

# Preferred Options - Development Land Allocations: Housing

## Annex E - Firm Housing Allocations

### DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
ANNEX E: 109 HALL ROAD, AYLESFORD - FIRM HOUSING ALLOCATION				
5. LAND OWNER				
79	Hallam Land Management Limited	PO/079.13	This is a constrained site which has been identified for development for a considerable time and is unlikely to come forward within the plan period. The allocation should be deleted.	It is identified as an unconstrained site. Whilst it is currently occupied, it is not considered that there is any reason why it should not come forward for housing development prior to 2021. It is surrounded by existing residential development.
79	Hallam Land Management Limited	PO/079.19	The allocation should be deleted for the following reasons: * The site is in operational use and will not be available for development within the plan period * No proposals are made for the relocation of the existing commercial use * It will result in the loss of important employment land	The site is surrounded by existing residential development and the development of this site for housing would be consistent with this. Whilst the site is in commercial use as a book suppliers, it is small scale. As such, it is not considered to be important employment land and its loss would not significantly affect employment land supply.

### ANNEX E: 2 LONDON ROAD, LEYBOURNE - FIRM HOUSING ALLOCATION

#### 5. LAND OWNER

79	Hallam Land Management Limited	PO/079.22	The allocation should be deleted for the following reasons: * The site is in operational use and will not be available for development within the plan period * No proposals are made for the relocation of the existing commercial use	Whilst a recent planning application for the redevelopment of the site for residential use was refused this was not on a matter of principle. This shows there is interest in its redevelopment. There is no reason why it should not be available for development within the plan period. Part of the site is currently used as a petrol filling
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			* It will result in the loss of important local facilities	station and the remainder is vacant. Given that there are a number of petrol filling stations along the A20, it is not considered that the redevelopment of this site would result in the loss of important local facilities or that there is a need for its relocation.

### ANNEX E: BINGLEY CLOSE, SNODLAND - FIRM HOUSING ALLOCATION

#### 02. PARISH COUNCIL

152	Snodland Town Council	PO/152.01	Object to map E14 relating to Bingley Close Snodland and the loss of parking facilities for residents in the area.	Further investigation has revealed that there are multiple leasehold interests in the land. Therefore, the site is unlikely to come forward for development. It is proposed to remove it from the list of housing sites contained in Annex E.
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#### 3. INTEREST GROUP

218	Snodland Labour Party	PO/218.01	Proposal will result in loss of car parking space in the Bingley Close area.	Further investigation has revealed that there are multiple leasehold interests in the land. Therefore, the site is unlikely to come forward for development. It is proposed to remove it from the list of housing sites contained in Annex E.
289	RSPB	PO/289.05	Development should take account of the impact on nearby SSSIs.	The site is within the urban area of Snodland and will not impact on SSSIs.

### ANNEX E: BRICKMAKERS ARMS, MAIDSTONE ROAD, PLATT - FIRM HOUSING ALLOCATION

#### 2. PARISH COUNCIL

38	Platt Parish Council	PO/038.09	The site is unlikely to provide 30% affordable homes. It is likely to be built on before the proposed policy CP20 is adopted and therefore the provision could not be enforced.	Agree. Planning permission has been granted for 14 units on the site and the site will be developed before the policy is adopted. There is no provision for affordable housing within this development as the current policy does not require it. Therefore, the site will be removed from the list of housing allocations
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REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				contained in Annex E and placed on the list of sites with planning permission.
5. LAND OWNER				
79	Hallam Land Management Limited	PO/079.23	The allocation should be deleted for the following reasons: * It will result in the loss of important local facilities * It does not represent sustainable development	Planning permission has been granted for the residential redevelopment of the site
7. PUBLIC				
255	Dr Graham Darby	PO/255.01	Brickmakers Arms at Platt should be removed as it is likely to have been built by the time the policy is adopted.	The Annex will be updated to take account of the stage that the development has reached at the time that the DPD is submitted to the Secretary of State.

## ANNEX E: CASTLEDENE TRANSPORT AND PICKFORDS REMOVALS, MILL HALL, AYLESFORD - FIRM HOUSING ALLOCATION

### 3. INTEREST GROUP

287	Action with Communities in Rural Kent	PO/287.01	The developers should provide a level or slope access to the Maidstone bound platform of Aylesford Station to provide a simpler and more direct access route to the station.	Agree. Add a policy requirement to this effect.
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## ANNEX E: ISLES QUARRY WEST, BOROUGH GREEN - FIRM HOUSING ALLOCATION

### 1. OFFICIAL CONSULTEE

175	Kent County Council Strategy Division	PO/175.50	There is a need to refer to the archaeological impacts of development.	Since the entire site has been excavated and remodelled there is not likely to be any archaeological interest left in the site.
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2. PARISH COUNCIL				
32	Borough Green Parish Council	PO/032.01	Whilst they support the proposal to develop the site for housing in principle, they expect a comprehensive review of social and physical infrastructure to be carried out, e.g. doctors, dentists, water, highways, before they agree to housing development.	Noted. All development will need to make appropriate provision to mitigate impact on local services.
100	Ightham Parish Council	PO/100.12	<p>Objects to the proposal for the following reasons:</p> <ul style="list-style-type: none"> <li>* Affordable housing could be accommodated anywhere in the Borough and doesn't require the 140 market dwellings to enable them.</li> <li>* It will result in an inappropriate high density development on a rural village edge. 200 units is excessive.</li> <li>* The site is in the AONB and high density development would be visible from the North Downs and Ightham.</li> <li>* Isles Quarry East was part of the original proposal by Hanson, but is not included in the current allocation, despite the proposal for the same number of houses.</li> <li>* There is no certainty that the ground levels will be reduced to meet the policy requirement for housing.</li> <li>* The 'transport infrastructure' referred to should not be considered as a community benefit, financially connected to this housing development proposal since the upgrading and adoption of the private access road was a condition of a previous planning permission.</li> <li>* The impact of a possible increase of 500 residents on a population of 3,500 is large.</li> <li>* It is considered that the 60 affordable units should be dispersed in smaller groups within Borough Green over a period of time as windfall sites will arise. It may be premature to seek 60 affordable units before the decisions are made on the 2 appeals for 20 affordable units in Platt.</li> <li>* The site is in the Green Belt and should be retained as such. The industrially developed part of the site should be included as a Major Developed Site in the Green Belt with</li> </ul>	<ul style="list-style-type: none"> <li>* Agree that the market houses are not an essential to meet the Borough's housing requirements but they are necessary to support the provision of the affordable dwellings, the need for which is outlined in the reasoned justification for the policy.</li> <li>* The proposal would result in a density of 55 dwellings per hectare. It is considered that this could be satisfactorily provided with sensitive design and layout.</li> <li>* It is a requirement that any development of the site will need to respect its setting within the AONB. Limiting development to lower levels on the site should minimise its impact on the AONB.</li> <li>* It is considered that the 200 units could be satisfactorily provided on the site.</li> <li>* There is a policy requirement that the ground levels are reduced and that development of the higher level platform for housing is integrated with development at the lower level.</li> <li>* There is a requirement on a previous planning permission for the private haul road to be upgraded and adopted.</li> <li>* It is considered that Borough Green could accommodate the increase in population and indeed it would help sustain existing services.</li> <li>* No suitable alternative sites have been identified through earlier stages of the LDF process. The location at Isles Quarry West, Borough Green has been identified as the most sustainable location since it comprises damaged land and the village is classed as a rural service centre with a reasonable level of services.</li> <li>* The removal of this site from the Metropolitan Green Belt is justified in terms of the need for affordable housing outlined in the</li> </ul>

