
Preferred Options - Core Strategy

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
3.1 INTRODUCTION				
1. OFFICIAL CONSULTEE				
219	Home Builders Federation	PO/219.04	Paragraph 3.1.3 - implies the core strategy will remain in place and unaltered over the entire plan period up to 2021. Changes may arise from the annual monitoring report, revised Government Guidance, revisions to RSS or changes at the local level. Circumstances whereby a review may be necessary should be identified. PPS12 tests of soundness iv and ix apply.	The Core strategy will be reviewed in light of annual monitoring. An amendment to the text (now in para 1.1.4 of the Core Strategy) has been made to clarify the fact that the Core Strategy will be monitored on an annual basis and reviewed as necessary.
7. PUBLIC				
66	Mr T Packham	PO/066.01	Need time to reassess the plan and amend it in between the 10-15 year plan review cycle.	The DPDs that form the LDF will be kept under review and their performance monitored through the annual monitoring reports. If a need arises to revisit and update the policies, in the light of new Government advice, revisions to the South East Plan or new evidence, then the DPDs will be amended accordingly and consulted upon.
3.2 VISION				
1. OFFICIAL CONSULTEE				
64	English Nature	PO/064.06	Support for Paragraph 3.2.3 - regarding "...a place where its natural beauty, its biodiversity, heritage and public places are valued, protected and enhanced."	Noted.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
91	English Heritage	PO/091.06	Support for the LDF Vision, especially references to valuing, protecting or enhancing heritage and the public domain, together with the need for a sustainable high quality built environment and reconciliation of conflicts where they arise.	Noted. The wording has been slightly changed but the message is the same.
175	Kent County Council Strategy Division	PO/175.14	Paragraph 3.2.3, line 3. It is noted in the vision statement the views of residents that the countryside and rich heritage of the Borough must be conserved and enhanced for future generations. This is welcomed, however it would be better to use the term 'historic environment' rather than 'heritage' in the Vision Statement.	Agree.
3. INTEREST GROUP				
173	CPRE, Tonbridge & Malling District Committee	PO/173.10	<p>Some environmental problems have been taken into account in the Council's Vision for the LDF such as air pollution. This is not a factor to be dealt with as a planning matter, but regard must be made to its impacts.</p> <p>The Vision Statement should further clarify the meaning of the term 'sustainable' which requires the needs of future generations to be protected when attending to the needs of the present.</p>	<p>Draft policy CP1.3 in the Core Strategy addresses the need to conserve, and, wherever possible, enhance air as well as land and water quality.</p> <p>The definitions of sustainability are now clearly set out in the introduction to draft policy CP1, which includes reference to the Government's Sustainable Development Strategy (March 2005). Para. 6.1.2 in the Core Strategy defines sustainability as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'. This is a widely used definition.</p>
5. LAND OWNER				
179	The Beaucette Property Portfolio Ltd	PO/179.01	<p>The Vision should take account of matters raised in the Community Strategy and responses to consultation on the Issues Report for the review of the Local Plan. It should be phrased as follows:</p> <p>"To meet social, economic and environmental needs through sustainable and quality development in a manner that respects the natural beauty, biodiversity and heritage of the area and thus does not compromise the ability of future generations to</p>	<p>The wording of the Vision in the Core Strategy, which has been slightly revised from the Preferred Options version aims to define what sustainable development means for Tonbridge and Malling having regard to the views of its residents as expressed though the Community Strategy.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			meet their needs."	
6. HOUSE BUILDER				
72	Croudace Homes Limited	PO/072.03	The full range of community needs should be identified within the vision for the Borough. The vision should be amended to include the word 'housing' before the word 'social' in the penultimate line of the vision statement.	Agree.
7. PUBLIC				
170	Mr Stephen Graham	PO/170.05	Should state TMBC's chances of achieving its "vision" is very slim, in face of the ODPM's desire to sustain a high rate of growth of housing and other development in the Borough.	The vision is realistically achievable because on the issue of housing land supply there is already more than enough housing land potentially available to meet anticipated housing requirements up to 2021 without the need to identify or release any additional land. This position takes into account the housing requirement for Tonbridge and Malling Borough for the period 2006-2021 in the submitted version of the Regional Spatial Strategy for the South East. This is explained in further detail in Section 2 'Baseline Studies' of the Core Strategy under the sub-section 'Housing Land Supply' (see paragraphs 2.5.2 - 2.5.4).

3.3 AIMS AND OBJECTIVES

1. OFFICIAL CONSULTEE

64	English Nature	PO/064.11	Support Aim 3(d).	Noted.
64	English Nature	PO/064.07	Paragraph 3.3.1 Aim 1(c) - The definition of previously developed land from PPG3 should be included in the text as follows: "Concentrating development on previous developed (as defined in PPG 3) land within built-up areas before considering development of 'fresh land.'"	It is not considered necessary to repeat PPG3.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
64	English Nature	PO/064.10	Paragraph 3.3.1 Aim 3(c). Reference should be made to the potential for biodiversity enhancement in association with provision of greenspace.	Agree.
64	English Nature	PO/064.09	Paragraph 3.3.1 Aim 2(c). Should be strengthened as follows: " Avoiding areas of significance for landscape or nature conservation, including Sites of Special Scientific Interest, Special Areas of Conservation and Sites of Nature Conservation Interest, areas at risk of flooding and the best and most agricultural land."	The suggested wording is too detailed for the Core Strategy. These are matters for the Environmental Protection DPD.
64	English Nature	PO/064.08	Supports 3.3.1 Aim 1(f).	Noted.
69	Highways Agency	PO/069.08	Supports Aim 3(e). Also notes that where developments will have significant transport implications, Transport Assessments, including a Travel Plan, should be prepared in accordance with Department for Transport publications.	Noted.
69	Highways Agency	PO/069.07	Supports Aims 2(a) and (d). Locating development in areas where facilities are already available will reduce travel need and facilitate use of public transport.	Noted.
69	Highways Agency	PO/069.06	Supports Aims 1(c), (d) and (e). Prefers developments to be concentrated in urban areas close to existing transport hubs, to meet objectives of PPG13 and minimise the impact of development on trunk roads in the Borough.	Noted.
78	Kent Wildlife Trust	PO/078.09	For clarity, it should be set out in Aim 2, in subsequent policy or in supporting text that 'areas of significance for nature conservation' include: <ul style="list-style-type: none"> * Designated sites of international importance, including SACs, SPAs and Ramsar sites; * Designated sites of national importance including SSSIs and National Nature Reserves; * Designated sites of local importance including Local Wildlife Sites (SNClS) and Local Nature Reserves; * Priority habitats identified in the UK and Kent Biodiversity Action Plans; 	Definition of 'areas of significance for nature conservation' is a matter of detail for the Environmental Protection DPD, therefore no changes have been made. The recommended change commencing "...and the ecological infrastructure.." is considered unnecessary as it is a more detailed explanation of what is contained in Aim 1(f). This is a matter of detail that is covered by the original Aim 1(f) and is therefore considered unnecessary.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>* Ancient woodland; and * Sites supporting priority species identified in the UK Biodiversity Action where site or habitat protection is an identified aim, target or action.</p> <p>Aim 2 should also make explicit reference to the establishment of ecological networks and large-scale habitat restoration programmes by adding to the end of the bold text the following: " and the ecological infrastructure required to establish a robust network linking, enhancing and restoring existing wildlife sites and habitats.</p> <p>This will be achieved by: .. identifying and safeguarding land for large-scale habitat restoration and the creation of robust ecological linkages between existing and/or new wildlife habitats or sites."</p>	
78	Kent Wildlife Trust	PO/078.03	Supports Aim 3.	Noted.
91	English Heritage	PO/091.19	Supports Aim 3, particularly in relation to local distinctiveness, design standards, management of traffic in sensitive locations, and protection/access to built heritage.	Noted.
91	English Heritage	PO/091.07	Considers Aim 2 should include a sub-paragraph regarding safeguarding the historic environment, consistent with the natural environment in (c).	Wording has been added to Aim 2(c) that refers to important historic assets.
91	English Heritage	PO/091.18	Support Aim 1 (f)	Noted
103	Environment Agency	PO/103.07	Aim 1 should require sustainable construction techniques and low natural resource / efficient appliances to be used in new developments.	Agree in part to the recommended change. The use of resource efficient appliances within the house is beyond the local authority's control.
103	Environment Agency	PO/103.14	Support aims and objectives relating to the avoidance of development in areas at risk of flooding (Aim 2(c)) and the enhancement of biodiversity (Aim 3(d)).	Noted.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
175	Kent County Council Strategy Division	PO/175.15	Paragraph 3.3.1, Aim 1(d). Amend subsection (d) as follows: "Making sure that infrastructure and services are co-ordinated to meet the needs of new and existing communities and wherever required as an integral part of new development."	Reference to 'existing and new communities' and 'wherever required' has been inserted as Aim 2(d) .
175	Kent County Council Strategy Division	PO/175.16	Within the aims and objectives we welcome the inclusion of Aim 1(f) but would suggest that 'historic man-made resources' is changed to 'historic environment.'	Agree.
175	Kent County Council Strategy Division	PO/175.17	Paragraph 3.3.1, Aim 3(h). Within the aims and objectives the inclusion of Aim 3(h) is welcomed, but it is recommended that historic landscapes and sites of archaeological interest are added.	It is considered that the recommended wording is too specific for this aim, however reference to historic heritage has been included in Aim 3(h).
175	Kent County Council Strategy Division	PO/175.18	Paragraph 3.3.1, Aim 2. This aim should be amended to include "..education, libraries, youth, social and health services and all other community facilities needed.."	The list of examples has been removed because it would always be selective.
175	Kent County Council Strategy Division	PO/175.19	Paragraph 3.3.1, Aim 2(d) should be amended to include "..schools, roads and other community infrastructure including libraries, learning, youth, and social and health..".	The list of examples has been deleted as it can never be an exhaustive list. Reference is now made to transport and community infrastructure.
219	Home Builders Federation	PO/219.05	Paragraph 3.3.1 Aim 1(a) refers to ensuring the availability of sufficient land for housing and employment to meet regionally and locally identified needs only. Whilst this is a key component the aim should be amended to address the issue of implementation and delivery rather than just making land available. Refer PPS12 test of soundness vi.	Words have been added to Aim 1 referring to deliverability which will be continuously monitored.
233	Maidstone Borough Council	PO/233.04	Further to Aim 1(e), there should be emphasis placed on the importance of the Medway Valley railway line. With the projected growth in the North Kent area, an improved service on this line will become essential to meet sustainable transport requirements and passenger demand.	The Policies in the Core Strategy emphasise the need for development to be well located relative to public transport routes. In this respect access to stations on all railway lines in the Borough is important. The level and nature of services on the lines is not a matter over which the Council has any direct control, though it does seek to influence the operators to provide an

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
3. INTEREST GROUP				
178	Network Rail	PO/178.05	Generally supports the Aims 1, 2 and 3. Favour the location of new development in areas with good access to public transport. This meets many of the national and regional planning objectives for sustainable development and also assists in providing the means for existing infrastructure to be upgraded through the use of planning obligations under Section 106.	appropriate level of service and has done so in commenting on the South Eastern Franchise negotiations. Noted.
5. LAND OWNER				
107	H & H Celcon Limited	PO/107.06	Aim 1 fails to identify the delivery of the Borough Green Bypass as a stated objective of the LDF, or recognise and consider the requirement for enabling development to deliver infrastructure.	The purpose of the aims and objectives is to provide a high-level policy framework for the policies in the Core Strategy DPD and not to address particular types of development, such as the Borough Green Bypass. Policy CP27 on 'Community Services and Transport Infrastructure' specifically addresses the need to safeguard land for the implementation of transport schemes approved by Kent County Council as Highway Authority or other schemes that are necessary to support the development strategy. Furthermore, 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. Also, aim one and its associated objectives, along with the other aims and objectives, was developed in accordance with the principles of sustainable development. The aims and objectives were tested against the Sustainability Appraisal (SA) objectives

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
107	H & H Celcon Limited	PO/107.07	Aim 2 fails to recognise the requirement for enabling development to deliver infrastructure. Text should be added to explain how enabling development is required to enable delivery of safeguarded road schemes.	<p>developed by consultants Scott Wilson. The conclusion from the appraisal of the compatibility between the Core Strategy DPD aims and objectives and the SA objectives found there to be no conflicts in relation to aim one.</p> <p>How and when safeguarded highway schemes are funded is primarily a matter for Kent County Council, as Highways Authority, through 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.</p> <p>Furthermore, the purpose of the aims and objectives is to provide a high-level policy framework for the policies in the Core Strategy DPD and not to address particular types of development.</p> <p>Also, Aim 2 and its associated objectives, along with the other aims and objectives, was developed in accordance with the principles of sustainable development. The aims and objectives were tested against the Sustainability Appraisal (SA) objectives developed by consultants Scott Wilson. The conclusion from the appraisal of the compatibility between the Core Strategy DPD aims and objectives and the SA objectives found there to be no conflicts in relation to aim two.</p>
179	The Beaucette Property Portfolio Ltd	PO/179.03	<p>Paragraph 3.3.1 Aim 2. The words 'a spatial context' give the impression of significant importance in their own right. Infrastructure provision should be limited to that which is specifically necessary. Aim 2 should therefore be rephrased as follows:</p> <p>"To meet new development needs within a spatial context that coordinates it with necessary infrastructure, such as the roads, shops, education and health services required."</p>	<p>Agree in part to the recommended change. The spatial context is driven by more than just the need to co-ordinate infrastructure provision. However, the plan also needs to co-ordinate infrastructure related to new development with that required to meet existing needs. A new objective 2(d) is included in the light of this representation</p>
179	The Beaucette	PO/179.02	A principle aim of the plan ought to ensure that identified	The recommended word change regarding 'needs' is not

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
	Property Portfolio Ltd		needs for the community are met. Aim 1 should be altered as follows: "To ensure that new development needs are achieved in accordance with the principles of sustainability. (a) ..locally identified needs for housing, employment, shopping and other key land uses."	considered necessary. Aim 1 is about the form that development should take, not the need for development or the needs of development. Agree in principle with changes to Objective 1(a), however have not used the exact words as suggested.
179	The Beaucette Property Portfolio Ltd	PO/179.04	Paragraph 3.3.1 Aim 3. Should make reference to 'new development needs.' Also, it is inappropriate to unreservedly seek 'a high quality environment' as it is unrealistic. A more pragmatic approach is design that respects and enhances local character. Aim 3(b) should be rephrased as follows: "To ensure that new development needs and other actions result in a quality environment. (b) Requiring a standard of design in new development that respects and enhances local character."	The Council's aim is to seek to achieve high quality development. It is not accepted that this is an unrealistic aim, though it is acknowledged that actual standards may differ depending on the circumstances of the case.
184	Hildenborough Medical Group	PO/184.05	The Aims and Objectives should support the provision of new or improved services e.g. healthcare, whether or not related to new development. An amendment to the text should be consistent with CP1(3)(l).	Aim 2(d) has been amended to refer to existing or new communities
6. HOUSE BUILDER				
72	Croudace Homes Limited	PO/072.04	Support Aim 1, in particular objectives (a) and (g) which accord with PPG3 and PPS1.	Noted.
249	ZED Homes Limited	PO/249.05	Support Aim 1 which requires new development to be achieved in accordance with principles of sustainability and in particular subsections (b) and (c) relating to the reuse of brownfield sites.	Noted.

3.4 STRATEGY

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
1. OFFICIAL CONSULTEE				
175	Kent County Council Strategy Division	PO/175.21	Paragraph 3.4.10. Amend second sentence to: "it is vital that all community facilities such as education facilities, libraries, youth, social and health facilities and transport provision.."	All examples have been removed because the list could never be comprehensive.
175	Kent County Council Strategy Division	PO/175.20	The planning strategy broadly reflects that of the KMSP and is welcomed. In particular: <ul style="list-style-type: none">* the recognition of high level policy constraints* the protection and enhancement of the countryside and avoidance of the use of greenfield sites* the sustainable pattern of high quality development* concentration of new development at the main urban areas and those rural settlements which have a range of service/reasonable access* carrying forward the Metropolitan Green Belt and Strategic Gap constraints* focussing the main employment opportunities at Kings Hill and in existing employment areas.	Noted.
2. PARISH COUNCIL				
99	Offham Parish Council	PO/099.02	Paragraph 3.4.8 - Unclear whether or not all affordable housing requirements will automatically be accommodated on the site at Borough Green first rather than on sites whose development creates the need for affordable housing.	This depends on the nature of any needs identified elsewhere. Isles Quarry is intended to meet general affordable housing needs in the more remote parts of the Malling rural area. If there is a specific need in a particular locality that cannot reasonably be met at Borough Green then the Exception Site policy would allow development to meet such a need.
3. INTEREST GROUP				
56	East Malling Conservation Group	PO/056.01	Paragraph 3.4.2 regarding the exclusion of any new development in East Malling. Requests that further development on the East Malling Research Station site should be resisted.	There is no policy support for housing at East Malling Research Station. Any future development proposals must be able to demonstrate that they are related to, or support the operation of the Research Station. The main site of EMRS as shown on Map

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				G4 of the Development Land Allocations DPD is suitable for offices, research and development and light industrial manufacturing (B1) including conference, education and training uses.
157	National Trust	PO/157.01	Support the overall strategy for protection of countryside and concentration of development within urban areas on previously developed land. Also support the retention of the SLAs and Strategic Gaps.	Noted.
173	CPRE, Tonbridge & Malling District Committee	PO/173.01	Paragraph 3.4.1, which identifies constraints of higher-level policy, should also include reference to the decision at national level to set up the Major Sites Public Inquiry.	The paragraph refers to "the level and location of existing commitments" as one of the determinants of the development strategy. This includes the decisions by the Secretary of State on the three major sites that were subject to Inquiry.
174	Kent County Council Property Group	PO/174.04	Safeguarding of land for the school at Peters Pit. Notes the comment at paragraph 3.4.5 that the development that would trigger the school 'is mainly in post 2016.'	This has been overtaken by events. Planning permission has now been granted for the development at Peters Pit which will now mainly be developed in the post 2011 period.
5. LAND OWNER				
79	Hallam Land Management Limited	PO/079.01	<p>The core strategy focuses upon the Medway Gap and relies upon previously developed land to meet housing demand in Tonbridge. Many of these sites have been developed, resulting in limited site supply for the next 15 years and problems with the provision of affordable housing. Council should review its strategy and consider the implications of Tonbridge being identified as a Regional Hub in the Draft RSS.</p> <p>Also question the allocation at Peters Pit; the safeguarding of land at Lower Haysden Lane, Tonbridge, rather than allocating it; and removing land from the green belt at Isles Quarry in a remote location.</p>	<p>The work on the Tonbridge Central Area Action Plan has resulted identified significant potential for more previously developed land within Tonbridge coming forward for housing. The sequential approach contained in PPG3 requires previously developed land to be developed before greenfield land. The strategy reflects this. There is sufficient previously developed land to meet the Borough's housing needs until 2021 and therefore there is no need to release greenfield sites, including the Reserve Site at Lower Haysden Lane, Tonbridge. As a result, it is proposed to reduce it in size.</p> <p>Peters Pit is a long standing housing allocation and is a previously developed site. Planning permission has now been granted for the development.</p> <p>There is a need for affordable housing in the more remote, rural</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				parts of the Borough. This is the justification for removing land from the green belt at Isles Quarry. It is also a previously developed site which requires treatment..
107	H & H Celcon Limited	PO/107.08	The strategy fails to include a development strategy for Borough Green that provides for the funding and delivery of the Bypass. Text should be added to explain the development strategy at Borough Green and how it will deliver the bypass.	The funding of the Bypass is a matter for Kent County Council, as Highways Authority, through the Local Transport Plan and not for the Local Development Framework for Tonbridge and Malling Borough. The policy on mitigation requires appropriate contributions to any infrastructure necessary to serve development.
179	The Beaucette Property Portfolio Ltd	PO/179.05	The Strategy must relate to the needs of both existing and potential businesses within the area and other relevant stakeholders. The second line of paragraph 3.4.2 should be redrafted to: "..the Council's desire to reflect the wishes of its residents and the needs of existing and potential businesses to protect and.."	Reference to the needs of businesses has been added at the end of the sentence.
179	The Beaucette Property Portfolio Ltd	PO/179.08	The second sentence of paragraph 3.4.10 should refer to local shopping facilities and should be redrafted as follows: "It is vital that community and other facilities such as schools, shops and health facilities, and transport provision, advance in parallel with housing and commercial development."	All examples have been removed from the sentence because the list could never be comprehensive.
179	The Beaucette Property Portfolio Ltd	PO/179.06	Paragraph 3.4.7. In order to ensure the text refers to adjacent areas as well as the central area of town, to bring it into line with other recommended changes, and to ensure an appropriate mix of use, the paragraph should be redrafted as follows: "In the central area of the town and on adjacent sites, opportunities will be sought to strengthen its retail base, improve employment opportunities, enhance the environment and increase the number of people living close to the town centre. The focus will be on a quality of design that respects and enhances local character and a mix of uses to meet identified needs. This is a central plank of the Council's	The text of this paragraph has been amended in the light of this representation The term 'central area of the town' includes sites adjacent to the existing town centre. The aim is to achieve high quality design. Reference to respecting and enhancing local character has been added. The plan will identify firm proposals and other opportunities. Agree in principle with 'criteria to assist in the implementation of schemes' but alternative wording has been inserted.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			planning strategy. The Area Action Plan for Central Tonbridge will set out the development proposals that the Council wish to promote and criteria to assist in the implementation of schemes in conjunction with the private sector and local communities. The overall objective is to build upon the considerable advantages of the town centre and sustain a vibrant hub for living, working, shopping and leisure for borough residents, workers and visitors."	Reference to "shopping" added.
179	The Beaucette Property Portfolio Ltd	PO/179.07	Support Paragraph 3.4.9.	Noted.
220	Strategic Partners UK Fund I	PO/220.08	Paragraphs 3.4.6 - 3.4.9 regarding the Council's identification of sites to be safeguarded. The approach fails to take into account site-specific constraints on the client's site (2-8 Morley Road, Tonbridge) and the proposed policy approach set out in Policy CP23(2) would fail to provide an opportunity for mixed-use development. There is no market for the site in its current format. Consider that flexibility is required within the policy to enable site-specific considerations and constraints to be taken into account and to enable a mixed-use scheme to be developed.	2-8 Morley Road falls within the Tonbridge Industrial estate which is to be protected for employment use to meet the current and future needs of this part of the Borough. Mixed use redevelopment would only be acceptable if it consisted of B1,B2 and B8 uses.
6. HOUSE BUILDER				
72	Croudace Homes Limited	PO/072.06	New housing development in locations such as Borough Green provides an opportunity for the delivery of new services and facilities to meet community need. With regard to Watlingtonbury the provision of modest levels of new development can assist in providing direct community benefits to meet locally identified needs and affordable housing.	Noted. This is the purpose of the Isles Quarry proposal at Borough Green. Any proposals at Watlingtonbury would be dealt with under the Exception Site Policy.
72	Croudace Homes Limited	PO/072.05	Council's is correct to reflect wishes of residents in preparing a development strategy for the Borough, however it is important it does not lose sight of the PPG and PPS advice.	Noted.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
3.5 CREATING SUSTAINABLE COMMUNITIES IN THE BOROUGH				
1. OFFICIAL CONSULTEE				
175	Kent County Council Strategy Division	PO/175.23	Paragraph 3.5.5. Amend second sentence as follows: "It can also seek to co-ordinate the provision the local services and community facilities such as medical, shopping, leisure, and youth, education, libraries, social and health and cultural facilities."	All references to examples have been deleted because they can never be comprehensive.
175	Kent County Council Strategy Division	PO/175.29	Paragraph 3.5.11. Amend first sentence to: "Development may also have an impact on social, health, community and.." Word at end of sixth line should read "this" or "the".	The words social and community are considered to include health, therefore this additional word has not been added.
175	Kent County Council Strategy Division	PO/175.28	Paragraph 3.5.9. Mitigation of development impacts. Paragraph 3.5.9 'built historic resources' should be widened to cover the historic environment in general, as it is important that archaeology and historic landscapes are included alongside historic buildings. Mitigation of development in relation to archaeology is dealt with in detail in PPG16.	Agree that 'built historic resources' should be widened to cover the historic environment in general. This paragraph is now 6.4.5.
175	Kent County Council Strategy Division	PO/175.30	Paragraph 3.5.12. Amend third bullet point to "new open spaces, social, health, educational, library, leisure, youth, cultural and other community facilities.."	Agree. Now in paragraph 6.4.10.
175	Kent County Council Strategy Division	PO/175.31	Paragraph 3.5.12. Amend seventh bullet point to: "New works of art within developments and the public realm."	Agree. Now in paragraph 6.4.10.
175	Kent County Council Strategy Division	PO/175.22	Paragraph 3.5.4. In addition to conservation areas, mention should be made of the Scheduled Monuments, historic parks and gardens, and archaeological sites within the Borough. Further information can be provided if required.	This paragraph has been deleted as it is unnecessary detail in a Core Strategy.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
5. LAND OWNER				
179	The Beaucette Property Portfolio Ltd	PO/179.09	<p>Paragraph 3.5.5 should be redrafted to include consideration of how development requirements are provided and consideration of social inclusion issues. It is suggested the first sentence of paragraph 3.5.5 be redrafted as follows:</p> <p>"The Local Development Framework deals primarily with land use, and therefore has an important role to play in establishing how and where new development requirements should take place in order to reduce the need to travel and reliance on the use of the car, whilst conserving the natural environment and helping to address social inclusion issues."</p>	<p>The word 'new' has been added but not 'how' because this sentence is specifically about the location of development. Agree to the inclusion of reference to social inclusion. This paragraph is now renumbered 6.1.3.</p>

3.6 STRATEGIC POLICY CONSTRAINTS

1. OFFICIAL CONSULTEE

64	English Nature	PO/064.19	<p>There is no mention in the policy of the North Downs Woodland Special Area of Conservation (SAC) or Peter's Pit SAC. PPS9 requires local planning authorities to identify these sites on proposals maps and may need to cross-refer to the level of statutory protection in the text.</p> <p>The following text would provide useful clarification for European Designated Sites:</p> <p>"The general extent of the larger SSSIs and SACs in the Borough is shown diagrammatically on the Key Diagram. The precise extent of the SSSIs and the SACs is shown on the Proposals Map. Where a proposal may impact upon a SAC within the Borough, the proposal will be assessed in accordance with the Conservation (Natural Habitats and c) Regulations 1994. Policies relating to Sites of Nature Conservation Interest, Local Natural Reserves and Ancient Woodland will be included in the Environmental Protection</p>	<p>Wording to this effect has been included in the text following Policy CP10 (now CP9).</p>
----	----------------	-----------	--	--

