

**Tonbridge and Malling Borough Council**

**LOCAL DEVELOPMENT FRAMEWORK**

**DEVELOPMENT LAND ALLOCATIONS DPD**

**POSITION STATEMENT No DLA07**

**Detailed Issues**

Network Rail (178.02)  
Kent County Council (Strategy) (175.24/25/26/27/28/30)  
London Green Belt Council (302.05)  
Theatres Trust (04.05/06/07)  
Barratt Kent and ZED Homes (305.03)  
Southern Water (65.08)  
Natural England (64.12/13)  
Highways Agency  
(69.33/34/35/36/41/42/43/44/45/46/47/48/49/50/51/52)

**General Support**

West malling Parish Council (19.02)

**No Comment**

SEEDA (256.02)



# Tonbridge and Malling Local Development Framework

## Position Statement No DLA07

### Detailed Word changes

#### **1 Introduction**

- 1.1 This Position Statement addresses representations relating to the detailed wording of the Development Land Allocations DPD and other matters not covered by other Position Statements.

#### **2 The Council's Position**

- 2.1 The Borough Council's response to each of the representations is set out in the schedule attached at **Annex A**.

#### **3 Proposed Changes**

- 3.1 Where in Annex A it is indicated that the Council believes a change to the text of the DPD could be made, the proposed changes are set out under **Annex B**. In the Council's view some of these changes add clarity to the text and polices but do not substantially change their meaning. As such, the changes do not so significantly affect the content or soundness of the Document that it would need to be subject to further consultation.
- 3.2 The Council will be preparing for the Inspector's benefit a consolidated list of recommended changes taken from all of the Position Statements.

BRG - 11/07/07 12:15



Respondent	Representation	Council's Response
305.05 Barratt Kent & Michael Shwartz Group	Para 2.1.2 and Annex A should indicate that the potential yield from the sites with planning permission could vary from that already approved	Although not considered essential in order to make the DPD sound, the Council would not be opposed to the inclusion of this factual statement if the Inspector feels this would be helpful (see <b>Annex B</b> for suggested changes)
69/33/34 Highways Agency	Policy H1 - Generally concerned about the traffic impact of a number of the proposed housing sites on the Trunk Road network	The Borough Council wrote to the Highways Agency with all the information it had on 16 March 2007 (copy of latter at <b>Annex C</b> ). All of the housing sites identified under Policy H1 are on previously developed land. It is only any net increase in traffic over that already existing or committed that can reasonably be taken into account in Transport Assessments. All development will have to comply with Core Policy CP2 which requires the provision of Travel Plans, improvements to public transport, cycling, walking and any necessary enhancements to the safety of the highway network and the capacity of transport infrastructure.
69.41/42/43/44 Highways Agency	Policy H4 – Generally concerned about the traffic impact of a number of the proposed housing sites on the Trunk Road network, particularly at Blue Bell Hill	The Borough Council wrote to the Highways Agency with all the information it had on 16 March 2007 (copy of latter at <b>Annex C</b> ). All but one of the housing sites identified under Policy H4 are on previously developed land. It is only any net increase in traffic over that already existing or committed that can reasonably be taken into account in Transport Assessments. All development will have to comply with Core Policy CP2 which requires the provision of Travel Plans, improvements to public transport, cycling, walking and any necessary enhancements to the safety of the highway network and the capacity of transport infrastructure. There is no major development proposed at Blue Bell Hill.

Respondent	Representation	Council's Response
69.35/36/7/48 Highways Agency	Policy E1 – where development is likely to have significant transport implications Transport Assessments including Travel Plans should be prepared.	All development will have to comply with Core Policy CP2 which requires the provision of Travel Plans, improvements to public transport, cycling, walking and any necessary enhancements to the safety of the highway network and the capacity of transport infrastructure.
69.45/46 Highways Agency	Policy E1 – the Agency require that land use type and size of site to be identified for all sites so that their potential impact on the trunk road network, either singly or when considered in combination can be assessed.	The Borough Council wrote to the Highways Agency with all the information it had on 16 March 2007 (copy of latter at <b>Annex C</b> ). Virtually all of the employment areas identified under Policy E1 are either existing developed areas or already have planning permission. It is only any net increase in traffic over that already existing or committed that can reasonably be taken into account in Transport Assessments. All development will have to comply with Core Policy CP2.
69.51/52 Highways Agency	Policy E1(d) New Hythe – concern about potential impact of development on the trunk road network	Most of the new Hythe area is existing employment development. The only vacant areas are those identified under Policy E3 and most of these already have planning permission. It is only any net increase in traffic over that already existing or committed that can reasonably be taken into account in Transport Assessments. All development will have to comply with Core Policy CP2.
69.49/50 Highways Agency	Policy E2 – concerned about the potential impact of (b) Little Preston and (g) Drayton Road on the Trunk Road network.	Both of these sites are existing developed areas. It is only any net increase in traffic over that already existing or committed that can reasonably be taken into account in Transport assessments. The DPD includes no proposals to increase the floorspace at these sites.