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			suitable policy requirements to achieve a satisfactory housing development, including 30% affordable units, on a fully restored quarry face.	<p>reasoned justification for the policy.</p> <p>* It is accepted that the 60 affordable housing units could be achieved through development in and adjoining other rural settlements. However, the location at Isles Quarry West, Borough Green has been identified as the most sustainable location since it comprises damaged land and the village is classed as a rural service centre with a certain level of services.</p> <p>* The development would provide the benefits of meeting an identified need for rural affordable housing, the restoration of the site and general environmental improvement. It is considered that this provides the justification to revise the Green Belt boundary.</p> <p>* The removal of this site from the Metropolitan Green Belt and its location within an AONB, a Green Wedge and an ALLI is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21.</p> <p>* The location of the site adjacent to Borough Green means that it is more appropriate to promote the development of the site as an allocation than as a major Developed Site in the Green Belt. The latter approach would be much more restrictive and would therefore not create sufficient development potential to encourage the site's redevelopment or make the provision of sufficient affordable housing viable.</p>
5. LAND OWNER				
79	Hallam Land Management Limited	PO/079.26	<p>The allocation should be deleted for the following reasons:</p> <ul style="list-style-type: none"> <li>* Its impact on the Green Belt, AONB and important Green Wedge</li> <li>* Its impact on the SNCI.</li> <li>* Its remote location.</li> <li>* The proposal represents unsustainable development and is contrary to Government Policy and the provisions of PPG3.</li> </ul>	<ul style="list-style-type: none"> <li>* The removal of this site from the Metropolitan Green Belt and its location within an AONB and a Green Wedge is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21 in the Preferred Options Report. It is a requirement that any development of the site will need to respect its setting within the AONB.</li> <li>* The proposed development site would be separated from the Site of Nature Conservation Interest by a public amenity area and would not have a detrimental impact on it. In fact, it is a policy requirement that the SNCI should be subject to long term</li> </ul>

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				<p>management.</p> <p>* The site is on the edge of Borough Green which contains a good range of shops, services, community facilities, reasonable public transport, a primary school and a nearby secondary school. It is not considered to be a remote location.</p> <p>* This site comprises damaged land and is located on the edge of the settlement of Borough Green which has a range of services listed above. This represents sustainable development in accordance with the provisions of PPG3.</p>
106	Hanson Quarry Products Europe	PO/106.01	Site area should be increased to 5.4 hectares to enable the 200 units to be delivered at an average density of 37 dwellings per hectare. This would allow a lower density on the edge of the site where it abuts Green Belt and higher density near to local facilities. The enlargement of the development can be supported by a landscape analysis.	The site boundaries need to be drawn in such a way as to keep development at lower levels on the site to minimise its impact on the AONB and Metropolitan Green Belt. However, it is agreed that there is some scope to amend the boundary as shown in Annex D to the Development Land Allocations DPD.
106	Hanson Quarry Products Europe	PO/106.03	Support identification of the site for residential purposes and the proposed form of development mix. The site presents an opportunity for development to provide positive benefits such as affordable housing, and ecological and landscape enhancement.	Noted.
106	Hanson Quarry Products Europe	PO/106.04	The proposed area of land to be released from Green Belt will be insufficient to provide development that delivers affordable housing of a high urban design standard. It would lead to a density of 54 dwellings per hectare which provides limited scope to provide a range of densities across the site and a mix of house types. A revision to the area is proposed (see Map 13). This would allow lower density development adjacent to the Green Belt and higher densities closer in the central northern part of the site where it is more closely related to local facilities. A Landscape and Ecology Master Plan supports this revision.	The site boundaries need to be drawn in such a way as to keep development at lower levels on the site to minimise its impact on the AONB and Metropolitan Green Belt. However, it is agreed that there is some scope to amend the boundary as shown in Annex D to the Development Land Allocations DPD.
110	Hornet Engineering	PO/110.05	The development of the lower quarry level for housing development without developing the higher level platform	* The site boundaries are drawn in such a way as to keep development at lower levels on the site to minimise its impact on

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	Limited		<p>would be unsatisfactory for the following reasons:</p> <ul style="list-style-type: none"> <li>* B2 uses would be incompatible with residential uses.</li> <li>* Effective screening of the housing development would be impractical.</li> <li>* There could be issues with noise affecting the residents as there are no restrictions on emissions or hours of working.</li> <li>* It would not be economically viable to reduce the high level platform at a later date.</li> </ul> <p>Therefore, the fourth policy requirement for Isles Quarry West should be replaced with "It shall be a condition of the entire development that the high level platform in the northern part of the site shall have its ground level reduced and integrated with development at the lower level."</p> <p>The proposed site area of 3.66 hectares is too small to accommodate 200 houses for the following reasons:</p> <ul style="list-style-type: none"> <li>* The density of 55 dwellings per hectare exceeds the Government's recommendation in PPG3 that the density should be between 30 and 50 dwellings per hectare.</li> </ul> <p>Therefore, the site area should be amended from 3.66ha to 4.5ha by revising the western boundary (Map 13).</p>	<p>the AONB and Metropolitan Green Belt. It is considered that there would not be a conflict between housing and industrial uses because of the differing levels. The revised policy H2 in the Development Land Allocations DPD allows for the possible retention of the employment uses. A sensitive design and layout could mitigate any possible impacts.</p> <ul style="list-style-type: none"> <li>* The site boundaries need to be drawn in such a way as to keep development at lower levels on the site to minimise its impact on the AONB and Metropolitan Green Belt. However, it is agreed that there is some scope to amend the boundary as shown in Annex D to the Development Land Allocations DPD. This will allow a slightly lower density of development overall.</li> </ul>
110	Hornet Engineering Limited	PO/110.04	<p>Object to the western boundary line of the area to be taken out of the Green Belt for the following reasons:</p> <ul style="list-style-type: none"> <li>* It does not follow the recommendation of PPG2 paragraph 2.9 which states that "boundaries should be clearly defined, using edges where possible." The site bisects Hornet's employment site and should be amended to include the whole of the employment site.</li> <li>* It does not follow the recommendation of PPG2 paragraph 2.8 which states that "if boundaries are drawn excessively tightly around existing built-up areas it may not be possible to maintain the degree of permanence that Green Belts should have. This would devalue the concept of the Green Belt and</li> </ul>	<p>The site boundaries need to be drawn in such a way as to keep development at lower levels on the site to minimise its impact on the AONB and Metropolitan Green Belt. However, it is agreed that there is some scope to amend the boundary as shown in Annex D to the Development Land Allocations DPD. This now includes all of the Hornet Engineering site.</p> <p>The advice in paragraph 2.8 of PPG2 relates to situations where detailed Green Belt boundaries have not yet been defined and is specifically intended to relate to the identification of Reserve Sites. It is not relevant in this case.</p>

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			<p>reduce the value of local plans in making proper provision for necessary development in the future."</p> <ul style="list-style-type: none"> <li>* The density of 55 dwellings per hectare exceeds the Government's recommendation in PPG3 that the density should be between 30 and 50 dwellings per hectare.</li> <li>* The inclusion of only part of Hornet's site in the housing allocation means that there is little economic incentive to demolish the existing industrial buildings and lower the high level platform.</li> <li>* The current boundary would lead to industrial buildings operating on higher ground with housing at a lower level. This is considered unsatisfactory.</li> </ul>	
181	GLN (Wrotham) Ltd	PO/181.03	<p>Annex B should be deleted for reasons set out in representation numbers PO/181.02, PO/181.05-07, PO/181.09-10, and PO/181.14-16.</p>	<p>The responses to these representations are set out under the relevant reference numbers.</p>
181	GLN (Wrotham) Ltd	PO/181.10	<p>Paragraph 4.2.4 relating to Isles Quarry West, Borough Green, should be deleted for the following reasons:</p> <ul style="list-style-type: none"> <li>* Removal of this site from the Metropolitan Green Belt and development of this scale within AONB, Green Wedge and Area of Landscape Importance is not justified by the affordable housing argument.</li> <li>* No evidence is presented that the 60 affordable housing units cannot otherwise be achieved through development in and adjoining settlements in the north west part of the Borough.</li> <li>* Neither the restoration of the quarry nor the provision of other community benefits qualify as exceptional circumstances necessary to justify a revision to the established Green Belt boundary.</li> </ul>	<ul style="list-style-type: none"> <li>* The removal of this site from the Metropolitan Green Belt and its location within an AONB, a Green Wedge and an ALLI is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21 of the Preferred Options Report.</li> <li>* The 60 affordable housing units could be achieved through development in and adjoining other settlements. However, the location at Isles Quarry West, Borough Green has been identified as the most sustainable location since it comprises damaged land and the village is classed as a rural service centre with a reasonable level of services.</li> <li>* The exceptional circumstance in this case is the identified need for affordable housing. The development of the site would lead to restoration of the quarry and the provision of housing, community and recreation facilities.</li> </ul>
181	GLN (Wrotham) Ltd	PO/181.02	<p>The allocation should be deleted for the following reasons:</p> <ul style="list-style-type: none"> <li>* Retention and adoption of the private 'haul road' granted planning permission in connection with the quarry would be contrary to the terms of that planning permission.</li> </ul>	<ul style="list-style-type: none"> <li>* There is a requirement on a previous planning permission for the private haul road to be upgraded and adopted.</li> <li>* Core strategy policies CP6 and CP21 were appraised against 21 SEA / SA objectives developed from the objectives contained</li> </ul>

