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# Preferred Options - Options and Choices

## OPTIONS AND CHOICES

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REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
<b>2.1 INTRODUCTION</b>				
5. LAND OWNER				
220	Strategic Partners UK Fund I	PO/220.05	Paragraph 2.1.6 - support the Council's preferred approach regarding release of employment sites for alternative uses where there is a healthy supply of employment land, however do not support the Council's findings to safeguard sites for employment without taking into account the site-specific constraints of individual sites, particularly in relation to 2-8 Morley Road, Tonbridge. Consider that greater flexibility is required.	2-8 Morley Road lies within the Tonbridge Industrial Estate and is not suitable for redevelopment to uses other than B1, B2 and B8. Greater flexibility in the employment policies for this site would weaken the Council's position which is to ensure that there is an adequate supply of employment land for the current and future employment needs of the Borough.
<b>2.2 POLICIES: OPTIONS AVAILABLE</b>				
1. OFFICIAL CONSULTEE				
62	GOSE	PO/062.01	Clarification sought regarding the evidence base for affordable housing (paragraph 2.2.10 - 2.2.11). Queries whether the housing market analysis supports this approach in terms of viability and whether it will have a negative effect on supply in any particular location.	The final version of the Development Plan Document is based upon the findings of an up-to-date Housing Needs Assessment by Consultants DCA.
69	Highways Agency	PO/069.02	Regarding the preference for Option 1 in paragraphs 2.2.7 - 2.2.9 Settlement Hierarchy. The Highways Agency prefers Option 2. Would like to see policies that would minimise demand at source and take account of the need for the mitigation of trunk road impacts, particularly in rural areas where alternative transport choices are limited.	Noted. The published version of the Preferred Options Report incorrectly stated in paragraph 2.2.9 that the Interim Sustainability Appraisal concluded that Option 1 would be the most sustainable and that the Council had chosen this option as its preferred option. All references in paragraph 2.2.9 should have been to Option 2. Errata slips identifying the error were produced and inserted in copies of the Preferred Option Report at the time of its consultation.

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69	Highways Agency	PO/069.03	Supports Option 2 relating to Major Developed Sites in the Green Belt, as this has the greatest potential to minimise the impact on the trunk road network.	Noted. This is the adopted approach.
91	English Heritage	PO/091.04	Welcome preference for maintaining gaps between settlements to safeguard character of towns and countryside.	Noted.
109	Countryside Agency	PO/109.08	Expresses concern that a policy on landscape protection is not included in the core policies as indicated in paragraph 2.2.6.	Policy CP1 in the Core Strategy seeks to protect and enhance the natural and built environment. A revised version of Core Policy CP9 is included in the Core Strategy which addresses protection of separate identity of settlements and their landscape setting. Policies protecting the AONB and Special Landscape Areas is included in the Core Strategy. Other landscape protection policies will be included in the Environmental Protection Policies DPD.
109	Countryside Agency	PO/109.03	Support Paragraph 2.2.6 relating to landscape protection.	Noted.
2. PARISH COUNCIL				
268	Ditton Parish Council	PO/268.07	Paragraph 2.2.10: Level of Affordable Housing - prefer option 1 which is to continue to require the provision of affordable housing on sites in excess of 25 units across the Borough.	Draft PPS3 changes the national affordable housing threshold to 15 units. The Core Strategy has been revised in anticipation of this guidance being confirmed. In any case there is a need to increase the amount of affordable housing provided in the Borough.
268	Ditton Parish Council	PO/268.04	Support Option 1 (Paragraph 2.2.2) - maintaining settlement Identity	Noted.
268	Ditton Parish Council	PO/268.06	Paragraph 2.2.9: Settlement Hierarchy - prefer option 1 which allows minor development within all rural settlements.	<p>This was in fact a typographical error. All references in paragraph 2.2.9 of the Preferred Options Report should have referred to Option 2, not Option 1, as being the most sustainable and therefore preferred policy on rural settlements.</p> <p>The policies on rural settlements have been reviewed. 'Rural Service Centres' are now defined in new Policy CP13 as being those settlements where a reasonable range of services exist or are easily accessible. These are considered to be the most</p>