<b>Respondent</b>	<b>Representation</b>	<b>Council's Response</b>
175.24 Kent County Council (Strategy Division)	Policy H4(o) – Farm Ground Allotments, Gorham Drive, Tonbridge – include reference to biodiversity	All proposals will have to comply with Core Policy CP1 which seeks to protect biodiversity. Core Policy CP26 would require any necessary mitigation measures to be implemented. Local Plan Policies P3/2 and P3/3 that protect SNCIs are proposed to be saved and reviewed in the managing Development and the Environment DPD. It is not necessary to include a site-specific reference.
175.25 Kent County Council (Strategy Division)	Policy E1 (k) Land East of Woodgate Way – include reference to adjacent SNCI	The Borough Council is not aware of an SNCI adjacent to this site. All proposals will have to comply with Core Policy CP1 which seeks to protect biodiversity. Core Policy CP26 would require any necessary mitigation measures to be implemented. Local Plan Policies P3/2 and P3/3 that protect SNCIs are proposed to be saved and reviewed in the managing Development and the Environment DPD. It is not necessary to include a site-specific reference.
175.27 Kent County Council (Strategy Division)	Policy E3(k) North of Vantage Point, Holborough – include reference to enhancement of biodiversity	This site already has planning permission for employment development. All proposals will have to comply with Core Policy CP1 which seeks to protect biodiversity. Core Policy CP26 would require any necessary mitigation measures to be implemented. Local Plan Policies P3/2 and P3/3 that protect SNCIs are proposed to be saved and then reviewed in the managing Development and the Environment DPD. It is not necessary to include a site-specific reference.

<b>Respondent</b>	<b>Representation</b>	<b>Council's Response</b>
175.28 Kent County Council (Strategy Division)	Policy E3(n) Land off Cannon Lane – include reference to enhancing the adjacent SNCI	All proposals will have to comply with Core Policy CP1 which seeks to protect biodiversity. Core Policy CP26 would require any necessary mitigation measures to be implemented. Local Plan Policies P3/2 and P3/3 that protect SNCIs are proposed to be saved and then reviewed in the managing Development and the Environment DPD. It is not necessary to include a site-specific reference. There is a current planning application on this site and various biodiversity mitigation measures are being included.
175.26 Kent County Council (Strategy Division)	Policy E3(g) Priory Park – include reference to enhancing the adjacent SNCI.	All proposals will have to comply with Core Policy CP1 which seeks to protect biodiversity. Core Policy CP26 would require any necessary mitigation measures to be implemented. . Local Plan Policies P3/2 and P3/3 that protect SNCIs are proposed to be saved and then reviewed in the managing Development and the Environment DPD. In any case this site already has outline planning permission. The original outline permission for the development of the Quarry for housing, open space and employment included the creation of the area which is now designated an SCI.
64.12 Natural England	Policy H1 – add an additional clause requiring ecological mitigation for all firm housing allocations as follows:  “...any necessary mitigation measures identified as a result of an ecological survey”	This is not considered to be necessary because all proposals will have to comply with Core Policy CP1 which seeks to protect biodiversity. Core Policy CP26 would require any necessary mitigation measures to be implemented.

Respondent	Representation	Council's Response
178.02 Network Rail	<p>Policy H1(g) Land adjacent to Snodland Station - Revise 7th bullet point to read:</p> <p><b>“ provision of additional <u>cycle</u> parking at the station”</b></p> <p>(ie remove reference to additional car parking)</p>	<p>It is in the interests of sustainability to encourage the use of trains as a transportation mode. This necessitates the provision of sufficient car parking at stations and it is therefore a justifiable policy requirement for the development of this site, particularly as it is in the ownership of Network Rail. There could also be a reasonable requirement to provide additional cycle parking and if the Inspector would consider this helpful then the bullet point could be revised to read:</p> <ul style="list-style-type: none"> <li>• <b>Provision of additional <u>car and cycle</u> parking at the station</b></li> </ul>
64.12 Natural England	<p>Policy H4 – add an additional clause requiring ecological mitigation for all firm housing allocations as follows:</p> <p><b>“...any necessary mitigation measures identified as a result of an ecological survey”</b></p>	<p>This is not considered to be necessary because all proposals will have to comply with Core Policy CP1 which seeks to protect biodiversity. Core Policy CP26 would require any necessary mitigation measures to be implemented.</p>

