

Respondent ID	Agent ID	Document Part Name	Comment (plain text)	TMBC Response
45175233	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	I think that it makes sense to build new homes in the built up areas of the Borough, where there is existing infrastructure, including roads, transport, shops, GP surgeries and schools to cope with the increase in residents. I therefore would support the plan to build houses in and around local towns, brown field sites and rural hubs with transport links rather than encroaching on our rural villages.	Comment and support for location in built up areas noted.
42743009	0	4.3.1 - 4.3.3	The number and size of sites is focussed on the NE corner of the borough, which already bears the development burden unfairly, bringing with it all the problems of inadequate support services. I understand that an examination of TMBC planning records reveals that, in recent years, nearly 60% of housing development has occurred on just 1% of the current Tonbridge and Malling Borough and that is all with one mile of West Malling/Kings Hill. The burden should be shouldered more fairly across the whole borough, instead of cramming in more and more development in this unsustainable way and sacrificing the surrounding rural environment just because it is adjacent to existing housing estates. People living in the north of the borough deserve to live in healthy and protected environments just as much as those in the south of the borough.	Comment emphasising a need for more equal distribution of housing noted.
45368993	0	4.1.1 - 4.1.3, Figure 2	<p>Reply: It is my view that services are most definitely saturated,</p> <p>(a) Doctor appointments very difficult to obtain. Note Leybourne Chase new Doctors surgery not taken up by NHS therefore stretching the existing capacity to breaking point.</p> <p>(b) local Schools are at capacity.</p> <p>(c) The A&E at Maidstone Hospital is under sized and not fit for purpose. The route to Maidstone Hospital is frequently blocked along London Road.</p> <p>(d) These issues will be exacerbated by the recent approval to build another 250 homes on forty acre fields. The approval of this development already indicates the Leybourne area to have provided sufficient additional development within the Local Plan. Any increase over and above forty acre fields will indicate Leybourne to be providing an unfair amount of additional housing, arguably Leybourne area has already met its obligation to provide sites with the approval of forty acre fields.</p> <p>Q2. Can local infrastructure accept more development?</p> <p>Reply:</p> <p>The local infrastructure is already at capacity, roads are at capacity.</p> <p>The Leybourne Sewage system is frequently emitting odours as it is overloaded to its Original Design capacity. Any new housing will mean the existing Leybourne sewage system will require consultancy surveys potentially leading to the re-laying of the sewage system. This is a serious Health and Safety concern.</p> <p>The expansion of housing onto areas of Green fields in the Leybourne area will be contrary to the ORIGINAL Planning consents which called for specific levels of green areas to be maintained.</p>	Comment in relation to infrastructure provision in Leybourne noted. This matter will be considered and reflected within the new Infrastructure Delivery Plan and other evidence being prepared to support plan preparation.
44546305	44546401	4.1.1 - 4.1.3, Figure 2	<p>[59874]</p> <p>Snodland is currently identified as a Tier 1 Settlement in the existing settlement hierarchy and is therefore considered to be a sustainable location to accommodate growth. Snodland is a constrained settlement, namely, AONB and an extended area of Green Belt to the west; Green Belt to the north, and, a Strategic Gap and Flood Zone 3 to the east and south. Therefore, the submitted site is a logical, sustainable and relatively unconstrained extension to Snodland in the context of these natural and physical constraints.</p> <p>The existing settlement hierarchy in the adopted Development Plan is sound and accords with Central Government Guidance. It is important to focus growth from this sound basis.</p> <p>We consider that spatial strategy options 2, 3 and 4 as put forward in the Regulation 18 Consultation are the most sustainable and deliverable. The main settlements in the borough are highly sustainable in that they have a variety of transport options, service facilities, employment opportunities and social infrastructure. It is important that growth is delivered in sustainable ways and therefore these settlements therefore provide the most sustainable options for growth.</p> <p>Making the most of brownfield land and appropriate greenfield sites around the edges of the settlements is a sustainable approach. There are sites, such as Kitewood's land to the west of Hays Road in Snodland, which would deliver sustainable development and which do not perform soundly against green belt purposes. In such circumstances such land should be removed from the green belt to fulfil development needs in the borough.</p> <p>Arup's report 'Stage 2 Green Belt Assessment Exceptional Circumstances (Strategic) Note' prepared for Tonbridge and Malling Council in July 2022 notes that the 'demand for housing is high and growing, it is also geographically spread across the Borough. There is currently a significant undersupply of homes in the Borough, and this appears to be worsening.' However it explains that the Green Belt boundary is tightly drawn around the existing settlements in the Borough, minimising the potential for the settlements to accommodate growth over the long-term without alterations to the existing Green Belt boundaries. It concludes that these factors support 'the case that exceptional circumstances exist which justify alterations to the Green Belt boundary'.</p>	Comment in relation to Snodland's role in the settlement hierarchy noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document.
42822561	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	No option addresses the climate change agenda. None of the strategy options fit the bill without adding in further safeguards (to AONB especially). I disagree with the presumption of the definition of Rural Service Centres (see earlier comments), so Option 3 is not an option. Option 4 has some merit as some housing is needed in some of the village settlements, but in the absence of any detailed plans for the provision of supporting infrastructure, Green Belt and AONB protections could not be recommended. The climate change agenda must be addressed for all options.	Comment in relation to the climate change agenda noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.
