly Sharp	
	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.	01/09/2024	3	4	12	N	Medium	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met. Providing enough time in the work programme to test the local plan and its policies.	To be identified subject to revised timetable	Kelly Sharp	
	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	01/09/2024	3	4	12	N	Medium	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met. Providing enough time in the work programme to test the local plan and its policies.	To be identified subject to revised timetable	Kelly Sharp	

						Completed:					
-	Delay to the local plan production and consultation process; lack of consultant support, failure to deliver the study to time. Securing the right consultants to undertake the work with work being delivered in a timely manner to inform plan-making.	01/09/2024	3	4	16	N	Medium	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met. Engaging with consultants early to ensure they are available and have the necessary resources to deliver work to the identified timescales.	To be identified subject to revised timetable	Kelly Sharp	
	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.	01/09/2024	3	4	12	N	Medium	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met	To be identified subject to revised timetable	Kelly Sharp	
	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 the NPPF consultation.	01/09/2024	3	4	12	N	Medium	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met. Dissemination and approval by members.	To be identified subject to revised timetable	Kelly Sharp	

					Completed:					
	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 and any subsequent guidance. 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.	01/09/2024	3	4	16	Y	Medium	Project management approach, regular evidence base check ins, ensuring consultants are in place and internal and external deadlines are met. Ensuring that consultants are in place to undertake work when required.	To be identified subject to revised timetable	Kelly Sharp
	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.	01/09/2024	3	4	12	N	Medium	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met	To be identified subject to revised timetable	Kelly Sharp
ig e	Changes to the scope, timing or number of iterations of the evidence base requirements incurring additional costs; or amended requirements of national policy in order to meet the Governments proposed submission date of no later than December 2026.	01/09/2024	4	4	16	N	Medium	Regular financial management procedures, ensuring contracts are in place, strict project management controls	n/a	Kelly Sharp

						Completed:					
nts ally an	Meeting the transitional arrangements will be dependent on the extent of changes made as provided in a revised NPPF once published before the end of the year. A revised NPPF is likely to result in fundamental changes to the way we have progressed plan-making to date and there will be a need for evidence base updates, new evidence to be progressed alongside further on the local plan and its policies to account for a revised NPPF. A revised NPPF will result in cost implications to account for the work required and also the extended time period to deliver a local plan.	01/09/2024	5	4	12	N	Medium	Continue to liaise with members to keep them informed of any changes and timescales relating to a revised NPPF and other relevant consultations; ensure flexibility within new evidence base commissions and budgets to enable quick action once NPPF confirmed. Submission of response to the government's consultation setting out the implications for TMBC on the proposed national policy changes and other planning reforms.	n/a	Kelly Sharp	
ent v y as ice	Changes to work undertaken so far in plan-making, a need to undertake a further call for sites to identify suitable sites for development to meet needs. The knock on impact of this in evidence gathering and spatial strategy / site allocation testing and work to progress towards a Regulation 18 consultation.	01/09/2024	4	4	16	N	Medium	Consider work that has been progressed so far and identify a work programme to address further work required. Progress background work for a call for sites to progress once NPPF has been published. Work with consultants to understand implications and liaise with members to keep them informed. Progress duty to cooperate meetings with surrounding LPAs and other relevant stakeholders / partners.	n/a	Kelly Sharp	