

From: **Tom Dawlings (Cllr)**
Date: Fri, Nov 12, 2021 at 4:08 PM
Subject: Re: TW Local Plan - Climate Emergency
To: Stewart Gledhill <savecapel@gmail.com>
Cc: CLARK, Greg

Dear Mr Gledhill,

I am sorry I had thought I had replied to your email of 4th October but find I had not - apologies.

The Council's carbon reduction plan is to reduce the Council's carbon emissions to net zero by 2030. It is not to reduce the emissions of every property, business or vehicle in the Borough, although where we can help in this, for example through building regulations in requiring properties in the Borough to be built to a standard to minimise carbon emission, then we will. I understand that developers now install EV charging points on new homes with off-street parking and the Council is installing EV charging points in the car parks we own and manage.

The Council's carbon emissions are mainly from:

- our buildings, notably the Town and Assembly Halls, the Sports Centres and the Crematorium and we are actively working on improving the energy efficiency of these buildings
- vehicles, especially the waste collection vehicles where for the moment there is no economically sensible alternative to the diesel vehicles used at present, but this will change before 2030.

I have no doubt that there are significant carbon emissions involved in the construction of houses. Equally there is no doubt that more homes are needed in our country and the same level of carbon emission will result from the construction of new homes wherever these homes are built.

Previously developed land is prioritised over greenfield development but there is insufficient brownfield land for the housing needed. Town Centres also need employment and leisure opportunities as well as homes. The cinema site in Tunbridge Wells has an extant permission for 99 apartments as well as some retail and business areas. Having obtained planning consent, the owners/developers unfortunately concluded that building out the approved scheme would not be viable and so the regrettable cycle of buy, establish that a good return is not possible on the site and then sell to make good the outlay unfortunately continues.

As you are now aware, the Council's Local Plan has been submitted for examination and all comments that you want to make can now be made to the Inspector.

You ask why the process was not paused. The production of a Local Plan is a long process and in changing times would be a never-ending process if every ministerial comment led to a pause. Changing circumstances, however, have led to alterations being made without pausing the process - for example the Pre-Submission version of the Local Plan included changes to recognise the Covid pandemic, including the changing needs of businesses, the demand for office accommodation and the potential for more residential development in town centres. When I became Leader at the end of May, the Full Council had already approved the Pre-Submission Local Plan by a substantial majority with widespread cross-party support and so I was in no position to even seek to pause the process.

The Council has to produce a Local Plan based on national planning policy and legislation as it is and not based on how it might potentially be changed. Announcements from Government do suggest some policy re-thinking and if there were changes to national planning policy or the Government altered the housing numbers for boroughs like ours then the Inspector will raise this and want to discuss it during the Examination of our Local Plan. The Inspector also has the ability to recommend modification of the Plan. If there are significant policy/legislative changes, the Council may decide to

withdraw the Plan or not to adopt it after examination. I think it is also worth pointing out that the production and review of the Local Plan is a continual process and as soon as the Plan is adopted work will begin on the required five-year review of the Plan.

Having a new Local Plan is important because, whilst the housing supply position in the borough is improving, the Council cannot demonstrate a five-year supply of housing. This makes the borough vulnerable to speculative development and planning by appeal. This is demonstrated by the recent planning appeal for 400 houses at Hawkhurst where the Council's decision to refuse planning permission has been weakened by the lack of a five-year supply of housing. The adoption of the Local Plan will re-instate a robust housing supply. Perhaps more important is the fact that the policies which are used day in day out in the determination of planning applications need updating. The new policies will boost the supply of much needed affordable housing, particularly for social rent, and the amount of housing needed for the elderly and disabled and will ensure that new buildings are much more carbon efficient and sustainably designed.

Finally you ask me to explain why I don't believe that Capel's historic landscape is worth protecting. I have made no such judgement. Local Planning Authorities set out policies against which to assess planning applications and, for the Local Plan, the suitability and sustainability of the sites put forward by landowners for development. There are protections, notably in this borough on Areas of Outstanding Natural Beauty, but these areas are not determined by the Local Planning Authority.

Yours sincerely,

Tom

Cllr Tom Dawlings

Leader of Tunbridge Wells Borough Council