

The Local Plan process is evidence based. The Planners collect baseline evidence such as housing need, traffic and Air Quality, Greenbelt and AONB, and much much more. They then add in the Call for Sites evidence, sites that landowners put forward for development.

From this evidence base, Planners should then craft their Plan, and calculate the impact on the baseline evidence collected above, ie: What impact will this development have on the X,000 vehicles already using this road if we build X number houses.

Then they Draft the Plan.

But TMBC only commissioned a Traffic Study when we lodged our own Local Traffic Study showing the Impact 3000 houses would have in this area.

But the Inspectors have caught up with them. Pete's analysis below makes interesting reading, and is not quite so diplomatic as the Inspectors

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Regarding the Local Plan you may be interested in the enclosed letter from the Inspector now up on the Examination website <https://www.tmbc.gov.uk/services/planning-and-development/planning/planning-local-plans/local-plan-examination-contents/examination-documents>

I am relieved the Inspector is asking for the information that several of us have been concerned was missing and at last a dedicated webpage has been provided, but we must keep I eye on the Borough's summary of the consultation responses to ensure that it properly reflects our concerns.

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**From:** Peter Gillin [mailto:apilgrm@gmail.com]  
**Sent:** 03 March 2019 17:34  
**To:**  
**Subject:** Inspectors suspend their work on TMBC's Draft Local Plan due to incomplete evidence base and asked Ian Bailey to consider whether 'Main Modifications' are necessary

The Inspectors have criticised the following aspects of the draft Plan before considering content simply because it is incomplete evidentially and the Reg 19 website is not fit for purpose.

The Inspectors have written to Ian Bailey to say **“in short, the absence of a completed evidence base will unavoidably delay progress. All documents and actions required in this letter should be completed and submitted by no later than close of play on 29 March 2019.”**

Missing information and evidence in support of TMBC's Plan

- Regulation 22(c)(v) requires a summary of the main issues raised in the representations made pursuant to Regulation 20.
- Landscape and Visual Appraisal by 8 March 2019
- A20 VISUM Study: Update by 8 March 2019
- M26 Junction 2a Diverge/Merge Assessment by 8 March 2019

- Updated Sustainability Appraisal 29 March 2019
- Spatial Strategy Topic Paper by 29 March 2019
- Green Belt Topic Paper 29 March 2019
- Paragraph 116 of NPPF 2012 Topic Paper by 29 March 2019

**In addition TMBC's website must be updated immediately.**

- Publish on the examination webpages all documents submitted alongside the Local Plan, ordered thematically and indexed, as soon as possible preferably by close of play on 8 March 2019. This should include the Habitat Regulations Assessment (HRA) (January 2019) submitted to us on 22 February 2019.

**& this by 29<sup>th</sup> March.**

- Publish on the examination webpages all representations made in response to the Regulation 19 consultation in a manner which allows interested parties to easily identify and access individual representations and representations made to specific Policies or parts of the Local Plan as soon as possible,

Then Council must consider if **main modifications** are necessary in light of this evidence and if so provide to Inspectors their reasoning and to the public for reconsultation.

**“In short, the absence of a completed evidence base will unavoidably delay progress.”**

The Inspectors letter is attached.

Regards

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