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			DPD."	
	5. LAND OWNER			
110	Hornet Engineering Limited	PO/110.02	Support Paragraphs 3.6.2 - 3.6.8 relating to Isles Quarry West, Borough Green 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.
181	GLN (Wrotham) Ltd	PO/181.14	<p>Paragraph 3.6.7 in relation to Isles Quarry West, Borough Green, should be deleted for the following reasons:</p> <ul style="list-style-type: none"> * The achievement of the matters identified does not justify the revision of the Green Belt. * The justification for amending the Green Belt boundary is unclear. Paragraphs 3.6.6, 3.6.7, 3.7.27-3.7.29, and 4.2.4 provide different justifications including the restoration of the land and the provision of other community benefits. * Neither the restoration of the quarry nor the provision of "other community benefits" are exceptional circumstances necessary to justify a revision to the established Green Belt boundary. * The benefits for biodiversity in the vicinity of the site ignores the potential damage from development on the site. * The proposition that development would not significantly impact on the character of the AONB is unsupported by any evidence in the Core Strategy or Development Land Allocations DPD. 	<ul style="list-style-type: none"> * 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. The restoration of the quarry and the provision of other community benefits are additional benefits accruing from the development of the site. * The site is not specifically designated as having biological interest though Core Policy CP1 requires the quality of the natural environment to be conserved and, wherever possible, enhanced. * 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.
264	Knole Securities Limited	PO/264.02	<p>Land to the east of Tonbridge Road, Wateringbury (as shown on Map 1) should be removed from the Green Belt because:-</p> <ul style="list-style-type: none"> * A precedent has been set in allowing the adjacent doctor's surgery. * The boundary should reflect the presence of the surgery and seek to "balance up the development of Wateringbury". 	The site is located in the Metropolitan Green Belt. The importance of Green Belt boundaries is their permanence unless there are exceptional circumstances. There is no exceptional case for changing the Green Belt boundary in this location.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
6. HOUSE BUILDER				
71	Tatham Homes	PO/071.18	<p>Paragraph 3.6.11 should be deleted for the following reasons:</p> <ul style="list-style-type: none">* PPG3 does not justify the conclusion that the land at Howlands Allotments, Wrotham should be returned to green belt as the site benefits from services from the former Howlands Allotments site.* Wrotham should be identified as a sustainable settlement in CP15* The removal of safeguarded land status is inconsistent with the principles of sustainable development.	<p>Disagree. Paragraph 3.6.11 is justified by the update to PPG3 'Planning for Sustainable Communities in Rural Areas' (January 2005). The replacement Annex B advises that exception sites in rural areas can include those that may be subject to policies of restraint, such as Green Belt. With this in mind, and the fact that land at Howlands Allotments was safeguarded and excluded from the Green Belt only to permit affordable housing to meet an identified local need, there is no longer a need to apply the safeguarded land policy to this site.</p> <p>Wrotham is not considered to be a rural service centre because it lacks vital services including a Post Office. However, it is considered to be a rural settlement where minor development is considered appropriate, as defined by new policy CP14.</p>
71	Tatham Homes	PO/071.15	<p>Paragraph 3.6.7 in relation to Isles Quarry West, Borough Green, should be deleted for the following reasons:</p> <ul style="list-style-type: none">* The achievement of the matters identified does not justify the revision of the Green Belt.* The justification for amending the Green Belt boundary is unclear. Paragraphs 3.6.6, 3.6.7, 3.7.27-3.7.29, and 4.2.4 provide different justifications including the restoration of the land and the provision of other community benefits.* Neither the restoration of the quarry nor the provision of "other community benefits" are exceptional circumstances necessary to justify a revision to the established Green Belt boundary.* The benefits for biodiversity in the vicinity of the site ignores the potential damage from development on the site.* The proposition that development would not significantly impact on the character of the AONB is unsupported by any evidence in the Core Strategy or Development Land Allocations DPD.	<ul style="list-style-type: none">* 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. The restoration of the quarry and the provision of other community benefits are additional benefits accruing from the development of the site.* The site is not specifically designated as having biological interest though Core Policy CP1 requires the quality of the natural environment to be conserved and, wherever possible, enhanced.* 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.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
71	Tatham Homes	PO/071.16	<p>Paragraph 3.6.6 in relation to Isles Quarry West, Borough Green, should be deleted for the following reasons:</p> <p>* The argument for amending the Green Belt does not warrant exceptional circumstances; they should be permanent; should not be altered merely because the land has become derelict; and should only be altered if there is a material change in circumstances.</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 (now CP19). Paragraph 3.6.6 (now paragraph 6.2.6) sets out the other benefits of development at Isles Quarry.</p>
7. PUBLIC				
164	Mr F J and Mrs M V White	PO/164.01	<p>Support the Core Strategy, in particular the safeguarding of the rural community by restricting the development of villages like St Mary's Platt. Supports location of proposed affordable housing at Borough Green, rather than at Platt, as the site is near amenities required for such a development.</p>	<p>Noted.</p>
165	Mr I and Mrs G Hedley	PO/165.01	<p>Support for the protection of the Green Belt along the A25 at Platt. Support the proposal to locate affordable housing and residential development in Borough Green, near to amenities such as shops and transport, rather than in Platt.</p>	<p>Noted.</p>
166	Mr T J White	PO/166.01	<p>Support fro the protection of the Green Belt along the A25 at Platt. Also support the proposal to build market and affordable housing in Borough Green, which is a town with all the transport and shop amenities required, rather than in Platt.</p>	<p>Noted.</p>
167	Mr & Mrs T Gage	PO/167.01	<p>Support the policy relating to Metropolitan Green Belt because it protects the existing village environment of St Mary's Platt and concentrates housing in areas that are close to local amenities. It will also maintain the separation of communities and the rural nature of the area.</p>	<p>Noted.</p>
168	Mrs S Hedley	PO/168.01	<p>Support for the retention of the Green Belt along the A25, which will keep the rural environment of villages like Platt and will prevent communities joining into one. Also support the proposal to locate affordable housing and other residential development in Borough Green, near to amenities such as</p>	<p>Noted.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			shops and transport.	
<h3>3.7 LOCATION OF DEVELOPMENT</h3>				
<h4>BOROUGH COUNCILLOR</h4>				
138	Cllr. Joan Harrison	PO/138.01	Plaxtol cannot sustain further social or private development and as such should be placed in the same settlement hierarchy as Ightham, Platt and Wrotham - all rural villages that are larger than Plaxtol.	<p>The policies on rural settlements have been reviewed. Plaxtol is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits only minor development within settlements such as Plaxtol, subject to compliance with criteria.</p> <p>Plaxtol is no longer considered a 'Rural Service Centre' as defined by draft policy CP13. The reason why the change has been made is because Plaxtol is not considered to contain a reasonable range of services, or at least easy accessibility to them. For this reason the amount of development considered acceptable for Plaxtol is only minor, appropriate to the scale and character of the settlement.</p>
<h4>1. OFFICIAL CONSULTEE</h4>				
91	English Heritage	PO/091.14	The word 'particularly' should be inserted before 'relevant to planning' in paragraph 3.7.44. Alternatively PPG15 and PPG16 should be inserted as bullet points.	This paragraph has been deleted as unnecessarily repeating national guidance.
175	Kent County Council Strategy Division	PO/175.33	Paragraph 3.7.11. This paragraph specifically mentions the significant constraint of an "Ancient Monument". It would be better to amend this to "the Scheduled Monument of Eccles Roman Villa.'	This is considered to be an unnecessary level of detail for a Core Strategy.
<h4>5. LAND OWNER</h4>				
127	Mr Derek Holmes	PO/127.02	Platt should be included within CP15 with other villages because the extensive services and facilities exist and are in close proximity.	The policies on rural settlements have been reviewed. Platt is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits minor development within settlements such as

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				Platt, subject to compliance with certain criteria.
				Platt is not considered to be a 'Rural Service Centre' as defined by draft policy CP13 because it does not contain a reasonable range of services, for example it does not include a Post Office a surgery or clinic. For this reason the amount of development considered acceptable for Platt is only minor, appropriate to the scale and character of the settlement.
179	The Beaucette Property Portfolio Ltd	PO/179.17	<p>Paragraph 3.7.36. Recognition is needed that within main employment areas to be safeguarded, there may be areas that could meet relevant criteria for release at an appropriate time. A new sentence should be added after 'Key Diagram' stating: "However, there may be smaller areas within these main employment areas that do not always satisfy the requirements for safeguarding."</p>	Proposals would be considered on their merits. The aim of the policy approach is to safeguard the best employment locations.
180	Ringbest Ltd	PO/180.02	<p>A more appropriate criteria in paragraph 3.7.35 than 'capability of accommodating a range of uses' is 'whether buildings or sites are poorly suited to modern business, industrial or warehousing needs.' Sites may be able to accommodate a range of employment uses, but there may be no market requirement to provide for the particular uses that are capable of being accommodated. Such land would then be unnecessarily sterilised. The second sentence should be rephrased as follows: "Whilst it may be appropriate for certain poorly located sites, sites that are detrimental to residential amenity or those that are poorly suited to modern business, industrial or warehousing needs, to be redeveloped for other uses, it is important that the best located and most suitable sites are safeguarded."</p> <p>As indicated in previous representations Policy RE3 is misplaced. Reliance on Policy RE3 weakens the justification for Policy CP23. It is therefore suggested the penultimate</p>	This section has been rewritten in the light of this and other representations. It is considered that if a site is well located for employment purposes it is likely to be suited to modern employment needs. The wording has been revised to better reflect the content of South East Plan Policy RE3.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
180	Ringbest Ltd	PO/180.06	<p>sentence of this paragraph commencing "Policy RE2.." is deleted.</p> <p>Paragraph 3.7.42 needs to refer to the preferences set out by the sequential approach to site selection so that the opportunity of accommodating identified needs which cannot be met within town centres is met. It is suggested the word "key" in the second line of the paragraph is replaced by "preference" and an additional sentence is added to the end of the paragraph as follows:</p> <p>"However, if needs cannot be appropriately accommodated within town centres, they will need to be accommodated using the sequential approach to site assessment and other relevant retail policy tests."</p>	<p>The wording of the retail section and the Policy has been substantially revised in the light of this representation and others. However, the word 'key' will be retained as it is a key consideration.</p>
181	GLN (Wrotham) Ltd	PO/181.13	<p>Paragraph 3.7.3's application of settlement hierarchy is inappropriate as it results in a situation whereby, if one facility is lost, the settlement is denied the opportunity of new development that would otherwise benefit the other services.</p> <p>The presence of a post office should be not a determining factor as there have been many closures nationwide, and few rural post offices will be viable in the long term.</p> <p>The categorisation of the settlements is time sensitive and may not be altered at a later date following changes to the available services in each town e.g. Eccles has just lost its Post Office.</p> <p>If a criterion approach is justified:</p> <p>(a) settlements should not be required to meet the full suite of criteria</p> <p>(b) some weighting should be applied to avoid the situation whereby Wrotham, which is larger and closer to facilities than other towns, is listed as a CP16 town.</p>	<p>The policies on rural settlements have been reviewed. The settlements now considered to be the most sustainable locations for further housing and employment development are those that contain a reasonable range of services, or at least easy accessibility to the services. The settlements that meet this criteria are listed in draft policy CP13 on 'Rural Service Centres'. Wrotham does not qualify because it does not contain the range of services identified in para. 6.3.3.</p> <p>Wrotham is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits minor development within settlements subject to compliance with certain criteria.</p> <p>It is considered that the revised approach is more robust and will therefore be less sensitive to specific changes in circumstances such as the closure of a post office. However, the situation will be kept under review.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
7. PUBLIC				
66	Mr T Packham	PO/066.02	Council should be able to reassess the position of rural settlement and village boundaries to enable sensitive development at the margins of villages instead of infill being the only way to meet development demand in CP15 and CP16 villages. Increasing housing density within a village will result in people commuting to find open space for recreation.	Development may be permitted adjacent to villages under the exception site policy if a local need exists. Otherwise development will be limited to development appropriate to the scale of the settlement and the level of services it provides.
228	Mr Julian Beaven	PO/228.01	In relation to paragraph 3.7.28 relating to Isles Quarry West, Borough Green, they object to the proposal for the following reasons: * There is an inadequate range of shops in Borough Green, with poor parking and a congested main road. The proposal should be directly linked to a new Borough Green bypass. * The housing development will increase congestion on the A25 and M20 link. * There will be a dramatic impact on schools, doctors and dentists. * The site is too close to a landfill site so care needs to be taken to avoid pollution. * Low cost homes will devalue existing property values.	* Borough Green 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. * The proposal has been subject to consultation with Kent County Council Highways and these comments have been incorporated into the site policy requirements. There is a requirement to upgrade and adopt the private haul road to the north. 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). * The relevant infrastructure providers have been formally consulted and do not identify a need for additional facilities as a result of the development. * It is a policy requirement that any land contamination likely to affect the site is investigated and remediated. * Property devaluation is not a planning issue.

3.8 OTHER CORE POLICIES

1. OFFICIAL CONSULTEE

91	English Heritage	PO/091.20	Paragraph 3.8.3, which is presented as policy text, seems more like a policy.	The Quality of Development Policy has been substantially rewritten. Some elements of the supporting text have now been
----	------------------	-----------	---	--

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
91	English Heritage	PO/091.15	The title 'Other Core Policies' should be changed, as it suggests a first and second division of policies.	included in the policy. The Heading has been revised in light of this comment.
7. PUBLIC				
226	Mr Ian Machin	PO/226.01	PPS22 sets out that the Borough should have a specific policy to require that a percentage of the energy to be used in new residential and commercial developments should come from on-site renewable energy sources.	PPS22 gives local planning authorities the option to include such a policy and it is not a requirement. Policy CP1 requires proposals for development to minimise the use of energy and have regard to renewable energy sources which provides a context for the Environmental Protection Policies or Generic Development Control Policies DPD to take the matter forward in more detail.
257	Mr Dagmar Healey	PO/257.01	Lack of a policy relating to Mereworth Visitor Centre included under Policy P6/24 in the adopted Local Plan. This is important to encourage the use of the existing woodlands and to encourage recreation.	The deletion of the policy does not prohibit the development of such a facility. Any application would be dealt with on its merits in accordance with Green Belt policy.
269	Mrs Sally Rutherford	PO/269.01	Object to the absence of a policy relating to Mereworth Visitor Centre as included under Policy P6/24 in the adopted Local Plan. This is important to encourage outdoor recreation and healthy lifestyles in accordance with "2003 Tourism South East". Furthermore, the West Kent Area Framework 2003 refers to "increasing demands for quality tourist accommodation and facilities" and a "strong demand for quality rural self-catered accommodation". A policy should therefore be included that allows for small scale rural self-catering holiday accommodation with ancillary equestrian facilities.	The omission of the policy does not prohibit the development of a Visitor Centre. Any application would be dealt with on its merits in accordance with Green Belt policy. Likewise proposals for tourist accommodation would be considered on their merits in accordance with the general policies of the plan.

CP01 SUSTAINABLE DEVELOPMENT: GENERAL

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
1. OFFICIAL CONSULTEE				
62	GOSE	PO/062.04	<p>Concerned about the number of criteria based policies, particularly CP1 - CP4. As policies they mainly repeat national or regional policy.</p> <p>Query how the policies lead to a decision on the broad locations where development can take place.</p> <p>Would be helpful if a distinction was made at the core strategy level between policies that steer development to broad locations and those that set standards for good design and quality.</p>	<p>The number of criteria-based policies have been reduced. It has been made clear by the wording of the policies that most of them provide a context both for the preparation of more detailed DPDs and for considering planning applications for windfall development. Policy CP1 dealing with Sustainability is an overarching policy that applies to all development and sets the scene for all of the more detailed policies that follow. It has been significantly revised from the draft version.</p>
64	English Nature	PO/064.13	<p>CP1(3)(i). Policy should be strengthened to address the fragility and sensitivity to disturbance that some habitats suffer from as follows: "conserving and, wherever possible, enhancing the character and quality of local landscapes and the wider countryside and public access to them in a way that recognises and protects the fragility of these resources."</p>	<p>This sentence has been inserted into the light text following CP01.</p>
64	English Nature	PO/064.12	<p>Support policy CP1(3)(e).</p>	<p>Noted but the Policy has been substantially rewritten.</p>
65	Southern Water	PO/065.01	<p>Support the policy which will ensure development proposals result in:</p> <ul style="list-style-type: none"> * efficient use of infrastructure * safeguarding of residents amenity (Policy CP1 paves the way to include a policy in a more detailed DPD document regarding the need to ensure sufficient distance between development and wastewater treatment works to allow adequate odour dispersion). * protection of the quality and potential yield of water resources * implementation of SuDS in appropriate locations only (The design and long-term maintenance of SuDS can be considered in a more detailed DPD). * provision of essential infrastructure and services to the public 	<p>Noted, but the Policy has been substantially rewritten.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
69	Highways Agency	PO/069.09	Support policies which minimise the need to travel. Seeks creation of a strategy that will meet the principles of PPG13. Would be concerned about residential extensions to existing communities in case they become predominantly car-based settlements.	Noted.
78	Kent Wildlife Trust	PO/078.04	<p>The following changes are recommended to CP1:</p> <p>* Section 2 should be reworded to read 'The use and development of land will be assessed against .. the need to protect and enhance the natural and built environment and to maintain and create robust ecological linkages between wildlife habitats and sites ..</p> <p>* Section 3 should be reworded to read: 'Proposals for development must result in a high quality, sustainable environment in terms of ..</p> <p>(b) meeting BREEAM or Eco-Homes 'very good' standards as a minimum for all developments, maximising the efficiency of water use, maximising the use of re-used and recycled materials, and, wherever possible, creating carbon-neutral development ..</p> <p>(e) conserving and enhancing other natural resources, including air quality and biodiversity, and conserving soils.'</p>	<p>The recommended wording change to CP1(2) is considered to be too detailed for this policy and is covered by the term 'enhance.'</p> <p>Section 3 has been moved to the light type as being too detailed for the Core Strategy</p> <p>In relation to section (b) wording to this effect has been inserted into the light text following CP1.</p> <p>In relation to section (e) the words 'wherever possible' have been retained in the light text following the policy as enhancement may not be possible in all cases.</p>
91	English Heritage	PO/091.08	CP1(1) refers to safeguarding the historic 'built' environment, whereas criteria (k) refers to conserving or enhancing historic features, which is a broader level of protection. The structure of CP1 would be improved by referring to the 'built and historic' environment in the initial part of the policy, rather than in criteria (k). Criteria (h) - (j) are supported.	The structure of the policy has now been changed.
175	Kent County Council Strategy Division	PO/175.24	Subsections 1 and 3(k) are welcomed, although it would be better to widen 'historic built resources' to include the historic environment in general.	Agree - all references now made to the historic environment
175	Kent County	PO/175.25	Amend subsection (l) of Policy CP1 as follows: "providing all	The wording has been revised but this reference has been moved

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
	Council Strategy Division		necessary and required infrastructure and services for the public."	to the light type.
3. INTEREST GROUP				
14	Hadlow Park Residents' Association	PO/014.03	The efficient use of land for housing as set out in objective 3(a) to policy CP01 is in direct conflict with the principle that the quality of existing environments should be maintained as in policy CP30.	It is not considered that these policies are in conflict as all policies need to be read together.
289	RSPB	PO/289.01	Section 3 should include the need to protect biodiversity and wildlife and avoid impact on statutorily designated sites.	Wording to this effect have been included in the light text following CP01.
5. LAND OWNER				
107	H & H Celcon Limited	PO/107.09	The policy fails to provide for enabling development that can contribute towards sustainable development and the delivery of necessary infrastructure e.g. the Bypass at Borough Green. Text should be added to explain that enabling development outside of urban areas will be supported in certain circumstances to deliver sustainable development benefits.	Development allocations need to be justified on their own merit, i.e. to meet regional or local housing land supply requirements, not on the basis of enabling something else to happen. The funding of the Borough Green Bypass is a matter for Kent County Council, as Highways Authority, through the Local Transport Plan and not for the Local Development Framework for Tonbridge and Malling Borough.
179	The Beaucette Property Portfolio Ltd	PO/179.10	The first part of the policy is not necessary and should be deleted given the criteria in the third part of the policy. The second part of the policy should include reference to retail requirements and other needs. Criterion (h) should be rephrased to address the more appropriate requirement for design. It should include "retail" following "economic" and the third part should state "creating a safe environment which enhances the quality of the public realm."	The criteria have now been moved to light text following CP01. Reference to social requirements have been removed from this part of the policy. Reference to "creating a safe environment which enhances the quality of the public realm" has been included in the light text following CP01.
181	GLN (Wrotham) Ltd	PO/181.11	CP1(3)(l). Policy should be amended to make it clear that reference to infrastructure and services is confined to that	The reference has been moved to the light type an amendment has been made.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			necessary to serve the development in accordance with Government advice.	
181	GLN (Wrotham) Ltd	PO/181.08	In the absence of definitions it is not clear what is meant by the 'Borough's .. economic and social requirements.'	This reference has been removed.
182	Ramac Holdings Ltd	PO/182.03	Policy CP1(3)(l) should be amended to make it clear that reference to infrastructure and services should be confined to that necessary to serve the development in accordance with Government advice.	The reference has been moved to the light type an amendment has been made..
184	Hildenborough Medical Group	PO/184.02	Policy CP1(3)(l) should be amended. Reference to infrastructure and services for the public should be confined to that necessary to serve the development in accordance with Government advice.	The reference has been moved to the light type an amendment has been made.
184	Hildenborough Medical Group	PO/184.07	A definition of 'social requirements' should be provided for CP1(2), and should include healthcare.	Reference to social requirements has been removed from this part of the policy.
220	Strategic Partners UK Fund I	PO/220.09	Support CP1(g) and (h) regarding promotion of appropriate mixed-use development, and schemes which enhance the public realm.	Noted, but the Policy has been substantially rewritten.
220	Strategic Partners UK Fund I	PO/220.10	Consider CP1(2) should be amended to clarify flexibility to enable site-specific considerations to be taken into account.	Policy CP1.2 has been deleted from the Core Strategy.
6. HOUSE BUILDER				
71	Tatham Homes	PO/071.04	It is not clear what is meant by the 'Borough's .. economic and social requirements.' A definition should be provided in explanation.	The reference to 'economic and social requirements' has been removed.
71	Tatham Homes	PO/071.02	Policy should be amended to clarify that the reference to infrastructure and services is confined to that necessary to serve the development in accordance with Government advice. The words 'necessary to serve the development' should be added to CP1(3)(l).	An amendment has been made but this reference has been moved to the light type.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
72	Croudace Homes Limited	PO/072.07	The inclusion of criteria (a) - (l) is considered to be unnecessarily detailed and repeats CP30. The criteria should either be deleted or included within supporting text to the policy, and CP1(3) should be reworded as follows: '3. Proposals for development must result in a high quality sustainable environment.'	Agree. The policy has been reworded accordingly.

CP02 SUSTAINABLE DEVELOPMENT: MAKING BEST USE OF LAND AND PROVIDING FOR A RANGE OF NEEDS

1. OFFICIAL CONSULTEE

60	Sport England South East Region	PO/060.02	Support policy, particularly criteria 4 and 5. Essential that new developments provide a safe and friendly environment to encourage use of facilities. Would mean development takes account of its impact on leisure and community facilities. Criteria 5 is supported as it would result in sites that are needed to meet new demands for community facilities resulting from new development will be allocated and safeguarded.	Noted. These references have been moved to Policy CP1.
62	GOSE	PO/062.05	Concerned about the number of criteria based policies, particularly CP1 - CP4. As policies they mainly repeat national or regional policy. Query how the policies lead to a decision on the broad locations where development can take place. Would be helpful if a distinction was made at the core strategy level between policies that steer development to broad locations and those that set standards for good design and quality.	The number of criteria-based policies have been reduced. It has been made clear by the wording of the policies that most of them provide a context both for the preparation of more detailed DPDs and for considering planning applications for windfall development. Policy CP1 dealing with Sustainability is an overarching policy that applies to all development and sets the scene for all of the more detailed policies that follow. Policy CP2 has been combined with Policy CP1 and refined in the light of these comments.
62	GOSE	PO/062.08	Regarding CP2(3). Would expect to see a locational steer for the provision of gypsy and traveller sites. Query if Council is doing anything to establish whether there is a need for sites and whether this will be known when the submission document	A Study of the need for Gypsy and Traveller accommodation has been carried out by Consultants DCA. A new criteria-based policy has now been included in the Core Strategy. The LDS makes it clear that the Council will prepare a specific DPD to address the

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			is published.	issue of Gypsy Sites.
64	English Nature	PO/064.15	CP2(4). Should mention natural greenspace since it plays an important role in delivering sustainable communities, encouraging economic activity, and supporting people's health and well-being. Wording is suggested as follows: "..including the provision of health facilities, school places and open space, including natural greenspace.."	It is not considered necessary to explain what the Open Space Strategy will include within the Core Strategy. It will deal with all of the categories of Open Space listed in PPG17.
64	English Nature	PO/064.14	The following text would strengthen CP2(1): "Development will be concentrated on previously developed land (as defined in Planning Policy Guidance 3) where adequate survey effort prior to development has indicated that the development will not adversely impact upon protected or BAP species or habitats, in or close to existing settlements.."	This will be covered by other policies of the Plan.
69	Highways Agency	PO/069.10	New development sites that are incorporated within a mixed use development may provide a sustainable solution as they potentially reduce travel needs.	Noted.
78	Kent Wildlife Trust	PO/078.06	The policy should include a clause which emphasises the importance of natural open space as part of green infrastructure and sets out ways that developers will contribute towards delivery and long term management of this infrastructure.	Reference to open space is include but it is not considered necessary to go to the level of detail suggested. This will be a matter for the Open Space DPD.
103	Environment Agency	PO/103.08	This policy should include reference to contaminated land and the need for remediation or alternatively a separate policy on contaminated land should be included.	This is a matter of detail which will be considered at the allocation or planning application stage. A policy on the subject of contamination may be included in the Environmental Protection DPD.
175	Kent County Council Strategy Division	PO/175.26	Amend subsection (4) of Policy CP2 as follows: "Development must have regard to any consequential impact on personal safety and on social, leisure, cultural, and all community facilities, including but not limited to the level of provision for social and health facilities, education and school places, libraries, youth, shops and open space."	All examples have been removed because the list could never be comprehensive.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
223	Kent Police	PO/223.01	Would like wording changes to policy so that it identifies the needs of the police and emergency services as elements of community facilities that may be impacted upon by the provision of new development. This is in accordance with the Kent and Medway Structure Plan.	Policy CP27 deals with this issue. Policy and Emergency Services are specifically referred to in para 6.4.12.
2. PARISH COUNCIL				
38	Platt Parish Council	PO/038.01	Support Sustainable Development policies.	Noted.
3. INTEREST GROUP				
266	Showmen's Guild of GB LHC	PO/266.01	Add reference to travelling showpeople in paragraph 3 and this would be consistent with paragraph 3.7.33.	Agree that the text should be changed.
5. LAND OWNER				
107	H & H Celcon Limited	PO/107.10	The policy fails to recognise that in certain circumstances Sustainable Development will require development to take place on sites outside urban areas.	<p>A key principle of sustainable development is to focus development on previously-developed land at locations that contain a reasonable range of services to meet the needs of communities. This effectively translates into focusing development within urban and rural service centres. It must be stressed that the policy is high-level and strategic. It is not meant to deal with all potential proposals that may come forward during the lifetime of the LDF but provide a broad policy framework to guide the more detailed policies in the Core Strategy and other DPDs.</p> <p>There are exceptions, for example draft policy CP20 provides scope for development to take place adjoining rural settlements that meets an identified need for rural affordable housing. Furthermore, PPG2 'Green Belts' states "It is for the applicant to show why permission should be granted. Very special circumstances to justify inappropriate development will not exist</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."
169	Harvester Trust	PO/169.02	Subsection (3) of the policy should make it clear that the extent of affordable housing and/or the proportion of such housing within development schemes will be dependent on specific development proposals and the viability of schemes. In some circumstances it will not be appropriate to include affordable housing.	Paragraph 6.3.26 in the Core Strategy which provides the reasoned justification for new affordable housing policy CP18 makes it clear that the proportion of social rented housing may need to be varied according to site-specific circumstances and will be subject to negotiation. Planning applications are dealt with on their merits according to the circumstances of each case. It is not considered necessary to make any changes to Policy CP2 (now incorporated in CP1).
169	Harvester Trust	PO/169.01	Support development of new housing on sites where there are a range of services available and with the potential to be served by public transport.	Noted.
179	The Beaucette Property Portfolio Ltd	PO/179.11	Support Sustainable Development policies.	Noted.
181	GLN (Wrotham) Ltd	PO/181.12	Text in CP2(3) should be amended to provide cross reference to Policy CP20 thereby providing clarity on mix of tenure and affordability.	This Policy has now been moved to CP1.5 and the words "where appropriate" have been added. As a matter of principle cross-referencing been avoided. All policies have to be read together.
184	Hildenborough Medical Group	PO/184.08	Policy CP2(1) should be amended to acknowledge the fact that it may not be possible for all development to be undertaken on previously developed land, and to allow for the development of other land where justified through the application of a sequential test exercise.	The recommended amendment is not considered necessary. The word 'concentrated' implies that there may be development elsewhere. PPG3 sets out the sequential test and it is not necessary to repeat it here.
184	Hildenborough Medical Group	PO/184.03	The policy should include reference to provision being made for social development e.g. healthcare.	The policy has been revised to make reference to "social and community facilities."
184	Hildenborough Medical Group	PO/184.06	CP2(5) requires clarification on: * how 'community needs' are to be defined and identified * how suitable sites to meet those needs are to be identified * what part of the LDF documents will safeguard community needs, and	This matter is addressed in more detailed policies elsewhere within the Core Strategy and in the Development Land Allocations DPD. The wording has been amended and moved to Policy CP1.7

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			* how will community needs be safeguarded.	
220	Strategic Partners UK Fund I	PO/220.11	Support CP2(1) regarding development being concentrated on previously developed land.	Noted. This reference has been moved to Policy CP1.6.
	6. HOUSE BUILDER			
72	Croudace Homes Limited	PO/072.08	The wording 'in accordance with the requirements of the South East Plan, or' should be deleted from CP2(2). The emerging South East Plan sets out strategic objectives for the whole of the South East Region and will not therefore prescribe detailed Development Control criteria, thresholds or requirements dealing with housing mix. This should be dealt with by locally derived studies, in accordance with PPS1, PPS12 and the Companion Guide to PPS12.	Agree. The policy has been reworded accordingly.
134	Rydon Homes	PO/134.09	Relates to subparagraph (3). References to tenure of housing should be removed as this is not a planning consideration in either market or affordable housing.	Paragraph 25 of draft PPS3 "Housing" refers to the need for a balanced mix of tenures. Therefore, it is valid to include this requirement in the policy.
249	ZED Homes Limited	PO/249.04	Supports the concentration of development on previously used land at appropriate locations and consider that accessible brownfield sites should be given priority.	Noted.
	7. PUBLIC			
203	Ms Janine Allen	PO/203.02	Supports paragraph 3.5.6 and Policy CP2 regarding building on previously developed land. Thinks that greenfield sites should only be developed if no other brownfield site is available. Also support regard for social and community facilities and open space, as recreational use of land is important to build communities.	Noted.

