



EMCG Newsletter, March 2016

Call for Sites exercise

The New Year kicked off to a busy start for the Committee, which has been focussing in some detail on the ongoing “call for sites” exercise being conducted, on the orders of central government, by Tonbridge and Malling Borough Council.

Briefly, all local authorities have been ordered, as part of the National Policy Planning Framework (NPPF), to identify sites to meet the need for new housing in their area between now and 2031. The number of new housing units required for each area is calculated by central government and for Tonbridge and Malling it is **673 new units of housing per year between 2011 and the end of 2031**. The basis on which this figure is calculated is set out in the 90-page report prepared by G L Hearn Ltd in June 2015 and which can be read on the TMBC website (go to the “Call for Sites” section of the planning website and look for “SHMA update”).

The figure of 673 units a year for T & M BC cannot be challenged by local authorities or other interested parties. The good news is that the Borough had already identified, as part of the draft Local Plan for the Borough, sufficient sites for just over five years’ worth of new housing units. So the bottom line is that the Borough Council is required to identify sites for more than 10,000 new housing units in the Borough which could then be built between now and 2031.

Although there is no danger that this will happen here, it is worth noting that any local authorities who do not, by the deadline of late 2017, draw up a Local Plan which complies with the requirement of central government in respect of sites for new housing will have an appropriate number of sites in their area imposed on them by central government.

More than 250 sites in the borough have been put forward by various parties as potential building sites. There is a comprehensive map on the Council website. The sites are now being considered by the Council planners for “Suitability, Availability and Achievability” between now and 2031.

The Borough Council takes the line that this consideration is “a technical exercise, and not one about judgement on the planning merits” and accordingly that the Council will not be consulting the public about individual sites until after this process of “technical” consideration is complete. This is anticipated to be in May/June 2016, when the Council will publish the “Strategic Land Availability Assessment” and invite the elected councillors on the Planning and Transportation Board to decide how to take forward the process of formally identifying sites for development, including how to consult the public about that process. On this plan, then, representations from the public on specific sites are likely to be invited in July/August 2016.

The Committee has reservations about the above timetable, as follows. Those persons or organisations who have put forward their land in the “call for sites” exercise before the deadline of September 2015 had the opportunity to submit evidence about the suitability of the site in question for development, and how and why it meets the criteria of “Suitability, Availability and Achievability”. Whilst it is true that sites which survive the ongoing process of consideration by officials in the planning department and make it onto the “Strategic Land Availability Assessment” will, strictly speaking, not have had their formal planning status changed as a result, the plain fact is that those sites will have been flagged up by the local planners as candidates for planning applications for development. Against that background, we are not at all happy that ordinary residents of the Borough will not be invited to make representations until at least ten months after the sites have been put forward as candidates for development. There are two sites that have been put forward which are of particular concern for East Malling, namely Broadwater Farm (identified as “land north of Kings Hill”) and the whole of the land occupied by the East Malling Research Station!