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			<ul style="list-style-type: none"> <li>* The Strategic Environmental Appraisal and Sustainability Appraisal for this site is inadequate.</li> <li>* Clarification is required as to what 'public amenity area' means.</li> <li>* No commitment to the allocation of this site should be made in advance of publication of the specific area policy referred to and consideration of responses to public consultation thereon.</li> </ul>	<p>in the South East Integrated Regional Framework, the issues set out SEA Directive and the headline objectives suggested in the Government guidance on Sustainability Appraisal.</p> <ul style="list-style-type: none"> <li>* The masterplan for the site will set out recreational use of the public amenity area.</li> <li>* The area policy will be published in the Development Land Allocations DPD alongside the Core Strategy DPD. This takes on board the policy requirements set out in Annex E and comments received at the Preferred Options stage.</li> </ul>
6. HOUSE BUILDER				
71	Tatham Homes	PO/071.01	<p>The allocation should be deleted for the following reasons:</p> <ul style="list-style-type: none"> <li>* Retention and adoption of the private 'haul road' granted planning permission in connection with the quarry would be contrary to the terms of that planning permission.</li> <li>* The Strategic Environmental Appraisal and Sustainability Appraisal for this site is inadequate.</li> <li>* Clarification is required as to what 'public amenity area' means.</li> <li>* No commitment to the allocation of this site should be made in advance of publication of the specific area policy referred to and consideration of responses to public consultation thereon.</li> </ul>	<ul style="list-style-type: none"> <li>* There is a requirement on a previous planning permission for the private haul road to be upgraded and adopted.</li> <li>* Core strategy policies CP6 and CP21 were appraised against 21 SEA / SA objectives developed from the objectives contained in the South East Integrated Regional Framework, the issues set out SEA Directive and the headline objectives suggested in the Government guidance on Sustainability Appraisal.</li> <li>* The masterplan for the site will set out recreational use of the public amenity area.</li> <li>* The area policy will be published in the Development Land Allocations DPD alongside the Core Strategy DPD. This takes on board the policy requirements set out in Annex E and comments received at the Preferred Options stage.</li> </ul>
71	Tatham Homes	PO/071.09	<p>Annex B should be deleted for reasons set out in representation numbers PO/071.01, PO/071.03, PO/071.05 and PO/071.11-16.</p>	<p>The responses to these representations are set out under the relevant reference numbers.</p>
71	Tatham Homes	PO/071.11	<p>Paragraph 4.2.4 relating to Isles Quarry West, Borough Green, should be deleted for the following reasons:</p> <ul style="list-style-type: none"> <li>* Removal of this site from the Metropolitan Green Belt and development of this scale within AONB, Green Wedge and Area of Landscape Importance is not justified by the affordable housing argument.</li> <li>* No evidence is presented that the 60 affordable housing</li> </ul>	<ul style="list-style-type: none"> <li>* The removal of this site from the Metropolitan Green Belt and its location within an AONB, a Green Wedge and an ALLI is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21 of the Preferred Options Report.</li> <li>* The 60 affordable housing units could be achieved through development in and adjoining other settlements. However, the</li> </ul>

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			<p>units cannot otherwise be achieved through development in and adjoining settlements in the north west part of the Borough.</p> <p>* Neither the restoration of the quarry nor the provision of other community benefits qualify as exceptional circumstances necessary to justify a revision to the established Green Belt boundary.</p>	<p>location at Isles Quarry West, Borough Green has been identified as the most sustainable location since it comprises damaged land and the village is classed as a rural service centre with a reasonable level of services.</p> <p>* The exceptional circumstance in this case is the identified need for affordable housing. The development of the site would lead to restoration of the quarry and the provision of housing, community and recreation facilities.</p>
72	Croudace Homes Limited	PO/072.02	<p>Isles Quarry is a complex brownfield site that will have a substantial lead time prior to delivery of the first housing units, therefore a delay in housing provision will be inevitable. There is also uncertainty in relation to the likely costs and consequential viability of providing the level of affordable housing sought by the Council. Additional land should therefore be identified within the area to meet housing need.</p>	<p>The benefits of developing Isles Quarry are set out in para 3.6.7 of the Preferred Options Report. The benefits would not apply to other sites. The timing of development at Isles Quarry will be a matter for further investigation, but a firm commitment in the LDF will be the trigger for the development.</p>
72	Croudace Homes Limited	PO/072.01	<p>Isles Quarry is a complex brownfield site that will have a substantial lead time prior to delivery of the first housing units, therefore a delay in housing provision will be inevitable. There is also uncertainty in relation to the likely costs and consequential viability of providing the level of affordable housing sought by the Council. Additional land should therefore be identified within the area to meet housing need.</p>	<p>The benefits of developing Isles Quarry are set out in para 3.6.7 of the Preferred Options Report. These benefits would not apply to other sites. The timing of development at Isles Quarry will be a matter for further investigation, but a firm commitment in the LDF will be the trigger for the development.</p>
134	Rydon Homes	PO/134.03	<p>The proposal to amend the Green Belt boundary at Isles Quarry West, Borough Green, is flawed as it should only be altered in exceptional circumstances. No exceptional circumstances have been demonstrated because:-</p> <p>* The need for 60 affordable houses could be met on other sites around Borough Green without the need for cross-subsidy from private housing, e.g. site opposite Brickmakers Arms public house, St Mary's Platt (Map 2).</p> <p>* There is no need for further private housing in the Borough.</p> <p>* If 60 affordable dwellings are required, the amount of land released from the Green Belt should be kept to an absolute minimum to limit any harm to the Green Belt.</p>	<p>The site opposite the Brickmakers Arms public house is a greenfield site in the Green Belt. Platt is not amongst the list of settlements where services and facilities are in close proximity. Planning permission has been refused by the Secretary of State on appeal for affordable housing on this site. PPG3 advocates a search sequence in which previously developed land should be considered before greenfield land and development sites should be located and accessible to jobs, shops and services by modes other than the car. Isles Quarry West, Borough Green, meets these criteria.</p> <p>* There is an adequate supply of private housing in the Borough but this development is justified since it would meet an identified</p>