25366913	25366913	4.1.1 - 4.1.3, Figure 2	3.1 Berkeley supports the retention of the settlement hierarchy and suggests that it is an appropriate starting point to inform the spatial strategy for the Local Plan 2040.	Comment including support for the settlement hierarchy noted. This matter relates to the established settlement hierarchy, based on past approach and evidence. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy.
42716705	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	All proposals seem to allow for the further development of Kings Hill / Broadwater Farm, neither of which we support.	Comment noted
43113921	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>Please do not go ahead with this ridiculous plan for a 3,000+ mass housing estate.</p> <p>We cannot have our Green Belt and AONB and our homes and lives ruined by this outrageous greed and desire to concrete over our lives and the soul of this beautiful area.</p> <p>There is no infrastructure for such a hideous plan and our roads are already far too busy.</p> <p>A start might be to create the J5 slip roads. But that would just be a start because without them the county will just grind to a halt very soon.</p> <p>Only then can you contemplate building hospitals, primary and secondary schools, medical centres and shopping areas before you build homes.</p> <p>May your individual consciences guide you.</p>	Comment noted, including need for infrastructure support.
42642785	0	4.3.1 - 4.3.3	I've added comments on the appendix B sections which are relevant to where I live. Any development sites should be considered as previously set out for their easy access to public transport links and medical / education facilities. Building in rural locations will not offer these essential services. Not everyone owns a car. Not everyone can walk miles (particularly on dark unlit roads in rural settings in winter. It is essential that if you are going to build in rural areas that bus/transport links are reinstated.	Comment noted, including need for infrastructure support.
43313313	0	4.2.13-4.2.18 & Q5-6	<p>Question 5 & 6</p> <p>It is quite clear we are abysmally short of housing throughout the entire country but the South East is already densely overpopulated. We need to increase housing here, but also ensure the proportion added in other areas is larger to achieve the planned levelling up across the UK.</p> <p>Q.2. Do you agree that this settlement hierarchy should be retained and inform the spatial strategy for the Local Plan? Yes/No Please explain</p> <p>Yes, we agree that the settlement hierarchy is important, and it is in the interests of good planning to locate as much new development as possible towards the higher order settlements.</p> <p>It must also be recognised that lower order settlements and indeed some rural areas outside of settlements can be improved and enhanced in terms of their overall sustainability by accommodating new development there, and therefore it cannot be said that all development must adhere to the settlement hierarchy; there must be allowances for exceptions.</p> <p>Unfortunately we wont be able to attend this meeting but would like to express our views.</p> <p>In order to reach the target numbers there should be a focus on small projects on legitimate brown field sites. Not those where previous planning conditions have stipulated that sites be restored to green fields.</p> <p>Smaller developments would give local benefits in that smaller developments are more likely to use small local building firms rather than national companies that have a track record of shoddy workmanship. These should be spread throughout the whole of Tonbridge and Malling and not just pushed to the periphery as the last local plan did. Such a wide distribution will ensure that any negative impact or strains on local services are diminished and shared equitably.</p> <p>We hope you are happy for us to express our views by email and you can use this email however you wish</p>	Comment noted, including regional issues.
43548193	38432225	4.1.1 - 4.1.3, Figure 2	<p>Q.2. Do you agree that this settlement hierarchy should be retained and inform the spatial strategy for the Local Plan? Yes/No Please explain</p> <p>Yes, we agree that the settlement hierarchy is important, and it is in the interests of good planning to locate as much new development as possible towards the higher order settlements.</p> <p>It must also be recognised that lower order settlements and indeed some rural areas outside of settlements can be improved and enhanced in terms of their overall sustainability by accommodating new development there, and therefore it cannot be said that all development must adhere to the settlement hierarchy; there must be allowances for exceptions.</p> <p>Unfortunately we wont be able to attend this meeting but would like to express our views.</p> <p>In order to reach the target numbers there should be a focus on small projects on legitimate brown field sites. Not those where previous planning conditions have stipulated that sites be restored to green fields.</p> <p>Smaller developments would give local benefits in that smaller developments are more likely to use small local building firms rather than national companies that have a track record of shoddy workmanship. These should be spread throughout the whole of Tonbridge and Malling and not just pushed to the periphery as the last local plan did. Such a wide distribution will ensure that any negative impact or strains on local services are diminished and shared equitably.</p> <p>We hope you are happy for us to express our views by email and you can use this email however you wish</p>	Comment noted, including support for local development towards highest tier settlements. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document.
42675809	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	The problem with developing in the rural areas as seen with Kings Hill, small developments overtime become urban areas and the roads, facilities such as schools, doctors etc, cannot cope with the increased population.	Comment noted, including support for small site development.
42822017	0	4.1.1 - 4.1.3, Figure 2	Yes	Comment noted.
42831809	0	4.1.1 - 4.1.3, Figure 2	Yes	Comment noted.
44131329	0	4.1.1 - 4.1.3, Figure 2	Paragraph 4.2.1 - we take issue with the wording 'as far as possible' in this paragraph. Special Areas of Conservation, Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty and Ancient Woodland all have the strongest level of policy and / or legislative protection and development should simply avoid them (major development in the case of AONBs).	Comment noted.