CP03 SUSTAINABLE DEVELOPMENT IN THE COUNTRYSIDE

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
1. OFFICIAL CONSULTEE				
60	Sport England South East Region	PO/060.05	Support criteria (g) as it is difficult to provide for sport and recreation within the built up area due to spatial requirements. This policy would recognise that development outside settlements is often the only means of providing such essential community facilities.	Noted.
62	GOSE	PO/062.06	Concern about the number of criteria based policies, particularly CP1 - CP4. As policies they mainly repeat national or regional policy. Queries how the policies lead to a decision on the broad locations where development can take place. Would be helpful if a distinction was made at the core strategy level between policies that steer development to broad locations and those that set standards for good design and quality.	The number of criteria-based policies have been reduced. It has been made clear by the wording of the policies that most of them provide a context both for the preparation of more detailed DPDs and for considering planning applications for windfall development. Policy CP1 dealing with Sustainability is an overarching policy that applies to all development and sets the scene for all of the more detailed policies that follow. Policy CP3 has been deleted, though some elements have now been incorporated in the Policy dealing with Development in the countryside.
64	English Nature	PO/064.16	Support policy CP3(d).	Noted.
69	Highways Agency	PO/069.11	Recommend subsection (e) is amended to read "have, or provide, satisfactory access to the highways network" in order to clarify that developments should fund required infrastructure where necessary. Recommend that where development occurs in rural areas, both local roads and wider scale impacts should be considered.	This issue has been covered by other policies in the Core Strategy. In any case the entire policy CP03 has been deleted and subsumed into a new policy for development in the countryside (Policy CP15).
3. INTEREST GROUP				
157	National Trust	PO/157.02	Consider some criteria in this policy inappropriate and overly restrictive e.g. * under (a) it is considered an intensification of use may be acceptable without adverse impacts and is consistent with the need to make the best use of land as set out in PPS7.	Reference to intensification of use has been deleted. The entire policy CP03 has been deleted and subsumed into a new policy for development in the countryside (Policy CP15).

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>* Question whether subsections (b), (d) and (f) are in accordance with PPS7</p> <p>* Consider subsections (c), (e) and (g) are adequate criteria especially in light of other policies of the plan for the Green Belt, AONB and SLA.</p>	
173	CPRE, Tonbridge & Malling District Committee	PO/173.09	Proposes an additional caveat as CP3(f) to "specify landscaping measures including tree planting to minimise the impact of built development and maintain the openness of the countryside".	The entire policy CP03 has been deleted and subsumed into a new policy for development in the countryside (Policy CP15). Tree planting is considered to be a matter of detail inappropriate to the Core Strategy
289	RSPB	PO/289.02	The phrase "features of acknowledged importance" should be defined.	The entire policy CP03 has been deleted and subsumed into a new policy for development in the countryside (Policy CP15).
5. LAND OWNER				
107	H & H Celcon Limited	PO/107.11	The policy states that development can be justified in the Green Belt in very special circumstances, but does not go far enough to explain what form 'very special circumstances' can take e.g. enabling development proposals.	PPG2 states "It is for the applicant to show why permission should be granted. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." By definition very special circumstances cannot be identified in advance. They are specific to the case in question.
182	Ramac Holdings Ltd	PO/182.04	CP3(b) should be amended to acknowledge that in the case of a 'Major Developed Site in the Green Belt' (Development Land Allocation Replacement Policy, Annex I) siting of development on other land may confer benefits as per advice in PPG2 Annex C.	Reference to PPG2 is not considered necessary. In any case, the entire policy has been deleted and subsumed into a new policy for development in rural areas.
			The final paragraph of CP3 (b) should cross reference to the proposed DLA draft replacement policy.	
184	Hildenborough Medical Group	PO/184.13	Clarification is required about the definition of 'settlement confines.' Policy needs to be amended to avoid any conflict in interpretation of Core Strategy when read with proposed allocations of land outside present settlement confines.	Settlement confines will be as defined on the Proposals Map pursuant to new Policies CP12, CP13 and CP14 The entire policy CP03 has been deleted and subsumed into a

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>Policy should be amended to allow for the development of land other than previously developed land where justified by a sequential test exercise.</p> <p>Policy should be amended to allow for intensification of use, increase in footprint, and development outside the area covered by existing buildings where justified. This would provide consistency with approach to development in the Green Belt where policy provides for such development being permitted if justified by very special circumstances.</p>	<p>new policy for development in the countryside (Policy CP15).</p>
227	Gallagher Properties Ltd	PO/227.02	<p>The policy should be amended to reflect the overall policy framework for the provision of new development in the countryside, e.g. the construction of new building for employment.</p> <p>The preference for the re-use or redevelopment of existing buildings is contained in Structure Plan policy SS3 and does not need to be repeated.</p> <p>The policy restriction relating to intensification of use is contrary to policy CP25.</p> <p>The redevelopment of existing buildings should not be restricted to the area in recent use as it could limit the potential for beneficial relocation within the site.</p> <p>The provision of new premises for rural employers could be met within the settlements but this would negate the purpose of the policy framework to allow for the reasonable expansion of rural employment using existing sites.</p> <p>The nature of rural employers may involve historic development which may not now be appropriate outside settlements. Such employers could be precluded from</p>	<p>The entire policy CP03 has been deleted and subsumed into a new policy for development in the countryside (Policy CP15).</p> <p>Reference to intensification has been deleted.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			expanding which is unreasonable.	
	6. HOUSE BUILDER			
71	Tatham Homes	PO/071.17	The policy should be amended to acknowledge the fact that development of 'Safeguarded Land Sites' will result in new development and consequential additional footprint. Subsection (a) should be amended to start "Save for the development of 'Safeguarded Land' pursuant to Policy CP7.."	The entire policy CP03 has been deleted and subsumed into a new policy for development in the countryside (Policy CP15).
171	Croudace Homes Ltd	PO/171.01	Regarding the criteria outlined in the policy, as locations outside of settlement policy boundaries can offer sustainable locations for further development. Policy should be reworded accordingly.	The entire policy CP03 has been deleted and subsumed into a new policy for development in the countryside (Policy CP15).
239	Insite Development Ltd	PO/239.02	(a) is considered to be too restrictive as limited intensification may achieve the efficient reuse of the site with no material harm to the area. (b) is too onerous and does not recognise that redevelopment proposals can secure environmental improvements by the relocation of the built form within the site. (f) is unclear, unduly restrictive and does not reflect national policies that encourage reuse and redevelopment of rural buildings. (g) could unduly prevent the viable reuse of the building or site and proposals should not be restricted to those that require a location outside an existing settlement.	The entire policy CP03 has been deleted and subsumed into a new policy for development in the countryside (Policy CP15). Reference to intensification has been deleted.

CP04 SUSTAINABLE TRANSPORT

1. OFFICIAL CONSULTEE

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
62	GOSE	PO/062.07	<p>Concern about the number of criteria based policies, particularly CP1 - CP4. As policies they mainly repeat national or regional policy.</p> <p>Queries how the policies lead to a decision on the broad locations where development can take place.</p> <p>Would be helpful if a distinction was made at the core strategy level between policies that steer development to broad locations and those that set standards for good design and quality.</p>	<p>The number of criteria-based policies have been reduced. It has been made clear by the wording of the policies that most of them provide a context both for the preparation of more detailed DPDs and for considering planning applications for windfall development. Policy CP4 dealing with sustainable transport has been retained but significantly amended.</p>
69	Highways Agency	PO/069.12	<p>Subsection (b) should be revised so that travel plans are specific, measurable and monitored, with targets, incentives to meet targets, and a defined funding stream. This will ensure they are effective.</p>	<p>Wording to this effect has been added to the introductory text.</p>
91	English Heritage	PO/091.09	<p>CP4(f) needs to recognise the potential for transport infrastructure to have a direct and adverse impact on historic assets, not just on character.</p>	<p>Agree. Reference to the historic environment has now been added.</p>
175	Kent County Council Strategy Division	PO/175.27	<p>Welcome subsection (f) which states that road improvements should have regard to the character of an area. Perhaps this requirement could apply to development in general.</p>	<p>This matter has been covered by the General Design policy.</p>
5. LAND OWNER				
179	The Beaucette Property Portfolio Ltd	PO/179.12	<p>An additional criterion (j) should be added addressing necessary enhancements to local highway capacity as follows: "provide for necessary enhancements including to the capacity of any nearby highway infrastructure in order to meet the increase in demand from new development."</p>	<p>Reference to highway safety and transport capacity enhancements has been added.</p>
182	Ramac Holdings Ltd	PO/182.02	<p>The policy should be amended to acknowledge the fact that achievement of all these objectives may not be possible in the redevelopment of a Major Developed Site in the Green Belt</p>	<p>An amendment is not considered necessary as this is a high level policy that sets out the main transport objectives which needs to be read together with other policies of the plan.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			that otherwise complies with the DLA Draft Replacement Policy in Annex I. The words "unless justified by special circumstances, e.g.." should be inserted at the beginning.	
6. HOUSE BUILDER				
171	Croudace Homes Ltd	PO/171.02	Support in principle, but to accord with this policy land at Barming Rail Station should be safeguarded for the provision of small scale employment purposes and for the upgrading and improvement of facilities at the station. (Map 3)	In principle support for Policy CP04 noted, but there is no need for an employment allocation at the station which would intrude into the Strategic Gap.

CP05 MITIGATION OF DEVELOPMENT IMPACTS

1. OFFICIAL CONSULTEE

60	Sport England South East Region	PO/060.01	<p>This Policy will ensure contributions towards the provision of sport and recreation facilities needed to serve new development is provided by the developer. A 'Planning Contributions Kitbag' has been produced by Sport England to provide advice, techniques and tools for securing such provision.</p> <p>Also support part 2 which covers Sport England's own Playing Fields Policy.</p>	Noted.
62	GOSE	PO/062.09	Concerned about the wording of CP5. Would expect the issues covered by CP5 to be resolved in principle by the Council as part of good spatial planning. Unresolved issues may pose a threat to timely delivery.	This policy is aimed at windfall development. Where infrastructure and community needs are identified in respect of sites allocated in the Development Land Allocations DPD then these are specified as requirements.
64	English Nature	PO/064.17	CP5(2). Keen to ensure that replacement and compensatory habitat is provided before development commences to allow time for the habitat to mature and to see ongoing management and monitoring of habitats. Advocate a three step sequential approach to avoiding impacts as outlined in RTP1's 1999 Guide	<p>Wording to this effect has been added to the text.</p> <p>This policy is not about avoiding impacts - this is covered by other policies of the plan. It is about mitigating impacts when they occur.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>'Planning for Biodiversity - Good Practice Guide.' The following addition to CP5(2) would strengthen this: "...Any replacement measures would preferably be provided on-site at least on a like-for-like basis and ideally provided prior to development commencing to allow time for them to mature. Arrangements will be required from the developer for the ongoing management of the replacement resource to ensure it replaces the quality and extent of habitat lost."</p> <p>Concerned that CP5 does not focus on how to avoid adverse impacts upon nature conservation interest features within the Borough. Policy should focus on developing sites with low nature conservation value in preference to providing compensatory habitat. The decision making process should follow the RTPI's three-step sequential process. Such a policy should afford the same level of protection to biodiversity and important wildlife sites as CP10 does to AONBs.</p>	
65	Southern Water	PO/065.02	CP1(1). The formal requisition procedures set out in the Water Industry Act 1991 provide a legal mechanism for developers to provide necessary infrastructure to service their sites. Council should ensure development does not take place until infrastructure with adequate capacity is provided.	Noted, but the Council is not able to refuse residential development on the grounds that water supply is not available because of the statutory obligation on the water industry to supply water to all households.
69	Highways Agency	PO/069.16	Suggest the words 'and strategic' are inserted between the words 'local' and 'transport infrastructure' in paragraph 3.5.12.	The word 'local' has been removed from the sentence.
69	Highways Agency	PO/069.15	Would expect to see emerging policy mechanisms discussed in paragraph 3.5.11 that would minimise demand at source and require mitigation of trunk road impacts throughout all stages of development planning, implementation and operation e.g. joint working between the developers of several smaller sites to provide funding towards infrastructure that will relieve pressure at specific points on the trunk road network.	This particular section of the Core Strategy is about mitigating residual impacts after demand at source has been minimised, in the light of other policies and Government guidance. The expectations suggested are far too detailed for the Core Strategy. It is important to appreciate that the Core Strategy is a high-level strategic document that provides the policy framework for the more detailed policies in the Development Plan Documents, including the Generic Development Control Policies document. In dealing with proposals, the Borough council will have regard to Kent County Council's Development Contributions Guidance Note.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
69	Highways Agency	PO/069.14	Suggest that explicit reference is made in paragraph 3.5.11 to development impact 'either in isolation or in combination with other sites.'	Agree.
69	Highways Agency	PO/069.13	Suggest that the first sentence in paragraph 3.5.10 should make explicit reference to its application to transport measures. In relation to transport, improvements may also be 'off site' and possibly some distance from the development in question.	Transport is dealt with in another paragraph and is now specifically mentioned in new Policy CP26
78	Kent Wildlife Trust	PO/078.05	Recommended changes to paragraph 3.5.10 are as follows: * Remove the word 'only' from the second sentence * Insert after the second sentence "In the case of the natural environment and biodiversity, this may include measures which contribute to off-site schemes for the creation and/or restoration of large areas of wildlife habitat or the establishment of robust ecological networks. Developers should consider how ecological enhancement, mitigation and compensation associated with a particular development might be delivered in a co-co-ordinated fashion in order to secure maximum environmental benefits. In all cases, mitigation and compensation measures should relate to the particular biodiversity interest of the development site." * The third sentence should be replaced with "Where existing biodiversity resources are affected, mitigation measures should reflect the fact that replacement habitats or features are almost always of lower ecological value than established features, and that, therefore, replacement features should be provided in substantially greater quantity than those lost. For example, where an area of existing wildlife habitat is lost, at least double the area of new habitat should be created. * A new sentence should then be inserted: "Wherever possible, the replacement habitat should be similar to that lost	Some of these suggested changes have been taken into account, but the level of detail suggested is in some respects inappropriate to the Core Strategy and may be more appropriate for the Environmental Protection DPD. The final two recommended paragraphs have partly been included in policy and partly included in supporting text. Reference to two-for-one compensation has not been included as each case would need to be considered on its merits.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>in terms of soils, geology, aspect and physiognomy, in order to encourage the establishment of a similar suite of wild species."</p> <p>In paragraph 3.5.12 the bullet point reading 'new or improved wildlife habitats or links between them to enhance biodiversity' should be deleted and replaced with:</p> <ul style="list-style-type: none">" * new wildlife habitats to replace those lost* enhancements to existing wildlife habitats, where it can be clearly demonstrated that this will improve the capacity of the habitat to support key wild species* new links between existing areas of wildlife habitat where such a link will clearly add value to those areas of habitat* Contributions to off-site schemes for strategic enhancement of biodiversity where such schemes are close to the development site and of similar biodiversity interest." <p>The following should be added to CP5: "Where development that causes material harm to existing wildlife habitats or other biodiversity features is exceptionally justified, appropriate mitigation will be necessary to minimise or counteract any adverse impacts. Where the application of appropriate mitigation still leaves residual impacts, then compensatory measures must be provided. Replacement for lost or damaged wildlife habitat or other biodiversity features should normally be on or close to the development site and should be on a two for one basis.</p> <p>Proposals for mitigation and compensation measures will only be acceptable if it can be clearly shown that the mechanisms and funding can be secured for:</p> <ul style="list-style-type: none">* Maintenance and management in the long term;* Monitoring and assessment of the success of the proposed measures; and* Changes or modifications to the proposed measures should monitoring show that they have not achieved the desired aim and are therefore not functioning effectively to mitigate or	

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			compensate for negative impacts."	
91	English Heritage	PO/091.10	The policy needs to be revised to create a distinction between resources of national importance and of local interest, in order to be more closely aligned with PPGs 15 and 16.	This policy is about mitigation of development impacts and would not be affected by the status of the resource.
109	Countryside Agency	PO/109.04	Development plans should first look to bring social, economic and environmental benefits and then for solutions where unavoidable adverse impacts are mitigated or compensated. Development should always create a net gain and no significant loss.	Noted but it is not reasonable to expect all development to always create a net environmental gain, but certainly there should be no significant loss. That is the purpose of mitigation.
175	Kent County Council Strategy Division	PO/175.32	Amend CP5(1) line 6 to: "..ensure the provision of developer contributions (financial and/or land).." Amend CP5(2) line 4 to: "..measures will be required to secure.."	Reference to the nature of developer contributions is not considered necessary. Agree. The word 'necessary' has been changed to 'required.'
223	Kent Police	PO/223.02	Would like wording changes to supporting text in paragraph 3.5.12 to identify the needs of the police and emergency services as community facilities that may be subject to mitigation measures under policy CP5 (1). This is in accordance with the Kent and Medway Structure Plan.	Reference to police and emergency services added to new para 6.4.10 and reference to "service provision" has been included in new Policy to CP26.
2. PARISH COUNCIL				
38	Platt Parish Council	PO/038.02	Agree that it is essential that for any new development that the required infrastructure should already be in place or that the developer be required to provide it or pay for it, with no time-lag in provision.	Noted.
3. INTEREST GROUP				
174	Kent County Council Property Group	PO/174.06	The policy should refer to developer contributions. It should have a clear reference to the county-wide policy in the KCC structure plan which is supported by an annually updated guide for developers. This guide is currently being updated	The mitigation and community service provision policies have been significantly rewritten in the light of this and other representations. For the reasons given in the introduction no specific references are made to the Structure Plan. The KCC

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			and will become an adjunct to the KCC Community Plan 'Vision for Kent' referred to in 1.6.18.	Guide is but one of many material considerations and does not need to be referred to specifically.
178	Network Rail	PO/178.06	<p>Network Rail is funded to maintain the existing railway and does not have monies for enhancements. Would therefore welcome support from the Council to improve stations and facilitate minor infrastructure projects to cope with growth. New development around stations, could directly or indirectly support station improvement works.</p> <p>The policy is particularly appropriate as it has the scope to address all new development impacts on infrastructure (and not just those that are proximate).</p>	Noted.
178	Network Rail	PO/178.04	<p>Considers that it would be reasonable to provide for the pooling of contributions taken from developments in order to fund significant infrastructure improvements. This would enable part-contributions to be obtained from a greater range of developments and sources than it would be possible to obtain from a single party.</p> <p>Council should consider establishing a 'Project Bank' of services and mitigation works that may become necessary as a result of its emerging plans for new development areas and include station and interchange improvements in that list.</p> <p>Suggest include in CP5 an additional point that provides for the pooling of contributions, and for area-based project banks for larger infrastructure projects.</p>	This approach has already been used for three major sites, and will be proposed for Tonbridge Town Centre. Potential changes to national policy on the Planning Gain Supplement and tariffs mean that it would be premature to make such a specific reference Policy CP5. However, as worded the Policy does not preclude such an approach which could be taken forward in the Generic Development Control Policies DPD.
5. LAND OWNER				
179	The Beaucette Property Portfolio Ltd	PO/179.13	The form of development proposed will, in many circumstances, contain mitigation measures. There is therefore no need for a planning obligation or condition to specifically mitigate development. It is therefore suggested that the first part of Policy CP5 be rephrased as follows:	<p>The existing wording has been taken from the adopted Plan. The final part is not considered necessary because it is contained in Circular advice.</p> <p>It is not considered necessary to change the second part of the</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>"Consideration will be given as to the availability of service and community infrastructure necessary to support new development. Development will either incorporate such infrastructure or its provision will be secured by means of planning conditions or a planning obligation. In all circumstances, what is provided must be fairly and reasonably related in scale and kind to the proposed development and reasonable in all other respects."</p> <p>The second part of the policy should be amended so that "will" in line four is replaced with "may."</p>	<p>policy because if harmful impacts are identified then mitigation certainly will be required</p>
182	Ramac Holdings Ltd	PO/182.05	<p>A definition should be provided of what is meant by 'an existing natural, built or cultural resource.'</p>	<p>Reference to cultural resources has been deleted.</p>
6. HOUSE BUILDER				
72	Croudace Homes Limited	PO/072.09	<p>The Borough Council has failed to acknowledge its role in the development process which is to ensure that information is made available to support its policy requirements for Planning Obligations from development proposals. The wording of paragraphs 3.5.12 and 3.5.13 should be amended to reflect the Council's role in the process, and ensure it complies with Paragraph B5 of Circular 05/2005 - Planning Obligations.</p>	<p>The purpose of the Core Strategy is to provide a high-level strategic policy framework for the other more detailed topic based DPDs. Detailing mitigation measures and identification of need are not a matters for the Core Strategy. Regarding firm housing allocation sites in the Development Land Allocations DPD, the relevant service and infrastructure providers were consulted during the preparation of the policies and regard will be paid to Kent County Council's 'Developer Contributions Guidance Note' when dealing with specific proposals. Other mitigation issues not related to specific allocations are likely to be dealt with in the Generic Development Control Policies DPD or a Supplementary Planning Document.</p>

CP06 METROPOLITAN GREEN BELT

BOROUGH COUNCILLOR

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
162	Councillor Mrs Geraldine Bowden	PO/162.01	<p>Isles Quarry West, Borough Green, should not be deleted from the green belt for the following reasons:-</p> <ul style="list-style-type: none">* An essential characteristic of green belts is their permanence.* There is no strategic change to the boundaries identified in the Structure Plan or South East Plan.* The provision of affordable housing does not provide the exceptional justification to remove the Green Belt designation on this site. Affordable housing can be sourced in Borough Green Parish through other policies in the Core Strategy, e.g. within the built up confines of the village and through the redevelopment of industrial sites in the Green Belt to housing.	<ul style="list-style-type: none">* PPG2 states that the essential characteristic of Green Belts is their permanence. However, it is considered that there is an overriding need for affordable housing in this case which justifies the release of this Green Belt land.* It is agreed that there is no strategic change proposed to the Green Belt boundaries at Borough Green but this site is not of a sufficient size to be considered a strategic site.* Paragraph 3.7.26 explains why the affordable housing is unlikely to be sourced from other sites. 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).
1. OFFICIAL CONSULTEE				
62	GOSE	PO/062.10	<p>Query whether the changes to the Green Belt outlined in CP6 and CP7 result in a net gain or loss of Green Belt.</p>	<p>The net effect of returning the remaining area at Howlands Allotments, Wrotham and the land at Carpenters Lane, Hadlow to the Green Belt, and excluding the residential allocation at Isles Quarry West, Borough Green, is a marginal loss of 1.07 ha of Green Belt. However it is proposed to significantly rationalise the extent of safeguarded land north of Lower Haysden Lane and return approximately half the site to the Green Belt. This proposed change, combined with other amendments i.e. extensions to village confines at Ryarsh, Platt and Birling and the marginal extension of the residential allocation at Isles Quarry West, results in a net gain to the Green Belt of 1.21 ha of land.</p>
2. PARISH COUNCIL				
81	Wrotham Parish Council	PO/081.01	<p>Permanence of Green Belt supported.</p>	<p>Noted.</p>
81	Wrotham Parish Council	PO/081.09	<p>Relates to subparagraph (2) Isles Quarry West, Borough Green which should be deleted for the following reasons:</p> <ul style="list-style-type: none">* The Green Belt should have a greater degree of permanence than is indicated by the proposed changes.* Development would be intensive, visible from Wrotham Hill	<ul style="list-style-type: none">* PPG2 states that the essential characteristic of Green Belts is their permanence and it is agreed that this designation helps retain the rural character of the countryside and settlements. However, it is considered that there is an overriding need for affordable housing in this case which justifies the release of this