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			<ul style="list-style-type: none"> <li>* The site is not previously developed land as previous consents have required restoration and much of it has blended into the landscape. Therefore, it does not meet the criteria of Annex C of PPG3. The Green Belt should not suffer from past failures to enforce planning conditions.</li> <li>* The restoration of the site would not fulfil any Green Belt purposes.</li> <li>* There has been no material change of circumstances in the need for restoration since the adoption of the Local Plan in 1998.</li> <li>* The development of the site for housing will harm the AONB.</li> <li>* The strategic local gap between Borough Green and Ightham would be eroded.</li> <li>* The access road was originally permitted on a temporary basis and should not be given greater status now.</li> <li>* The landowners should not be entitled to further profit from degrading the landscape but should restore it instead.</li> <li>* The proposal does not meet the tests of soundness.</li> </ul>	<p>need for affordable housing.</p> <ul style="list-style-type: none"> <li>* Agree that the amount of land released from the Green Belt should be kept to a minimum and the site boundary constitutes the minimum amount of land necessary to achieve 60 affordable dwellings.</li> <li>* Only part of the site is subject to restoration conditions. The remaining parts contain buildings and constitute damaged land.</li> <li>* It is not considered that the development of the site for housing would fulfil any Green Belt purposes. However, the removal of this site from the Metropolitan Green Belt is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21(now CP19).</li> <li>* There has been a change in circumstances since the Local Plan was adopted in 1998 in that there is now a significant identified need for affordable housing in the rural part of the Borough.</li> <li>* The location of the development within an AONB is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21 (now CP19). It is a requirement that any development of the site will need to respect its setting within the AONB.</li> <li>* The location of this site within 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 (now CP19).</li> <li>* It is agreed that the access road was originally allowed on a temporary basis but permission was granted in 2000 to bring the road up to adoptable standards.</li> <li>* The development of the site would meet an identified need for affordable housing in the rural area.</li> <li>* It is considered that the proposal is sound and is the most sustainable option for meeting an identified need for affordable housing in the rural area.</li> </ul>

## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
160	Miss Katharine Donaldson	PO/160.01	<ul style="list-style-type: none"> <li>* The site is Green Belt and within the North Downs AONB.</li> <li>* Development would set a precedent for developing the Green Belt in future.</li> <li>* It could encourage other quarrying companies not to restore their land after operations have ceased but to put it forward for development instead.</li> <li>* There is insufficient water to supply new development.</li> <li>* It could result in an additional 400 cars using the A25, increasing noise and pollution.</li> <li>* Borough Green shopper car parking is already inadequate on Saturdays and this development will exacerbate the situation.</li> <li>* Housing development should take place on brownfield sites and not areas of outstanding natural beauty.</li> </ul>	<ul style="list-style-type: none"> <li>* The removal of this site from the Metropolitan Green Belt and its location within an AONB is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21. It is a requirement that any development of the site will need to respect its setting within the AONB.</li> <li>* It is not considered that development of the site would set a precedent as there are special circumstances which justify its development to provide affordable housing.</li> <li>* Noted, though there are special circumstances which justify the development of this site to provide affordable housing.</li> <li>* The water company has been consulted and does not raise any issues in relation to water supply.</li> <li>* It is not considered that the additional traffic would create an unacceptable increase in noise and pollution along the A25.</li> <li>* The development is located close to the rural service centre of Borough Green. It will be a policy requirement for footpaths and cycle routes to the centre to be improved to encourage sustainable modes of transport.</li> <li>* The site at Isles Quarry West, Borough Green has been identified as the most sustainable location for affordable housing since it comprises damaged land and the village is classed as a rural service centre with a certain level of services.</li> </ul>
163	Mr Ronald and Mrs Ida Taft	PO/163.01	<p>The site should not be allocated for development for the following reasons:-</p> <ul style="list-style-type: none"> <li>* It is located in the Green Belt.</li> <li>* The road infrastructure will not support the additional vehicles generated by it.</li> <li>* There is no requirement for housing in Borough Green.</li> <li>* There is insufficient industry to support the additional working population.</li> <li>* There is insufficient car parking space in the village.</li> <li>* Preferable to provide smaller affordable housing developments in more scattered locations.</li> </ul>	<ul style="list-style-type: none"> <li>* The removal of this site from the Metropolitan Green Belt is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21 in the Preferred Options Report.</li> <li>* The proposal will need to satisfactorily mitigate any traffic impact including contributions to public transport. There is a requirement to upgrade the private haul road to adoptable standards.</li> <li>* There is a need for affordable housing unit in this part of the Borough, as outlined in the reasoned justification for policy CP21.</li> <li>* The location at Isles Quarry West, Borough Green has been identified as the most sustainable location since it comprises damaged land and the village is classed as a rural service centre</li> </ul>

## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
177	Mr Martin Syms	PO/177.01	<p>The allocation should be deleted for the following reasons:</p> <ul style="list-style-type: none"> <li>* The site is within the green belt, the AONB and a SLA, an ALLI and a Green Wedge.</li> <li>* The proposals do not include any plans to enhance the local infrastructure which is at capacity e.g. doctor's surgery and primary school.</li> <li>* Question whether it means that TMBC is not going to enforce Hanson's obligation to return the quarry to its former condition.</li> </ul>	<p>with a certain level of services.</p> <ul style="list-style-type: none"> <li>* The development is located close to the rural service centre of Borough Green. It will be a policy requirement for footpaths and cycle routes to the centre to be improved to encourage sustainable modes of transport.</li> <li>* Paragraph 3.7.26 in the Preferred Options Report explains why the affordable housing is unlikely to be sourced from other sites.</li> </ul> <p>* The removal of this site from the Metropolitan Green Belt and its location within an AONB, a SLA, a Green Wedge and an ALLI is justified in terms of the need for affordable housing outlined in the reasoned justification for the policy. It is a requirement that any development of the site will need to respect its setting within the AONB.</p> <ul style="list-style-type: none"> <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>* It is a matter for Kent County Council, as the Minerals and Waste Planning Authority, to enforce any conditions in relation to the quarry. Much of the quarry pre-dates modern planning legislation and is not covered by enforceable restoration conditions. There are lawful use rights within the quarry for industrial and storage purposes which means that the quarry will remain in the same state as it is unless it is redeveloped.</li> </ul>
186	Ms Patricia Cooper	PO/186.01	<p>The site should be deleted for the following reasons:</p> <ul style="list-style-type: none"> <li>* It would erode the Green Belt.</li> <li>* There is no need for new homes in this area.</li> <li>* There is no need for the public amenity area.</li> <li>* It would result in the loss of countryside.</li> <li>* Haul road was given permission for use for a period of only 10 years.</li> </ul>	<ul style="list-style-type: none"> <li>* The removal of this site from the Metropolitan Green Belt is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21.</li> <li>* Agree that the market houses are not an essential to meeting housing requirements but are necessary to support the provision of the affordable dwellings, the need for which is outlined in the reasoned justification for policy CP21 in the Preferred Options Report.</li> <li>* It would result in the loss of damaged land.</li> <li>* Haul road was granted permanent planning permission by Kent</li> </ul>

## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
224	Mr Mike Taylor	PO/224.01	<ul style="list-style-type: none"> <li>* The proposal would create an extra strain on the infrastructure, particularly the sewerage system.</li> <li>* There is no demonstrable need for more local social or low cost housing and new housing that is built is being bought by people from outside the village.</li> <li>* The land could be used to expand the doctor's surgery, relocate the primary school or provide a cemetery.</li> <li>* Industrial development on the north west part of the site, after the bypass is built, would be beneficial to the village.</li> <li>* Land to the south west should be restored and returned to agricultural or leisure use.</li> <li>* There is no need for further general housing.</li> <li>* The size of the development would destroy village life.</li> </ul>	<p>County Council in 1994.</p> <ul style="list-style-type: none"> <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>* The need for affordable housing is outlined in the reasoned justification for policy CP21.</li> <li>* The relevant infrastructure providers have been formally consulted and do not identify a need for additional facilities in the village.</li> <li>* This is not considered to be a well located or good quality site for employment use.</li> <li>* Only part of the site is subject to restoration conditions. The remaining parts contain buildings and constitute damaged land.</li> <li>* Agree that the market houses are not an essential to meeting housing requirements but are necessary to support the provision of the affordable dwellings, the need for which is outlined in the reasoned justification for policy CP21 in the Preferred Options Report.</li> <li>* It is not considered that a development of this scale would destroy village life. On the contrary it will help support local services and facilities</li> </ul>
230	Ms Lucilla Mackay	PO/230.01	<ul style="list-style-type: none"> <li>* The site is within the green belt, the AONB and an ALLI.</li> <li>* It is unreasonable to build 140 private houses to cross fund 60 affordable homes.</li> </ul>	<ul style="list-style-type: none"> <li>* The removal of this site from the Metropolitan Green Belt and its location within an AONB and an ALLI is justified in terms of the need for affordable housing outlined in the reasoned justification for the policy. It is a requirement that any development of the site will need to respect its setting within the AONB.</li> <li>* The market houses are necessary to support the provision of the affordable dwellings.</li> </ul>
232	Mr A D Mackay	PO/232.01	<ul style="list-style-type: none"> <li>* The site is within the green belt, the AONB and an ALLI.</li> <li>* It is unreasonable to build 140 private houses to cross fund 60 affordable homes.</li> <li>* The land may be contaminated because of its close</li> </ul>	<ul style="list-style-type: none"> <li>* The removal of this site from the Metropolitan Green Belt and its location within an AONB and an ALLI is justified in terms of the need for affordable housing outlined in the reasoned justification for the policy. It is a requirement that any development of the site</li> </ul>

## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			proximity to the quarry and therefore no housing should be built on it.	will need to respect its setting within the AONB. * The market houses are necessary to support the provision of the affordable dwellings. * It is a policy requirement that any land contamination likely to affect the site is investigated and remediated.
238	Mr & Mrs James	PO/238.01	Concerned that over-development would put too much strain on already overstretched services, i.e. health, education, roads, parking, transport, libraries. At present, the roads are slow in the mornings.	* 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.
240	Mr Adrian Tribe	PO/240.01	The Borough Green bypass would be a necessary and integral part of any development of the site and this should be a requirement to avoid dangerously high levels of traffic through the centre of the village.	It is not considered that this development alone justifies the provision of the Borough Green bypass and the inclusion of such a policy requirement would not meet the tests contained in Circular 05/2005 (Planning Obligations).
241	Mr Don Morgan	PO/241.01	<p>* The proposal would adversely impact on the natural beauty of the countryside and landscape along Thong Lane.</p> <p>* The affordable housing would attract outsiders into the village and not be for local people.</p> <p>* Access to the site would be from the A25 either via steep, narrow Quarry Hill Road and difficult junction with the A25 by the Baptist Church or by the long way round along Western Road, A25 and Haul Road. The area is already congested because of the medical centre, a clinic, the parish church and its hall and parked cars belonging to the residents of houses with no off street parking. Crossing the A25 by car and on foot is difficult and dangerous.</p> <p>The bypass should be built before any development is built in Borough Green.</p>	<p>* The location of this site within the countryside is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21 in the Preferred Options Report. There is a policy requirement relating to the provision of landscaping.</p> <p>* Paragraph 3.7.26 in the Preferred Options Report outlines the need for affordable housing in the Malling Rural and Borough Green / Wrotham sub areas, identified in the Housing Needs and Affordability Study.</p> <p>* 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.</p>
242	Mr David & Mrs Shelley Cox	PO/242.01	<p>* The Housing Needs and Affordability Study 2002 is flawed and the reasoning behind including Isles Quarry West as an allocation is invalid.</p> <p>* The Green Belt should not be impinged on and should be</p>	* The Housing Needs Study has been reviewed but it still finds a significant affordability problem in the more remote parts of the rural area. The strategy of meeting some of this need at Isles Quarry is still considered to be sound. The Council believes that

## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			protected in the long term. * There is no justification for Isles Quarry West to be developed as it does not fulfil any of the PPG2 criteria and there are no "very special circumstances."	there are exceptional circumstances justifying the release of Isles Quarry West from the Green Belt. * The removal of this site from the Metropolitan Green Belt is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21 in the Preferred Options Report. * It is considered that there are special circumstances which justify the development of this site to provide affordable housing.
243	Mr Tim Shaw	PO/243.01	Prior to any further housing be built in Borough Green, the following are required: * The completion of the bypass. * A community leisure centre. * A doctor's surgery that can meet current and future demand. * A primary school that can meet increased educational demands and child intake. * A secondary school that can meet increased educational demands and child intake. * A full time operationally manned police station. * Consideration of increased traffic, security, road safety, anti-social behaviour and management.	* 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.
245	Mr & Mrs Hunt	PO/245.01	* Unsuitable access/egress for construction traffic which would create noise, traffic, air pollution and safety issues. * Issue of land movement. * Question how the water system would cope. * The road network could not cope with the extra vehicle movements, especially Quarry Hill Road which is congested, is not suitable for heavy vehicles or additional traffic and is used as a cut through. * There are insufficient schools, doctors, dentists, jobs and train capacity to cope with the additional population. * The green belt should not be changed. * Properties would be devalued. * The development would destroy the village atmosphere.	* The issue of construction traffic would be dealt on the basis of advice from by Kent County Council as Highway Authority at the time of a planning application. * There is not considered to be an issue of land movement but this would be a matter of constructional detail fro the Building Regulations. * 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. * The proposal will need to satisfactorily mitigate any traffic impact including contributions to public transport. There is a requirement to upgrade the private haul road to adoptable standards. * The relevant infrastructure providers have been formally

## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
247	Mr Ray and Mrs Dorothy Fuller	PO/247.01	<ul style="list-style-type: none"> <li>* Any further housing development would be detrimental to the interest of the village and its residents.</li> <li>* There should not be any development of the green belt or extension of the boundary of Borough Green.</li> <li>* There is not sufficient demand for new housing, given that large numbers of properties remain empty for long periods in the village.</li> </ul>	<p>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.</p> <ul style="list-style-type: none"> <li>* The location of this site within the Metropolitan Green Belt 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>* Property devaluation is not a planning issue.</li> <li>* It is not considered that a development of this scale would destroy the village atmosphere.</li> </ul>
260	Mr R A Glennon	PO/260.01	<p>Concerned about the development for the following reasons:</p> <ul style="list-style-type: none"> <li>* The development will have an adverse effect on the local infrastructure, i.e. doctors, schools, water reserves, power supply. There would be an adverse impact on the road network and traffic safety, particularly the junction on the A25 at Quarry Hill Road.</li> <li>* It would have an urbanising effect, leading to the loss of trees and green landscaping.</li> <li>* Developing this Green Belt site is contrary to recognised policy. It is also in the North Downs AONB, an ALLI, a SLA and a Green Wedge.</li> </ul>	<ul style="list-style-type: none"> <li>* It is not considered that a development of this scale would be detrimental to the interest of the village and its residents.</li> <li>* The removal of this site from the Metropolitan Green Belt is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21.</li> <li>* Agree that the market houses are not an essential to meet housing requirements but are necessary to support the provision of the affordable dwellings.</li> </ul> <p>* 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.</p> <p>* 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 in the Preferred Options Report. There is a policy requirement relating to the provision of landscaping.</p> <p>* The removal of this site from the Metropolitan Green Belt and its location within an AONB, a SLA, an ALLI and a Green Wedge is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21.</p>

## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
273	Mr I E Bond	PO/273.01	<p>The proposal should be deleted for the following reasons:</p> <ul style="list-style-type: none"> <li>* The area cannot sustain 200 homes as the doctors, schools, dentists etc are already at capacity.</li> <li>* The development would increase traffic and parking problems, leading to more pollution.</li> <li>* The Green Belt should be protected.</li> </ul>	<ul style="list-style-type: none"> <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>* The development is located close to the rural service centre of Borough Green. It will be a policy requirement for footpaths and cycle routes to the centre to be improved to encourage sustainable modes of transport. It is not considered that the additional traffic would create an unacceptable increase in pollution.</li> <li>* The removal of this site from the Metropolitan Green Belt is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21 in the Preferred Options Report.</li> </ul>
275	Michael and Janice Jenson	PO/275.01	<ul style="list-style-type: none"> <li>* The development will ruin the countryside which is designated as Green Belt and AONB.</li> <li>* It will exacerbate existing traffic problems in Borough Green.</li> <li>* It will increase the strain on health care, schools and other local amenities.</li> </ul>	<ul style="list-style-type: none"> <li>* The removal of this site from the Metropolitan Green Belt and its location within the AONB is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21 of the Preferred Options Report. This is not attractive countryside . It is a derelict quarry.</li> <li>* The development is located close to the rural service centre of Borough Green. It will be a policy requirement for footpaths and cycle routes to the centre to be improved to encourage sustainable modes of transport.</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> </ul>
276	Mrs Charlotte Brooker	PO/276.01	<ul style="list-style-type: none"> <li>* The area is Green Belt and AONB.</li> <li>* It will turn a country village into a town.</li> <li>* It will exacerbate traffic congestion, increasing air pollution.</li> <li>* It will adversely affect local wildlife.</li> <li>* The health services and schools will not be able to cope.</li> <li>* The quarry should be restored to its former condition.</li> </ul>	<ul style="list-style-type: none"> <li>* The removal of this site from the Metropolitan Green Belt and its location in the AONB is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21 in the Preferred Options Report.</li> <li>* It is not considered that a development of this scale would significantly alter the character of Borough Green.</li> </ul>

## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
280	Mr Roy Williams	PO/280.01	<p>* Loss of green belt land which is supposed to be permanent. There are no special circumstances for its loss as the constrained sites suitable for housing could be used to provide 60 affordable homes.</p> <p>* Such a large development will not integrate with the rest of the town and will become a soulless estate. It would be preferable to spread the houses over several smaller sites which will lead to closer integration, be less obtrusive and have less impact on adjacent areas.</p> <p>* The affordable housing could be spread between this site plus the rejected ones at Crouch Lane and Wrotham Road, with the minimum of enabling open market housing.</p> <p>* The site should not be developed for housing in order to pay for the bypass. Planning obligations should only be used in accordance with Circular 05/2005.</p>	<p>* The development is located close to the rural service centre of Borough Green. It will be a policy requirement for footpaths and cycle routes to the centre to be improved to encourage sustainable modes of transport. It is not considered that the additional traffic would create an unacceptable increase in pollution.</p> <p>* The site is not on any designated site of importance to wildlife and should not adversely affect it. There is a policy requirement that provision is made for the long term management of the Site of Nature Conservation Interest to the west.</p> <p>* 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.</p> <p>* Much of the quarry pre-dates modern planning legislation and is not covered by enforceable restoration conditions. There are lawful use rights within the quarry for industrial and storage purposes which means that the quarry will remain in the same state as it is unless it is redeveloped. It will not be restored.</p> <p>* The location of this site within the Metropolitan Green Belt is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21 in the Preferred Options Report.</p> <p>* It is considered that the development would integrate with the rest of Borough Green if there are footpath / cycle links to the retail centre, in accordance with the policy requirement.</p> <p>* Paragraph 3.7.26 explains why the affordable housing is unlikely to be sourced from other sites. Whilst it could theoretically be provided on the sites at Crouch Lane and / or Wrotham Road, Borough Green, these are greenfield sites and not damaged in the way that Isles Quarry West has been. They would not be preferable alternatives.</p> <p>* There is no specific requirement to provide the bypass as a result of the development. However, the proposal will need to</p>

## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
285	Mr John Adams	PO/285.01	<p>* No objection to limited development as the area is an eyesore but 200 dwellings is too many.</p> <p>* The ratio of affordable houses is a very poor ratio in an area with affordable housing needs.</p> <p>* The area should be returned to green belt.</p>	<p>satisfactorily mitigate any traffic impact including contributions to public transport and there is a requirement to upgrade the private haul road to adoptable standards. Development requirements would be made in accordance with Circular 05/2005.</p> <p>* The need for affordable housing has been reviewed following a new Housing and Market Needs Assessment. The new Policy (CP18) requires 40% affordable housing to be provided but this depends upon the economics of development. The most appropriate balance of tenures on this site can only be determined at the time of considering a planning application when the costs and market circumstances pertaining at the time can be taken into account. It will be the Council's aim to allow the least amount of market housing necessary to provide the maximum amount of affordable housing and restore the site in a satisfactory way.</p> <p>* The removal of this site from the Metropolitan Green Belt is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21.</p>

## ANNEX E: LAND ADJACENT SNODLAND STATION, SNODLAND - FIRM HOUSING ALLOCATION

### 02. PARISH COUNCIL

152	Snodland Town Council	PO/152.02	No objection in principle to map E15 relating to land adjacent to Snodland Station, but wish to see part of site reserved for parking uses, in order to promote and encourage use of rail.	Noted. Policy requirements for the land adjacent to Snodland Station and listed in Annex E include making provision for additional parking at the station.
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### 3. INTEREST GROUP

178	Network Rail	PO/178.03	The site is owned by Network Rail. Its use for housing development will only be permitted by the rail regulator if it is not required for current or strategic railway purposes. Therefore, the requirement to provide additional station parking should not be included in the policies applying to its	<p>It is a requirement for all such developments to provide public open space if there is a need at the time the site is developed. There is no justification for deleting this requirement in this case.</p> <p>It is in the interests of sustainability to encourage the use of trains</p>
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## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			development. The site could contribute to community benefits such as enhanced access. Policy requirements should allow flexibility in considering whether the public realm enhancements can be provided on-site, as opposed to off-site only.	as a transportation method. This necessitates the provision of sufficient car parking at stations and is a justifiable policy requirement for the development of this site, particularly as it is in the ownership of Network Rail..
			Suggest changes to 5th bullet point relating to Map E15 in Annex E to read "provide contribution towards enhancing off-site public open space provision, or provide public realm enhancements on-site." Suggest deletion of 6th bullet point	
218	Snodland Labour Party	PO/218.02	No objection in principle to development of part of site E15 but wish to see a reasonable part of the site reserved for car parking space in order to promote and encourage the use of train services.	Noted. Policy requirements for the land adjacent to Snodland Station and listed in Annex E include making provision for additional parking at the station.
289	RSPB	PO/289.06	Development should take account of the impact on nearby SSSIs.	The site is within the urban area of Snodland and will not impact on SSSIs.
5. LAND OWNER				
79	Hallam Land Management Limited	PO/079.25	The allocation should be deleted as it is not suitable for residential development.	Whilst the site contains landscaping, it is considered to be suitable for residential development as planning permission has recently been granted for residential development of the site to the north west and this site can be sensitively designed to take account of the Conservation Area, railway noise, etc.

## ANNEX E: NEW ROAD INDUSTRIAL ESTATE, DITTON - FIRM HOUSING ALLOCATION

### 5. LAND OWNER

79	Hallam Land Management Limited	PO/079.12	This is a constrained site which has been identified for development for a considerable time and is unlikely to come forward within the plan period. The allocation should be	It is identified as an unconstrained site. Planning permission was granted for the redevelopment of the site for housing in November 2005. Therefore, it is very likely to be implemented within the
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## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
79	Hallam Land Management Limited	PO/079.21	<p>deleted.</p> <p>The allocation should be deleted for the following reasons:</p> <ul style="list-style-type: none"> <li>* The site is in operational use and will not be available for development within the plan period</li> <li>* No proposals are made for the relocation of the existing commercial use</li> <li>* It will result in the loss of important employment land</li> <li>* It does not represent sustainable development</li> </ul>	<p>plan period.</p> <p>Planning permission was granted for the redevelopment of the site for housing in November 2005. Therefore, it is very likely to be available for development within the plan period. The site is within the Medway Gap urban area and, given the level of facilities in this area, is considered to be a sustainable location. The Employment Land Review took account of the loss of this site, which is considered to be environmentally beneficial.</p>