Respondent	Representation	Council's Response
65.08 Southern Water	<p>Policy H4 include a reference to the need for sewerage enhancement in respect of the following sites:</p> <p>(e) TA Centre , London Road, Ditton  (g) Ditton Service Station, London Road, Ditton  (i) Clare Park Service Station, London Road, Larkfield  (o) Farm Gournd Allotments, Gorham Drive, Tonbridge  (p) 159-159a Pembury Road, Tonbridge  (q) 17 Preston Road, Tonbridge  (r) 60A Priory Street &amp; 31 Pembury Road, Tonbridge</p>	<p>Core Policy CP26 makes it clear that all development proposals must either incorporate the infrastructure required as a result of the scheme or make provision for financial contributions to secure such infrastructure provision at the time it is needed. This policy is cross-referred to in Policy H2 (but with a typographic error referring to Policy CP27 which needs to be corrected). In the case of sewerage, the Water Authorities have their own powers under the Water Industries Act 1991 to levy an infrastructure connection charge to cover the cost of enhancements. The Council would not therefore expect itself to require a development to make such provision by means of condition or legal agreement. It is therefore not necessary to be specific in the Policy about the need for improvements to the sewerage system, but if the Inspector thinks it would be helpful to flag up the issue, then the Council would have no objection to the addition of another bullet point for each of the sites referred to as follows:</p> <ul style="list-style-type: none"> <li>• <b>contributions towards the improvement of off-site sewerage capacity.</b></li> </ul>
004/06 The Theatres Trust	<p>The word "cultural facilities" should be added to all policies where the words "community facilities" are used.</p>	<p>Whilst the Council does not think this change is essential to make the DPD sound, if the Inspector thinks it would be helpful then the Council would have no objection to the relevant clause in Policies H1, H2 , H3 and H4 being changed to read:</p> <p><b>..... including any necessary contributions towards the provision of education and other community <u>and cultural</u> facilities pursuant to Core Policy CP27 CP26.</b></p>

<b>Respondent</b>	<b>Representation</b>	<b>Council's Response</b>
004/05 The Theatres Trust	A needs and impact assessment should be undertaken for potential sites for theatre use, arts centres and other cultural activities and any deficiencies met.	Each case will be considered on its merits. A comprehensive study has not been undertaken and without this evidence base the Development Land Allocations DPD makes no proposals of this nature.
004/07 The Theatres Trust	Developer contributions should include "cultural facilities" A SPD on Developer Contributions should be prepared.	The issue of development contributions is covered by Core Policy CP26. Any development contribution must relate fairly and proportionally to the impact of the development. The Council has adopted a protocol for dealing with developer contributions <sup>1</sup> . It currently has no plans to prepare a general SPD on Development Contributions though it is preparing one specifically on the Tonbridge Regeneration Fund.
302.05 London Green Belt Council	It would be helpful, to avoid cross-referencing to the Core Strategy, if it could be made clear in the Development Land Allocations DPD that Isles Quarry West had been removed from the Green Belt	This is not considered to be necessary. It is the Core Strategy that proposes removing the site from the Green Belt. The Development Land Allocations DPD is prepared pursuant to the Core Strategy and therefore if the Core Strategy is adopted the site will no longer lie within the Green Belt.

<sup>1</sup> RD 7.35 – Development Contributions – Practice Note



## Possible changes to the text of the Development Land Allocations DPD

*[The reference number of the proposer of the change is indicated in square brackets.  
It should be noted that the Borough Council is not necessarily recommending all of these  
changes, but would not be opposed to them if the Inspector thinks they would be helpful]*

Para 2.1.2 – Revise to read [305.05]

2.1.2 As at 31<sup>st</sup> March 2006, planning permission existed for 4,606 dwellings that are likely to be implemented within the 2006-2021 period (see **Annex A**). These sites will be shown on the Proposals Map for information only. The yield on these sites may vary if revised planning permissions are granted.....

**Policy H1** – revise the relevant part of the Policy to read: [004/06]

.... including any necessary contributions towards the provision of recreation, education and other community and cultural facilities, pursuant to Core Policy ~~CP27~~ CP26.

**Policy H1(g) Land adjacent to Snodland Station** - Revise the seventh bullet point to read [178.02]:

- Provision of additional car and cycle parking at the station;

**Policy H2** – revise the relevant part of the Policy to read: [004/06]

.... including any necessary contributions towards the provision of education and other community and cultural facilities, pursuant to Core Policy ~~CP27~~ CP26.