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>and located in an elevated rural location within the AONB.</p> <ul style="list-style-type: none"> * It would lead to more coalescence and would have a detrimental impact on the Green Wedge between Ightham and Borough Green. * There is no overriding reason for the proposal. * It is not required to meet the Borough's housing requirement. 	<p>Green Belt land.</p> <ul style="list-style-type: none"> * 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. * 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 (now CP19). * 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). * 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 (now CP19).
100	Ightham Parish Council	PO/100.01	<p>No changes to the Green Belt west of the A228 in CP6(1).</p>	<p>Noted, but the revised policy is somewhat less restrictive than the draft policy.</p>
100	Ightham Parish Council	PO/100.11	<p>Relates to subparagraph 2, Isles Quarry West, Borough Green. They object to the deletion of the Green Belt for the following reasons:</p> <ul style="list-style-type: none"> * Green belts should be permanent and they help retain the rural character of the countryside and settlements within this part of the Borough. * Disagree with paragraph 3.6.7(g) and consider that development too dense or high could impact significantly on the AONB. * The site lies within an ALLI and Green Wedge between Borough Green and Ightham which contribute to the rural character of these settlements and maintain a narrow gap between the villages. The omission of an ALLI policy makes the retention of Green Belt boundaries around Borough Green and adjacent villages more important. * There is no exceptional justification to change the boundaries which have been retained at previous Local Plan inquiries. The proposed change is not small scale. 	<ul style="list-style-type: none"> * PPG2 states that the essential characteristic of Green Belts is their permanence and it is agreed that this designation helps retain the rural character of the countryside and settlements. However, it is considered that there is an overriding need for affordable housing in this case which justifies the release of this Green Belt land. * 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. * There will be a policy on ALLIs in the Environmental Protection Policies DPD. Green Wedges are replaced by policy CP9 which seeks to retain the separate identity of settlements. It is not considered that the development of the site will lead to an erosion of the rural character of the two settlements or adversely affect the visual gap between them since it would be located on the lower part of the site on a former quarry. * The removal of this site from the Metropolitan Green Belt is justified in terms of the need for affordable housing outlined in the

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<ul style="list-style-type: none"> * The 140 market houses are not an essential housing land allocation but are an incentive to the landowner and developer to provide 60 affordable dwellings. * The 60 affordable dwellings can be sourced from other sites. * The site is Green Belt and should be safeguarded for its own sake. There is no scale of quality where some parts, developed or damaged, should be considered less important than others. * There is no assurance that all the area proposed as residential allocation would be made available for housing and the policy requirement to reduce ground levels may not be feasible. * Redevelopment for housing from industry in the Green Belt could bring forth affordable housing with market housing on this sustainable site in Borough Green. Removal of the Green Belt should be the last resort. 	<p>reasoned justification for policy CP21.</p> <ul style="list-style-type: none"> * Agree that the 140 market houses are not an essential housing land allocation but are necessary to provide the 60 affordable dwellings. * Paragraph 3.7.26 explains why the affordable housing is unlikely to be sourced from other sites. * 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. The use of damaged land in favour of a greenfield site is in accordance with PPG3. * The feasibility of the development has been considered by the Council's consultants and it has been found that the development is feasible. * Noted though the redevelopment of the site for housing and its location adjacent to the settlement of Borough Green mean that there is little justification for retaining the Green Belt boundary.
5. LAND OWNER				
70	Mr A Westlake Esq.	PO/070.01	<p>Core Strategy fails to identify land at New House Farm, Kemsing Road, Wrotham (Map 4) as an existing major developed site in the Green Belt under CP6 and shown in the Development Land Allocations DPD.</p> <p>The operation of the existing site is not ideal, and redevelopment would have beneficial effects on amenity, layout, and the environment.</p> <p>The site has a positive relationship to Wrotham village and is located in an AONB. Redevelopment of the site would be in line with policies regarding AONBs in CP10, and also CP16 and CP17.</p>	<p>This site is not of a scale or character that is appropriate to be identified as a major developed site in the Green Belt. Any proposals for redevelopment would be considered on their merits in accordance with Green Belt policy.</p>
79	Hallam Land Management Limited	PO/079.03	<p>Object to the removal of Isles Quarry from the Green Belt to facilitate strategic development because it will not achieve sustainable development, and will not meet the provisions of PPG3 and the sequential approach.</p>	<p>The removal of the site from the Green Belt has been justified on the grounds that it could meet an identified need for rural affordable housing in a more remote part of the Borough. It is previously development land and on the edge of a settlement</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				where services and facilities are available and therefore meets the provisions of PPG3.
106	Hanson Quarry Products Europe	PO/106.02	Support removal of Isles Quarry West from Green Belt as there are lawful uses for various commercial purposes and the scheme represents an opportunity for regeneration in this part of Borough Green.	Noted.
107	H & H Celcon Limited	PO/107.12	The case for the Isle's Quarry to be deleted from the Green Belt to enable comprehensive development to take place constitutes special circumstances. The same should apply to proposals to enable funding and delivery of the Bypass. Text and the Proposals Map should be amended to enable the proposed land at Borough Green for the new aerated aircrete product factory to be deleted from the Green Belt to enable funding and delivery of the Borough Green Bypass (Map 9).	The policy issue of excluding this site from the Green Belt is a matter for the minerals planning authority for the Borough, Kent County Council, through the Minerals Development Framework, not the Local Development Framework for Tonbridge and Malling.
128	Orpines Limited	PO/128.01	Relates to the inclusion of the site at Orpines, Watringbury within the green belt. It is not in open countryside but adjoins existing housing development and is physically well related to the built up area of Watringbury. The policy should be amended to delete the site from the green belt to enable the site to be development for housing to meet local needs.	This greenfield site is located in the Metropolitan Green Belt in an important gap between Watringbury and Teston. Background studies for the Kent and Medway Structure Plan have concluded that there is no strategic need for a review of Green Belt boundaries in order to provide additional land for open market housing. The majority of the Borough's housing needs can be met on sites outside the Green Belt. Any proposals for affordable housing on this site will be considered on their merits under the exception sites policy.
181	GLN (Wrotham) Ltd	PO/181.16	Subparagraph 2 relating to Isles Quarry West, Borough Green, should be deleted because the amendment of the Green Belt boundary at this site is not justified.	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).
181	GLN (Wrotham) Ltd	PO/181.15	Paragraph 3.6.6 in relation to Isles Quarry West, Borough Green, should be deleted for the following reasons: * The argument for amending the Green Belt does not warrant exceptional circumstances. Green Belts should be permanent; should not be altered merely because the land has become derelict; and should only be altered if there is a material change in circumstances.	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). Para 3.6.6 (now para 6.2.6) sets out the other benefits of development at Isles Quarry.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
264	Knole Securities Limited	PO/264.03	Land to the east of Tonbridge Road, Watringbury should be removed from the Green Belt because the development of this small strip of land will not result in any significant erosion of the visual gap between Watringbury and Teston. It is already contained on three sides by existing development.	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.
6. HOUSE BUILDER				
71	Tatham Homes	PO/071.03	Subparagraph 2 relating to Isles Quarry West, Borough Green, should be deleted because the amendment of the Green Belt boundary at this site is not justified.	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).
72	Croudace Homes Limited	PO/072.10	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.	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.
134	Rydon Homes	PO/134.02	<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> <ul style="list-style-type: none"> * 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). * There is no need for further private housing in the Borough. * 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. * The site is not previously developed land as previous consents have required restoration and much of it has blended 	<ul style="list-style-type: none"> * 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. * There is an adequate supply of private housing in the Borough but this development is justified since it would meet an identified need for affordable housing. * Agree that the amount of land released from the Green Belt

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>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.</p> <ul style="list-style-type: none">* The restoration of the site would not fulfil any Green Belt purposes.* There has been no material change of circumstances in the need for restoration since the adoption of the Local Plan in 1998.* The development of the site for housing will harm the AONB.* The strategic local gap between Borough Green and Ightham would be eroded.* The access road was originally permitted on a temporary basis and should not be given greater status now.* The landowners should not be entitled to further profit from degrading the landscape but should restore it instead.* The proposal does not meet the tests of soundness.	<p>should be kept to a minimum and the site boundary constitutes the minimum amount of land necessary to achieve 60 affordable dwellings.</p> <ul style="list-style-type: none">* Only part of the site is subject to restoration conditions. The remaining parts contain buildings and constitute damaged land.* 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).* 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.* 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.* 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).* 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.* The development of the site would meet an identified need for affordable housing in the rural area.* 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.

CP07 SAFEGUARDED LAND

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
1. OFFICIAL CONSULTEE				
62	GOSE	PO/062.11	Query whether the changes to the Green Belt outlined in CP6 and CP7 result in a net gain or loss of Green Belt.	The net effect of returning the remaining area at Howlands Allotments, Wrotham and the land at Carpenters Lane, Hadlow to the Green Belt, and excluding the residential allocation at Isles Quarry West, Borough Green, is a marginal loss of 1.07 ha of Green Belt. However it is proposed to significantly rationalise the extent of safeguarded land north of Lower Haysden Lane and return approximately half the site to the Green Belt. This proposed change, combined with other amendments i.e. extensions to village confines at Ryarsh, Platt and Birling and the marginal extension of the residential allocation at Isles Quarry West, results in a net gain to the Green Belt of 1.21 ha of land.
69	Highways Agency	PO/069.04	Concerned there may be impacts on the trunk road network from development on land north of Dry Hill Park. The area is surrounded by other development and is located 3km from the A21.	It must be stressed that there is no proposal to develop this safeguarded land within the Plan period. The purpose of this policy is to ensure that there is land available around Tonbridge to meet the longer-term development needs of the town beyond the lifetime of the Plan, i.e. after 2021. If there is a pressing need for the development of the site to be brought forward then the Borough Council will initially assess the potential for revising the Core Strategy, and any other relevant DPDs, to ensure there are adequate policies in place to deal with all the spatial issues associated with a proposal. Furthermore, when a specific proposal is made it will be judged on its merits in the light of adopted LDF policies and Government advice and feedback received from consultation with relevant consultees. Issues such as traffic impacts will be assessed and addressed, as appropriate, and a traffic impact assessment will be sought when required.
5. LAND OWNER				
79	Hallam Land Management Limited	PO/079.04	Lower Haysden Lane - site should be allocated for development within the plan period. Constraints such as the proximity of the floodplain can be accommodated within any detailed scheme and the size of the site does not need to be	The Reserve Sites are safeguarded for future development and will not be released within the plan period unless justified by studies undertaken in support of a Development Allocations DPD. They are intended to protect the Green Belt from future

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			reduced.	encroachment and have been reserved since the Tonbridge and Hildenborough Local Plan was adopted in 1987. There is sufficient land for housing within the Borough to meet needs until 2021 and there is no justification for the release of this site for development within the plan period. Furthermore, in the light of the significant potential for development now identified in the central area of Tonbridge it has been decided to reduce the size of the Reserve Site at Lower Haysden Lane (see Annex F to Core Strategy).
6. HOUSE BUILDER				
71	Tatham Homes	PO/071.20	CP7(2) should be amended by deleting 'Undertaken in support of a Development Allocation DPD' and inserting 'Demonstrating a need to release the site to deliver housing provision pursuant to Policy CP19.' This will allow for justification through appropriate studies outside a Development Allocation DPD.	This policy has been reworded in light of this comment but it is still considered appropriate only to release the land through the development plan process.
71	Tatham Homes	PO/071.19	The Former Howlands Allotment site, Old London Road, Wrotham should be added to CP7 as a safeguarded site in subsection (c). The site should be identified in the Key Diagram and consequential changes made to the text of the Document.	There is no policy need to retain the remaining area at Howlands Allotments, Wrotham as safeguarded land, excluded from the Green Belt. The purpose of excluding this site from the Green Belt was so that it could be developed for affordable housing to meet a local need, if and when it is identified. Revised guidance in PPG3 now means that rural exception sites can be allowed in the Green Belt. For this reason, the site is proposed to be returned to the Green Belt. Any proposal for affordable housing on this site will be dealt with on its merits in accordance with the exception policy CP22 (now CP20).
134	Rydon Homes	PO/134.07	Land at Carpenters Lane, Hadlow should be added to the list of safeguarded land. There are no exceptional circumstances for changing the Green Belt boundary in this location. Failing the site being allocated to meet local housing needs, it should be included in the list of safeguarded land to meet longer term housing needs.	Whether this site is returned to green belt, identified as safeguarded land, or firmly allocated, does not affect the outcome which is that the site will only be developed if there is a local need for affordable housing. In the light of Council's decision on the wider strategy for affordable housing it has been decided to return this site to the Green Belt. Any proposal for affordable housing on this site will be considered under the exception sites policy.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
239	Insite Development Ltd	PO/239.01	The strategy seeks to concentrate all of the large scale housing allocations onto land on the East Bank of the Medway. Further land is needed around Tonbridge to avoid an unsustainable pattern of development. The safeguarding of the 2 sites is welcomed but these sites have limited capacity and should be supplemented by additional land to ensure adequate supply. Therefore, land at Hilden Farm as shown on Map 5 should be included as a site within the policy to provide for additional housing opportunities (including affordable housing) and open space.	The sites are reserved for future development and will not be released within the plan period unless justified by studies undertaken in support of a Development Allocations DPD. They are intended to protect the Green Belt from future encroachment and have been reserved since the Local Plan was adopted in 1996. There is sufficient land for housing within the Borough to meet needs until 2021 and there is no justification for reserving a further site around Tonbridge.
7. PUBLIC				
278	Graham Burbridge	PO/278.01	Petition containing 768 signatures seeking the deletion of the western part of the reserve site North of Lower Haysden Lane, Tonbridge, and extension of the Green Belt into the site. The site has important landscape value and the lower part of it provides significant water storage from the River Medway at times of flood.	The site is reserved under Policy CP7 in the Preferred Options Report for future development and will not be released within the plan period unless justified. The safeguarded land is intended to protect the Green Belt from future encroachment and has been reserved since the Tonbridge and Hildenborough Local Plan was adopted in 1987. It is intended to ensure that there is sufficient development land within the Borough to meet long term development needs. In the light of the petition and the significant potential now identified for further housing development within the central area of Tonbridge the Council has decided to reduce the size of the Reserve Site and return its western margins to the Green Belt.
282	Mr Tim Lynch	PO/282.01	Lower Haysden Lane, Tonbridge - agree that the site should be retained as a long term reserve for housing though questions how sustainable travel would be achieved there. Keep long term reserve status under review and delete it if better housing sites come forward.	Noted. The site is not currently being put forward for development and travel options would be considered if the land is eventually needed for housing. The long term reserve status of the site will be kept under review in future development plan documents. The extent of the area has been reduced in size (see Annex F to Core Strategy).

CP08 STRATEGIC GAP

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
1. OFFICIAL CONSULTEE				
62	GOSE	PO/062.12	<p>It is intimated in paragraph 2.3.10 that CP8 and CP9 are subject to the inclusion of the Medway Strategic Gap in the South East Plan. Given that the SE Plan will not be adopted before the core strategy is submitted there is concern about the inclusion of these policies.</p> <p>GOSE is happy with the approach of having a plan objective that seeks to avoid coalescence between settlements and maintain their identity if the evidence base supports this approach, but is concerned about the creation of formal local designations such as a strategic gap on the proposals map, especially given that such a designation does not relate to the intrinsic quality of the landscape.</p> <p>An alternative suggestion is to keep the identify and the avoidance of coalescence as a plan objective, and reword the policy to reflect that objective without reference to a local designation such as a strategic gap.</p>	<p>It is made clear that the LDF is being prepared in accordance with the evolving RSS. The submitted version of the RSS includes an appropriate strategic context for the retention of the long-established strategic gap between the Medway Towns and Maidstone and the Medway Gap Urban area. Strategic Gaps have nothing to do with intrinsic quality of the landscape. It is a structural policy aimed at maintaining the separation of major urban areas. If need be the Council could rely upon the adopted Kent and Medway Structure Plan policy for the Strategic Gap.</p>
219	Home Builders Federation	PO/219.06	<p>There is no evidence that the Council has reviewed existing designations in light of requirements outlined in paragraphs 24 and 25 of PPS7. No evidence has been provided that a criteria based policy approach could not provide the necessary degree of protection for these areas. Policy CP8 and the strategic gap notation on the proposals map should be deleted and the matter dealt with by way of a criteria based policy (PPS12, paragraph 4.24, test of soundness iv).</p>	<p>The full South East Plan has been submitted to the Secretary of State. Policy CC10 provides the overall strategic context for strategic gaps and the policy states that these will be protected from inappropriate development with the purpose of maintaining the character of the region by retaining the separate identity and preventing the coalescence of settlements. Policy KTG 3 relates to the core strategy for the Kent Thames Gateway Sub-Region. This clearly states that policies should protect the Strategic Gaps to the south, east and west of Medway urban area from development. This is reinforced by policy KTG 11 which specifically refers to the Strategic Gap between Medway, Maidstone and the Medway Gap. The Core Strategy is being prepared in accordance with the South East Plan, therefore policy CP8 is justified.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
3. INTEREST GROUP				
173	CPRE, Tonbridge & Malling District Committee	PO/173.07	Suggest that the Strategic Gap be upgraded to Green Belt in order to separate the three largest urban areas in Kent.	The general extent of Green Belts have to be defined first at a higher level than the LDF. There is no proposal in the South East Plan to extend or create a new Green Belt. However, there is a context for the definition of the area as a Strategic Gap.
190	Cemex UK Materials Limited	PO/190.02	Should the Bushey Wood site be required for development prior to 2021 the Strategic Gap allocation will need to be sufficiently flexible to allow earlier development of the sites. It is recommended that an additional sentence is added to the end of CP8 as follows: "Special circumstances include a shortfall in strategic housing provision and the need to release additional land for residential development prior to 2021."	This is covered by the policy for Bushey Wood. Reference has been included in the light type following new Policy CP5.
5. LAND OWNER				
119	Blue Circle Industries Plc (trading as Lafarge Cement UK)	PO/119.07	Object to the policy and paragraphs 3.6.12 - 3.6.13. Suggest the strategic gap designation be revised to exclude the area of land to the north of the existing Vantage Point employment allocation and the Medway Works roundabout and rail link to avoid leaving a triangular area of unused land. Suggest revision to the strategic gap designation to exclude land to the south of the existing Vantage Point employment allocation to allow an extension to the employment area.	It is agreed that the proposed rail link should form the boundary of employment area and the Strategic Gap should be revised accordingly (see Annex H3 to Core Strategy) There should be no change to the Strategic Gap to the south of the Holborough employment area.
172	Trenport Investments Ltd	PO/172.07	Object to inclusion of the Area of Opportunity at Bushey Wood within the Strategic Gap, as the land is clearly recognised as having long term development potential which it is not necessary to keep free from development. Also object to this suggestion in the POC. If the land is safeguarded for development, there is no logic in safeguarding it as open land. It is proposed that the current adopted Local Plan context should be rolled forward that the land at Bushey Wood should not be covered by the strategic gap.	By definition the land lies within the Strategic Gap between the Medway Towns and Maidstone/Medway Gap. There is no development proposed within the Area of Opportunity during the current LDF period (up to 2021). It is therefore not inconsistent for the Area of Opportunity to be shown within the designated Strategic Gap.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
265	Royal British Legion Industries	PO/265.08	Land between Quarry Wood and Hermitage Lane should be removed from the Strategic Gap as it serves no useful function in terms of the aims of the designation. On the ground, the Strategic Gap extends from the eastern edge of Hermitage Lane which provides a defensible edge to it. The open field on the eastern side of Hermitage Lane up to the railway line provide a clear visual break between Aylesford/Ditton and Maidstone. The boundaries can be redrawn and are flexible. The local planning authority is already proposing some changes to the Strategic Gap as the Key Diagram shows the M2 removed from it.	It is agreed that the confines of the built up area and consequently the boundary of the Strategic Gap should be amended in this area (see Annex H2 to Core Strategy). There is no change to the extent of the Strategic Gap in the vicinity of the M2.
6. HOUSE BUILDER				
171	Croudace Homes Ltd	PO/171.03	<p>The strategic gap is incorrectly drawn in respect of land between Ditton and Maidstone. Proposals to exclude land at Hermitage Lane, Aylesford and at Aylesford Depot from the strategic gap are inconsistent with Council's past strategy to allow appropriate development in the Strategic Gap without the need to exclude the site from the Gap. By excluding pockets of land from the Strategic Gap and by allowing development within the Gap, Council has provided no evidence that the Gap needs to be maintained.</p> <p>Recommends either:</p> <ul style="list-style-type: none"> * The Strategic Gap be deleted and the matter dealt with by way of a criteria based policy (as outlined in PPS7). * If Council choose not to delete the Strategic Gap, land at Barming Rail Station should be excluded from the Strategic Gap and the site safeguarded for small scale employment use and improvements to the railway station * Land at Barming Rail Station should be retained within the Gap and identified as a land allocation for small scale employment purposes and station improvements. (Map 3). 	<p>The land identified on Map 4 in the 'Response to Issues Report Consultation' (November 2004), relates to representations made by Kent & Medway NHS Strategic Health Authority and the West Kent NHS and Social Care Trust on the Issues Report (September 2003). The representation sought the exclusion of this parcel of land at Hermitage Lane from the Strategic Gap and inclusion of the land in the built-up urban area of Aylesford. In response the Borough Council at the time disagreed with the representations, arguing that there is no justifiable case for amending the extent of the Gap and the built-up area. The extent of the site is labelled 4.1 on Map H3 in Appendix H 'Rejected Housing Sites' of the Preferred Options Report.</p> <p>In response to further representations the Borough Council is now proposing to amend the urban confines of Aylesford to include the row of properties fronting the west side of Hermitage Lane, south of the junction with the A20 - see Annex H of the Core Strategy. The redevelopment of the Housing Association's temporary accommodation has so materially changed the character of the Hermitage Lane frontage that it is now considered no longer tenable to argue that Hermitage Lane is not a more sensible boundary to the confines of the built-up area. In so redefining the</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				<p>confines a small area of land between Quarry Wood and the rear of the Hermitage lane properties can most appropriately be allocated for B1 development.</p> <p>The submitted version of the South East Plan provides the policy framework for identifying and protecting Strategic Gaps .</p> <p>There is no justifiable case for releasing land from the Strategic Gap for office development. This proposal would harm the function of the Strategic Gap as a physical break between Maidstone and Aylesford.</p> <p>There is potential to identify land for additional station parking to meet commuter needs and this is recognised in the adopted Tonbridge and Malling Borough Local Plan (December 1998). This is a saved policy and any proposals would be considered on their merits.</p>

CP09 SEPARATE IDENTITY OF SETTLEMENTS

1. OFFICIAL CONSULTEE

62	GOSE	PO/062.13	GOSE agrees with the approach to have a plan objective that seeks to avoid coalescence between settlements and maintain their identity if the evidence base supports this approach, but is concerned about the creation of formal local designations such as a strategic gap on the proposals map.	Policy CP9 is a generic policy to deal with maintaining the separate identity of settlements outside the Strategic Gap.
91	English Heritage	PO/091.12	Support retention of separate settlement identities and the maintenance and enhancement of settings.	Noted.
109	Countryside Agency	PO/109.05	Support separate settlement identity policy.	Noted.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
2. PARISH COUNCIL				
81	Wrotham Parish Council	PO/081.02	Support separate settlement identity policy.	Noted.
100	Ightham Parish Council	PO/100.02	Support for the maintenance of the separate identity of settlements. Boundaries on the Proposals Map will reduce the potential for breaching Green Wedges or ALLIs.	Noted.
3. INTEREST GROUP				
173	CPRE, Tonbridge & Malling District Committee	PO/173.08	Paragraph 3.6.14 stresses the importance of "...settlements not being joined together and that the green wedges that separate village and areas of local landscape importance that enhance their settings are protected." To ensure existing green wedges and areas of local landscape importance are protected and that there can be no possible misunderstanding, Council is urged to omit the final sentence, "Any development that is acceptable...".	The policy has been significantly reworded taking into account this representation.
5. LAND OWNER				
184	Hildenborough Medical Group	PO/184.01	This policy should be amended, because any development adjoining a settlement that is justified by policies of the Core Strategy may by definition narrow the gap between settlements.	Revised wording has been proposed.
6. HOUSE BUILDER				
72	Croudace Homes Limited	PO/072.11	The policy is over restrictive and will potentially constrain development in appropriate and sustainable locations within or adjacent to the urban edge, that could be accommodated without affecting the policy's purpose. Other material considerations, besides distance between settlements, include landscaping, topography, land use, boundary treatment and enclosure. CP9 should be amended as follows: 'Development should not result in material harm to the	The policy has been reworded taking into account this representation.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			character of settlements when viewed from the settlement itself, the countryside or adjoining settlements. Any development that is acceptable within the terms of this policy should seek to respect the setting of the settlement and should not result in an erosion of the separate identity of the settlement.'	
171	Croudace Homes Ltd	PO/171.04	Land at Barming Station should be safeguarded for small scale employment use and improvements to the railway station (Map 3). Small scale employment at the railway station would be complementary to employment use at the Barming Depot site and would be less visually prominent than the Barming Depot. The Barming Station site would not compromise the separate identity of the Ditton and Maidstone settlements or harm their respective character.	<p>There is no justifiable case for releasing land from the Strategic Gap for employment development. This proposal would harm the function of the Strategic Gap as a physical break between Maidstone and Aylesford.</p> <p>There is potential to identify land for additional station parking to meet commuter needs and this is recognised in the adopted Tonbridge and Malling Borough Local Plan (December 1998). This is a saved policy and any proposals would be considered on their merits.</p>
7. PUBLIC				
170	Mr Stephen Graham	PO/170.06	Regarding the omission of Green Wedges and Areas of Landscape Importance from the POR as they appear in the existing TMBC Local Plan. Policy CP9's two sentences contradict each other and will not protect existing Green Wedges and Areas of Landscape Importance. The second sentence should be deleted.	The policy has been reworded in light of this representation.
271	Ms Yasmin Vawda	PO/271.06	Green wedges should be afforded greater protection and promoted to a statutory designation.	The policy seeks to protect the countryside and the separate identity of settlements. PPS7 makes it clear that there is a presumption against showing such designations on the Proposals Map.

CP10 AREAS OF OUTSTANDING NATURAL BEAUTY

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
1. OFFICIAL CONSULTEE				
64	English Nature	PO/064.18	Support Areas of Outstanding Natural Beauty policy.	Noted.
74	Kent Downs AONB Unit	PO/074.02	<p>The policy protection for the Kent Downs AONB is welcomed and will demonstrate in part the Council's legal 'duty of regard' under the Countryside and Rights of Way Act 2000. The level of policy protection will provide better understanding of the potential impact of development on landscape character. However the policy should:</p> <ul style="list-style-type: none">* identify what the distinctive features of the Kent Downs are to help in the conservation and enhancement of the Kent Downs landscape.* Include the Medway Landscape Character Area in this policy* include reference to the Kent Downs AONB Landscape Design Handbook in the list of plans in subsequent DPD.	<p>The AONB Policy has been significantly amended. To make specific reference to the distinctive features of the AONB and the Medway Valley Character Area would be too detailed for a Core Strategy Policy. Such matters are best left to more detailed LDDs. Reference is now made in the light type to the Landscape Design Handbook which has been adopted as a material consideration for Development Control. Reference is also now included in the Policy to Landscape and Access Management Study for the Medway Valley.</p>
109	Countryside Agency	PO/109.06	Support the Areas of Outstanding Natural Beauty Policy.	Noted.
3. INTEREST GROUP				
157	National Trust	PO/157.03	Suggest the first paragraph of this policy should state that development which would cause harm to the AONB will not be permitted. Subsection (b) gives too much of a 'green light' to development in the AONB and should be re-phrased so that it accords with PPS7.	The policy has been reworded so that it is more in line with the KMSP policy which it will replace.

CP11 SPECIAL LANDSCAPE AREAS

1. OFFICIAL CONSULTEE

62	GOSE	PO/062.14	Justification will be necessary for this policy in view of the advice in PPG7.	The Special Landscape Areas are long-established in the Structure Plan. They are of at least county-wide importance and have been subject to detailed justification and testing through the
----	------	-----------	--	---

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				Structure Plan process.
			2. PARISH COUNCIL	
100	Ightham Parish Council	PO/100.03	Support retention of the 3 SLAs.	Noted.