42755105	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Feel concerned that the Settlement confines seem to disappear with later plans. I feel that eventually the settlements could join together and we lose the open nature of the Borough. With the acknowledged need for homes I fear this is a real possibility.	Comment noted.
42832193	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Woudham has no bus service, traffic through the village is eye watering, why isn't Woudham in the green belt, it should be. it's unuse at Otfield there's a bus service 400 m away, we have no bus service here. parking is unacceptable, it's so bad	Comment noted.

			<p>infrastructure problems already within the borough.</p> <p>Plan Appendix A makes it obvious that unfair priority of quality of life has been consistently given to the south, south west and west and north west of the borough at the great expense of living standards in the north, north east, east and south east, which includes where I live in East Malling.</p> <p>This village has already changed beyond recognition, together with West Malling, as a result primarily of the Kings Hill original brownfield boundaries being consistently and progressively ignored by planning approvals.</p> <p>I see it in the daily mental confusion and anger of residents caused by infrastructure not coping with the last 30 years development in this part of the borough.</p> <p>This imbalance MUST BE ADDRESSED at last by some sort of protection by green belt extension to prevent coalescence into some sort of amorphous sprawl between West/East Malling/Wateringbury/Teston/Kings Hill and the rejection of Site 59740 in particular.</p> <p>I have calculated that these are the hectares of development proposed in the plan by May 23 ward and area of the borough:</p> <p>(I have a spreadsheet to support this. If you would like it please let me know).</p> <p>Area Hectares of development Percentage of total 3,696.95</p>	Comment noted.
42738689	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Quantum plus 10%. Potentially this will identify the area situated between the Medway Gap and Kings Hill incorporating East Malling and Ditton to increase in size!	Comment noted.
36594049	0	4.2.13-4.2.18 & QS-6	The classification process does not seem to have considered the "value" particularly of local amenity land. All of the sites identified in Leybourne are amenity and these small green spaces provide a highly valued breathing space in an otherwise high density residential area. All areas should therefore be subjectively assessed for their intrinsic value to the local community.	Comment noted.
42720001	0	4.3.1 - 4.3.3	The plan should not add to the existing developed areas of Kings Hill, its been planned and sold as such and should not be cramped. This would be against your objectives. Also the golf course was part of the original plan, it provides employment and recreational activity and should not be touched as it takes away a facility.	Comment noted.
42729441	0	4.3.1 - 4.3.3	Sustainability	Comment noted.
43417889	0	4.3.1 - 4.3.3	I do not agree with the sustainability report. Most of it makes no sense at all.	Comment noted.
42353345	0	4.1.1 - 4.1.3, Figure 2	Your hierarchy of settlements ignores the fact that people travelling between settlements must pass through the Rural Areas. Developments in Rural Service Centres impact Rural Areas. Rural Service Centres need sustainable transport if they are not to destroy the countryside around them.	Comment noted.
42438689	0	4.1.1 - 4.1.3, Figure 2	Great use of words that nobody can understand. It seems that money talks and it matters not what local people think, it would have been kinder and more honest to include actual planned or proposed projects. The above tells me nothing. Reduction in HGV traffic through borough Green would be a good start and an enforced speed limit in the main town rather than police hiding in a van outside would be sensible. Station Road should also have speed bumps as motorists fly down at speed. It won't be long before someone is seriously injured or killed in that Road.	Comment noted.
42442529	0	4.1.1 - 4.1.3, Figure 2	There are no significant employment opportunities in Wateringbury, being a relatively small village, and any proposed developments would increase traffic significantly. Traffic already queues at rush hour times along the A26, in Red Hill and Bow Road as the village is a main route from outlying areas to the main towns. The air quality at the crossroads and approaching roads is already excessive because of the volume of traffic and this will only be exacerbated.	Comment noted.
42489313	0	4.1.1 - 4.1.3, Figure 2	With regard to the Local Plan, this email is to state I totally object to any building on the green belt in tonbridge & Malling. The area has already become suburbanised by recent developments allowed.	Comment noted.
42557441	0	4.1.1 - 4.1.3, Figure 2	All building should be in towns where shops and services are. I would be in agreement with building on the Celcon site if it is vacated.	Comment noted.
42590561	0	4.1.1 - 4.1.3, Figure 2	Practical, simple, high level categorization of the settlements of the borough.	Comment noted.
42401953	0	4.1.1 - 4.1.3, Figure 2	Rural Service Centres are not thriving as they should. For example, West Malling has lost important local services such as GP surgery and bank and doesn't have a post office. Hadlow no longer has a butcher or grocer, would sympathetic housing development in the increasingly impoverished service provision encourage such services to return?	Comment noted.
42646849	0	4.1.1 - 4.1.3, Figure 2	This plan is absolutely ridiculous - these fields are arable, and should not be built on. They are, on my deeds, listed as green belt - I have never been informed that they are not!	Comment noted.
42617505	0	4.1.1 - 4.1.3, Figure 2	Our address in Matthew's Lane is Hadlow, however we are in a rural area closer in character to West Peckham. The specific area we are in I would class as Rural Settlement or even just Rural. The closest house to us being 250 yards away, the next one maybe 500 yards away.	Comment noted.