**Policy H3** – revise the relevant part of the Policy to read: [004/06]

.... including any necessary contributions towards the provision of education and other community and cultural facilities, pursuant to Core Policy ~~CP27~~ CP26.

**Policy H4** – revise the relevant part of the Policy to read: [004/06]

.... including any necessary contributions towards the provision of recreation, education and other community and cultural facilities, pursuant to Core Policy ~~CP27~~ CP26.

**Policy H4** - Add the following bullet point:

- Contributions towards the improvement of off-site sewerage capacity;

to the following sites [65.08]:

- (e) TA Centre , London Road, Ditton**
- (g) Ditton Service Station, London Road, Ditton**
- (ii) Clare Park Service Station, London Road, Larkfield**
- (s) Farm Gournd Allotments, Gorham Drive, Tonbridge**
- (t) 159-159a Pembury Road, Tonbridge**
- (u) 17 Preston Road, Tonbridge**
- (v) 60A Priory Street & 31 Pembury Road, Tonbridge**

#### **Annex A Sites with Planning Permission 31 March 2006**

Add the following footnote to the table on page 39 [305.05]

“The yield on these sites may vary if revised planning permissions are granted.”

## Annex C

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<b>Our ref</b>	PTLS/P&C/04-14
<b>Date</b>	16 March 2007

Dear Mr Moore

### **TONBRIDGE AND MALLING LOCAL DEVELOPMENT FRAMEWORK**

I am writing further to our useful meeting on 21 February 2007. At that meeting I undertook to supply you with information on the planning status of all of the sites identified in your submission. My aim is to clarify matters and to narrow down any differences of view to the absolute minimum for the benefit of the Public Examination. This could either be by the preparation of a Statement of Common Ground or by a simple statement from you revising your position in the light of the clarification hopefully contained in this letter and the attached schedule.

The attached schedule reproduces all of the sites referred to in the schedule attached to your representation on the Development Land Allocations Document, but it is relevant also to the Core Strategy, because matters of confidence about land supply, both for housing and employment are matters for consideration at the Core Strategy Public Examination. I have added a final column under which I have included our comments to clarify the status of each site/policy area.

In considering these comments in respect of each site/location you should bear in mind the following:

- Whether the policy area is already fully developed, in which case the policy is merely providing a context for considering redevelopment proposals. In these cases the LDF itself is not actually proposing any development.
- Where redevelopment is for the same use the assumption should be that there will be no net change in traffic generation from a site.
- Where redevelopment is for an alternative use you must take account of the potential traffic generation of the existing, permitted or lawful uses on a site. It is therefore only the net increase, if any, that should be taken into account in assessing impact because that is all that the LDF is influencing.
- Where a planning permission already exists the proposal is not a proposal of the LDF and cannot be objected to.

In terms of housing, the Council is proposing no greenfield sites for development. All of its residential allocations are on previously developed land. In all cases therefore it is necessary to consider only the net change in traffic generation, and in the majority of cases, we would argue that this would be negligible and in most cases beneficial in environmental terms through the removal of HGV movements in residential areas. This is particularly the case with regard to the "constrained housing sites", which, by definition, are all currently occupied mainly by intrusive commercial uses and it is the traffic generation from those sites that the Council is principally concerned about reducing.

The Employment areas identified under Policies E1 and E2 are existing employment locations where the only changes are going to be through redevelopment where zero net change in traffic generation should be assumed. The only new employment land within these areas is separately identified under Policy E3, but note that the majority of site (m) west of Woodgate Way (The Priory Works) already has planning permission for employment development. You should also note that, with the exception of the one new small site (h) at Hermitage Lane, all of the rest are carried forward unaltered from the existing statutory development plan.

With regard to retail areas, with the exception of Kings Hill, these are all existing retail areas where the only scope is for redevelopment where zero net change in traffic generation should be assumed. In the case of Kings Hill, planning permission already exists. The only potential new retail development (other than in Tonbridge Town Centre) is possibly at Quarry Wood, subject to passing some pretty high planning hurdles. In this case, it would be by means of redeveloping existing industrial uses which means that it is the net change in traffic that needs to be considered.

The Major Developed Sites in the Green Belt identified under Policy M1 are, as the name suggests, all currently developed sites and most are generating traffic now. The aim of the policy is to secure environmentally beneficial redevelopment including if possible, a reduction in trip generation and certainly an environmental improvement in the character of traffic from such sites.