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				sustainable locations for further housing and employment development within the rural area. At all 'Other Rural Settlements' (new Policy CP14) only minor development is considered permissible, subject to compliance with certain criteria.
268	Ditton Parish Council	PO/268.08	Support Option 2 (Paragraph 2.2.14) - Major Developed Sites in the Green Belt.	Noted.
268	Ditton Parish Council	PO/268.05	Support Option 1 (Paragraph 2.2.3) - retention of Special Landscape Area.	Noted.
3. INTEREST GROUP				
52	Hildenborough Village Preservation Association	PO/052.04	Support retention of SLAs in addition to AONB designated areas (paragraph 2.2.4) especially in the north of Hildenborough.  Support maintenance of the policy of maintaining gaps or 'green wedges' between settlements, in particular between Hildenborough and Tonbridge.  Support Option 2 in paragraph 2.2.13 and 2.2.14 and Council's decision.	Noted.
173	CPRE, Tonbridge & Malling District Committee	PO/173.04	Option 1 in paragraph 2.2.3. However, suggest that the SLA covering Mereworth Woods is deserving of upgrading to AONB status.	Noted. Areas of Outstanding Natural Beauty are designated nationally and as such TMBC does not have the authority to designate Mereworth Woods as an AONB.
173	CPRE, Tonbridge & Malling District Committee	PO/173.03	Option 1 in paragraph 2.2.1 to maintain gaps between settlements.	Noted.
6. HOUSE BUILDER				
221	Fairview New Homes Limited	PO/221.01	Section 2.2.10 - 2.2.11 regarding the selection of Option 3 over Option 1. Prefer option 1 as it is in line with National Policy	Draft PPS3 changes the national affordable housing threshold to 15 units.

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			Guidance and Circular 6/98 guidance. Any change from this is considered premature.	
			7. PUBLIC	
222	Miss Gill Goode	PO/222.02	Support paragraph 2.2.2 regarding the maintenance of gaps between settlements.	Noted.
271	Ms Yasmin Vawda	PO/271.01	Paragraph 2.2.3:-  SLAs should be enlarged to enhance and protect the countryside, and promoted to AONBs.  ALLIs should be retained and given more significance or otherwise promoted to SLAs.  Countryside designations should not be abolished.  Green Wedges should be retained.	The Core Strategy needs to be in conformity with PPS7 which sets out how the countryside should be protected. Policies CP9, CP10 and CP11 in the Preferred Options Report reflect this. AONBs are landscapes of national importance and are designated by the Countryside Agency. It is not possible for the Borough Council to change these. SLAs are important in the county-wide context and derive from the Kent Countryside Plan and are proposed to be retained in the LDF. There is no justification to change the extent of these areas.
271	Ms Yasmin Vawda	PO/271.05	Support for maintaining gaps between the settlements.	Noted.

## 2.3 SITES: OPTIONS AVAILABLE

### 1. OFFICIAL CONSULTEE

62	GOSE	PO/062.03	Commend the general Area of Opportunity approach (paragraphs 2.3.12 - 2.3.18) on the East Bank of the Medway.	Noted.
62	GOSE	PO/062.02	Clarification sought regarding paragraphs 2.3.1 - 2.3.9: * Given that Green Belt Boundaries should have a degree of permanence, is it reasonable to return safeguarded sites to the Green Belt at this stage? * How would safeguarded sites contribute to Green Belt objectives compared to other locations? * Would there be any merit in keeping reserve sites to cope	The sites in question are small sites, not strategic reserves. Changes to PPG3 (2000) and PPS3 (2005) mean that affordable housing can now be regarded as a very special circumstance for allowing development within the Green Belt. As such it is not considered necessary to keep these sites as safeguarded land. However, it should be noted that in response to other representations and to the emerging scope for development in the

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			with unforeseen circumstances?	centre of Tonbridge that it is now proposed to reduce the size of the Reserve Site at Lower Haysden Lane Tonbridge and return some land to the Green Belt.
175	Kent County Council Strategy Division	PO/175.13	Objects to Paragraph 2.3.15. There needs to be further assessment of the historic environment for the extension area (Option 2) in line with assessments for the existing Bushey Wood area.	A detailed archaeological desk study of the area has been undertaken by CgMs. There are no areas of significance within the extended area which has mainly been quarried.
2. PARISH COUNCIL				
268	Ditton Parish Council	PO/268.09	Support Paragraph 2.3.9: Safeguarded Land	Noted.
268	Ditton Parish Council	PO/268.10	Support Paragraph 2.3.11: Strategic Gap - prefer option 1 to retain the existing strategic gap.	Noted. Option 1 is being proposed.
268	Ditton Parish Council	PO/268.11	Paragraph 2.3.18: East Bank of the Medway - prefer option 1 to continue to save the existing land at Bushey Wood as an Area of Opportunity.	<p>It must be stressed that there is unlikely to be a need to develop land at Bushey Wood during the LDF period (up to 2021). The Area of Opportunity has been identified because it makes clear the Borough Council's longer term intentions for the area and provides a context to resist any proposals made in the short-term which might prejudice the longer-term potential of the area.</p> <p>Furthermore, it must be emphasised that it has never been envisaged that the entire extent of the area would be developed. The option of extending the coverage of the Area of Opportunity is being pursued because it potentially provides the maximum opportunity to improve areas of derelict and despoiled land and to review current land uses to the benefit of the wider communities of the East Bank. Other potential positive benefits include effective management of areas of nature conservation and archaeological interests. These benefits are recognised in the Sustainability Appraisal.</p>
268	Ditton Parish Council	PO/268.12	Support Paragraph 2.3.22: Rural Affordable Housing Strategy	Noted.