42727271	0	4.1.1 - 4.1.3, Figure 2	'.....because they contain an array of services including schools, shops and healthcare.....' Ditton Edge?	Comment noted.
42744961	0	4.1.1 - 4.1.3, Figure 2	A disaster in the making (building)	Comment noted.
42755105	0	4.1.1 - 4.1.3, Figure 2	Should avoid urban sprawl into greenbelt areas	Comment noted.
42794625	0	4.1.1 - 4.1.3, Figure 2	All are equally important	Comment noted.
42720897	0	4.1.1 - 4.1.3, Figure 2	Concerned that the Rural Settlements just spread further and further with little attention to the infrastructure and lives of people already settled.	Comment noted.
42802977	0	4.1.1 - 4.1.3, Figure 2	No comment	Comment noted.
42806945	0	4.1.1 - 4.1.3, Figure 2	The proposals for the land between Wateringbury and Mereworth show vast numbers of houses which does not fit with 4.1.2 as most of the are set up for development is between the villages and is rural where the plan days development has been restricted. The proposals for this area are in direct opposition to the sums of the plan.	Comment noted.
42832193	0	4.1.1 - 4.1.3, Figure 2	This list encapsulates the feel of the borough, and the preservation of these individual areas is important to the benefit of it, and to prevent it sliding into an urban sprawl.	Comment noted.
42832833	42826433	4.1.1 - 4.1.3, Figure 2	The list of Other Rural Settlements includes Fairseat, which is a hamlet of and part of the parish of Stanstead which is not mentioned! The fact that there are some fields between the houses which mainly make up Fairseat and that the houses in Stanstead tend to be more widely spaced is not relevant. What facilities Fairseat residents enjoy are to a large extent in Stanstead - for instance the church and the pub.	Comment noted.
43884609	0	4.1.1 - 4.1.3, Figure 2	Wouldham has no bus service, parking is awful. Many houses have been built here already. traffic has increased due to the bridge being built at Peters village plus over a 1,000 houses. As a village we don't want or need anymore houses	Comment noted.
44634401	0	4.1.1 - 4.1.3, Figure 2	Q.2. Do you agree that this settlement hierarchy should be retained and inform the spatial strategy for the Local Plan? Yes/No Please explain	Comment noted.
44951137	0	4.1.1 - 4.1.3, Figure 2	Whilst we agree with the Existing Settlement Hierarchy, in accordance with the NPPF (paragraph 79), "planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services." This is particularly the case for the village of Crouch.	Comment noted.
46022337	0	4.1.1 - 4.1.3, Figure 2	The Regulation 18 Plan identifies 5 different growth scenarios in order to meet the aforementioned need, which include delivery of growth within the existing settlement areas but beyond the Green Belt and AONB boundaries (Option 1), the use of greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements, as well as adjacent to these settlements (Option 4), as well as identifying an option which would see potential new settlement/s remote from existing towns and villages (Option 5).	Comment noted.
42144545	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Comment on diagram	Comment noted.
42441153	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	As before E. Peckham and Hadlow are not rural centres. They are backwaters compared to B. Green, West Malling and Hildenborough all of whom have train stations. E. Peckham has a by pass and Hadlow the A26 running through it and it shakes as the arctic drive through it.	Comment noted.
42443329	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Finally I object to Kings Hill being classified as an urban settlement as it does not have the facilities to support this status, current residents can barely get a doctors appointment as it is.	Comment noted.
42442561	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	*image*	Comment noted.
42471041	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	The first thing that should be considered before planning of any new housing is that they not be allowed to build on floodplain's or sites of AONB. Are 'assessed needs' a national government arbitrary number to meet policy? No consideration of local circumstances and feelings?	Comment noted.
42541281	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Keep Development in areas that are already urban. Utter nonsense to ruin our villages.	Comment noted.
42556065	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Current residents are unable to register with doctors & dentists- where would new residents register?	Comment noted.
42199073	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Kings Hill is overdeveloped and has historically born too much demand. The strategy needs to be reviewed.	Comment noted.
42401953	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	It would be useful if the same key could be used for each option. I.e so it is clear which options involve building in green belt land	Comment noted.
42657345	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Option 1 - Too much development has been concentrated in the northern part of the Borough - more will happen in this area whilst the Council does not have an up to date local plan - the road infrastructure and services cannot cope with any more	Comment noted.
42368129	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Options 2 and 3 - more realistic - growth needs to focus in the Tonbridge area	Comment noted.
44951137	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Options 4 and 5 - stupid to develop in rural areas with no sustainable transport links, infrastructure or services to cope	Comment noted.
42424561	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	This proposal is ludicrous! It would destroy the fabric of our rural society.	Comment noted.
42199073	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	The majority of for sustainability appraisal objectives for Sites 59797 and 598000 have not been considered properly and contain factual error.	Comment noted.
42401953	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Need to avoid urban creep. Once green belt and AONB are encroached upon it is the thin end of the wedge	Comment noted.
42657345	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Non of these - we need our agricultural land and our green spaces	Comment noted.