I trust you find this helpful. I would appreciate it if you could, as matter of urgency, reconsider the Agency's representations on the LDF in the light of these comments and advise me how you would now like to progress matters. The Inspector's Notes for the Pre-Examination Meeting suggest that Statements of Common Ground should be finalised by 22 March, but she did indicate that if a greater time was necessary to resolve differences she would accept a delay. It would certainly be helpful if we could have a clear understanding of your position by 4 April which is the deadline for the submission of any further statements from those who have made representations.

Yours sincerely

**Brian Gates**  
Chief Planner (Policy)

**Appendix A - Housing**

*Table 1: Housing Allocations*

Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Size of Development (Dwellings)	TMBC Comments
(a) 109 Hall Road	Aylesford	<2km	J5 M20	5	Already occupied by a small warehouse. Unlikely to be any net change in traffic generation. Potentially a benefit.
(b) Oil, Depot, Station Road	Aylesford	2km	J5 M20	21	Oil Depot – Current HGV use plus employees. Close to station for residents. Net benefit in traffic terms.
(c) Nu-Venture Coaches, Mill Hall	Aylesford	~2km	J5 M20	8	Coach Depot – HGV use across level crossing. Close to station for residents. Net benefit in traffic terms.
(d) Castledene Transport and Pickfords Removals, Mill Hall	Aylesford	>2km	J5 M20	58	Currently large warehouse buildings. HGV movements across level crossing. Close to station for residents. Nil detriment in traffic terms.
(f) Kings Hill	Kings Hill	<5km	J4 M20	65	This site was taken into account in all of the traffic studies associated with the Kings Hill Phase 2 application.

Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Size of Development (Dwellings)	TMBC Comments
Policy H2 – Isles Quarry	Borough Green	<2km	J3 .M20	200	See Position Statement CS04. This is previously developed land with lawfully existing uses rights for industry and haulage. It is only the net change in traffic that will be relevant. There are environmental benefits of removing HGVs from the site.

Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Size of Development (Dwellings)	TMBC Comments
Policy H3 – Preston Hall	Aylesford	<2km	J5.M20	180	The site is currently occupied by the Head Quarter Office building for the Strategic Health Authority and an operating hospital and other on-site medical facilities. There is considerable on-site car parking. It would not be expected that residential redevelopment of these uses would materially affect traffic generation from the site and may even improve on the current situation. The capacity of the junction with the A20 is itself likely to be a constraining factor

Table 2: Constrained Housing Sites (Policy H4)

Road/ Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Size of Development (Dwellings)	TMBC Comments
(a) Scott Bros, Mill Hall	Aylesford	~2km	J5 M20	13	This is a concrete slab making plant that generates HGV and employee traffic. It is unlikely that residential redevelopment will significantly change traffic volumes but will improve the situation environmentally
(b) West of Maidstone Road	Blue Bell Hill	<0.5 km	J3 M2	9	This is a small industrial building with use rights that could generate traffic. It is unlikely that its redevelopment for housing would materially alter the situation.
(c) 242 London Road	West Malling	~1.5km	J4 M20	8	This is a commercial premises that already generates traffic. It is unlikely that residential redevelopment would materially alter the level of traffic generation from the site.

Road/ Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Size of Development (Dwellings)	TMBC Comments
(d) 263-265 London Road	West Malling	~1.5km	J4 M20	8	This is a petrol filling station and vehicle workshop which generates significant traffic movements. Residential development would be likely to improve on this situation.
(e) TA Centre, London Road	Ditton	~2km	J4/5 M20	51	The TA centre is unlikely to be available during the plan period but if it was then the traffic generated for a residential redevelopment would have to be compared with not only the existing use but any alternative use that could be made of the existing buildings.
(f) 613 London Road	Ditton	~2km	J4/5 M20	6	This is a petrol filling station which generates a significant amount of traffic. Residential development of the site would generate less traffic movements.
(g) Ditton Service Station 675 London Road	Ditton	~2km	J4/5 M20	20	This is a vehicle showroom and workshop which generates employee and customer traffic.. Residential redevelopment would be unlikely to generate a significant net increase in trips.
(h) Industrial Site, Blacklands	East Malling	<4km	J4/5 M20	11	This is a group of small businesses that generate employee, delivery and customer traffic. . It is unlikely that residential redevelopment would materially alter the level of traffic generation from the site.
(i) Millbrook House, 114 Mill Street	East Malling	~2km	J4 M20	10	This is an office building that generates peak hour traffic to and from the site and considerable on-street parking. It is likely that residential redevelopment would materially improve the level of traffic generation from the site.
(k) 140-142 Tonbridge Road	Hildenborough	~1km	Stocks Green Rd/ A21	14	This is a vehicle showroom and workshop which generates employee and customer traffic.. Residential redevelopment would be unlikely to generate a significant net increase in trips.