CP12 SITES OF SPECIAL SCIENTIFIC INTEREST

			1. OFFICIAL CONSULTEE	
78	Kent Wildlife Trust	PO/078.01	This policy is not as clear or precise as the equivalent policy in the Kent and Medway Structure Plan. It also fails to address sites of international importance for biodiversity.	The policy has been revised so that it is more in line with the Kent and Medway Structure Plan.
91	English Heritage	PO/091.11	It is inconsistent to include a specific environmental policy on SSSIs within the Core Strategy, but have equivalent policies for historic environmental designations within the Environmental Policies DPD.	The historic environment is covered in general terms by Policy CP01, however it will be covered in more detail in the Environmental Protection DPD. The significant difference is that SSSI's are not defined by the Borough Council and therefore dictate the Strategy. Conservation Areas and most other historic designations are determined by the Borough Council and therefore. The Environmental Policies DPD is not a lower order document but it does allow matters to be dealt with in more detail.
			2. PARISH COUNCIL	
100	Ightham Parish Council	PO/100.04	Support Sites of Special Scientific Interest policy.	Noted.
			3. INTEREST GROUP	
289	RSPB	PO/289.03	Include a statement that local authorities have a duty to take reasonable steps to further the conservation and enhancement of SSSIs.	Agree.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
CP13 FLOOD PROTECTION				
1. OFFICIAL CONSULTEE				
65	Southern Water	PO/065.13	Support flood protection policy.	Noted.
103	Environment Agency	PO/103.11	The policy should make reference to PPG25 along with an advisory that nothing should detract from this guidance and the forthcoming replacement PPS25.	Core policies should not repeat policies contained in PPGs and PPSs. Reference to PPS25 will be made.
103	Environment Agency	PO/103.09	Paragraph 3.6.27 - The second sentence is misleading and should be replaced with "This shows the area that could be affected by the 1 in 100 year fluvial and 1 in 200 year tidal flood events."	Policy CP35 has been deleted as being too detailed for a Core Strategy. The issue is now covered in more general terms under new Policy CP25.
3. INTEREST GROUP				
289	RSPB	PO/289.12	The background text should include a statement that includes plans to prioritise "soft" defences over "hard" flood defences and consider the creation of wetland areas as part of the overall strategy.	This is a matter for the Environmental Protection DPD.
5. LAND OWNER				
169	Harvester Trust	PO/169.03	<p>The policy should give stronger support to the redevelopment of sites in the central area of Tonbridge which are within areas at risk from flooding.</p> <p>The economic, social and regeneration benefits of redevelopment should be given greater emphasis in the policy, and weighed against the risk of flooding, subject to appropriate safeguards.</p> <p>There is a 'tension' between policies set out in PPG3 and</p>	<p>This policy has been prepared in accordance with existing and emerging Government guidance. It has been updated in consultation with the Environment Agency in the light of draft PPS25, in particular with respect to the development of a Strategic Flood Risk Assessment (SFRA) for Tonbridge and Aylesford. The Council will have regard to the SFRA when dealing with proposals in these particular locations. It must be stressed that in reaching decisions on sites in Tonbridge and Aylesford, the Council will also have regard to the economic, social, environmental and generational benefits associated with the</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			PPG25 and the Core Strategy. It should give greater weight to the housing redevelopment and regeneration initiatives in central Tonbridge and other accessible locations on previously developed land.	proposals and will weigh them accordingly against the actual risk of flooding.

CP14 SETTLEMENT HIERARCHY

1. OFFICIAL CONSULTEE

69	Highways Agency	PO/069.17	The interim results of the Highway Authority's assessment of potential impact of the proposed South East Plan's housing developments on the trunk road and motorway network (which will be updated once the Borough-level housing allocations are finalised in early December 2005) show that the proposed locations for growth in Tonbridge and Malling could have a detrimental impact on the safety and efficiency of the M20, M26, and A21 trunk road corridors, particularly those sections that already suffer from significant stress.	The level of housing growth in the Borough is a matter for the South East Plan. Detailed matters of impact will be assessed in relation to individual sites and planning applications.
----	-----------------	-----------	---	--

3. INTEREST GROUP

56	East Malling Conservation Group	PO/056.04	The policy includes a blanket statement that East Malling is an urban area. The Written Statement definition adopted December 1998 should be retained instead.	The draft policy actually refers to the urban area of East Malling. However, to clarify, reference is now made to the 'major developed parts of East Malling'. The extent of the area is clear from the Key Diagram and the Proposals Map.
173	CPRE, Tonbridge & Malling District Committee	PO/173.02	Note that Government's policy for LDFs does not require them to conform to local government boundaries as they are supposed to reflect local community areas. It is strongly urged that advantage is taken of this approach in setting out options for former districts. Policy CP14 calling for development to be concentrated at three locations would be reinforced by this LDF division.	There is no suggestion in Government advice that a Core Strategy can apply to less than the extent of the Borough. Any reference to not necessarily conforming to existing local authority boundaries is intended to allow for joint LDFs with adjoining local authorities not the sub-division of a district. In the interests of sustainability Policy CP14 seeks to concentrate development at the main urban areas.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
5. LAND OWNER				
169	Harvester Trust	PO/169.04	Support development within the urban area of Tonbridge.	Noted.
184	Hildenborough Medical Group	PO/184.10	Clarification is required about what document provides definition of 'the confines of the urban areas.'	It is now made clear in the Core Strategy that the urban confines are defined in the Proposals Map pursuant to the relevant Core Strategy policies.
220	Strategic Partners UK Fund I	PO/220.12	Support the principles in paragraph 3.7.1 and CP14 that development should be concentrated in urban areas.	Noted.
6. HOUSE BUILDER				
249	ZED Homes Limited	PO/249.03	Endorse the approach to concentrating development within or adjacent to the existing urban areas and the areas listed in the policy are considered to represent the key settlements.	Noted.

CP15 SETTLEMENT HIERARCHY

2. PARISH COUNCIL

16	Plaxtol Parish Council	PO/016.01	Plaxtol does not fulfil the criteria for inclusion in Policy CP15. This is due to the closure/decline of services in recent years including public transport.	<p>The policies on rural settlements have been reviewed. Plaxtol is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits only minor development within the confines subject to compliance with certain criteria.</p> <p>Plaxtol is not considered to be a 'Rural Service Centre' as defined by draft policy CP13 because it is agreed that the settlement does not contain a reasonable range of services, or at least easy accessibility to them. For this reason the amount of development considered acceptable for Plaxtol is only minor, appropriate to the scale and character of the settlement.</p>
38	Platt Parish	PO/038.03	Support the approach of concentrating development within the	Noted.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
	Council		confines of these larger settlements where services and facilities exist. Pleased to note that development outside the confines would be severely restricted.	
268	Ditton Parish Council	PO/268.13	Ditton should be included in the list of settlements.	Ditton is within the Medway Gap urban area.
279	Wateringbury Parish Council	PO/279.01	Object to paragraph 3.7.3 - A frequent bus service should be defined to include Sundays and Bank Holidays.	The definition of a frequent bus service derives from the criteria used throughout Kent in the urban capacity studies. Inclusion of Sundays and Bank Holidays is considered to be too extreme.
288	Burham Parish Council	PO/288.01	Concerned that under Policy CP15 development could be permitted outside the built confines of Burham. Whilst Burham meets the service criteria it is located in the Strategic Gap and there would be an impact on views from the North Downs.	The Rural Settlement policies have been reviewed. Burham is not included in the list of Rural Service Centres where development outside the confines might be permitted. Any development outside the confines of Burham village would have to be exceptionally justified.
3. INTEREST GROUP				
14	Hadlow Park Residents' Association	PO/014.01	There is no carrying forward of existing policy P4/9 to protect existing Low Density Residential Areas that possess special character. These need to be protected in the light of requirements to make the most efficient use of land and higher residential densities. Therefore, a caveat is required in policy CP15 to require any development to be compatible with the density and character of these areas.	It is proposed to carry forward existing policy P4/9 into the Environmental Protection Policies DPD. All policies should be read together, therefore all proposals for development must comply with policy CP1 which requires development to be concentrated at the highest density compatible with the local built and natural environment. It is therefore not considered that a caveat to policy CP15 (now CP13) is required.
52	Hildenborough Village Preservation Association	PO/052.06	Support inclusion of Hildenborough within Policy CP15.	Noted.
5. LAND OWNER				
79	Hallam Land Management Limited	PO/079.05	The search sequence should not be extended beyond the principal urban areas and locating development in these settlements would not lead to sustainable development.	The list of settlements contained in the policy derives from a Kent wide Urban Capacity Study methodology for identifying those rural settlements where a minimum range of services exist or are

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			Therefore, the policy should be deleted as it will lead to a pattern of dispersed development across the District instead of development in the most sustainable locations.	accessible. The Government guidance for undertaking Urban Capacity Studies "Tapping the Potential" makes clear that Urban Capacity Studies should not necessarily be confined to the main urban areas. Furthermore, PPG3 states that it is important that there is adequate housing provision in rural areas to meet the needs of local people and to contribute to the delivery of sustainable communities. The search sequence contained in PPG3 states that local planning authorities start with the re-use of previously-developed land and buildings within urban areas identified by the urban housing capacity study. This is what Policy CP15 (now CP13) is intended to support.
107	H & H Celcon Limited	PO/107.13	The policy fails to explain what may constitute very special circumstances within the Green Belt e.g. enabling development to fund a safeguarded road scheme.	PPG2 states "It is for the applicant to show why permission should be granted. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." It is made clear that development plans should not seek to identify in advance what special circumstances might arise. They can only be considered on a case by case basis.
153	Mrs P Jordan	PO/153.01	Dunks Green should be included in the list of settlements with services in close proximity and a development boundary should be drawn around Dunks Green that includes the land at the north east of Silver Hill Plantation, adjacent to Long Mill Lane (see Map 6).	<p>The policies on rural settlements have been reviewed. Dunks Green is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits only minor development within settlements such as Dunks Green, subject to compliance with certain criteria. It is located within the Green Belt which means there is a strong presumption against any development outside the village confines.</p> <p>Dunks Green is not considered a 'Rural Service Centre' as defined by draft policy CP13 because it is not considered to contain a reasonable range of services, or at least easy accessibility to them. For this reason the amount of development considered acceptable for Dunks Green is only minor, appropriate to the scale and character of the settlement.</p>
181	GLN	PO/181.17	Wrotham should be identified as a sustainable settlement.	The policies on rural settlements have been reviewed. Wrotham

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
	(Wrotham) Ltd			<p>is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits only minor development within settlements such as Wrotham, subject to compliance with certain criteria.</p> <p>Wrotham is not considered a 'Rural Service Centre' as defined by draft policy CP13 because the settlement does not contain a reasonable range of services, or at least easy accessibility to them. For this reason the amount of development considered acceptable for Wrotham is only minor, appropriate to the scale and character of the settlement. This is a somewhat less restrictive policy than in the Preferred Options Report.</p>
181	GLN (Wrotham) Ltd	PO/181.04	Key Diagram should be amended to identify Wrotham as a sustainable settlement.	<p>The policies on rural settlements have been reviewed. Wrotham is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits only minor development within settlements such as Wrotham, subject to compliance with certain criteria.</p> <p>Wrotham is not considered a 'Rural Service Centre' as defined by draft policy CP13 because the settlement does not contain a reasonable range of services, or at least easy accessibility to them. For this reason the amount of development considered acceptable for Wrotham is only minor, appropriate to the scale and character of the settlement. This is a somewhat less restrictive policy than in the Preferred Options Report. The Key Diagram will be amended to reflect the revised policies but not to accord with this representation.</p>
182	Ramac Holdings Ltd	PO/182.06	CP15(2) should be amended to reflect the fact that the redevelopment of a Major Developed Site in the Green Belt for residential purposes, pursuant to TMBLP Policy P6/17 and P6/18 or draft replacement policy DLA Annex I, may not be rural affordable housing as per Policy CP22.	All policies need to be read together. If development is proposed in accordance with the Major Developed Sites policy it is policy compliant and therefore, by definition, not covered by the Exceptions Sites policy.
184	Hildenborough Medical Group	PO/184.12	Policy CP15(2)(a) and (b) could be combined by: * deleting (b) * amending (a) by deleting 'or' and replacing 'needs' with 'or other need.'	Point (b) has been deleted, and (a) amended in light of this representation.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			Policy should be further amended to allow for development in appropriate circumstances where justified relative to the needs of the wider community e.g. principle surgery premises located at Westwood, Hildenborough.	
			6. HOUSE BUILDER	
71	Tatham Homes	PO/071.07	Wrotham should be deleted from the list of settlements in CP16 as it is a sustainable rural settlement and instead be added to CP15.	<p>The policies on rural settlements have been reviewed. Wrotham is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits only minor development within settlements such as Wrotham, subject to compliance with certain criteria.</p> <p>Wrotham is not considered a 'Rural Service Centre' as defined by draft policy CP13 because the settlement does not contain a reasonable range of services, or at least easy accessibility to them. For this reason the amount of development considered acceptable for Wrotham is only minor, appropriate to the scale and character of the settlement. This is a somewhat less restrictive policy than in the Preferred Options Report. The Key Diagram will be amended to reflect the revised policies but not to accord with this representation.</p>
71	Tatham Homes	PO/071.08	Key Diagram should be amended to identify Wrotham as a sustainable settlement.	<p>The policies on rural settlements have been reviewed. Wrotham is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits only minor development within settlements such as Wrotham, subject to compliance with certain criteria.</p> <p>Wrotham is not considered a 'Rural Service Centre' as defined by draft policy CP13 because the settlement does not contain a reasonable range of services, or at least easy accessibility to them. For this reason the amount of development considered acceptable for Wrotham is only minor, appropriate to the scale and character of the settlement. This is a somewhat less restrictive policy than in the Preferred Options Report. The Key Diagram will be amended to reflect the revised policies but not to accord with this representation.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
72	Croudace Homes Limited	PO/072.12	The inclusion of subsection (2)(a) - (c) within this policy is supported.	Noted, but this part of the policy has been rewritten.
239	Insite Development Ltd	PO/239.03	The policy could unduly prevent the provision of new housing development on land that does not physically adjoin the built form even though it may be in close proximity to the settlement and capable of relating to it. Therefore, it is inconsistent with Policy SS6 in the draft Kent and Medway Structure Plan.	Development in close proximity to a settlement is considered to be development in the countryside. PPG3 refers to urban extensions and by definition these must abut the existing settlement.

CP16 SETTLEMENT HIERARCHY

2. PARISH COUNCIL

38	Platt Parish Council	PO/038.04	Support approach of this policy and the inclusion of Platt, Crouch and Wrotham Heath as it would protect the character of these small villages.	Noted, but the revised policy is somewhat less restrictive than the draft policy.
81	Wrotham Parish Council	PO/081.03	Agree to the inclusion of Wrotham within the policy and the one for one replacement policy.	Noted, but the revised policy is somewhat less restrictive than the draft policy.
100	Ightham Parish Council	PO/100.05	Inclusion of Ightham in CP16 and accept the settlement hierarchy process. Consider the one-for-one replacement policy helpful within a tight village confine.	Noted.

5. LAND OWNER

181	GLN (Wrotham) Ltd	PO/181.01	Wrotham should be identified as a sustainable settlement under Policy CP15 not CP16(t).	<p>The policies on rural settlements have been reviewed. Wrotham is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits only minor development within settlements such as Wrotham, subject to compliance with certain criteria.</p> <p>Wrotham is not considered a 'Rural Service Centre' as defined by draft policy CP13 because the settlement does not contain a reasonable range of services, or at least easy accessibility to them. For this reason the amount of development considered</p>
-----	-------------------	-----------	---	---

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				acceptable for Wrotham is only minor, appropriate to the scale and character of the settlement. This is a somewhat less restrictive policy than in the Preferred Options Report.
			6. HOUSE BUILDER	
71	Tatham Homes	PO/071.10	<p>Considers paragraph 3.7.3 should be amended to delete reference to the Post Office from the list of criteria to be satisfied to secure promotion as a sustainable settlement, for the following reasons:</p> <ul style="list-style-type: none">* The loss of a facility identified in the criteria for sustainable settlements, can result in the change in status of the settlement, and therefore the loss of development that would otherwise benefit the viability of other identified services* Post offices are being closed nationwide and few rural post offices will remain open in the longer term due to changes to the pensions payment system* These time sensitive criteria may result in a situation where settlements are not reclassified once classified. <p>If such a criteria is applied then:</p> <ul style="list-style-type: none">(a) a full set should not be required, and(b) some weighting should be applied as the current distinction between CP15 and CP16 results in Wrotham being included as a CP16 town when it should be CP15.	<p>The criteria-based approach has been revised.</p>
71	Tatham Homes	PO/071.06	<p>Wrotham should be deleted from the list of settlements in CP16 as it is a sustainable rural settlement. Wrotham should instead be added to CP15.</p>	<p>The policies on rural settlements have been reviewed. Wrotham is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits only minor development within settlements such as Wrotham, subject to compliance with certain criteria.</p> <p>Wrotham is not considered a 'Rural Service Centre' as defined by draft policy CP13 because the settlement does not contain a reasonable range of services, or at least easy accessibility to them. For this reason the amount of development considered acceptable for Wrotham is only minor, appropriate to the scale and character of the settlement. This is a somewhat less</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
7. PUBLIC				restrictive policy than in the Preferred Options Report.
149	Howard Sharp & Partners LLP	PO/149.03	Suggest the exclusion of infilling development from some of the CP16 villages. This policy is considered over restrictive as there are good services of a local nature in Ightham, Platt, Wouldham and Wrotham Heath. There are other communities where the nature of the settlement fully justifies some infilling such as Fairseat or Golden Green. Suggest following the existing plan as far as possible and reviewing the words of CP16.	<p>The policies on rural settlements have been reviewed. The settlements now considered to be the most sustainable locations for further housing and employment development within the rural area are: Borough Green, East Peckham; Hadlow; Hildenborough; and West Malling. These qualify as 'Rural Service Centres' - as defined by draft policy CP13 - because they contain a reasonable range of services, or at least easy accessibility to the services.</p> <p>Platt, Wouldham, Wrotham Heath, Fairseat and Golden Green are now considered 'Other Rural Settlements' as defined by draft policy CP14. Within the confines of these settlements only minor development is permissible, appropriate to the scale and character of the village and compliance with policy criteria. This is somewhat less restrictive policy than in the Preferred Options Report. The reason why these places are not considered 'Rural Service Centres' is because they do not contain a sufficient range of cores services to enable them to be considered sustainable locations for future development, e.g. they may lack a Post Office, a primary school, a surgery/clinic or even a regular bus/rail service.</p>
261	Mr M R Barton	PO/261.01	Platt should not be included in this policy but should be included in policy CP15 as it has all the necessary amenities.	<p>The policies on rural settlements have been reviewed. Platt is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits minor development within settlements such as Platt, subject to compliance with criteria.</p> <p>Platt is not considered a 'Rural Service Centre' as defined by draft policy CP13. The reason why Platt is not considered a sustainable rural settlement is because it does not contain a reasonable range of services, as defined in draft para. 6.3.3. For this reason the amount of development considered acceptable for Platt is only minor, appropriate to the scale and character of the</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
262	Mrs D M S Barton	PO/262.01	Platt should not be included in this policy but should be included in policy CP15 as it has all the necessary amenities.	<p>settlement. This is somewhat less restrictive than the draft policy.</p> <p>The policies on rural settlements have been reviewed. Platt is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits minor development within settlements such as Platt, subject to compliance with criteria.</p> <p>Platt is not considered a 'Rural Service Centre' as defined by draft policy CP13. The reason why Platt is not considered a sustainable rural settlement is because it does not contain a reasonable range of services, as defined in draft para. 6.3.3. For this reason the amount of development considered acceptable for Platt is only minor, appropriate to the scale and character of the settlement. This is somewhat less restrictive than the draft policy.</p>
263	Mr G J & Mrs P A Hickey	PO/263.02	Platt should not be included in this policy but should be included in policy CP15 as it has all the necessary amenities.	<p>The policies on rural settlements have been reviewed. Platt is now defined as an 'Other Rural Settlement' in policy CP14. This policy permits minor development within settlements such as Platt, subject to compliance with criteria.</p> <p>Platt is not considered a 'Rural Service Centre' as defined by draft policy CP13. The reason why Platt is not considered a sustainable rural settlement is because it does not contain a reasonable range of services, as defined in draft para. 6.3.3. For this reason the amount of development considered acceptable for Platt is only minor, appropriate to the scale and character of the settlement. This is somewhat less restrictive than the draft policy.</p>

CP17 DEVELOPMENT IN THE RURAL AREAS

2. PARISH COUNCIL

81	Wrotham Parish Council	PO/081.04	Support development in rural areas policy.	Noted, but this has been substantially redrafted..
----	------------------------	-----------	--	--

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
100	Ightham Parish Council	PO/100.06	Support restrictions to Green Belt development in (a) to (e) of the policy.	Noted, but this policy has been substantially redrafted.
5. LAND OWNER				
182	Ramac Holdings Ltd	PO/182.07	Policy CP17(d) should be amended to 'redevelopment of a defined Major Developed Site in the Green Belt' in accordance with TMBLP Policy P6/17 and P6/18 or DLA Annex I draft replacement policy.	This is a high level policy with which the Development Land Allocation DPD policy must conform.
184	Hildenborough Medical Group	PO/184.11	Policy should be amended to allow for development adjacent to the confines of urban areas where justified and to include an appropriate cross reference to Policy CP14.	Reference to new policy CP13 has been included.
6. HOUSE BUILDER				
239	Insite Development Ltd	PO/239.04	The policy fails to refer to the re-use or redevelopment of previously developed land or buildings in the countryside and is inconsistent with CP3, PPS7 and the draft Kent and Medway Structure Plan.	Policy CP03 has been combined with this Policy. The new policy addresses the nature of uses acceptable in the countryside. Priority would always be afforded to the use of previously developed land over a greenfield site.

CP18 BUSHY WOOD AREA OF OPPORTUNITY

1. OFFICIAL CONSULTEE

64	English Nature	PO/064.20	Concerned about the Bushey Wood Area of Opportunity which may impact on the Eccles Old Pits Site of Nature Conservation Interest. No mention is made of how direct and indirect impacts upon these sites will be mitigated. Would like to see more details contained within the Preferred Options Report regarding the mitigation for this policy.	There is no need for any development at Bushey 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 development of the site on the nature conservation interests prevailing at the time will be fully appraised.
----	----------------	-----------	--	---

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
65	Southern Water	PO/065.04	<p>The extended Area of Opportunity at Bushey Wood borders Aylesford Wastewater Treatment Works. Do not object to the safeguarding of the site but are concerned this might lead to sensitive development adjacent to the works.</p> <p>Recommend two means of overcoming this objection: (1) Delete from the area of opportunity, the extended area to the east (see Map 8) (2) Insert a new policy, or amend CP18, so that the proposed deleted area in point (1) is safeguarded as a buffer zone in which sensitive development will be permitted or released, provided the distance to the works is sufficient to allow adequate odour dispersion.</p>	<p>Paragraph 3.7.14 (now 6.3.22) identifies a list of criteria that future development in the area will be assessed against. Included in this list is "the relationship between the development and the Aylesford Wastewater Treatment Works."</p>
69	Highways Agency	PO/069.18	<p>Concerned about the impact of the large development at Bushey Wood on the trunk road network, particularly as it is located less than 2km south of Peters Pit.</p>	<p>There is no need for any development at Bushey 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, and the impact on the provision of community services and infrastructure, will be fully appraised, and any necessary mitigation measures included.</p>
78	Kent Wildlife Trust	PO/078.07	<p>The approach in paragraph 3.7.14 is an old-style approach which trades off environmental loss against economic gain. The bullet point should be reworded as follows: 'Assessment of future development potential of this area will need to have regard to: Prior evaluation of the biodiversity interest of the Area of Opportunity, and the strategic protection and enhancement of biodiversity as an integral part of the design of development.'</p>	<p>The existing wording better reflects the balanced judgments that will need to be undertaken at the time development is proposed.</p>
91	English Heritage	PO/091.05	<p>Support the extension of the strategic gap at Bushey Wood, and the clarification in paragraph 2.3.13 and 2.3.16 that</p>	<p>Noted.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			development within the proposed 'Area of Opportunity' will be limited to take account of constraints including archaeological constraints.	
			Paragraph 3.7.14 - development potential will have regard to prior evaluation of the archaeological potential of the area and setting of the Friars and Aylesford Conservation Areas.	
175	Kent County Council Strategy Division	PO/175.36	Paragraph 3.7.14 should include reference to the need to conserve and enhance the Scheduled Monument.	Agree.
175	Kent County Council Strategy Division	PO/175.49	There is a need to refer to the archaeological impacts of development.	This is an Area of Opportunity and not specifically allocated for development. Therefore, it is not necessary to refer to archaeological impact.
175	Kent County Council Strategy Division	PO/175.34	Strategically there is no commitment to Bushey Wood as a development location in the short or longer term in the KMSP with strategic developments on the East Bank of the Medway identified in Policy WK3 being confined to Peters Pit. Given the adequacy of housing land supply for the longer term and the safeguarding of the Bushey Wood area from built development provided by strategic gap and other policy considerations an 'Area of Opportunity' designation is considered unnecessary and likely to prejudice future evaluation of planning circumstances and location criteria for development.	Disagree. The safeguarding policy for land at Bushey Wood is considered necessary because it makes clear the Borough Council's longer terms intentions for the area and provides a context to prevent development that would prejudice its longer-term useful potential.
233	Maidstone Borough Council	PO/233.02	Policy is potentially harmful to the concept of the Strategic Gap and the designation is unnecessary as there is sufficient land supply to meet the housing need to 2021. As the use of this land supply is projected outside the current plan implementation period, it should not be shown but should be maintained as Strategic Gap.	Disagree. The area is still designated as Strategic Gap. The Area of Opportunity identifies land with potential to meet long term development needs beyond the end of the LDF period. The safeguarding policy for land at Bushey Wood is considered necessary because it makes clear the Borough Council's longer terms intentions for the area and provides a context to prevent

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				development that would prejudice its longer-term useful potential. This policy is needed for Tonbridge and Malling bearing in mind that three-quarters of the Borough is Green Belt.
3. INTEREST GROUP				
173	CPRE, Tonbridge & Malling District Committee	PO/173.05	Paragraph 3.7.14 lists a number of factors which have to be taken into account. These reflect long running debates in earlier Plan consultations. One that is not mentioned is section 2.6 and Map A of the 1998 Plan which sets out options for a crossing of the Medway. The statement in paragraph 3.7.14 calls for the provision of adequate access avoiding Eccles. This is misleading and requires correction.	The detailed access arrangements to Bushey Wood is a matter for a future review of the LDF. All that paragraph 3.7.14 does is to set out the sorts of matters that will need to be taken into account.
190	Cemex UK Materials Limited	PO/190.01	Cemex's site at Aylesford is located within the Bushey Wood Area of Opportunity. Cemex supports the safeguarding of the Bushey Wood Area of Opportunity and the Council recognition that this land can be used to meet the long term housing needs of the Borough.	Noted.
289	RSPB	PO/289.04	The map at Annex A should show nearby SSSIs.	The SSSIs are not relevant to the map in Annex A which is intended just to show the Bushey Wood Area of Opportunity and its proposed extension.
289	RSPB	PO/289.09	Background text to policy, especially paragraph 3.7.14, should acknowledge the presence of the relevant international statutorily designated sites. SEA should be carried out where it affects such a site to avoid damage to it. Less damaging alternatives and the need for the potential development must be considered.	There are no international designated sites in the immediate vicinity of Bushey Wood.
5. LAND OWNER				
79	Hallam Land Management Limited	PO/079.06	The policy should be deleted as development of the site will not achieve a sustainable pattern of development and its proposed extension will erode the Green Belt.	Due to the strength of constraints applying throughout the rest of the Borough, the identification and safeguarding of this land is intended to meet the long term development needs of the Borough post 2021. It is adjacent to the village of Eccles. The