42368129	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	I strongly believe that housing development in the area should avoid AONB and Green Belt land	Comment noted.
44951137	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Green Belt is sacrosanct and cannot be swapped for areas elsewhere	Comment noted.
42368129	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	The new Prime Minister says there is sufficient brown field sites so use them	Comment noted.
44951137	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	*image*	Comment noted.

			<p>Kings Hill</p> <p>Existing Conservation and green spaces protected, including woodland and natural habitats which all residents enjoy. Many moved here because of our semi rural surroundings.</p> <p>Kings Hill has expanded greatly and any future expansion will spoil the ethos of development.</p> <p>Overdevelopment! - Leading to loss of existing green spaces, natural habitats, bridle paths and woodlands.</p> <p>Turning into one large car park.</p> <p>Losing our semi rural status.</p> <p>Would require larger medical facilities.</p> <p>Protect Green belt. Concerned that houses being built on Green belt.</p>	
45480129		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.		Comment noted.
42584097		0 4.2.13-4.2.18 & Q5-6	Try explaining questions better to a lay person far too complicated	Comment noted.
42616033		0 4.2.13-4.2.18 & Q5-6	Kings Hill is over developed and cannot support further over development In the case of Tonbridge & Malling borough these needs are 839 dwellings per annum or 15,941 dwellings (gross).....	Comment noted.
42617505		0 4.2.13-4.2.18 & Q5-6	Who says? Who is doing the maths on just what the needs are for the UK housing wise? There are many many arguments that this is NOT the best way forward.	Comment noted.
42722309		0 4.2.13-4.2.18 & Q5-6	A robust challenge of the target set for the borough is needed. The target should relate to the needs of the area rather than an arbitrary target	Comment noted.
42722305		0 4.2.13-4.2.18 & Q5-6	not qualified to answer this question	Comment noted.
38539137		0 4.2.13-4.2.18 & Q5-6	This text is almost unintelligible. What on earth do you expect people to answer? 4.2.14 Need appears to be higher than realistic given low level of homelessness in the borough and also given the house building capacity in the country looking at new developments in the past decade.	Comment noted.
42641505		0 4.2.13-4.2.18 & Q5-6	4.2.15 "capacity of the housing market to absorb growth" have falling birthrates and reduced immigration been taken into account? Given that the levels of homelessness in the country and Borough are low, the proposed numbers of housing seem disproportionate and designed to favour building firms not the Borough population. The impact of the two neighbouring Housing Market Areas, and that of our proximity to London are noted but need to be actively challenged. The degree of crowding, air and light pollution caused by excessive development in rural areas will only worsen if this (and other similar) area(s) is required to absorb overflow from other areas.	Comment noted.
42815521		0 4.2.13-4.2.18 & Q5-6	There need to be active incentives for economic growth to be shared outside the crowded SE corner of the UK - including supply of housing. Following our village meeting yesterday evening with Matt Boughton regarding the local plan, I would like to submit the following comments.	Comment noted.
45175233		0 4.2.13-4.2.18 & Q5-6	I support the council in believing that our target for building 839 new homes each year is excessive, particularly as 71% of our land is greenbelt. I believe that the council should continue to lobby the Government about reducing this number as Rishi Sunak has recently stated that the Government intends to protect the green belt.	Comment noted.
42038785		0 4.3.1 - 4.3.3	There are too many here, and too many are red herrings. Please can we have a list that only includes sites likely to be shortlisted.	Comment noted.
38779009		0 4.3.1 - 4.3.3		Comment noted.
42038785		0 4.3.1 - 4.3.3	Close to the M2, M20 or A21 corridors.	Comment noted.
42224609		0 4.3.1 - 4.3.3	Only to say that, wherever possible both Green Belt and A50NB should be actively protected. I support core strategy 1.	Comment noted.
42588097		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Core strategy 3 and possibly 2, serves to destroy villages/rural communities. It is unlikely provision of services will be increased in all areas so this would mean increased demand on schools, roads, GPs, water, electricity etc that are already stretched with I imagine very little change in infrastructure. Green belt needs to be protected.	Support for Option 1 and reasoning noted.
42335569		0 4.3.1 - 4.3.3	Council, Landowners and developers need to be creative in utilising under used sites which already have development on them. For example building above railway car parks (with car spaces on ground floor) and soon to be redundant office buildings.	Comment noted.
42362561		0 4.3.1 - 4.3.3	We cannot sustain anymore mass building developments!! It's already overcrowded here!!	Comment noted.