Road/ Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Size of Development (Dwellings)	TMBC Comments
(l) Clare Park Service Station and B&Q store	Larkfield	~2km	J4/5 M20	59	This is a petrol filling station and B&Q retail warehouse which together generate a significant amount of traffic. Residential redevelopment of the site would be likely to generate less traffic movements.
(m) Garage, 2 London Road	Leybourne	<1km	J4 M20	20	This is a petrol filling station which generates a significant amount of traffic. Residential development of the site would generate less traffic movements.
(n) 294 Malling Road and Land adjacent	Snodland	<3km	J4 M20	17	This is a builders yard which generates employee, customer and delivery traffic. Residential redevelopment would be unlikely to generate a significant net increase in trips.
(o) Farm Ground Allotments, Gorham Drive	Tonbridge	<1km	A26/A21	23	This is a greenfield site within the urban confines. Its development for housing would result in an increase of traffic from the site.
(p) 159-159a Pembury Road	Tonbridge	<0.5km	A26/A21	5	Petrol filling station with showroom and workshops which generates traffic from customers and employees. Residential redevelopment would be unlikely to generate a significant net increase in trips.
(q) 17 Preston Road	Tonbridge	<2km	A26/A21	5	This is a commercial premises that already generates traffic though it has no on-site parking. Residential redevelopment has to be considered in the light of the existing use.
(r) 60A Priory Street and 31 Pembury Road	Tonbridge	<1km	A26/A21	18	These are commercial premises that already generate traffic. Residential redevelopment has to be considered in the light of the existing uses.
(s) 54 Quarry Hill Road	Tonbridge	<0.5km	A26/A21	10	This is a petrol filling station and series of lock-up garages which generate traffic. Residential redevelopment has to be considered in the light of the existing use.

**Appendix B - Employment**

Table 3: Employment – Policy E1

Road/ Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Zone	TMBC Comment
(a) Holborough	Snodland	~2km	J4 M20	B1, B2, B8	Existing employment area with outstanding planning permission for development on the area identified under Policy E3(k). The LDF proposes nothing that would generate traffic from this site
(b) Land east of the Bypass	Snodland	<2km	J4 M20	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(c) Ham Hill	Snodland	~1km	J4 M20	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(d) New Hythe Area	Larkfield	~1km	J5 M20	B1, B2, B8	Other than the sites identified under Policy E3 this is a completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site other than on the Policy E3 locations.
(e) Forstal Road	Aylesford	<1km	J5 M20	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site

Road/ Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Zone	TMBC Comment
(f) Quarry Wood including Priory Park	Near Kings Hill	<5km	J4 M20	B1, B2, B8	Other than the site identified under Policy E3(g), this is a completely developed employment area. The only proposals within the developed area would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site as Policy area E3(g) already has planning permission.
(g) Barming Depot	Aylesford	>0.5km	J5 M20	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(h) 20/20 Estate	Aylesford	>0.5km	J5 M20	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(j) Bourne Enterprise Centre	Borough Green	>2km	J2A M26, J2 M20	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(k) Land West of Woodgate Way	Tonbridge	<1km	A26/A21	B1, B2, B8	This is partly an existing developed employment area part of which is currently vacant but has use rights. The whole site north of Tudely Lane has outline planning permission for B2/B8 development. The only part of the site which is actually a proposal of the LDF, and which is carried forward from the TMBLP, is the greenfield site south of Tudely Lane.

Road/ Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Zone	TMBC Comment
(l) Tonbridge Industrial Estate	Tonbridge	<1km	A26/A21	B1, B2, B8	Together with Policy TCA9 in the TCAAP this is a completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic other than on the greenfield site identified under Policy E3(n). There is a current planning application on this site which is likely to be determined before the LDF is adopted.
(m) Laker Road	Bridgewood	>1km	J3 M2	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(n)North of Station Approach	Borough Green	>2km	J2A M26, J2 M20	B1	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(o) North of Fairfield Road	Borough Green	>2km	J2A M26, J2 M20	B1	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(p) Hermitage Lane	Barming	<3km	J4 M20	B1	This is a small greenfield site within the proposed confines of the built-up area which would generate traffic if it were to be developed.
(q) Rockfort Road	Snodland	<2km	J4 M20	B1	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(r) Kings Hill	Kings Hill	<5km	J4 M20	Mixed Use; B1, hotel, conference, education, commercial leisure	The entire site has planning permission. There are no employment proposals of the LDF that would generate traffic from this site.