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				land is not within the Green Belt.
172	Trenport Investments Ltd	PO/172.08	Recommend insertion between Policy CP18 and CP19 of Eccles Community Development Plan . There is a case for early release of land at Eccles (effectively as the first phase of development of Bushey Wood) in line with CP15 in order to forward fund much needed community and environmental improvements for the village. (See Map 7) The land in question, whilst greenfield, is an urban extension, and the package of measures will seek to enhance the sustainability of the existing community by reducing the need to travel away from the village.	There is no need or local justification for the release of a greenfield site for housing development adjacent to Eccles. This land within the Area of Opportunity should continue to be safeguarded to meet long term development needs. Any need for affordable housing can be considered in the context of the Exception Site Policy.
172	Trenport Investments Ltd	PO/172.06	Support the continued safeguarding of the Bushey Wood Area of Opportunity including its extension to include the Island Site.	Noted.
7. PUBLIC				
277	Mr Dean Jones	PO/277.01	<p>Option 2 of paragraph 2.3.18 which seeks to extend the Area of Opportunity should not be pursued. It should all be protected as part of the Strategic Gap.</p> <p>The countryside and village atmosphere of the east bank of the Medway should be retained and not destroyed.</p> <p>The proposal is contrary to the Kent and Medway Structure Plan and the Medway Gap Landscape and Access Study which value the area's natural and historical past and seek to open up the area for greater access.</p> <p>The area has important archaeological, historic and ecological value.</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>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
CP19 HOUSING PROVISION				
1. OFFICIAL CONSULTEE				
62	GOSE	PO/062.15	<p>The Core Strategy recognises that possible changes could be made by the SE Plan. Question whether the strategy can cope with a range of outcomes. The end date of 2021 is commended.</p> <p>Would not normally expect to see specific sites in a core strategy, although recognise that 3 of the sites already have planning permission.</p>	<p>The Council is confident that it has sufficient flexibility to deal with alternative outcomes to the Regional Planning debate on housing numbers. This is now made clear in the Core Strategy. Surprised that GOSE would not expect to see reference to strategically important development locations, with a total capacity of more than 4000 dwellings, identified in a Core Strategy. They are fundamental to the development strategy and the fact that they all now have planning permission is also relevant in terms of dictating the spatial distribution of development in the Borough.</p>
69	Highways Agency	PO/069.19	<p>Understand that the sites identified in CP19(2)(a) - (c) have planning permission and are contributing to the S278 scheme at M20 junction 4. However it is understood that Peters Pit, identified in CP19(2)(d), is subject to a planning inquiry for early 2006. The Highways Agency is concerned about whether the development is coming forward earlier than anticipated, and about the impact of the development on the safety and operation of the trunk road network.</p>	<p>This is a matter that has been considered in the context of determining the planning application.</p>
219	Home Builders Federation	PO/219.07	<p>It would be helpful if Table 1 on p32 was included here to provide a policy context for all aspects of housing land supply.</p> <p>Subsection 3 of the policy is superfluous.</p> <p>The core strategy does not mention PMM.</p> <p>Meeting housing requirements is a key objective of Government policy and should operate taking account of two scenarios. Firstly dealing with sites coming forward sooner or in greater numbers than anticipated and conversely sites coming forward later or in fewer numbers than originally</p>	<p>Detailed information in the form of a housing trajectory is now included in an Annex which is cross-referred to in the housing section of the Strategy.</p> <p>Subsection 3 of the policy has been reworded in the light of this comment.</p> <p>With regard to PPM, the Council is satisfied that there is no need to bring forward any additional sites for development. The rate of development will be regulated by the market. A new section has been added dealing with monitoring and delivery.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>envisaged. The core strategy must address this scenario in its policies and explain the mechanism by which it will be implemented in the supporting text. Must also provide sufficient sites to ensure housing requirement is met in full, and allow for a pool of allocated reserve sites.</p> <p>Core strategy needs further elaboration to explain how monitoring results will be used to determine the managed release of sites.</p>	
3. INTEREST GROUP				
190	Cemex UK Materials Limited	PO/190.03	<p>Object to assertion that the development of all four strategic sites together with the estimated continuing yield from windfalls will be more than sufficient land to meet the requirements of the draft RSS. It is considered that this will over estimate the number of windfall sites coming forward and will mean that additional residential 'reserve' sites should be identified to accommodate the potential shortfall in the number of residential sites. It is suggested that the following words are added to the end of CP19:</p> <p>"(e) Borough Green, which will be developed mainly in the post 2016 period (see Map 9) (f) Wrotham, which will be developed mainly in the post 2016 period (see Map 9)."</p>	<p>There has been a comprehensive review of the projection of windfall development which confirms that the original estimate is robust if not conservative. There is no need for any further reserve sites beyond those already identified.</p>
235	Hyde Housing Association Ltd	PO/235.03	<p>Should include a requirement for the provision of a proportion of Lifetime Homes and Wheelchair accessible homes on larger strategic sites to meet the private sector need for this type of accessible housing.</p>	<p>This is a matter for the Council's Housing Strategy</p>
5. LAND OWNER				
79	Hallam Land Management Limited	PO/079.07	<p>Concerned about the merits of Peters Pit, the viability of the proposals, the extent of infrastructure required, and the ability to deliver 1000 units within the plan period if the site is to be</p>	<p>Planning permission has been granted for the development at Peters Pit and the Core Strategy and Development Land Allocations DPD has been amended accordingly.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			developed post 2016.	
128	Orpines Limited	PO/128.03	The overall housing land requirements for the Borough over the Plan period to 2021 must be regarded as unreliable as they are based on information dated March 2004 and fail to take account of potentially significant social, economic and demographic changes.	The LDF is being prepared in general conformity with the version of the South East Plan submitted to the Secretary of State in March 2006. All data has been updated to 31 March 2006.
169	Harvester Trust	PO/169.05	Object to Policy CP19(1). Suggest the housing provision should be increased for the period 2006 - 2021.	The overall level of provision is a matter for the South East Plan
172	Trenport Investments Ltd	PO/172.03	Support the continued allocation of Peter's Village as a strategic development site within the LDF. However, object to the suggestions that Peter's Pit and Works should be delayed until "mainly post 2016." Would wish to see development commence in 2009 and continue until 2019.	Planning permission has been granted for the development of Peters Pit which will start to yield housing in 2009. The Policy is therefore revised to refer to "mainly in the post 2011 period".
6. HOUSE BUILDER				
72	Croudace Homes Limited	PO/072.13	It is important that the Council has regard to the level of objection received by SEERA on the District level housing figures for the Draft South East Plan. Limited weight can be attached to the figure of 6,400 dwellings at this early stage in the RSS process, and the Core Strategy should acknowledge this within the italic supporting text to the policy. It is important the LDD does not proceed to submission stage until there is greater certainty about housing figures in the South East Plan.	A caveat has been added to the text and the Policy. The LDF will be submitted following the submission of the South East Plan to the Secretary of State. There is sufficient flexibility to allow for any reasonable changes to the housing provision figures.

CP20 AFFORDABLE HOUSING

1. OFFICIAL CONSULTEE

62	GOSE	PO/062.16	Seeks clarification on whether the housing market analysis would support the policy approach contained in CP20 in terms of viability. Question whether it will have a negative effect on supply in any particular location?	The Policy has been reviewed in the light of the Housing Needs and Market Assessment carried out by DCA as a result of which the target percentage has been increased. The viability of this has been tested in general terms by the Council's Estate's advisors.
----	------	-----------	---	---

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
2. PARISH COUNCIL				
38	Platt Parish Council	PO/038.05	Support the idea of spreading affordable housing round small sites in the settlement to create a mixed and inclusive community. This policy should be firmly enforced and developers should not be allowed to buy their way out of it or do deals that allow them to transfer the provision to other sites.	The actual level of provision on any individual site would be subject to negotiation and, if need be, to viability assessment within the context of the overall target. Noted.
81	Wrotham Parish Council	PO/081.05	Support affordable housing policy.	Noted.
99	Offham Parish Council	PO/099.01	Concerned about the requirement to provide 30% affordable housing on all sites of 6 dwellings or more in a blanket requirement, as it could restrict development in rural areas because of economic reasons. Also question whether Housing Associations will be willing to take on these housing developments.	This policy has been revised. In the case of rural settlements, the Borough Council proposes a target for affordable housing provision on all sites of 5 dwellings or above, or 0.16ha or above, of not less than 40% of the number of dwellings in any scheme (see Core Strategy Policy CP18). The development of this target and site threshold size was informed by national and regional housing policy, the Council's Housing Strategy and also a Housing and Market Needs Assessment undertaken in the autumn of 2005. This practice accords with advice in PPG3. The exact level of provision will be a matter for detailed negotiation between the Borough Council and the developer, in consultation with the relevant Housing Association.
100	Ightham Parish Council	PO/100.07	Support rural sites of 6 dwellings or more having a requirement of 30% affordable units.	Noted, but this has now been changed to 5 units or more and a requirement of 40%
3. INTEREST GROUP				
178	Network Rail	PO/178.02	The reference to affordable housing in Urban Areas refers to a	The Policy requirement has been reviewed in the light of a new

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			target of 30%. Reference should be made in the supporting text to exceptions to this target. A new sentence should be inserted to read: "The target requirement needs to be considered in the context of the financial viability of the development, if for instance there are unusual infrastructure costs which need to be borne by the developer, the consideration of the ability for the scheme to deliver the target for affordable housing should take exception costs into account."	Housing and Market Needs Assessment. Reference is now included to the viability of development.
178	Network Rail	PO/178.01	Subsection.3 should be deleted. The approach to affordable housing in Urban areas that refers to 75% social rented housing, and the remainder being shared equity, conflicts with the guidance in circular 06/98 which states that planning policy should not be expressed in favour of any particular form of tenure.	Draft Policy CP18 has been prepared in accordance with emerging Government guidance on housing in the draft PPS3. Para. 25 of this PPS3 advises that separate targets should be set for social-rented and intermediate housing. The percentage of social rented housing has been reduced to 70%. The development of the policy was informed by national and regional housing policy, the Council's Housing Strategy and also a Housing and Market Assessment undertaken in the autumn of 2005. This practice accords with advice in PPG3.
235	Hyde Housing Association Ltd	PO/235.01	Supports thresholds and percentages set out in the policy although this will mean that some sites will become unviable for development.	Noted, but these have been reviewed in the light of the latest Housing and Market Needs Assessment. Reference to viability is included.
5. LAND OWNER				
169	Harvester Trust	PO/169.06	Proposed policy is too prescriptive and should set out criteria and circumstances where it may not be appropriate to provide 30% affordable housing, or where affordable housing may not be appropriate in order to secure the realisation of other planning benefits. CP20(3) of the proposed policy is excessively prescriptive. It is inappropriate to require a specific proportion of social rented housing on a general basis.	This policy has been revised. The Borough Council now proposes affordable housing provision of not less than 40% of the number of dwellings in any scheme (see Core Strategy Policy CP18). The development of this target and site threshold size was informed by national and regional housing policy, the Council's Housing Strategy and also a Housing and Market Needs Assessment undertaken in the autumn of 2005. This practice accords with advice in PPG3. Emerging advice in para. 25 of the draft PPS3 advises that separate targets for social-rented and

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
172	Trenport Investments Ltd	PO/172.11	<p>Various objections are raised to the affordable housing policies set out in the Preferred Options Report. In summary:</p> <ul style="list-style-type: none">* Questions the analysis of the Housing Needs Assessment on which the affordable housing policies are based (paragraphs. 1.6.12 - 1.6.16)* Highlights the need to recognise that the 30% target is a starting point for negotiations on sites and that, in accordance with Circular 6/98, particular costs associated with bringing forward some sites, especially brownfield sites, which may reduce the amount and/or type of affordable housing the site is able to provide (paragraphs. 2.2.10 - 2.2.11).* Objects to the use of a 'requirement' rather than a target percentage, and the restrictive proposals for tenure mix (Policy CP20).* The 2003 Housing Needs and Affordability Study fails to set Tonbridge and Malling in a sub-regional housing context and to explore cross boundary relationships.* The 2003 study only looks as far ahead as 2011, whilst the LDF will cover the period to 2021.* The lack of an integrated approach encompassing housing market and housing needs assessment* Lack of involvement by stakeholders and a partnership approach.* * Agree with definition of affordable housing however believe definitions should be enduring over time thus references to "households earning approximately £20,000" is inappropriate.* CP20 as written does not acknowledge factors such as existing local affordable housing provision, particular costs and	<p>intermediate housing should be set. This has been reflected in criterion 3 of draft policy CP18.</p> <p>The exact level of provision will be a matter for detailed negotiation between the Borough Council and the developer, in consultation with the relevant Housing Association.</p> <p>A new Housing Needs and Market Assessment has been carried out by Consultants DCA, the conclusions of which have been reflected in revisions to the affordable housing policy. All references to requirements have been removed. It is acknowledged that the policy is a starting point for negotiation and that viability of development is a material consideration.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>economics of site development, realisation of other planning objectives and achieving successful housing developments. The availability of public subsidy is a particular factor which will affect the amount and type of affordable housing which can be provided.</p> <p>* Support site size thresholds set out in Sections 1 and 2 of the proposed policy</p> <p>* Section 3 of the proposed policy is not consistent with paragraph 3.7.22. Support the version identified in paragraph 3.7.22 as it provides more flexibility.</p> <p>* The reference 'unless local circumstances dictate otherwise' in relation to providing 75% of the affordable dwellings as social rented is too restrictive.</p>	
6. HOUSE BUILDER				
134	Rydon Homes	PO/134.08	References to tenure of housing should be removed as this is not a planning consideration in either market or affordable housing.	Paragraph 25 of draft PPS3 'Housing' advises the need for a balanced mix of tenures. It is therefore valid to include this requirement in the policy.
221	Fairview New Homes Limited	PO/221.02	CP20(1). Circular 6/98 clearly states that policies for affordable housing should set 'indicative' targets for specific sites. As such, the expected target provision should not be included within the document other than as an indicative target.	The word 'requirement' has been removed from the policy.
221	Fairview New Homes Limited	PO/221.04	Request that when considering the introduction of Lifetime Homes standards and the provision of wheelchair housing, recognition should be given to the way in which such requirements potentially affect the viability of a development.	This section of the Policy has now been deleted. It is considered to be a matter for the Council's Housing Strategy
221	Fairview New Homes Limited	PO/221.03	Paragraph 3.7.21 should not set a specific housing mix for developments, but should allow flexibility for the composition of residential development to be determined by developers at the time. Such requirements can affect the viability of schemes, especially on small sites.	Draft PPS3 indicates that tenure mix is a material consideration. Reference to viability has also been added to the policy.
244	Russet Homes	PO/244.02	Subject to confirmation of proposed changes to PPG3, Russet	Noted.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
	Limited		Homes support the policy.	
249	ZED Homes Limited	PO/249.02	The requirement that 75% of affordable housing will be social rented is in direct conflict with Circular 6/98 which states that "planning policy should not be expressed in favour of any particular form of tenure" and the text should more properly read "Affordable housing should be provided in a mix of tenures (incorporating both low cost market and subsidised house) to be agreed during negotiations on site specific proposals."	It is considered that this policy requirement is important if affordable housing needs are to be met. Paragraph 25 of draft PPS3 'Housing' advises that separate targets for social rented and intermediate housing should be set. This will replace the advice in Circular 6/98.

CP21 ISLES QUARRY WEST

BOROUGH COUNCILLOR

162	Councillor Mrs Geraldine Bowden	PO/162.02	<p>The site should not be deleted from the green belt for the following reasons:-</p> <ul style="list-style-type: none">* The 140 market houses are not necessary to enable the provision of 60 affordable units.* The community uses and upgrading and adoption of the private access road can be achieved without this policy.* The comprehensive restoration of the quarry can only be achieved if the high level platform is lowered, which may not be feasible.* The damaged land and industrial buildings within the site could be redeveloped for housing with landscape mitigation.* The policy would lead to high density development on land currently in the Green Belt, AONB, SLA and ALLI.* Therefore seeks the retention of the green belt and the designation of the shaded part of the site (shown in Annex B) as a Major Developed Site in the Green Belt with appropriate policy requirements to achieve a satisfactory housing development (including 30% affordable dwellings) on a restored quarry face and suitable in the AONB and green belt.	<ul style="list-style-type: none">* The market housing is necessary to support the provision of affordable dwellings as well as the other improvements to the site.* Development of the site would improve the quality of community uses and provide greater likelihood of the private access road being upgraded and adopted.* It is a prerequisite that if the higher-level platform is to be developed for housing, its ground levels need to be reduced and integrated with the housing development at the lower level.* Redevelopment of the employment uses is what is proposed.* 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.* 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 the policy. It is considered that the implementation of strict policy criteria would create a satisfactory development.
-----	---------------------------------	-----------	--	---

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
1. OFFICIAL CONSULTEE				
62	GOSE	PO/062.17	Would not normally expect to see specific sites in a core strategy.	This development location is considered to be strategically significant enough to deserve specific mention in the Core Strategy. However, the more detailed criteria have been deleted.
175	Kent County Council Strategy Division	PO/175.35	<p>Isles Quarry is not a strategic site under terms of Policy WK3 in the KMSp. Policy WK1 does not envisage release of land from the Green Belt to meet strategic housing requirements.</p> <p>Do not object to the policy provided that the assessment criteria take account of:</p> <ul style="list-style-type: none">* the implications of the proposal for the open character of the Green Belt at this location;* the implications for the separate identity of Borough Green and Ightham;* the quality and character of the landscape within the AONB; <p>and</p> <ul style="list-style-type: none">* the nature of any measures envisaged to mitigate any adverse impacts on these functions and attributes of the area.	<p>Accept that Isles Quarry is not strategic in a county-wide context. However, it is strategically important in a borough-wide context given its role in meeting the affordable housing needs of the north west part of the Borough.</p> <p>The policy requirements take account of all the suggested criteria.</p>
2. PARISH COUNCIL				
38	Platt Parish Council	PO/038.06	<p>Do not object at present because:</p> <ul style="list-style-type: none">* The site is regarded as damaged land, is not subject to restoration conditions, and has continuing permission for 'dirty processes;'* the future of the site has been a local concern for many years; and* Borough Green Parish Council are giving the proposal serious consideration. <p>However, they are concerned about its effect on the infrastructure and traffic. The provision of a Borough Green and Platt by-pass would help.</p>	<p>Noted. The impacts on the infrastructure and traffic will be taken into account, including whether or not there is the need for a contribution towards the by-pass.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
81	Wrotham Parish Council	PO/081.10	<p>* Development would be intensive, visible from Wrotham Hill and located in an elevated rural location within the AONB.</p> <p>* The number of dwellings proposed is excessive.</p>	<p>* 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.</p> <p>* The market houses are not an essential to meeting the Borough's housing requirements but are necessary to support the provision of the affordable dwellings, the need for which are outlined in the reasoned justification for policy CP21. 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.</p>
3. INTEREST GROUP				
52	Hildenborough Village Preservation Association	PO/052.08	Support the decision that Hildenborough should not be treated in the same way as Borough Green (paragraph 3.7.30).	Noted.
173	CPRE, Tonbridge & Malling District Committee	PO/173.06	<p>* Propose that the site at Isles Quarry West is treated with caution as it is located adjacent to a large domestic waste landfill site which was topped approximately 15 years ago.</p> <p>* It is suggested that this site is approached similarly to Bushey Wood where the site is developed some time in the future because houses in this location are not likely to be acceptable to residents when the potential landfill hazard is given publicity.</p>	<p>* It is a policy requirement that any land contamination likely to affect the site is investigated and remediated.</p> <p>* The reasoned justification for policy CP21 outlines why there is a need for the site to be developed within the DPD period.</p>
190	Cemex UK Materials Limited	PO/190.04	<p>Consider the recognition of Borough Green as a 'rural service centre' be extended to provide more housing in this area. Object to current wording of CP21 and suggest the following be added to CP21:</p> <p>" (b) Land at Borough Green is identified as a strategic housing site including not less than 30% affordable dwellings together with associated community and transport infrastructure, subject to the comprehensive restoration of the Quarry and adequate landscape mitigation (see Map 9).</p>	<p>There is no strategic need to justify the release of land from the Green Belt at the sites referred to in the representation for residential development. There is already more than enough housing land potentially available to meet anticipated housing requirements up to 2021 without the need to identify or release any additional land.</p> <p>Land at Isles Quarry West has principally been identified as a strategic housing site to ensure the adequate provision of</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			(c) Land at Wrotham is identified as a strategic housing site including not less than 30% affordable dwellings together with associated community and transport infrastructure, subject to the comprehensive restoration of the Quarry and adequate landscape mitigation (see Map 9)."	affordable housing to meet an identified need in the rural part of the Borough. This is the exceptional justification for taking this particular site out of the Green Belt and developing it for housing.
5. LAND OWNER				
79	Hallam Land Management Limited	PO/079.08	The policy overrides the provisions of PPG3, the search sequence, and the requirement to locate development in sustainable locations, to achieve no more than 30% affordable housing. This allocation should be deleted, and the exceptions policy used as a more effective way of achieving affordable housing within the rural area.	There are wider benefits resulting from the development of this site as set out in para 3.6.7 of the Preferred Options Report. It is a peripheral housing site on damaged land adjacent to a rural service centre. It is considered to be a sustainable development proposal in terms of PPG3.
106	Hanson Quarry Products Europe	PO/106.05	Support identification of Isles Quarry West as an appropriate location for 60 affordable houses. Restoration proposals for the quarry will include ecological and landscape enhancement which will allow public access to parts of the restored quarry.	Noted.
110	Hornet Engineering Limited	PO/110.03	Support Isles Quarry West site 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.
181	GLN (Wrotham) Ltd	PO/181.05	Paragraph 3.7.27 should be deleted for the following reasons: * 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. * Concentrating development in Borough Green will not make the best use of social infrastructure. * No evidence is provided to show that the continued viability and vitality of local services in Borough Green is dependent on the development of the site. The consequence of making it more difficult to justify affordable housing development in and adjoining other settlements in the north west part of the Borough may contribute to the decline of viability and vitality or	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. The concentration of development in Borough Green will support its rural service centre role. The scale of development that could be justified to meet local needs in other rural settlements would not be sufficient to materially alter the viability of local shops.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
181	GLN (Wrotham) Ltd	PO/181.09	shops and services in those other centres. This policy should be deleted for the following reasons: * The removal of this site from the Metropolitan Green Belt and development of this scale within an AONB, Green Wedge and Area of Landscape Importance is not justified. * Development of this scale would be contrary to PPG7 and core strategy policy CP10.	* 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 the policy. It is a requirement that any development of the site will need to respect its setting within the AONB. * In terms of national planning guidance, now contained in PPS7, major developments should only take place in AONBs in exceptional circumstances. It is not considered that the development of Isles Quarry constitutes major development as envisaged in PPS7. PPS7 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.
181	GLN (Wrotham) Ltd	PO/181.07	Paragraph 3.7.29 relating to Isles Quarry West, Borough Green, should be deleted for the following reasons: * 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. * The benefits of the development do not provide necessary justification to revise the Green Belt boundary. * Development of this site is incompatible with its location in the AONB, Green Wedge and Area of Landscape Importance, and the relevant planning policies that apply.	* 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. * 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. * 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 (now CP19).

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
181	GLN (Wrotham) Ltd	PO/181.06	The secondary school referred to in para 3.7.28 is in Wrotham.	The text introducing this Policy has been substantially amended and reference to the school has been deleted.
	6. HOUSE BUILDER			
71	Tatham Homes	PO/071.13	The secondary school is in Wrotham. Paragraph 3.7.28 should be deleted.	This paragraph has been deleted.
71	Tatham Homes	PO/071.12	Paragraph 3.7.29 relating to Isles Quarry West, Borough Green, should be deleted for the following reasons: * 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. * The benefits of the development do not provide necessary justification to revise the Green Belt boundary. * Development of this site is incompatible with its location in the AONB, Green Wedge and Area of Landscape Importance, and the relevant planning policies that apply.	* 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. * 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. * 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(now Policy CP19).
71	Tatham Homes	PO/071.05	This policy should be deleted for the following reasons: * The removal of this site from the Metropolitan Green Belt and development of this scale within an AONB, Green Wedge and Area of Landscape Importance is not justified. * Development of this scale would be contrary to PPG7 and core strategy policy CP10.	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 the policy. It is a requirement that any development of the site will need to respect its setting within the AONB. * In terms of national planning guidance, now contained in PPS7, major developments should only take place in AONBs in exceptional circumstances. It is not considered that the development of Isles Quarry constitutes major development as envisaged in PPS7. PPS7 further states that the conservation of

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				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.
71	Tatham Homes	PO/071.14	<p>Paragraph 3.7.27 should be deleted for the following reasons:</p> <ul style="list-style-type: none"> * 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. * Concentrating development in Borough Green will not make the best use of social infrastructure. * No evidence is provided to show that the continued viability and vitality of local services in Borough Green is dependent on the development of the site. The consequence of making it more difficult to justify affordable housing development in and adjoining other settlements in the north west part of the Borough may contribute to the decline of viability and vitality or shops and services. 	<p>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. The concentration of development in Borough Green will support its rural service centre role. The scale of development that could be justified to meet local needs in other rural settlements would not be sufficient to materially alter the viability of local shops.</p>
72	Croudace Homes Limited	PO/072.14	<p>Object to Isles Quarry site as it is a complex brownfield site. This will result in 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/134.01	<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> <ul style="list-style-type: none"> * The need for 60 affordable houses could be met on other 	<ul style="list-style-type: none"> * 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

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>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.</p> <ul style="list-style-type: none">* There is no need for further private housing in the Borough.* 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.* 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.* The restoration of the site would not fulfil any Green Belt purposes.* There has been no material change of circumstances in the need for restoration since the adoption of the Local Plan in 1998.* The development of the site for housing will harm the AONB.* The strategic local gap between Borough Green and Ightham would be eroded.* The access road was originally permitted on a temporary basis and should not be given greater status now.* The landowners should not be entitled to further profit from degrading the landscape but should restore it instead.* The proposal does not meet the tests of soundness.	<p>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> <ul style="list-style-type: none">* There is an adequate supply of private housing in the Borough but this development is justified since it would meet an identified need for affordable housing.* 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.* Only part of the site is subject to restoration conditions. The remaining parts contain buildings and constitute damaged land.* 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).* 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.* 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.* 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).* 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.* The development of the site would meet an identified need for

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
244	Russet Homes Limited	PO/244.01	<p>Support the recognition of the need for affordable housing. Do not agree that the rural service centre approach suggested at Borough Green is the best way forward, because most rural housing needs surveys show that people usually prefer to remain in or adjacent to their village. Therefore, the discounted option of settlements adjacent to existing villages to help those who already live there is preferable and should be reviewed.</p> <p>Housing Corporation funding means that villages with a population in excess of 3,000 cannot qualify for such funds. Therefore, the proposal could not be funded via this primary route. It is suggested that if the rural service centre is to be the preferred option, then this should be located within a village capable of receiving this funding.</p> <p>There is concern that only 30% of the homes would be affordable and other sites could provide more affordable homes without the need for such a high level of private residential development in the Green Belt.</p>	<p>affordable housing in the rural area.</p> <p>* 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.</p> <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. Provision to meet genuine local needs in these settlements can still be pursued via the Exception Sites route.</p> <p>This affordable housing policy has been revised. The Borough Council proposes a target for affordable housing provision of not less than 40% of the net number of dwellings in any scheme (see draft Core Strategy Policy CP18). The development of this target and site threshold size was informed by national and regional housing policy, the Council's Housing Strategy and also a Housing and Market Needs Assessment undertaken in the autumn of 2005. This practice accords with advice in PPG3.</p> <p>On the matter of funding, 'market towns' also qualify for consideration for Housing Corporation funding and these include settlements with a population of 3,000 or more.</p>
7. PUBLIC				
255	Dr Graham Darby	PO/255.03	<p>The site should be deleted for the following reasons:</p> <ul style="list-style-type: none"> * It would result in the loss of a significant portion of Green Belt land which currently maintains the character and identities of surrounding villages. * There is no need for the housing. * The present infrastructure could not support the additional increase in population. 	<ul style="list-style-type: none"> * 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 the policy. * 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 policy CP21.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				* The relevant infrastructure providers have been 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.
CP22 RURAL AFFORDABLE HOUSING				
1. OFFICIAL CONSULTEE				
62	GOSE	PO/062.18	Seeks clarification on whether a local needs assessment has been undertaken to identify the locations where rural housing is needed.	An up-to-date Housing and Market Needs Assessment has been carried out by Consultants DCA, which does identify the general need for affordable housing the rural area referred to. More specific local needs surveys will be required to justify any releases of exception sites.
69	Highways Agency	PO/069.22	Support options to improve sustainable transport modes. Would be concerned if development generated significant traffic which could have an impact on the trunk road.	Noted, but developments under the exception sites policy are normally very small.
69	Highways Agency	PO/069.20	Suggests that where developments occur out of town areas, they should be limited to sites where sustainable transport modes are available.	The criteria identified in CP22(d) include proximity to public transport and absence of highway impact as considerations that must be satisfied for rural affordable housing to be developed in areas where there would normally be a presumption against development.
2. PARISH COUNCIL				
16	Plaxtol Parish Council	PO/016.02	Plaxtol does not require further affordable housing and therefore does not fall under Policy CP22.	Plaxtol may have genuine affordable housing needs at some point in the future and the policy framework should be in place to help deliver this. If there is no genuine need, development would not be allowed under policy CP22 (now CP20)
38	Platt Parish Council	PO/038.07	Pleased to note the continuation of the exception scheme for rural affordable housing where local need is shown and such housing should be available in perpetuity for that purpose.	Noted.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
81	Wrotham Parish Council	PO/081.06	Support rural affordable housing policy.	Noted.
100	Ightham Parish Council	PO/100.08	The considerations in CP22 make affordable housing in CP16 villages difficult but not impossible.	The policy has been reworded to make it clear that exception sites can be considered at Policy CP16 (now CP14) villages
7. PUBLIC				
255	Dr Graham Darby	PO/255.02	There is a need to supply rural affordable housing and such housing should be reserved for this purpose in perpetuity.	Noted. Section 106 agreements seek to ensure that affordable housing is available as such for as long as possible.