25406913	25406817	4.1.1 - 4.1.3, Figure 2	It is considered that there will be no single spatial option that should be pursued. The intensification/densification option must be considered to accord with national guidance (on the reuse of previously developed land and before land is released from the Green Belt) but it will not deliver sufficient quantities of land to meet the required development needs. The intensification option is also likely to be limited in historic city and town centres where historic assets will need to be protected. It is also likely that there will be infrastructure capacity issues associated with significant levels of new development within existing settlements e.g. schools and health services already at capacity with limited scope to expand. The likely yield from this land source must be rigorously tested to make sure it is reliable for development and not over-stated. A mixed spatial option is likely to be the most sustainable and deliverable option. FECL consider that should first establish the capacity of the main towns to accommodate further expansion and focus on extending existing urban areas in locations where new communities can enhance and improve infrastructure provision and create sustainable communities. This should also prioritise the best-connected places to maximise and improve the existing infrastructure where available. This must include a focus on Tonbridge as a priority to reflect its role as the largest settlement and its location in the southern HMA. Beyond this, and depending on the scale of growth to be accommodated, FECL support some dispersed growth in villages where there is identified needs before new standalone settlements are considered. We set out our comments on each option and why some should not be progressed: Spatial Option 1. This approach will not achieve a distribution of growth across the district. It does not offer a choice of homes in different locations. It runs the risk of further expanding the affordability gap between the north and south of the district. Critically, it would ignore the main town of Tonbridge. There is an important distinction to draw between the Green Belt and the AONB when considering the spatial strategy options. These two designations should not be linked in importance or when considering impacts of development. The AONB should be protected from development that would detract from its special qualities. The Green Belt function is different as it is not a landscape quality policy. It must be reviewed to make sure the boundaries are suitably drawn and remain the most relevant whilst achieving sustainable development. As the majority of the land in the district is within Green Belt, it is necessary to undertake thorough urban capacity testing to demonstrate that exceptional circumstances existed to release GB land or safeguard land through that process. The early work that has been undertaken as part of the evidence gathering acknowledges that there is insufficient urban and brownfield sites to accommodate all the growth requirements to 2040. Spatial options 2 and 3 recognise the need to include greenfield land and we support the Councils case that exceptional circumstances exist to consider Green Belt release as an essential part of the final strategy. No matter what development comes out of this please take account of current rural villages, a better infrastructure regarding parking on new developments, solar panels etc	Comments on each of the proposed spatial options noted. Further work is being undertaken to refine and define the proposed spatial strategies, taking into account consultation responses, site availability and suitability and national planning policy and guidance. Key considerations within this will also be the outcomes of the sustainability appraisal report and the housing market delivery study in relation to demand and locations of. This will be reflected within the next Regulation 18 document.
42026081		0 4.3.1 - 4.3.3		Comment noted.
42197121		0 4.3.1 - 4.3.3	The list of sites are a complete mess and it makes this consultation process very difficult. The council should have set out the pros and cons of viable options.	Comment noted.
42442529		0 4.3.1 - 4.3.3	Outside of small villages that are already blighted by congestion from through traffic.	Comment noted.
39011745		0 4.3.1 - 4.3.3	Many of the sites are clearly unsuitable, being Ancient Woodland, AONB, in a Flood Zone 3 areas. It is ridiculous that these sites have not been identified as low probability sites with such considerations being outside the consideration for sustainability. This makes it very difficult for the public to respond on relevant sites, wasting a lot of time and reducing the chances of appropriate feedback on sites that are actually in-scope for consideration.	Comment noted.
42603521		0 4.3.1 - 4.3.3	Please do not build on open green spaces such as parks and golf courses. Use previously developed land. Stop carving up green spaces for houses.	Comment noted.
42616033		0 4.3.1 - 4.3.3	In areas which can support development need	Comment noted.
42614913		0 4.3.1 - 4.3.3	In order to properly answer Q7 a link should be provided here to the Sustainability Appraisal Report (2022). The reader of this consultation paper is required to search for the reference section on which the question is being asked. Why? 1.2.5 The existing settlement hierarchy is outlined in figure 2 of the consultation document. However, the pattern of development was largely derived on a historic basis and settlement functions that pre-dates modern planning. Accordingly, sites should be based on their merits based on a bespoke assessment. 1.2.6 A range of site locations and options are needed and the National Planning Policy Framework (NPPF) promotes balance. Whilst paragraph 73 is clear that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, para 69 acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and so at least 10% of their housing requirement should be met on sites, no larger than one hectare. Our client's land represents such an opportunity and is a natural extension to a well-established scheme the allocation of which would help safeguard more sensitive undeveloped sites. 1.2.7 In considering development options, we agree that the plan must seek to balance the need to support sustainable patterns of growth with the need to protect natural and heritage assets as far as possible. However, the scale of growth is unprecedented and so the only absolute constraints should be on areas of Special Areas of Conservation, Sites of Special Scientific Interest, Ancient Woodland, Listed Buildings and Scheduled Monuments. 1.2.8 Policy support for development in the Green Belt and within the Area of Outstanding Natural Beauty (under exceptional circumstances) clearly exists. How should development be distributed across the borough? 1.2.9 Having regard to the identified development needs of the area, the constraints in the borough and the two HMAs, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below. Option 1 1.2.10 Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape. 1.2.11 For the reasons outlined above we fundamentally object to the notion that Green Belt should not be released. If one looks at the settlement hierarchy, Tonbridge, Kings Hill, Snodland, Borough Green, East Peckham, Hadlow, Hildenborough and West Malling are all tier 1 and 2 settlements that fall within the Green Belt and would see development restricted by the option 1 approach. 1.2.12 In respect of national policy, paragraph 140 of the NPPF states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their	Comment noted.