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3. INTEREST GROUP				
52	Hildenborough Village Preservation Association	PO/052.05	Are opposed to Option 3 in paragraph 2.3.7 as it would eat into the current greenfield gap between Tonbridge and Hildenborough.	Noted. The Council has decided to make no change to its existing policy in respect of the Reserve site North of Dry Hill Park Road.
174	Kent County Council Property Group	PO/174.01	Object to Paragraph 2.3.7 - Note the reasoning for not removing land north of Woodgate Way from the Green Belt and that TMBC do not wish housing to be developed on this land. Concur with this view, however the land owned by KCC is largely the Weald of Kent School and its lands. Every planning application for new school buildings is a departure from Green Belt policy and needs approval as such. Concerned about risk of refusal for individual applications in future and delays whilst GOSE and ODPM consider each case. Suggest removal of the school's built area from the Green Belt. School is willing to prepare a masterplan for the proposed LDF plan period.	Noted. In the light of this representation the Council proposes to amend the confines of the urban area to include the school buildings at the Weald of Kent School, Tonbridge, which will have the effect of marginally altering the extent of the Green Belt at this location (see Annex H to the Core Strategy).
235	Hyde Housing Association Ltd	PO/235.02	Object to Paragraph 2.3.22 - Allocating a site in Borough Green to meet the affordable housing need for surrounding villages will not meet the objective. This is because, in settlements with over 3000 population, there remains the right to acquire which means that they can be bought and then sold on to anyone. Most people would like to remain in their villages close to family and friends, even if services are limited, and moving them would worsen social exclusion.	<p>The Sustainability Appraisal found the option of concentrating the development of rural affordable housing at the rural service centre of Borough Green to be the more sustainable solution, particularly in terms of reducing the need to travel and ensuring that sufficient affordable housing is built. Dispersing the development of affordable housing to more remote rural areas would not necessarily guarantee adequate provision because of the size of the sites available.</p> <p>On the matter of occupancy and the need to ensure that the properties are not sold on the open market and remain affordable housing units, this is a detailed issue to be addressed at the planning application stage through appropriate planning conditions and/or legal agreements.</p>
5. LAND OWNER				

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107	H & H Celcon Limited	PO/107.21	The SAs should be repeated to assess the option of enabling development provision at the HHCL site for the funding and delivery of the Borough Green and Platt Bypass.	It is acknowledged that the Borough Green Bypass is a safeguarded scheme that the Highways Authority considers should be funded partially or fully by development. However, given the higher-level constraint policies affecting this part of the Borough, namely the Metropolitan Green Belt and the North Downs Area of Outstanding Natural Beauty, considering the HHCL site for enabling development to fund the Borough Green Bypass does not represent a genuine sustainable spatial option for the LDF. It is considered that the issue of a new blockworks is a matter for consideration by the Minerals Development Framework being prepared by Kent County Council.
107	H & H Celcon Limited	PO/107.05	Options for enabling development to fund and deliver the Borough Green Bypass are not outlined. Text should be added explaining the options available to provide enabling development that will fund and deliver the bypass.	How and when safeguarded highway schemes are funded is primarily a matter for the Local Transport Plan for Kent, not the Local Development Framework for Tonbridge and Malling Borough. It is not the focus of the LDF to find financial solutions for approved schemes but to deliver a balanced spatial strategy that addresses the social, economic and environmental issues affecting the Borough and community of Tonbridge and Malling.
110	Hornet Engineering Limited	PO/110.01	Paragraphs 2.3.19 - 2.3.24. Supports Rural Affordable Housing Strategy Option 2 relating to Isles Quarry West, Borough Green. This is because there is a need for more affordable housing in the area, the site is an eyesore, the village has good transport links and infrastructure, and the additional population would help to sustain the services.	Noted.
7. PUBLIC				
185	Miss Keeley	PO/185.01	The Bushey Wood Area of Opportunity will result in: * a large number of homes in a small area of the Borough * effects on the existing road infrastructure; * effects on services such as water, refuse disposal, police, public transport, doctors * effects on AONB, SLA, LSSI * conversion of Aylesford from a village to a town.	There is no need for any development at Bushy Wood during the time horizon of the LDF (up to 2021). It has been identified as an area of opportunity to potentially meet residential needs post 2021. When there is an identified need to formally allocate additional housing sites in the future, the suitability of the Bushy Wood area will be examined in more detailed, alongside other potential sites that may have become available. At that stage the impact of the development of the site for residential development,