## ANNEX E: NU-VENTURE COACHES, MILL HALL, AYLESFORD - FIRM HOUSING ALLOCATION

### 5. LAND OWNER

79	Hallam Land Management Limited	PO/079.20	<p>The allocation should be deleted for the following reasons:</p> <ul style="list-style-type: none"> <li>* The site is in operational use and will not be available for development within the plan period</li> <li>* No proposals are made for the relocation of the existing commercial use</li> <li>* It will result in the loss of important employment land</li> <li>* The site is in a predominantly commercial area and would only be suitable for residential development as part of a comprehensive redevelopment of the whole area</li> <li>* The site is liable to flood</li> </ul>	<p>Residential development has been approved for the site to the east. Furthermore, there are existing cottages on the south side of the road. The development of this site for housing would be consistent with these and it is not considered that the site should be developed as part of a comprehensive redevelopment of the area. Whilst the site is in commercial use, it is a depot and not intensively used. As such, it is not considered to be important employment land and its loss would not significantly affect employment land supply. There are policy requirements to ensure that the development of the site is designed to take account of flood risk.</p>
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## ANNEX E: OIL DEPOT, STATION ROAD, AYLESFORD - FIRM HOUSING ALLOCATION

### 5. LAND OWNER

79	Hallam Land Management Limited	PO/079.18	<p>The allocation should be deleted for the following reasons:</p> <ul style="list-style-type: none"> <li>* The site is in operational use and will not be available for development within the plan period</li> </ul>	<p>There are newly built residential developments immediately to the north and west and the development of this site for housing would be consistent with these. Whilst the site is in commercial use it is</p>
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## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<ul style="list-style-type: none"> <li>* No proposals are made for the relocation of the existing commercial use</li> <li>* It will result in the loss of important employment land</li> <li>* The site is liable to flood</li> <li>* Development of the site is constrained by noise from the railway line</li> </ul>	not considered to be important employment land. Its loss was taken into account in the Employment Land Review. There are policy requirements to ensure that the development of the site is designed to take account of flood risk and noise.

### ANNEX E: PARK HOUSE, 110/112 MILL STREET, EAST MALLING - FIRM HOUSING ALLOCATION

#### 3. INTEREST GROUP

56	East Malling Conservation Group	PO/056.03	The Firm Housing Allocations policy allocates 5 houses for this site which contradicts the previous planning refusal for application TM/04/02695/RD. The development of the site should therefore be removed from the allocation.	Any proposals for this site will be judged on their individual merits, and will be expected to be designed sensitively to reflect the setting of the conservation area. The previous application gives an indication that the site is likely to be developed within the plan period . It is therefore appropriate that it should be firmly allocated.
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### ANNEX E: PETERS PIT - FIRM HOUSING ALLOCATION

#### 3. INTEREST GROUP

289	RSPB	PO/289.08	<p>The map should show the Special Area of Conservation and nearby SSSIs.</p> <p>The policy requirements should take account of the Special Area of Conservation.</p>	<p>This map needs to be read in conjunction with the Local Plan Proposals Map which shows the SSSIs but not the Special Area of Conservation. These are matters that will be taken forward in the Environmental Protection Policies DPD.</p> <p>Now that planning permission has been granted there will be no need for a policy.</p>
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#### 5. LAND OWNER

79	Hallam Land Management	PO/079.24	<p>The allocation should be deleted for the following reasons:</p> <ul style="list-style-type: none"> <li>* It is in a remote location and will not represent sustainable</li> </ul>	Planning permission has been granted for the development. There will therefore be no need for a policy.
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## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
	Limited		<p>development</p> <ul style="list-style-type: none"> <li>* The impact upon SSSI and SNCI</li> <li>* Significant investment in infrastructure required will have environmental impacts and a serious impact upon the scheme</li> <li>* It cannot be delivered within the plan period.</li> </ul>	
172	Trenport Investments Ltd	PO/172.04	<p>Regarding Peters Village affordable housing requirement as set out in Annex E as 30%. Consider that the abnormal costs associated with the development preclude achievement of this level of affordable housing, although it is recognised that the generic percentage target of 30% affordable housing on qualifying sites is justified and will contribute towards the achievement of mixed and balanced communities across the Borough.</p> <p>The requirements fail to refer to the allowance for some development prior to the bridge opening. There is a case for 200 units to be developed prior to bridge opening on the basis of previous uses on the Peters Works site, as set out in the Local Plan. Consider that this provision should be rolled forward into the DPD.</p>	<p>Planning permission for development at Peters Pit has been granted and, in the light of a viability assessment, 25% affordable housing provision has been agreed.</p>
172	Trenport Investments Ltd	PO/172.05	<p>Plan E13 appears to show some changes from the Adopted Local Plan. Whilst the allocation largely follows the developed area in the current master plan, this is too prescriptive, particularly in respect of the upper platforms where the structural landscaping, consistent with the previous policy, should form part of the allocation.</p>	<p>Agreed that the boundaries be revised to reflect those in the planning application as now permitted.</p>
7. PUBLIC				
222	Miss Gill Goode	PO/222.01	<p>Concerned about current proposals for a Green Route to allow buses and cars to enter Peters Pit from Hall Road with no restrictions. Access along Hall Road will result in traffic problems for Wouldham High Street. Access from Peters Pit to Pilgrims Way via the north-east corner of the development would be better as the road could be widened. Wouldham</p>	<p>Planning permission has been granted for the development of Peters Pit. All of these matters were considered in making that decision.</p>

**DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS**

<b>REF</b>	<b>RESPONDENT</b>	<b>REP</b>	<b>REPRESENTATION</b>	<b>RESPONSE</b>
			<p>High Street could then make up part of a Green Way from the junction with Pilgrims Way to Aylesford Friary and then to Maidstone. This would also help realise the potential of the River Medway as per paragraph 3.8.10.</p> <p>Provision of cycle and bridle routes within the development is little use without a wider policy of integration.</p> <p>Agrees with the protection of trees that are subject to a TPO in the north of the site.</p> <p>Agrees with policy to enhance the nature conservation interest of the area</p> <p>Considers the proposed road realignment and development on part of the SNCI is at odds with policy to enhance the nature conservation interest. DPD should be more specific with regard to transport infrastructure surrounding the Peters Pit Development.</p> <p>The question of northern access has not be answered satisfactorily.</p> <p>Peter's Pit is located near to Wouldham which is not listed as a sustainable rural settlement in CP16.</p> <p>Wouldham is not in a position to cope with additional buildings at Peters Pit before the bridge has been built.</p>	

**ANNEX E: PRESTON HALL, AYLESFORD - FIRM HOUSING ALLOCATION**

1. OFFICIAL CONSULTEE

75 Kent &	PO/075.01	The firm housing allocation in Map E1 is supported as the site	The master plan has been helpful in identifying the scope for
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## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
	Medway NHS Strategic Health Authority		is not required by NHS beyond the short term. The land shown on Map E1 includes a small area of land belonging to the Royal British Legion Industries (RBLI). The Strategic Health Authority has adopted a joint approach towards the future development of the site, including development of landholdings on Map H3 (5.1), RBLI land within E1, and RBLI land between the three NHS land parcels (5.1) shown on H3. The original submission was amplified by the submission of a Master Plan which identified and quantified a series of different options for the comprehensive development of the site whilst retaining the Listed Building.	development. In the view of the Borough Council only land within the confines of the built up area is acceptable for development. This limits the dwelling capacity to about 180 dwellings which is the figure now included in the policy. Any proposals for the redevelopment of existing uses on Health Authority land in the countryside would be considered on their merits.
5. LAND OWNER				
265	Royal British Legion Industries	PO/265.07	Support firm housing allocation for Preston Hall, Aylesford.	Noted.
265	Royal British Legion Industries	PO/265.02	Site on the eastern side of London Road East, north of existing residential properties and south of Gavin Astor House should be allocated for housing (see Map 16). It currently comprises a block of garages. Land to the west is already identified as suitable for housing. Designation of this site will round off existing residential and other development to both the north and south and will link with any new residential development to the west.	Agree that this site should be included within the overall area for comprehensive treatment.