43309729	25240577	4.1.1 - 4.1.3, Figure 2		Comments on each of the proposed spatial options noted, including comments supporting need for Green Belt release. Further work is being undertaken to refine and define the proposed spatial strategies, taking into account consultation responses, site availability and suitability and national planning policy and guidance. Key considerations within this will also be the outcomes of the sustainability appraisal report and the housing market delivery study in relation to demand and locations of. This will be reflected within the next Regulation 18 document.

43311521	25240577	4.1.1 - 4.1.3, Figure 2	<p>1.2.5 The existing settlement hierarchy is outlined in figure 2 of the consultation document. However, the pattern of development was largely derived on a historic basis and settlement functions that pre-date modern planning. Accordingly, it should not be assumed that it represents the most appropriate basis to plan future growth. Naturally some settlements are better served by facilities than others, with some underperforming villages could be elevated within the settlement hierarchy with appropriately planned and sustainable growth.</p> <p>1.2.6 Given the characteristics of TMBC, a range of site locations and options are needed and the National Planning Policy Framework (NPPF) promotes balance. For example, paragraph 73 is clear that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Equally, para 69 acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and so at least 10% of their housing requirement should be met on sites no larger than one hectare. At para 78 the framework states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.</p> <p>1.2.7 What is apparent is that there is no policy support for simply maintaining the status quo and disbursing development solely on a proportionate basis based on past trends. In our view, Hildenborough represents a Rural Service Centre that could evolve further with the right investment.</p>	<p>Comment relating to the settlement hierarchy noted. This matter relates to the established settlement hierarchy, based on past approach and evidence, including that related to the two market areas. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. The council is undertaking a further Green Belt study which will provide further evidence on the performance of the Green Belt within the borough.</p> <p>Comments in relation to support for focus of development within settlements, but acknowledging other growth noted. Reference to Hildenborough noted. Support</p>
42634113	0	4.3.1 - 4.3.3	<p>SOUTH, fed up, with the north getting it all.</p>	<p>Comment noted.</p>
43395937	25240577	4.1.1 - 4.1.3, Figure 2	<p>1.2.5 The existing settlement hierarchy is outlined in figure 2 of the consultation document. However, the pattern of development was largely derived on a historic basis and settlement patterns that pre-dates modern planning. Accordingly, it should not be assumed that it represents the most appropriate basis to plan future growth. Naturally some settlements are better served by facilities than others, with some underperforming villages could be elevated within the settlement hierarchy with appropriately planned and sustainable growth.</p> <p>1.2.6 Given the characteristics of TMBC, a range of site locations and options are needed and the National Planning Policy Framework (NPPF) promotes balance. For example, paragraph 73 is clear that the supply of large numbers of new homes often can be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Equally, para 69 acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and so at least 10% of their housing requirement should be met on sites no larger than one hectare. At para 78 the framework states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.</p> <p>1.2.7 What is apparent is that there is no policy support for simply maintaining the status quo and disbursing development solely on a proportionate basis based on past trends. In our view, Wateringbury represents a rural settlements that could evolve to Rural service status with the right investment. The same cannot be said for all settlements within this category.</p> <p>1.2.8 In addition to settlement characteristics, it must also be recognised that within Tonbridge & Malling there are two Housing Market Areas (HMAs): the Sevenoaks/Tonbridge/Tunbridge Wells HMA; and the Maidstone HMA and the needs for both will need in to addressed.</p> <p>1.2.9 Given this context, there is Government support for a range of housing types and scales, and this should be reflected in the future settlement</p>	<p>Comment relating to the settlement hierarchy noted. This matter relates to the established settlement hierarchy, based on past approach and evidence, including that related to the two marker areas. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. The council is undertaking a further Green Belt study which will provide further evidence on the performance of the Green Belt within the borough.</p> <p>Comments in relation to support for focus of development within settlements, but acknowledging other growth noted. Reference to Wateringbury noted. Support for options 3 and 4 and the dispersed settlement patterns noted. Comments relating to difficulties for local plan with new settlements under option 5 also noted.</p>
43397313	25240577	4.1.1 - 4.1.3, Figure 2	<p>1.2.5 The existing settlement hierarchy is outlined in figure 2 of the consultation document, with Tonbridge, where our client's land is located, being a top tier settlement. Given its range of services it should be afforded a high level of additional growth and our client's land represents a relatively unconstrained opportunity.</p> <p>1.2.6 A range of site locations and options are needed and the National Planning Policy Framework (NPPF) promotes balance. However, paragraph 73 is clear that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. We consider Lower Haysden to be such an area that could accommodate this growth.</p> <p>1.2.7 In addition to settlement characteristics, it must also be recognised that within Tonbridge & Malling there are two Housing Market Areas (HMAs): the Sevenoaks/Tonbridge/Tunbridge Wells HMA; and the Maidstone HMA and the needs for both will need in to addressed. Our client's land fall within the Sevenoaks/Tonbridge/Tunbridge Wells HMA, the main settlement of which is Tonbridge and heavily constrained by areas at risk of flooding. Accordingly, we consider Lower Haysden to be the most sustainable and deliverable option available for meeting the HMA need.</p> <p>How should development be distributed across the borough?</p> <p>1.2.8 Having regard to the identified development needs of the area, the constraints in the borough and the two HMAs, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below.</p> <p>Option 1</p> <p>1.2.9 Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape.</p>	<p>Comment relating to the settlement hierarchy noted. This matter relates to the established settlement hierarchy, based on past approach and evidence, including that related to the two market areas. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. The council is undertaking a further Green Belt study which will provide further evidence on the performance of the Green Belt within the borough.</p> <p>Comments in relation to support for focus of development within settlements, but acknowledging other growth noted. Reference to Tonbridge being the location of most focus noted. Support for options 3 and 4 and the dispersed settlement patterns noted. Comments relating to difficulties for local plan with new settlements under option 5 also noted.</p>