CP23 NEW EMPLOYMENT PROVISION

1. OFFICIAL CONSULTEE

69	Highways Agency	PO/069.21	Suggest the words 'and public transport services' included in CP23(1) should apply to CP23(2).	Agree.
----	-----------------	-----------	--	--------

5. LAND OWNER

179	The Beaucette Property Portfolio Ltd	PO/179.14	<p>Paragraph 3.7.34. The text inappropriately refers to Policy RE3 of the emerging SE Plan. Paragraph 4.1 of the emerging RSS indicates that it has a "currently poor understanding of land supply at the local level." Its requirement for a range of sites to be made available for employment purposes, does not fit well with recent research undertaken for the Kent and Medway Structure Plan that finds a good supply of existing employment land in the Tonbridge and Malling area. It would be more appropriate to refer to this research in the text.</p> <p>It is suggested the first sentence of paragraph 3.7.34 be deleted and a new sentence inserted after the second existing sentence as follows: "These conclusions support the research on which the emerging Kent and Medway Structure Plan is based and its</p>	<p>The Structure Plan research has been reviewed by Drivas Jonas and updated in light of current Government Guidance. For the reasons explained in paragraph 1.4.6 of the Preferred Options Report, no overt reference will be made in the Core Strategy to the KMSP.</p>
-----	--------------------------------------	-----------	---	---

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
179	The Beaucette Property Portfolio Ltd	PO/179.15	<p>proposal that no "fresh land" is required to be provided in Tonbridge and Malling in the period to 2021."</p> <p>Criteria relating to location and residential amenity have some relevance. However, a more appropriate criteria than 'capability of accommodating a range of uses' is 'whether buildings or sites are poorly suited to modern business, industrial or warehousing needs.' Sites may be able to accommodate a range of employment uses, but there may be no need or market requirement to provide for the particular uses that are capable of being accommodated. Such land would then be unnecessarily sterilised.</p> <p>The second sentence should be rephrased as follows: "Whilst it may be appropriate for certain poorly located sites, sites that are detrimental to residential amenity or those that are poorly suited to modern business, industrial or warehousing needs, to be redeveloped for other uses, it is important that the best located and most suitable sites are safeguarded."</p> <p>Policy RE3 is misplaced. Given Council's Employment Land Review demonstrated there will be no fresh land prior to 2016 and the emerging Kent and Medway Structure Plan has indicated no "fresh land" needs to be provided until 2021, the reference to "reduce the need for fresh land allocations" is misplaced. Reliance on Policy RE3 weakens the justification for Policy CP23. It is therefore suggested the penultimate sentence of this paragraph commencing "Policy RE3.." is deleted.</p>	<p>This section has been rewritten in the light of this and other representations. It is considered that if a site is well located for employment purposes it is likely to be suited to modern employment needs. The wording has been revised to better reflect the content of South East Plan Policy RE3.</p>
179	The Beaucette Property Portfolio Ltd	PO/179.16	<p>The present approach to employment land provision is too coarse. Safeguarded land should be subject to criteria permitting losses if relevant factors are met. The first part of policy CP23 should be redrafted as follows: "New employment provision will be met at Kings Hill. Provision will also be made on vacant sites within the main employment</p>	<p>Whilst the policy has been restructured its thrust remains the same. The Employment Land Review has already made judgments about which sites should be safeguarded. By definition it would not be appropriate to apply the suggested criteria to the loss of safeguarded sites to other uses. This would defeat the object of safeguarding them.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>areas as well as through intensification or redevelopment of existing employment sites. These sites will need to be well located in relation to the main road network and public transport services and well suited to meet current business, industrial and warehousing requirements."</p> <p>The second part of the policy should be rephrased as follows: "Employment areas currently in employment use that are well located to the main road network and accessible by public transport and capable of meeting modern business, industrial or warehousing needs will be safeguarded for such use. Loss to other uses may be permitted subject to consideration, as appropriate, against the following factors: (a) An assessment of impact from loss in terms of the quality and quantity of employment land supply in the market area and current take up rates showing no prejudice to overall supply; (b) The ability of the site or premises to meet modern business, industrial or warehousing needs; and (c) Any amenity benefits that may arise from redevelopment."</p>	
180	Ringbest Ltd	PO/180.03	<p>The present approach to employment land provision is too coarse. Safeguarded land should be subject to criteria permitting losses if relevant factors are met. The first part of policy CP23 should be redrafted as follows: "New employment provision will be met at Kings Hill. Provision will also be made on vacant sites within the main employment areas as well as through intensification or redevelopment of existing employment sites. These sites will need to be well located in relation to the main road network and public transport services and well suited to meet current business, industrial and warehousing requirements."</p> <p>The second part of the policy should be rephrased as follows: "Employment areas currently in employment use that are well located to the main road network and accessible by public transport and capable of meeting modern business, industrial</p>	<p>Whilst the policy has been restructured its thrust remains the same. The Employment Land Review has already made judgments about which sites should be safeguarded. By definition it would not be appropriate to apply the suggested criteria to the loss of safeguarded sites to other uses. This would defeat the object of safeguarding them.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>or warehousing needs will be safeguarded for such use. Loss to other uses may be permitted subject to consideration, as appropriate, against the following factors:</p> <p>(a) An assessment of impact from loss in terms of the quality and quantity of employment land supply in the market area and current take up rates showing no prejudice to overall supply;</p> <p>(b) The ability of the site or premises to meet modern business, industrial or warehousing needs; and</p> <p>(c) Any amenity benefits that may arise from redevelopment."</p>	
180	Ringbest Ltd	PO/180.04	<p>Paragraph 3.7.36. To be consistent with recommended changes to CP23, recognition is needed that within the main employment areas to be safeguarded, there may be areas that could meet relevant criteria for release at an appropriate time. It is suggested that a new sentence be added after "Key Diagram" stating:</p> <p>"However, there may be smaller areas within these main employment areas that do not always satisfy the requirements for safeguarding."</p>	Proposals would be considered on their merits. The aim of the policy approach is to safeguard the best employment locations.
180	Ringbest Ltd	PO/180.01	<p>Paragraph 3.7.34 inappropriately refers to Policy RE3 of the emerging South East Plan, which states in paragraph 4.1 that it has a "currently poor understanding of land supply at the local level." In contrast, the recent research undertaken for the Kent and Medway Structure Plan finds there is a good supply of existing employment land in Tonbridge and Malling. The text of the first sentence should be deleted, and a new sentence inserted after the second existing sentence as follows:</p> <p>"These conclusions support the research on which the emerging Kent and Medway Structure Plan is based and its proposal that no "fresh land" is required to be provided in Tonbridge and Malling in the period to 2021."</p>	The Structure Plan research has been reviewed by Drivas Jonas and updated in light of current Government Guidance. For the reasons explained in paragraph 1.4.6 of the Preferred Options Report, no overt reference will be made in the Core Strategy to the KMSP.
183	C & K Extrusions Ltd	PO/183.03	<p>Clarification is required of the phrase 'capable of meeting a range of employment uses.'</p> <p>The safeguarding of a site for employment use should not only</p>	<p>It means B1 to B8 uses.</p> <p>The sites proposed for safeguarding have been identified following a thorough Employment Land Review which took</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>be determined by the location relative to the main road network and the ability of the site to meet a range of employment uses. The phrase 'do not cause an unacceptable loss of amenity to residential neighbours' should be inserted after the word 'that' in the second line of sub-paragraph 2.</p> <p>The second paragraph of Policy CP23(2) should be deleted.</p>	<p>account of all relevant factors.</p> <p>The second part of the policy is fundamental to safeguarding the best and most versatile employment land in line with Government advice.</p>
183	C & K Extrusions Ltd	PO/183.02	<p>A policy should be included in the Core Strategy to allow sites categorised in the Employment Land Report as 'other urban (2) sites' to be redeveloped for other purposes, in particular Drayton Road, Tonbridge (refer paragraphs 10.89 - 97 of the Employment Land Review).</p>	<p>Sites suitable for redevelopment will be judged on their own merits as per the criteria set out in policy E2 of the Development Land Allocations DPD. Drayton Road is a locally important and well used employment site who's offer would be difficult to replicate elsewhere in the town and therefore, the Council does not support its allocation or use for non-employment purposes.</p>
220	Strategic Partners UK Fund I	PO/220.06	<p>Policy 3.7.34 - regarding Council's approach to safeguarding the best employment land. Safeguarded sites have been identified arbitrarily with insufficient flexibility within the relevant policies to enable consideration of site-specific issues. PPG3 paragraph 42(a) establishes the principle of a flexible approach to employment land. PPG4 promotes providing a range and choice of employment sites. Council should adopt a criteria based approach to Policy CP23(2)</p>	<p>The methodology used in the Borough's Employment Land Review is that identified as best practice in the Government's guidance published in "Employment Land Reviews: Guidance Note, December 2004". The Council's ELR concludes that the Tonbridge Industrial Estate should be protected for current and future employment needs with the exception of the fringes that connect to the town centre area. 2-8 Morley Road is not well connected with the central town centre area as it sits well within the Industrial Estate.</p> <p>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.</p>
220	Strategic Partners UK Fund I	PO/220.02	<p>Object to CP23(2) on the basis that it fails to provide flexibility to enable site specific considerations to be taken into account. With regard to 2-8 Morley Road, Tonbridge, there is no market for the site in its current format. The current approach to safeguarding employment sites would prohibit redevelopment for an alternative use.</p>	<p>The site is within an established and functioning industrial estate and the use of the site for employment uses must be protected to ensure that there are a range of sites and facilities available for employment purposes in this part of the Borough. The Council would not wish to develop a policy approach that would weaken this protection of the site for employment purposes. Redevelopment of sites such as this for employment purposes</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>The Council should adopt a criteria based approach to CP23(2) to enable site specific considerations to be taken into account. The following alternative wording is suggested:</p> <p>"Employment areas currently in employment use that are capable of meeting a range of employment uses will be safeguarded for such use.</p> <p>Proposals for other non-employment uses (not within Class B1, B2 or B8) will only be granted planning permission when:</p> <p>(a) the proposed development would have an acceptable relationship with surrounding land uses; and either</p> <p>(b) there would still be enough employment land within the borough in terms of overall supply, choice and availability; or</p> <p>(c) the existing buildings are unsuitable for employment re-use;</p> <p>or</p> <p>(d) site-specific constraints exist which justify a flexible approach or alternative uses.</p>	<p>would be acceptable under the terms of the Core strategy, Development Land Allocations DPD and the Tonbridge Central Area Action Plan.</p>
			<p>6. HOUSE BUILDER</p>	
2	McCarthy & Stone (Developments) Ltd	PO/002.01	<p>The policy does not allow for enough flexibility. It does not have regard to national planning policy guidance which encourages full and effective use of available land within existing urban areas in order to both meet the requirements of new housing and at the same time maintain conservation policies. PPG3 places an increased emphasis on the best use of land and buildings within urban areas. The proposed policy could frustrate attempts by existing owners to find a suitable alternative and viable use for land or buildings that are clearly no longer economically viable for employment use. CP23 should be redrafted to allow for more flexibility</p>	<p>CP23 is in line with national planning policy in that it seeks to protect the best existing employment sites currently in employment use (i.e. viable, working sites and premises) from redevelopment to other uses. Seeking to protect current land in employment use helps to achieve national and local objectives of mixed and sustainable communities. A more flexible approach is adopted towards other sites as set out under Policy E2 of the Development Land Allocations DPD. Many other employment sites are specifically identified as being suitable for residential redevelopment under Policy H4 of the Development Land Allocations DPD. The Council is therefore adopting a constructive and responsive approach towards development of employment land.</p>
171	Croudace Homes Ltd	PO/171.05	<p>Object to the fact that new employment provision will be met only at Kings Hill, on vacant sites within the main employment</p>	<p>There is no evidence that demand for small scale employment needs is such that a policy addressing this specific issue is</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			areas, and through the redevelopment of existing well-sited employment sites. Kings Hill does not provide for small scale employment needs. Policy fails to recognise that other sites in the Borough such as Barming Rail Station may be suitable for employment provision. Policy should be reworded to recognise that other sites in the Borough may be suitable to accommodate employment provision.	<p>justified. Where proposals for small scale employment development are made, they will be judged on their individual merits within the context of Policy E2 in the Development Land Allocations DPD and Policy CP22.3 of the Core Strategy. Kings Hill does provide for small units by the subdivision of some of the larger units, the use of flex buildings and conversion of the listed former airfield buildings.</p> <p>The Employment Land Review found no need for additional employment land. The Council will continue to monitor employment development and should the need arise, will consider a specific policy to address this issue.</p> <p>The site at Barming Station would not be considered an appropriate site as a small scale employment area as it is within the Strategic Gap.</p>

CP24 EMPLOYMENT IN SETTLEMENT CONFINES

1. OFFICIAL CONSULTEE

64 English Nature PO/064.21

Support Clause 3 of policy CP24. However no reference is made to biodiversity impacts resulting from this policy so the following revision is suggested:
"(3) An acceptable redevelopment that minimises that, where possible, avoids impacts upon biodiversity which results in significant improvements to the local environment and biodiversity."

Reference to avoiding impacts on biodiversity has now been included in first part of the policy which has now been subsumed into new Policy CP22..

3. INTEREST GROUP

52 Hildenborough Village Preservation Association PO/052.07

Support inclusion of Hildenborough within Policy CP24.

Noted.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
6. HOUSE BUILDER				
171	Croudace Homes Ltd	PO/171.06	Supports the recognition of the need to provide for employment units for small firms in urban areas and villages.	Noted.
CP25 EMPLOYMENT OUTSIDE SETTLEMENT CONFINES				
5. LAND OWNER				
107	H & H Celcon Limited	PO/107.14	<p>The policy providing for necessary expansion of existing authorised employment uses outside settlement confines is supported.</p> <p>The provision that development in the Green Belt is justified by very special circumstances should be accompanied by an explanation of what constitutes very special circumstances e.g. funding and delivery of a safeguarded road scheme.</p>	<p>Noted, but this policy has been deleted as being too detailed for the Core Strategy. Reference to the expansion of existing firms in the rural area is now covered by new Policy CP15 dealing with development in the countryside.</p> <p>PPG2 states "It is for the applicant to show why permission should be granted. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.". It is made clear that development plans should specifically not seek to identify special circumstances in advance.</p>
227	Gallagher Properties Ltd	PO/227.01	Because the policy facilitates the expansion of existing employment sites that are sited in sustainable locations in the countryside.	Noted, but this policy has been deleted as being too detailed for the Core Strategy. Reference to the expansion of existing firms in the rural area is now covered by new Policy CP15 dealing with development in the countryside.
6. HOUSE BUILDER				
171	Croudace Homes Ltd	PO/171.07	Policy should be reworded to permit the provision of small scale employment units outside of settlement confines, provided the development is in a suitable sustainable location and appropriate in terms of scale and character.	Policy CP25 does not rule out the provision of small scale employment units outside of settlement confines, provided the development meets the criteria identified within the policy.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
CP26 RETAIL HIERARCHY				
1. OFFICIAL CONSULTEE				
175	Kent County Council Strategy Division	PO/175.37	The re-designation of Quarry Wood as an out-of-centre retail facility as opposed to a district centre is welcomed. This recognises that any identified capacity for comparison floorspace in this area is likely to be more suitably accommodated in Maidstone using the sequential approach (if such sites exist).	Noted.
3. INTEREST GROUP				
52	Hildenborough Village Preservation Association	PO/052.09	Support the fact that Hildenborough is identified as a Rural Local Centre in Policy CP26.	Noted.
5. LAND OWNER				
179	The Beaucette Property Portfolio Ltd	PO/179.19	Support the retail hierarchy policy.	Noted.
180	Ringbest Ltd	PO/180.05	<p>The reference to recent development extending the range and choice of shopping at the South Aylesford Retail Park is minor and does not support the comment made.</p> <p>The South Aylesford area is located where it can serve both the Maidstone and Malling area and should be referred to here to be consistent with paragraph 1.6.25. The third sentence of paragraph 3.7.40 should be deleted and replaced with "It is located where it can serve both the Maidstone and Malling area catchments."</p>	It is not the role of the Core Strategy to allocate land for various uses. However, the text and the Policy has been amended to express the Council's view that if the need exists, in principle, Quarry Wood is the most appropriate location for new comparison goods shopping that cannot be met within the Maidstone urban area.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>The site at Quarry Wood should be identified for retail needs for the following reasons:</p> <ul style="list-style-type: none">* It has no future as an employment site as accepted by the Council's Employment Land Report;* The Council's consultants have recognised the need within the Malling/Maidstone area for large scale DIY goods store and the sequential approach and retail impact considerations do not prevent its accommodation at Quarry Wood.* Retail needs have been identified that cannot be located in or on the edge of Maidstone or at other town centres and it has been demonstrated that the Quarry Wood site is the next most preferable site to accommodate need.* Public transport proposals have been enhanced, and the NLP Review had previously advised that there would be no adverse impact on relevant town centres from such a large DIY store.	
			<p>The Core Strategy should refer to the proposed allocation of land here as follows:</p> <p>"There is an identified quantitative and qualitative need to accommodate large scale DIY floorspace provision to serve this catchment. No sites are available in or adjacent to Maidstone town centre or relevant centres in Tonbridge and Malling. An allocation is therefore proposed on part of the nearby Quarry Wood Estate which is degraded and has little prospect of employment re-use." This is shown on Map 10. [Map J]</p>	
252	Tesco Stores Ltd	PO/252.06	<p>The Key Diagram shows Lunsford Park District Centre as being out of centre. Tesco objects to this for the reasons outlined in PO/252.02. The "Out-of-Centre" allocation should be replaced with "District Centre" allocation.</p>	<p>Since the Local Plan was adopted, the nature of Lunsford Park has changed in that the number of units has declined from 4 plus a superstore to 2 plus a hypermarket. The function of the centre has changed in that it now serves a much wider catchment area and does not meet the test in PPS6 of what constitutes a "District Centre".</p>
252	Tesco Stores Ltd	PO/252.05	<p>Lunsford Park should not be deleted as a District Centre for the reasons outlined in PO/252.02.</p>	<p>Since the Local Plan was adopted, the nature of Lunsford Park has changed in that the number of units has declined from 4 plus</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
252	Tesco Stores Ltd	PO/252.02	The retail facilities at Lunsford Park should not be described as "out of centre" but should be designated as a District Centre in accordance with the Local Plan and PPS6. It provides a wide range of goods and services to meet the needs of the catchment, i.e. food and non-food goods, a café, pharmacy, photo processing, cash machines, post box, recycling facilities, petrol filling station, 2 shop units and a doctor's surgery. It is also accessible by a range of means of transport including scheduled bus services, courtesy bus services, by bicycle and on foot. It is surrounded by residential development. Further, it satisfies the test for the definition of a District Centre in both PPG6 and PPS6. Therefore, they request that the District Centre at Lunsford Park, as allocated in the adopted Local Plan, be designated as a District Centre in the DPD subject to a minor revision to the boundary to include the doctor's surgery at the rear of the site.	a superstore to 2 plus a hypermarket. The function of the centre has changed in that it now serves a much wider catchment area and does not meet the test in PPS6 of what constitutes a "District Centre". The Doctor's Surgery is not well linked to Lunsford Park and does not form part of the centre. Since the Local Plan was adopted, the nature of Lunsford Park has changed in that the number of units has declined from 4 plus a superstore to 2 plus a hypermarket. The function of the centre has changed in that it now serves a much wider catchment area and does not meet the test in PPS6 of what constitutes a "District Centre".
254	Asda Stores Ltd	PO/254.01	The redefinition of Kings Hill as a District Centre accurately reflects the function of the centre accurately reflects its function and catchment.	Noted.

CP27 NEW RETAIL DEVELOPMENT

1. OFFICIAL CONSULTEE

91	English Heritage	PO/091.13	Support criteria requiring retail development to contribute to an improvement of the town centre.	Noted.
----	------------------	-----------	---	--------

5. LAND OWNER

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
179	The Beaucette Property Portfolio Ltd	PO/179.18	Because of the significant scale of retail needing to be accommodated in Tonbridge, the final line of paragraph 3.7.39 should state "...and other opportunities to accommodate identified retail needs and thus maintain and enhance its vitality and viability."	The paragraph has been reworded to refer to 'accommodating new retail development' in the light of this comment.
179	The Beaucette Property Portfolio Ltd	PO/179.20	Paragraph 3.7.42 needs to refer to the preferences set out by the sequential approach to site selection. The word "key" in the second line of the paragraph should be replaced by "preference" and an additional sentence needs to be added at the end of the paragraph as follows: "However, if needs cannot be appropriately accommodated within town centres, they will need to be accommodated using the sequential approach to site assessment and other relevant retail policy tests."	The wording of the retail section and the Policy has been substantially revised in the light of this representation and others. However, the word 'key' will be retained as it is a key consideration.
179	The Beaucette Property Portfolio Ltd	PO/179.22	A new sentence should be added after the second sentence in paragraph 3.7.43 as follows: "A retail study has identified a substantial need for new comparison goods floorspace of up to 24,000m2 gross and for new convenience goods floorspace of up to 2,600m2 by 2016." The following sentence should then commence: "Planning policy for the Centre will set the context for development and investment to accommodate these needs and it is important.."	The wording of the paragraph relating to retail development and the Policy has been substantially revised in the light of this and other representations. The detail is included in the introductory section of the Strategy.
179	The Beaucette Property Portfolio Ltd	PO/179.21	In order to include the sequential assessment of retail proposals, the first part of policy CP27 should state "Proposals for new retail development will be permitted if:" An new criterion should be added immediately following criterion (a) as follows: "a retail need is demonstrated and it cannot be accommodated in the town centre, then edge of centre sites will be assessed before out of centre sites. Out of centre sites that are close to existing retail development will be preferred over ones that have no such relationship."	The policy has been reworded in the light of this representation. A new criterion has been added accordingly. Criterion (d) has been deleted.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
180	Ringbest Ltd	PO/180.07	<p>Existing criterion (d) can be deleted as it duplicates CP29 provisions.</p> <p>This policy needs to be reworded to reflect Government guidance for the assessment of retail proposals including the sequential assessment. The first part of the policy should state: "Proposals for new retail development will be permitted if:"</p> <p>A new criterion should be added immediately following criterion (a) as follows: "a retail need is demonstrated and it cannot be accommodated in the town centre, then edge of centre sites will be assessed before out of centre sites. Out of centre sites that are close to existing retail development will be preferred over ones that have no such relationship."</p>	<p>The policy has been reworded in the light of this representation and further discussions with the objector.</p> <p>A new criterion has been added accordingly.</p> <p>Criterion (d) has been deleted.</p>
234	WM Morrison Supermarkets Plc	PO/234.01	<p>Existing criterion (d) can be deleted as it essentially duplicates policy provision in CP29.</p> <p>Would like to emphasise the potential beneficial role of retail developments, including the generation of additional local employment opportunities and potential to enhance competitiveness and improve the built environment.</p>	<p>Noted.</p>
252	Tesco Stores Ltd	PO/252.03	<p>It is not consistent with PPS6 which only requires impact assessments to be undertaken for town centre uses which are located on edge-of-centre or out-of-centre locations where these are not in accordance with an up-to-date development plan strategy. The policy should be redrafted to be consistent with PPS6.</p>	<p>Policy CP23 in the submission draft Core Strategy has been amended from Policy CP27 to clarify the issue of impact of retail proposals.</p>