## ANNEX E: ROYAL BRITISH LEGION VILLAGE, HALL ROAD, AYLESFORD - FIRM HOUSING ALLOCATION

### 5. LAND OWNER

79	Hallam Land Management Limited	PO/079.17	The allocation should be deleted for the following reasons: * The site is in operational use and will not be available for development within the plan period. * No proposals are made for the relocation of the existing	In view of representations made by the Royal British Legion Industries, agree to remove the site from the list of firm housing allocations.
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## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
265	Royal British Legion Industries	PO/265.04	<p>commercial use</p> <p>* It will result in the loss of important employment land</p> <p>Concerned about the loss of employment land and the staff car park which could ultimately weaken the RBLI's long term economic base (Map 16). It is close to industrial areas and any residential use of the site could be adversely affected by noise and the intensity of traffic movements. It should remain in employment use and its residential allocation should be deleted.</p>	Agree to remove the site from the list of firm housing allocations but include within the overall master plan area. The future use of this site can then be determined in the context of the master plan.

### ANNEX E: xx GENERAL xx

#### 1. OFFICIAL CONSULTEE

65	Southern Water	PO/065.07	<p>Southern Water has assessed the sites included in Annex E and F to determine sewer capacity . Comments have been provided on foul sewerage in respect of each site..</p> <p>* Development that takes place before adequate sewerage infrastructure is available may lead to service failures.</p> <p>* New developments are required to connect to a point where there is adequate sewer capacity. Any improvements needed can be provided by developers, facilitated by the application of planning conditions.</p> <p>* Development design must ensure that any infrastructure crossing the development site is not built over. An easement width of 6 and 13 metres is required for sewer pipes depending on the size and depth.</p> <p>* Many sites in central Tonbridge are constrained by sewer capacity however they present opportunities for the removal of surface water from the system to create additional capacity for foul sewage.</p>	Noted. These points are best addressed at the stage of a planning application.
175	Kent County Council	PO/175.51	<p>There is a need to refer to the archaeological impacts of development in respect of sites listed in Annex E.</p>	Policy requirements have been added to this effect where appropriate

## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
	Strategy Division			
	7. PUBLIC			
187	Mr D Cogley	PO/187.01	Site immediately west of Brook Street farm buildings, Tonbridge, (Map 14) should be included in the list of firm housing allocations.	Whilst the site is within the Tonbridge settlement boundary there is a history of applications being refused on this site because of the unacceptable outward extension of built development and the impact on the appearance and setting of the adjacent Listed Building. It is therefore not considered suitable for designation as a firm housing allocation. Any planning application on the site would be dealt with on its merits.

## ANNEX E: xx NEW xx

### 3. INTEREST GROUP

174	Kent County Council Property Group	PO/174.02	Since publication of the Preferred Options report the primary school in East Malling has been closed. In the interests of speeding a solution to avoid vandalism, the school buildings on Mill Street will be demolished and a development brief prepared for consultation on the land's future use. Residential use, a scout hut, some playing field land for the Malling School, and public open space are uses proposed. It is requested that this site be added to TMBC's considered housing sites (Map 15).	A planning application for the redevelopment of this previously developed site in the countryside will be considered on its merits. If the site does come forward for development, it will be regarded as windfall development.
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### 4. CONSULTANT

281	Scott Wilson Kirkpatrick & Co Ltd	PO/281.01	Land to the Rear of Town Hill, West Malling should be included as a housing allocation, be included within the settlement boundary and outside the green belt (see Map 17). It is bounded by development on almost all sides and therefore naturally forms part of the settlement. It is also in a highly sustainable location, with access to local facilities within 5	This is a greenfield site within the Green Belt. Previously developed land should be developed before greenfield land. There is sufficient allocated previously developed land to provide for the housing needs of the Borough up to 2021. The key feature of Green Belts is their permanence and there are no special circumstances for removing this site from the Green Belt.
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## DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			minutes walking distance.	
5. LAND OWNER				
119	Blue Circle Industries Plc (trading as Lafarge Cement UK)	PO/119.06	Suggest the triangular area of land between Holborough Road and the Snodland bypass be allocated for housing (see Map 18). Due to small size and physical separation, this site is not a viable area of farmland.	This site is not acceptable for housing. It makes an important contribution towards the openness of the Strategic Gap at the entrance to Snodland. It is an important local amenity.
264	Knole Securities Limited	PO/264.01	<p>Land to the east of Tonbridge Road, Wateringbury (see Map 1) should be included as a site for residential and community use because:-</p> <ul style="list-style-type: none"> <li>* Part of the site is bound on 3 sides by development so it is well contained and well-related to other development. It is bound to the west and south by residential development and the doctor's surgery has created an irregular boundary to the south.</li> <li>* It is not in productive agricultural use.</li> <li>* Access can be satisfactorily achieved.</li> <li>* The site is immediately available for development.</li> </ul> <p>The site is sustainable as it is readily accessible by public transport and services are located in the immediate vicinity.</p>	The site is located in the Metropolitan Green Belt. The importance of Green Belt boundaries is their permanence. The majority of the Borough's housing needs can be met on sites outside of the Green Belt and there is no need for this site to be developed for housing and community use. Therefore, there is no exceptional case for changing the Green Belt boundary and allocating this site for development.
265	Royal British Legion Industries	PO/265.09	The Churchill Centre, land surrounding it and open land to the east should be allocated for residential development (see Map 16)	The site is within the Strategic Gap and most of it is greenfield. As such, it should be protected from further development. There is no need for additional housing land supply within the Borough.
265	Royal British Legion Industries	PO/265.01	Site to the west of existing residential properties and east of the Churchill Centre on East Park Road should be allocated for housing (see Map 16). This is a logical infill site.	The site is within the Strategic Gap and is greenfield. As such, it should be protected from further development. There is no need for additional housing land supply within the Borough.
265	Royal British Legion Industries	PO/265.05	Land between Quarry Wood and houses fronting Hermitage Lane should be allocated for residential development (see Map 10) . It was formerly used for allotments but is now overgrown. There is industrial development to the west, a site	It has been agreed to extend the confines of the built up area in this vicinity, but it is considered that the area of land between the Quarry Wood Industrial Estate and the houses fronting Hermitage Lane would be better allocated for B1 employment use.

**DEVELOPMENT LAND ALLOCATIONS: HOUSING, ANNEX E - FIRM HOUSING ALLOCATIONS**

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>with extant planning permission for retail to the north and residential development to the east. It is adjacent to existing ribbon housing development and its development for residential use would reflect the nature of new development that is currently under construction to the south and round off development in this area.</p>	
<p>6. HOUSE BUILDER</p>				
134	Rydon Homes	PO/134.04	<p>As alternative to Isles Quarry West, Borough Green, land opposite Brickmakers Arms Public House, north of the A25 Maidstone Road, Platt, (3.5ha) (Map 2) could accommodate part or all of the 60 affordable houses required.</p> <p>* Smaller sites adjoining smaller settlements could be selected to enable local needs to be met locally. There are key villages which enjoy a reasonable level of local service provision and a bus service to nearby towns.</p> <p>* These solutions would result in less green belt land being lost as the market housing to cross subsidise the affordable housing would not be required.</p>	<p>* The site suggested is greenfield and on the edge of a Platt which is a settlement more remote from services. Isles Quarry West, Borough Green, has been identified as the most sustainable location since it comprises damaged land and the village is classed as a rural service centre with a certain level of services.</p> <p>* No suitable alternative sites came forward at earlier stages of the LDF process. Isles Quarry West, Borough Green, has been identified as the most sustainable location since it comprises damaged land and the village is classed as a rural service centre with a certain level of services.</p> <p>* The removal of this site from the Metropolitan Green Belt is justified in terms of the need for affordable housing outlined in the reasoned justification for policy CP21. No suitable alternative sites came forward at earlier stages in the LDF process. Planning permission has been recently refused on appeal for affordable housing on this site at Platt.</p>