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			Additional homes should be located in places such as Tonbridge.	and the impact on the provision of community services and infrastructure, will be fully appraised.
253	Mr J D I Baker	PO/253.01	<p>Bushey Wood Area of Opportunity should not be extended as it is unjustified and premature. There is no likely requirement for this land for more than 15 years. It runs the risk of undermining the strategic gap policy of maintaining the separation of settlements. The former boundary did not conflict with this as development could take place which would not merge with New Hythe, part of the Medway Gap urban area. The boundary should be kept away to the east of the river. In terms of the area of opportunity, option 1 or option 3 should be selected. The strategic gap should continue to include the land on the east bank, as far west as the river bank.</p>	<p>It must be stressed that there is unlikely to be a need to develop land at Bushey Wood during the LDF period (up to 2021). The Area of Opportunity has been identified because it makes clear the Borough Council's longer term intentions for the area and provides a context to resist any proposals made in the short-term which might prejudice the longer-term potential of the area.</p> <p>Furthermore, it must be emphasised that it has never been envisaged that the entire extent of the area would be developed. The option of extending the coverage of the Area of Opportunity is being pursued because it potentially provides the maximum opportunity to improve areas of derelict and despoiled land and to review current land uses to the benefit of the wider communities of the East Bank. Other potential positive benefits include effective management of areas of nature conservation and archaeological interests. These benefits are recognised in the Sustainability Appraisal.</p>
271	Ms Yasmin Vawda	PO/271.02	<p>Relates to paragraph 2.3.23 in relation to Isles Quarry West, Borough Green, as follows:</p> <ul style="list-style-type: none"> <li>* There should be no alteration to the Green Belt boundary or development of the Green Wedge around Borough Green as settlements will eventually coalesce.</li> <li>* There is no need for this housing site.</li> <li>* It is unsustainable.</li> <li>* It is contrary to PPS7.</li> </ul>	<ul style="list-style-type: none"> <li>* The location of this site within the Metropolitan Green Belt and a Green Wedge between Borough Green and Ightham is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21.</li> <li>* Agree that the 140 market houses are not an essential housing land allocation but are necessary to provide the 60 affordable dwellings, the need for which are outlined in the reasoned justification for policy CP21.</li> <li>* Isles Quarry West, Borough Green has been identified as the most sustainable location for affordable and associated market housing since it comprises damaged land and the village is classed as a rural service centre with a certain level of services.</li> <li>* In terms of national planning guidance, now contained in PPS7, major developments should only take place in AONBs in exceptional circumstances. It is questionable whether the proposal at Isles Quarry constitutes major development. PPS7</li> </ul>

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271	Ms Yasmin Vawda	PO/271.03	<p>Relates to paragraph 2.3.24 in relation to Isles Quarry West, Borough Green, as follows:</p> <ul style="list-style-type: none"><li>* Building a large housing estate on the green belt is unacceptable and contrary to PPG2. It should be restored to greenfield, nature conservation uses and SLA designation.</li><li>* There will be traffic implications and a drain on resources such as the local school, utilities etc., contrary to PPS1.</li><li>* The countryside should be protected and more quiet lanes implemented.</li><li>* There should be real measures to reduce private car use and improve public transport.</li><li>* There should only be very limited, small scale infill housing in Borough Green</li></ul>	<p>further states that the conservation of the natural beauty of the landscape and countryside of AONBs is important. It also recognises that planning policies should support suitably located and designed development necessary to facilitate the economic and social well-being of these areas and their communities, including the provision of adequate housing to meet identified local needs. It is considered that the proposal for housing at Isles Quarry would meet an identified local need for housing and can respect its setting within the AONB.</p> <ul style="list-style-type: none"><li>* The location of this site within the Metropolitan Green Belt and a SLA is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21. There are policy requirements relating to nature conservation and the provision of landscaping.</li><li>* The relevant infrastructure providers have been formally consulted and do not identify a need for additional facilities as a result of the development, apart from the need to upgrade and adopt the access road to the north which is included as a policy requirement.</li><li>* Whilst this site is outside the village confines, it is damaged land and the justification for its development is outlined in the reasoned justification for policy CP21.</li><li>* The site is on the edge of Borough Green which is classed as a rural service centre with a certain level of services. It is a policy requirement that there is provision of footpaths / cycle routes to link with the existing public rights of way network and the retail centre of Borough Green to encourage sustainable modes of transport.</li><li>* Paragraph 3.7.26 explains why the affordable housing is unlikely to be sourced from other sites.</li></ul>