CP29 TONBRIDGE TOWN CENTRE

1. OFFICIAL CONSULTEE

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
64	English Nature	PO/064.22	<p>Any redevelopment of the river corridor should take into account potential impacts and seek enhancements for biodiversity within Tonbridge. Recommend the inclusion of the following text:</p> <p>"(b) maximise the use of the waterfront by the allocation of appropriate mixed-use developments which are compatible with the biodiversity of the river environment and provision of enhancements to the riverside for the benefit of people and wildlife."</p>	<p>This insertion is not considered to be necessary because all policies are to be read together. Furthermore, the 'benefit to people and wildlife' is considered to be a reason for the policy, not policy itself.</p>
78	Kent Wildlife Trust	PO/078.08	<p>Within Tonbridge there is an opportunity to improve the Medway as a natural corridor for biodiversity. An additional clause should be added to CP29: " .. pull development back from the river to create a more natural river margin and enhance the function of the river as a strategic ecological link."</p>	<p>This would not necessarily be the objective in the town centre.</p>
103	Environment Agency	PO/103.10	<p>The policy should refer to PPG25 and PPS25 and to CP13.</p>	<p>Policy CP13 (now CP11) deals with flood protection and this is applicable for developments throughout the Borough and takes on board the policies in PPG25 and draft PPS25. There is no need to cross refer to it in Policy CP29 (now CP24) which would create duplication. All policies need to be read together.</p>
3. INTEREST GROUP				
284	Tonbridge Parish Church	PO/284.01	<p>Support Paragraph 3.7.46 - the Council's vision for Tonbridge Town Centre.</p>	<p>Noted.</p>
5. LAND OWNER				
79	Hallam Land Management Limited	PO/079.09	<p>To address the affordable housing problem, further development should be focused in Tonbridge. The safeguarded site at Lower Haysden Lane should be allocated for development within this plan period.</p>	<p>The work on the Tonbridge Central Area Action Plan will result in more previously developed land within Tonbridge coming forward for housing in that area. The sequential approach contained in PPG3 requires previously developed land to be developed before greenfield land. The strategy reflects this. There is sufficient previously developed land to meet the Borough's housing needs until 2021 and therefore there is no need to release greenfield sites, including Lower Haysden Lane, Tonbridge. As a result it is</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
179	The Beaucette Property Portfolio Ltd	PO/179.23	<p>The first sentence of paragraph 3.4.47 should be rewritten as follows: "The Area Action Plan for Tonbridge Central Area will provide the proposals and the policy framework to facilitate appropriate development of a quality that respects and enhances local character and meets these objectives and the identified, and urgent, retail needs for the town as well as enhancing the town centre's vitality and viability."</p>	<p>proposed to reduce the size of the Reserve Site at Lower Haysden Lane.</p> <p>This paragraph has been revised partly in light of this representation, though the reference to high quality development has not been changed.</p>
179	The Beaucette Property Portfolio Ltd	PO/179.24	<p>The beginning of the policy and criterion (a) should be redrafted as follows: "The policy for Tonbridge Town Centre is to meet the identified urgent retail, housing, employment, and leisure needs within a sustainable pattern of development so as to regenerate and enhance the vitality and viability of the town centre, whilst:"</p> <p>Criteria (b) - (h) now becomes (a) - (g).</p>	<p>The policy has been reworded and restructured in the light of this comment.</p>
220	Strategic Partners UK Fund I	PO/220.03	<p>Supports Council's emerging policies promote the principle of improving waterfront areas and locating mixed-use development adjacent to the waterfront. The site at 2-8 Morley Road, Tonbridge will provide an opportunity to deliver a mixed-use scheme next to the waterfront and would accord with the objectives of the Tonbridge Town Centre Masterplan Preferred Options Report.</p>	<p>Noted, but the Council consider that the site at Morley Road is only suitable for mixed use redevelopment that consists of B1, B2 and B8 uses.</p>
283	Lidl UK	PO/283.01	<p>The Tonbridge Central Area Action Plan needs to meet the needs reflected in this policy.</p>	<p>Noted.</p>

CP30 DESIGN OF DEVELOPMENT

1. OFFICIAL CONSULTEE

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
60	Sport England South East Region	PO/060.03	<p>Support CP30(c). This policy will ensure adequate recreation space will be provided with new developments. This should be supported by an up to date Open Space Strategy, and of an SPD to guide standards of provision of recreation.</p> <p>Support CP30(i) which provide for ease of access to community facilities and encourages means of transport other than the car. This is in line with submitter's guidance 'Active Design.'</p>	This policy has been substantially rewritten. Provision of Open Space is now covered by Policy CP1 and will be dealt with in more detail in the Open Space DPD. Policy CP2 deals with the issue of accessibility.
64	English Nature	PO/064.23	<p>CP30(c) - Suggest reference be made to natural greenspace and provision of local nature reserves since the easy access to wildlife and natural spaces supports health and wellbeing. The following amendment should be made to strengthen the policy: "make provision for sufficient quality recreation and amenity space including greenspace and local nature reserves."</p>	This is considered to be too detailed for the Core Strategy. It is a matter for the Open Space Strategy.
64	English Nature	PO/064.24	<p>CP30(j) - Suggest strengthening the policy as follows: "...through appropriate habitat creation and enhancement schemes, normally using local plant species of native origin, unless non-native species are justified by the particular circumstance of the site."</p>	This is considered to be too detailed for a Core Strategy.
74	Kent Downs AONB Unit	PO/074.04	<p>Reference in paragraph 3.8.3 to Village Design Statements is supported. There may be scope in the LDF to indicate that it is supportive of the production of community led initiatives such as Village Design Statements, and other 'tools' such as design briefs that help raise the quality and promote local distinctiveness.</p>	Not necessary to say this in the Core Strategy. What is relevant is that development should be in accordance with such Guidance where it exists.
78	Kent Wildlife Trust	PO/078.10	<p>The core policy document fails to address sustainable construction issues and therefore doesn't comply with CC3 of the South East Plan. A new policy should be included which conforms with policy CC3, or policy CP30 should be reworded to address sustainable construction.</p>	This matter is too detailed for a Core Strategy Policy. However, reference to sustainable construction is now made in paragraph 6.1.5 of the Core Strategy.
103	Environment Agency	PO/103.12	<p>Reference should be made to natural resource (e.g. water and energy) efficiency during the lifetime of the development, not</p>	Agree. Reference to natural resource efficiency has now been incorporated into Policy CP01.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			just the construction stage.	
109	Countryside Agency	PO/109.07	Support design of development policy.	Noted.
219	Home Builders Federation	PO/219.09	It is not possible under planning legislation to make provision of public art a mandatory requirement. For it to be a requirement of new development, as in CP30, is unreasonable, excessive and unsound. The Policy should be reworded to make it clear that Council will seek to negotiate with developers for the provision of, or contributions towards, public art 'where appropriate.'	The Policy has been substantially rewritten. The reference to public art is no longer indicated as a requirement.
2. PARISH COUNCIL				
81	Wrotham Parish Council	PO/081.07	Support design of development policy.	Noted.
100	Ightham Parish Council	PO/100.09	Consider that good design and high quality development with appropriate materials important.	Noted.
3. INTEREST GROUP				
14	Hadlow Park Residents' Association	PO/014.02	The policy should contain a qualification that any new housing within the existing defined Low Density Residential Areas must not undermine their special character	The special character of new housing within the existing defined Low Density Residential Areas is covered by the generality of the policy.
5. LAND OWNER				
179	The Beaucette Property Portfolio Ltd	PO/179.26	<p>The beginning of the policy should be rephrased as follows: "In line with the principles of Kent Design, all developments should be designed to a quality that is in character with or enhances the appearance of the area."</p> <p>The various criteria relate to matters of detail and should be deleted in accordance with the advice of PPS12 and its Companion Guide which indicate that such matters should be</p>	<p>It is the Council's objective that all development should be of high quality. The policy has been substantially redrafted in the light of this representation and others.</p> <p>More detail on how to achieve these objectives is included in Kent Design which has been adopted as a Supplementary Planning Document.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			left to a Supplementary Planning Document.	
179	The Beaucette Property Portfolio Ltd	PO/179.25	References to design should not relate to an unreasonable expectation of 'high quality'. It is more appropriate to ensure that design respects and enhances local character. The beginning of paragraph 3.8.1 can be recast to read as follows: "Good design is a key element of sustainable development, so the Council will promote standards of design which can enhance the sense of place and identity of an area."	The recommended changes have not been incorporated as the objective is to achieve a high quality of design.

CP31 PARKING

1. OFFICIAL CONSULTEE

175	Kent County Council Strategy Division	PO/175.38	This Policy should specifically refer to the Council's Parking Standards.	This policy has been deleted as it is too detailed for the Core Strategy. It will instead be a matter for the Generic Development Control Policies DPD.
-----	---------------------------------------	-----------	---	---

5. LAND OWNER

169	Harvester Trust	PO/169.07	Support the case for a lower level of parking provision where there is good access to public transport and/or there is potential for journeys to be made by modes other than the private car.	This policy has been deleted as it is too detailed for the Core Strategy. It will instead be a matter for the Generic Development Control Policies DPD
179	The Beaucette Property Portfolio Ltd	PO/179.28	Paragraph 3.8.6 - There is no need for Council to set out circumstances where a lower standard may be appropriate since it is directly related to the ability to access sites by modes other than car. There is therefore no need for a further Generic Development Control Policy.	It has been decided that Parking is a matter too detailed fro the Core Strategy. It is an issue for the Generic Development Control Policy DPD.
179	The Beaucette Property Portfolio Ltd	PO/179.27	This policy is confusing. The policy can be simplified and made consistent with PPG13 as follows: "Parking associated with new developments will have regard to the maximum parking standards and in assessing the	This policy has been deleted as it is too detailed for the Core Strategy. It will instead be a matter for the Generic Development Control Policies DPD

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
184	Hildenborough Medical Group	PO/184.09	<p>appropriate level within these standards, regard will be had to the potential for journeys to be made by modes other than the car."</p> <p>Clarification is required about what 'maximum parking standards' have been adopted by Council. Reference to a 'lower standard' should be replaced by 'another standard' allowing for parking needs to be judged on their merits.</p>	<p>This policy has been deleted as it is too detailed for the Core Strategy. It will instead be a matter for the Generic Development Control Policies DPD</p>

CP32 TRANSPORT SCHEMES

1. OFFICIAL CONSULTEE

62	GOSE	PO/062.19	<p>This is a criteria based policy related to specific uses. It does not lead to any broad locations for development.</p>	<p>This is not a criteria-based policy. It is a high level Core Policy to provide the context for a more detailed safeguarding policy in the Development Allocations DPD. In the submitted version it has been combined with other policies.</p>
----	------	-----------	---	--

5. LAND OWNER

107	H & H Celcon Limited	PO/107.15	<p>Policy fails to explain that land required for the implementation of transport schemes adopted by KCC as Highway Authority may also require enabling development to fund and deliver such transport schemes.</p>	<p>The purpose of this policy (now draft policy CP27) is, in part, to safeguard land required for the implementation of approved transport schemes. It is not the function of the policy to consider how such schemes can be funded. This is a matter for Kent County Council, as Highways Authority, through the Local Transport Plan and not for the Local Development Framework for Tonbridge and Malling Borough.</p>
172	Trenport Investments Ltd	PO/172.10	<p>Regarding the continued safeguarding of land at the Snodland bypass to allow for dualling throughout its length. There is no public funding, no development that would warrant its construction, and traffic generated from Peters Village does not justify implementation of this scheme.</p>	<p>The Snodland Bypass is identified in the Local Transport Plan, and therefore TMBC must safeguard it.</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
6. HOUSE BUILDER				
171	Croudace Homes Ltd	PO/171.08	Support policy principle which safeguards land for the provision of new transport infrastructure to meet the needs of new development. However it fails to safeguard land at Hermitage Lane for a roundabout. At the s.78 inquiry into Land East of Hermitage Lane (July 2002) TMBC accepted the principle and design of the roundabout. To accord with Policy CP32 and to have regard to the allocations of the neighbouring Maidstone Borough Council, the land at Hermitage Lane should be safeguarded for a roundabout to provide primary access to an allocated housing site in the Maidstone area. The key diagram should be altered accordingly.	Support noted. It is not appropriate to safeguard land in the Development Land Allocations DPD for an unadopted highway scheme associated with a proposal that does not yet have planning permission and where the Borough Council is not the planning authority for the development. Furthermore, Maidstone Borough Council (MBC) has resolved not to release Local Plan allocated greenfield sites. This decision was made in the light of PPG3 'Housing' and MBC's Urban Capacity Study (2002) which found that the Council has the ability to meet its housing provisions on identified brownfield sites. For this reason it would be premature to safeguard land for a roundabout to serve a site where there is uncertainty over its release for development. In any case it is not necessary to safeguard a road improvement that can take place entirely on land within highway limits or on land controlled by the applicant in an area where no other prejudicial development would be permitted. Adequate provisions are made in the Maidstone Borough-wide Local Plan (December 2000) to address the access and highways issues associated with the housing allocation at land east of Hermitage Lane, Maidstone in policies H11, T3, T8 and T23 which itself will be the subject of review through the Maidstone LDF process. Any proposal for the development of this site will be judged in the light of the prevailing policies, Government advice and consultation with Kent County Council as the Highway Authority.

CP33 COMMUNITY SERVICES SAFEGUARDING

1. OFFICIAL CONSULTEE

62	GOSE	PO/062.20	This is a criteria based policy related to specific uses. It does not lead to any broad locations for development.	This is not a criteria-based policy. It is a high level Core Policy to provide the context for a more detailed safeguarding policy in the Development Allocations DPD. In the submitted version it has
----	------	-----------	--	--

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
				been combined with other policies.
65	Southern Water	PO/065.05	"services to meet community needs" should include water and wastewater services.	All examples have been removed from the Core Strategy as the list could never be comprehensive.
175	Kent County Council Strategy Division	PO/175.39	Paragraph 3.8.8. The first sentence should be amended to: "For communities to be sustainable, it is desirable for a range of services such as education, libraries, leisure, youth, social and health facilities to be available."	A definition of community services has been added.
223	Kent Police	PO/223.03	Paragraph 3.8.8 - wording should be changed to confirm that the needs of the police and emergency services are considered to be community services that should be available and safeguarded under policy CP33. This is in accordance with the Kent and Medway Structure Plan.	A definition of community services has been added.
6. HOUSE BUILDER				
171	Croudace Homes Ltd	PO/171.09	Support principle of safeguarding land for the provision of services to meet community needs. To accord with this, land at Barming Rail Station should be safeguarded to provide improvements to the station, and a new policy should be included in the Preferred Options Report to safeguard and improve facilities at the Borough's stations. Policies P7/1 and P7/2 recognised the importance of improving facilities at the Borough's railway stations and with safeguarding community facilities, but these have not been carried across into the new Core Strategy.	Support noted. The Barming car park extension is proposed for deletion as a safeguarded site because Network Rail has no proposal to extend the car park. If there is no certainty that the extension will take place during the lifetime of the LDF plan period then it is unrealistic to continue safeguarding the site. Any proposal that comes forward during the lifetime of the plan will be treated on its merits in the light of Government advice and other policies in the various DPDs.

CP34 COMMUNITY FACILITIES PROTECTION

1. OFFICIAL CONSULTEE

60	Sport England South East Region	PO/060.04	Could be interpreted as applying to sports and recreational facilities. Criteria a) and b) do not reflect any national guidance for allowing the loss of sport and recreational	References to viability have been removed. Further changes have also been made in the light of this and other representations.
----	---------------------------------	-----------	---	--

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			<p>facilities. Financial viability should not be a criteria as this is difficult to demonstrate and difficult for the planning authority to assess.</p> <p>Protection of facilities should be based on up to date audits and assessments of provision related to current and projected demands. A facility may be financially unsustainable due to poor management, not because there isn't a demand for facilities. This policy could be used by unscrupulous owners of sites to run down facilities and then seek more profitable uses of a site using criteria (b) in support of a proposal. Criteria (a) is unacceptable as it does not take into account the ability of the alternative facility to accommodate displaced users as a result of a closure of a facility.</p>	
62	GOSE	PO/062.21	This is a criteria based policy related to specific uses. It does not lead to any broad locations for development.	This is an important high level development control policy about the retention of community services and facilities. In the submitted version it has been combined with other polices.
65	Southern Water	PO/065.06	A more detailed DPD should be established regarding the need for a developer to demonstrate adequate odour dispersion if located near to the wastewater treatment works.	This matter is more appropriately covered in the Environmental Protection DPD.
175	Kent County Council Strategy Division	PO/175.41	<p>The policy and text should be expanded to refer to the following:</p> <ul style="list-style-type: none"> * The developer should prove that the existing or past use is no longer required, has been accommodated at an alternative location, or will be provided by at the developers cost in an acceptable form or location to the service provider. * The developer should prove that the building or site is not required for any other community use. * Where there is any reference to financial viability it must be on an open book basis. 	The Policy has been substantially rewritten in the light of this and other representations.
175	Kent County Council Strategy Division	PO/175.40	Paragraph 3.8.9. Second sentence should be amended to: "The Council will require an assessment of the financial viability on an open book basis of retaining the existing use.."	Unnecessary detail for a Core Strategy

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
CP35 RIVERSIDE DEVELOPMENT				
1. OFFICIAL CONSULTEE				
62	GOSE	PO/062.22	This is a criteria based policy related to specific uses. It does not lead to any broad locations for development.	Policy CP35 has been deleted as being too detailed for a Core Strategy. The issue is now covered in more general terms under new Policy CP25.
64	English Nature	PO/064.25	Support policy CP35(b) and (c). Concerned that increased access should not be to the detriment of the biodiversity of the area. Policy should be strengthened as follows: "Provide or improve safe public access to the riverside providing that this does not conflict with the biodiversity interest of the river and its environs."	Policy CP35 has been deleted as being too detailed for a Core Strategy. The issue is now covered in more general terms under new Policy CP25.
78	Kent Wildlife Trust	PO/078.11	CP35 does not accord with PPS9. Subsection (b) should be amended to read "Conserve and enhance biodiversity of the river and its banks."	Policy CP35 has been deleted as being too detailed for a Core Strategy. The issue is now covered in more general terms under new Policy CP25.
91	English Heritage	PO/091.16	While CP35(a) recognises the importance of the riverside environment and (b) protects/enhances biodiversity, the policy should also recognise the archaeological importance of such areas.	Policy CP35 has been deleted as being too detailed for a Core Strategy. The issue is now covered in more general terms under new Policy CP25.
103	Environment Agency	PO/103.13	Wording should be changed to:- (a) Conserve "and" enhance the character of the riverside. (b) Protect "and" enhance the biodiversity of the river and its banks. Welcome the inclusion of criterion (g) which refers to flood risk.	Agree.
5. LAND OWNER				
169	Harvester Trust	PO/169.08	Support for Riverside Development.	Noted.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
179	The Beaucette Property Portfolio Ltd	PO/179.29	It is inappropriate that riverside development "must" meet all of the criteria set out in the policy. Many of these are not matters of fundamental importance. Some criteria provide helpful guidance, but criteria (e), (f), and (g) are inappropriate to provide in a Core Strategy given the advice of PPS12 and the Companion Guide and should be deleted. The policy should be commenced with "Riverside development will be assessed in terms of its contribution to:"	This Policy has been deleted as being too detailed for a Core Strategy. The issue is now covered in more general terms under Policy CP25.
220	Strategic Partners UK Fund I	PO/220.04	CP35 states that development must provide a variety of uses and activities, 2-8 Morley Road, Tonbridge provides an excellent opportunity to deliver a scheme which responds positively to the waterfront, whilst at the same time bringing the site forward for a mixed uses	<p>2-8 Morley Road falls within the Tonbridge Industrial estate which is to be protected for employment use to meet the current and future needs of this part of the Borough. Mixed use redevelopment would only be acceptable if it consisted of B1,B2 and B8 uses.</p> <p>Policy CP35 has been deleted as being too detailed for a Core Strategy. The issue is now covered in more general terms under new Policy CP25.</p>

CP36 RURAL DIVERSIFICATION

1. OFFICIAL CONSULTEE

62	GOSE	PO/062.23	This is a criteria based policy related to specific uses. It does not lead to any broad locations for development.	In the submitted version this policy has been deleted, though some elements have been incorporated in the general policy on development in the Countryside.
----	------	-----------	--	---

2. PARISH COUNCIL

81	Wrotham Parish Council	PO/081.08	Needs to be refined to prevent ad hoc development where farm buildings have become separated from the land to which they previously related and to define viable.	These are detailed matters which are not appropriate to a core policy and which should be considered in the Generic Development Control Policies DPD.
100	Ightham Parish Council	PO/100.10	Would assist farmers to diversify with new rural enterprises. There also needs to be criteria that determines what a farm is	This is too detailed for the Core Strategy, and is a matter for the Generic Development Control policies DPD.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			and what a farmhouse with a remnant of former land is.	
			7. PUBLIC	
248	Mrs F R D Chartres	PO/248.01	The policy does not allow for the development of self-catered tourist accommodation associated with farm diversification and the reference in the policy to "very" special circumstances in the Green Belt should be deleted.	The wording of the part of the policy relating to Green Belt development is in accordance with PPG2. However, the whole Policy has been deleted as being too detailed for the Core Strategy. Some elements have been included in new Policy CP15 dealing with Development in the Countryside.

CP37 TOURISM DEVELOPMENT

			3. INTEREST GROUP	
157	National Trust	PO/157.05	Not all tourism development will support rural diversification, e.g. non-farm based tourism such as improved visitor facilities at an established tourism attraction. This sub-paragraph should be deleted.	This Policy has been deleted as being too detailed for the Core Strategy.
157	National Trust	PO/157.04	Unsure what 'strategy for sustainable visitor management' means. Needs further clarification.	This Policy has been deleted as being too detailed for the Core Strategy.

CP38 PUBLIC REALM

			1. OFFICIAL CONSULTEE	
60	Sport England South East Region	PO/060.06	Broadly reflects Sport England's own Playing Fields policies. Refers to an Open Space Strategy to assess the levels of new open space provision to meet the needs of new developments.	This Policy has been deleted as being too detailed for the Core Strategy. The main elements have been incorporated in new Policies CP1 and CP25.
64	English Nature	PO/064.26	CP38(a). Reference should be made to the provision of natural greenspace or local nature reserves due to their role in delivering sustainable communities. Suggest the policy is	This Policy has been deleted as being too detailed for the Core Strategy. The main elements have been incorporated in new Policies CP1 and CP25.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			strengthened as follows: "Protect, and wherever possible, enhance existing open spaces, and ensure that new provision is made to meet the future needs of the Borough in accordance with an Open Space Strategy including natural greenspace and local nature reserves."	
2. PARISH COUNCIL				
16	Plaxtol Parish Council	PO/016.03	Endorses this policy wholeheartedly.	Noted but this Policy has been deleted as being too detailed for the Core Strategy. The main elements have been incorporated in new Policies CP1 and CP25.

xx GENERAL xx

1. OFFICIAL CONSULTEE				
69	Highways Agency	PO/069.25	The M2 Motorway should be coloured blue on the Key Diagram.	Agree.
158	South East England Regional Assembly	PO/158.01	Reminder that the development plan documents should be in general conformity with the current Regional Spatial Strategy (RPG9) and take account of the emerging Draft South East Plan, Part I (Core Regional Policies).	The LDF is being prepared in accordance with the evolving South East Plan.
3. INTEREST GROUP				
4	Theatres Trust	PO/004.01	Concerned at lack of reference to cultural activities in general and the performing arts in particular. Surprised that reference to the Kent Cultural Strategy, Borough Leisure Strategy and the Local Cultural Strategy are not developed into a policy link for the Core strategy.	It is not the role of the Core Strategy to replicate the policies contained in other strategies. It focuses on the spatial elements of those strategies.
139	The Garden History Society	PO/139.01	Seeks assurance that the Local Development Framework will contain policies to give protection to sites on the English	Noted. This is a matter that will be dealt with in the Environmental Protection DPD in the second tranche of the LDF.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
			Heritage Register of Parks and Gardens of Special Historic Interest and the local list of historic designated landscapes including public parks, cemeteries and gardens so that their character, appearance, setting and features can be safeguarded for the future.	
139	The Garden History Society	PO/139.02	Seek to ensure that Policy on the protection of Historic Parks and Gardens should indicate that there is a presumption against enabling development to accord with the English Heritage Policy Statement 'Enabling Development and the Conservation of Historic Assets'.	Noted. This is a matter to be addressed through the Second Tranche of DPDs in the Environmental Protection DPD.
xx NEW xx				
1. OFFICIAL CONSULTEE				
78	Kent Wildlife Trust	PO/078.02	The preferred options report should contain explicit policies protecting designated wildlife sites and ancient woodlands. The Kent and Medway Structure Plan includes policies on these issues (policies E6, E7 and E9) that could be adopted as core policies in the LDF.	Detailed policies regarding wildlife sites and ancient woodlands will be prepared as part of the Environmental Protection DPD.
175	Kent County Council Strategy Division	PO/175.47	There is only one specific mention of Public Rights of Way in the core strategy document (paragraph 3.8.13). With the increasing pressure of development in Kent it is vitally important that the basis for negotiating improvements to the PROW network, be they diversions, creations, or surface improvements, is made as robust as possible. The LDF should therefore provide a policy basis in order for the aspirations of the Rights of Way Improvement Plan to be implemented. A policy should be included which reflects the wording of KMSP Policy QL18, along with wording that reflects the need to achieve this in conjunction with the local highway authority through their Rights of Way Improvement Plan.	This is too detailed for the Core Strategy, but is possibly a matter for the Generic Development Control Policies DPD.

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
175	Kent County Council Strategy Division	PO/175.48	<p>A policy should be included setting out the detailed methodology for seeking development contributions. This may be more appropriate within the Generic Development Control Policies DPD supported by a more detailed SPD. It should demonstrate the methodology and forecasting approach used to assess requirements. Guidance should be given on the size of facilities required to serve specific developments, and consideration should be given to the scope to co-locate services e.g. Health and Social Care Centres or the Life Long Learning Centres. The facilities that should be taken into account include:</p> <ul style="list-style-type: none">* Education including nursery, primary, secondary, higher and further education* Health* Social care* Youth* Libraries* Play, recreation and sport facilities* Adult education* Art including public art* Informal community facilities e.g. community halls* Cultural facilities* Facilities for voluntary groups* Religious facilities* Transport* Environmental improvements* Utilities* Police, Fire and Ambulance. <p>It should be set out how development contributions will be calculated and be clear how costs will be apportioned where facilities are required to serve a number of different developments or to in part respond to existing demands. Further advice on this specific issue can be obtained from Paul Campion on 01622 221346.</p>	<p>A high level Policy on mitigation is included in the Core Strategy to provide a context for either a more detailed policy in the Generic Development Control Policies DPD or in a Supplementary Planning Document.</p>
175	Kent County	PO/175.46	<p>There is no specific policy relating to the historic environment.</p>	<p>The need for new developments to consider archaeology, historic</p>

CORE STRATEGY

REF	RESPONDENT	REP	REPRESENTATION	RESPONSE
	Council Strategy Division		Guidance on the need for new developments to consider archaeology, historic buildings and historic landscapes would be welcomed. There needs to be appropriate assessment of the impact of the new development on the historic environment resource and provision for suitable mitigation, including preservation in situ, conservation and wherever possible enhancement. Kent and Medway Structure Plan policies QL8-QL10 provide a possible framework.	buildings and historic landscapes is a matter for the Environmental Protection DPD. Mitigation is covered by the Core Strategy.
3. INTEREST GROUP				
237	Mobile Operators Association	PO/237.01	There is a requirement to include a criteria based policy for telecommunications development in accordance with PPG8.	This will be a matter for the Generic Development Control Policies Development Plan Document.
259	National Offender Management Service	PO/259.01	It should include a criteria based policy to deal with a firm prison proposal should it arise during the plan period.	There is no need for the inclusion of such a policy. Any proposal for a prison would be dealt with on its merits in accordance with the core policies contained in the strategy.
7. PUBLIC				
282	Mr Tim Lynch	PO/282.05	Land between Pembury Road and Woodgate Way, including the grounds of Weald of Kent School, should remain undeveloped and within the Green Belt.	Noted.