Road/ Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Zone	TMBC Comment
(s) East Malling Research Centre	East Malling	~3km	J4 M20	Mixed Use; B1, conference, education and other related uses to research centre	The LDF does identify scope for the expansion of uses on this site, but it is highly constrained by the quality of the local access.
(t) Bradbourne	East Malling	~1.5km	J4 M20	Mixed Use; B1, conference, education and training	Completely developed employment area comprising listed buildings The LDF proposes nothing that would generate traffic from this site

Table 4: Other Employment Land- Policy E2

Road/ Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Zone	TMBC Comments
(a) Mill Hall	Aylesford	~2km	J5 M20	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(b) Little Preston	Aylesford	<0.1km	J5 M20	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(c) Lower Bell	Aylesford	<2km	J3 M2 and J6 M20	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site

Road/ Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Zone	TMBC Comments
(d) Hall Road	Aylesford	<2km	J5 M20	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(e) Quarry Wood	Ditton	<1km	J5 M20	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(f) Ditton Laboratories, Kiln Barn Lane	Ditton	<1km	J5 M20	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site
(g) Drayton Road	Tonbridge	~0.5km	A26/A21	B1, B2, B8	Completely developed employment area. The only proposals would result from redevelopment which would be unlikely to generate additional traffic. The LDF proposes nothing that would generate traffic from this site

For sites H-R please see the Major Developed Sites in the Green Belt section below.

Table 5: Vacant Sites Allocated to Employment - Policy E3

Road/ Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	Size (ha)	TMBC Comments
(h) Hermitage Lane	Barming	<3km	J5 M20	1.55	This small greenfield site within the proposed urban confines is a proposal of the LDF which would generate traffic if it were to be developed. Its impact on the wider network would be likely to be insignificant.
(i) Former Mill Hall Centre	New Hythe	~0.5km	J4 M20	4.13	This brownfield site is an allocation of the LDF which is carried forward from the TMBLP. If it were to be developed it would generate additional traffic.
(j) Former Playing Fields	New Hythe	~0.5km	J4 M20	2.16	This greenfield site within the urban area is an allocation of the LDF which is carried forward from the TMBLP. If it were to be developed it would generate additional traffic.
(m) West of Woodgate Way	Tonbridge	<2km	A26/A21	7.65	The part of this site north of Tudely Lane has outline planning permission for B2/B8 development. South of Tudely Lane is greenfield site which is carried forward from the TMBLP. If it were to be developed it would generate additional traffic.
(n) Land off Cannon Lane	Tonbridge	<2km	A26/A21	1.41	This greenfield site within the defined urban confines is an allocation carried forward from the TMBLP. There is a current planning application for employment development on this site which is likely to be determined before the adoption of the LDF.

**Appendix C – Retail**

Table 6: Retail – Policy R1

Name	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	TMBC Comments
<b>District Centres</b>			
(a) Borough Green	~1km	J2A M26, J2 M20	Totally developed existing retail area. There are no proposals of the LDF that would generate additional traffic.
(b) Kings Hill	<5km	J4 M20	The LDF contains no proposals for new retail development at Kings Hill. The shopping centre has planning permission. Phase 1 is complete. Work of Phase 2 is still to commence. Planning permission also exist for the insertion of a mezzanine within the Asda store which has yet to be implemented. These proposals are intended to retain as many trips as possible within Kings Hill.
(c) Martin Square, Larkfield	~1.5km	J4 M20	The LDF contains no proposals for new retail development at Martin Square. There is no real scope for further new development. The only opportunities would be by means of redevelopment which would be unlikely to generate additional traffic.
(d) Snodland	~2km	J4 M20	The LDF contains no proposals for new retail development at Snodland which is a Conservation Area. There is no real scope for further new development. The only opportunities would be by means of redevelopment which would be unlikely to generate additional traffic.

Name	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	TMBC Comments
(e) West Malling	<2km	J4 M20	The LDF contains no proposals for new retail development at West Malling which is a Conservation Area. There is no real scope for further new development. The only opportunities would be by means of redevelopment which would be unlikely to generate additional traffic.
<b>Tonbridge Urban Local Retail Centres</b>			
(f) Martin Hardie Way	~4km	A26/A21	The LDF contains no proposals for new retail development at this small parade of local shops. There is no real scope for further new development. The only opportunities would be by means of redevelopment which would be unlikely to generate additional traffic.
(g) York Parade	~4km	A26/A21	The LDF contains no proposals for new retail development at this small parade of local shops. There is no real scope for further new development. The only opportunities would be by means of redevelopment which would be unlikely to generate additional traffic.
<b>Medway Gap Urban Local Retail Centres</b>			
(h) Twisden Rd, East Malling	~1.5km	J4 M20	The LDF contains no proposals for new retail development at this small parade of local shops. There is no real scope for further new development. The only opportunities would be by means of redevelopment which would be unlikely to generate additional traffic.
(i) Premier Parade, Aylesford	~1km	J5 M20	The LDF contains no proposals for new retail development at this small parade of local shops. There is no real scope for further new development. The only opportunities would be by means of redevelopment which would be unlikely to generate additional traffic.

Name	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	TMBC Comments
(j) Woodlands Parade, Ditton	>1km	J5 M20	The LDF contains no proposals for new retail development at this small parade of local shops. There is no real scope for further new development. The only opportunities would be by means of redevelopment which would be unlikely to generate additional traffic.
(k) Little Market Row, Leybourne	<1km	J4 M20	The LDF contains no proposals for new retail development at this small parade of local shops. There is no real scope for further new development. The only opportunities would be by means of redevelopment which would be unlikely to generate additional traffic.
<b>Out Of Town Centres</b>			
(l) Lunsford Park	<1km	J4 M20	The LDF contains no proposals for new retail development at Lunsford Park. The only opportunities would be by means of redevelopment the traffic impact of which would have to assessed in the context of a specific proposal
(m) Quarry Wood, Aylesford	<1km	J5 M20	There is no scope for significant additional retail development within the identified retail area. The LDF does identify Quarry Wood as the best out-of -town location to meet any additional need that cannot first be met within the Maidstone urban area. If such a need were to be met it would be by means of redeveloping existing employment uses. It would therefore only be the net change in trip generation that would be relevant.
(n) Cannon Lane, Tonbridge	~3km	A26/A21	The only remaining parcel of land within this location already has outstanding planning permission for a retail warehouse building. The Tonbridge Central Area Action Plan suggest some alternative mixed use from of development on this vacant site under Policy TCA11(s)

**Appendix D – Major Developed Sites in the Green Belt**

Table 7: Major Developed Sites in the Green Belt – M1

Road/ Location	Town/ Village	Distance to Trunk Road Network	Nearest Trunk Road Network Junction	TMBC Comments
(a) South of London Road	Addington	<0.5km	J2A M26	Existing commercial premises. The terms of the policy limit the scale and trip generation from the site. Assume nil detriment to traffic conditions
(b) Winsor Works, London Road	Addington	<0.5km	J2A M26	Existing commercial premises. The terms of the policy limit the scale and trip generation from the site. Assume nil detriment to traffic conditions
(c) Platt Industrial Estate	Platt	>1.5km	J2A M26	Existing commercial premises. The terms of the policy limit the scale and trip generation from the site. There is still one vacant parcel within the site identified under Policy E3(l). Because of the poor quality of local access, limiting trip generation from any development or redevelopment within this area would be a prime consideration.
(d) Long Pond Works	Borough Green	~1km	J2A M26, J2 M20	Existing commercial premises. The terms of the policy limit the scale and trip generation from the site. Assume nil detriment to traffic conditions
(e) Works, south of Cricketts Farm	Ightham	~2.5km	J2A M26, J2 M20	Existing commercial premises. The terms of the policy limit the scale and trip generation from the site. There is a current proposal for an extension to the block making works which is the subject of a call-in Inquiry in May 2007.
(h) Salts Yard, Redwell Lane	Ightham	~2.5km	J2A M26, J2 M20	Small commercial premises. The terms of the policy limit the scale and trip generation from the site. Assume nil detriment to traffic conditions
(j) Roughway Mill	Plaxtol	<5km	J2A M26	Existing poorly accessed commercial premises. The terms of the policy limit the scale and trip generation from the site. Assume nil detriment to traffic conditions
(k) Former Ryarsh Brickworks	Ryarsh	~1.5km	J4 M20	Planning permission now exits for the residential redevelopment of the former brickworks
(l) Old Holborough	Snodland	~2.5km	J4 M20	Existing commercial and residential premises. The terms of the policy limit the scale and trip generation from the site. Assume nil detriment to traffic conditions
(m) Nepicar Area East, London Road	Wrotham	<1km	J2A M26, J2 M20	Existing commercial premises. The terms of the policy limit the scale and trip generation from the site. Assume nil detriment to traffic conditions
(n) Nepicar Area West, London Road	Wrotham	<1km	J2A M26, J2 M20	Existing commercial premises. The terms of the policy limit the scale and trip generation from the site. Assume nil detriment to traffic conditions
(o) Tower Grange, Wrotham Hill	Wrotham	<1km	J2A M26, J2 M20	Existing commercial premises. The terms of the policy limit the scale and trip generation from the site. Assume nil detriment to traffic conditions