42401953	0	4.3.1 - 4.3.3	<p>STOP BUILDING !!</p>	<p>Comment noted.</p>
42646849	0	4.3.1 - 4.3.3	<p>As I've said already, I believe there is a much smaller capacity for increased housing than the current government targets want. The capacity that does exist is largely in the redevelopment of brownfield sites and minor expansion of existing local towns. The current targets are simply unrealistic without significant destruction to the local green belt/ farming land.</p>	<p>Comment noted.</p>
25104193	0	4.3.1 - 4.3.3	<p>Only sites in urban areas should be considered for development.</p>	<p>Comment noted.</p>
42674753	0	4.3.1 - 4.3.3	<p>All sites identified in Hildenborough will have considerable impact on the infrastructure and quality of life in our village. Safety and health are of prime importance. Roads are already congested, health facilities stretched and schools full. The Berkley homes development and care home will both add to these pressures.</p>	<p>Comment noted.</p>
42687265	0	4.3.1 - 4.3.3	<p>A lot of the areas put forward are ridiculous i.e in a car park and a lot of areas already belong to the Parish to prevent greedy developers from building on even the smallest green space which as residents we rely on for our wellbeing</p>	<p>Comment noted.</p>
43676929	43676897	4.1.1 - 4.1.3, Figure 2	<p>1.2.4 The existing settlement hierarchy is outlined in figure 2 of the consultation document. However, the pattern of development was largely derived on a historic basis and settlement functions that pre-date modern planning. Accordingly, it should not be assumed that it represents the most appropriate basis to plan future growth. Naturally some settlements are better served by facilities than others, with some underperforming villages could be elevated within the settlement hierarchy with appropriately planned and sustainable growth.</p> <p>1.2.5 Furthermore, the settlement hierarchy approach is not ideally suited to considering the spatial distribution of employment development. Unlike residential development, employment development must consider other key operational and market drivers, as acknowledged in the Council's Economic Development Needs Study Part 1 (EDNS). This means that whilst the settlement hierarchy can provide a useful guide, it cannot be relied upon alone. The Local Plan Review must therefore recognise this in its employment policies and when considering the allocation of employment sites.</p> <p>1.2.6 Given the characteristics of TMBC, a range of site locations and options are needed and the National Planning Policy Framework (NPPF) promotes balance. As the Regulation 18 draft recognises, at Paragraph 81, the NPPF states that "significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development". The spatial approach to meeting employment needs of the Borough must therefore balance a range of issues and not be solely dictated by the settlement hierarchy, which in turn may lead to a different spatial approach being adopted in broad terms to meet housing and employment needs whilst ultimately still striving to achieve sustainable development.</p> <p>What is apparent is that there is no policy support for simply maintaining the status quo and disbursing employment development solely on a proportionate basis based on past trends. As the EDNS identifies, factors such as proximity to the strategic highway network and site availability, in particular for industrial development, all play an important role too.</p> <p>How should development be distributed across the borough?</p> <p>1.2.8 Having regard to the identified development needs of the area and the constraints in the borough, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below, although would reiterate the points raised above in respect of how a single approach to all forms and types of development is an overly-simplistic approach and does not recognise the wider dynamics that lie behind employment needs.</p> <p>Option 1</p> <p>1.2.9 Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape.</p>	<p>Comment relating to the settlement hierarchy noted. This matter relates to the established settlement hierarchy, based on past approach and evidence, including that related to the two market areas. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. The council is undertaking a further Green Belt study which will provide further evidence on the performance of the Green Belt within the borough.</p> <p>Comments relating to future work on the EDNS noted. Comments in relation to support for focus of development within settlements, but acknowledging other growth required noted. Reference to East Peckham as a location of some growth noted. Support for options 3 and 4 and the dispersed settlement patterns noted. Comments relating to difficulties for local plan with new settlements under option 5 also noted.</p>

			<p>Q2. Do you agree that this settlement hierarchy should be retained and inform the spatial strategy for the Local Plan?</p> <p>The existing settlement hierarchy is outlined in figure 2 of the consultation document. However, the pattern of development was largely derived on a historic basis and settlement functions that pre-date modern planning. Accordingly, it should not be assumed that it represents the most appropriate basis to plan future growth. Naturally some settlements are better served by facilities than others, with some underperforming villages could be elevated within the settlement hierarchy with appropriately planned and sustainable growth.</p> <p>Given the characteristics of TMBC, a range of site locations and options are needed and the National Planning Policy Framework (NPPF) promotes balance. For example, paragraph 73 is clear that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Equally, para 69 acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and so at least 10% of their housing requirement should be met on sites no larger than one hectare. At para 78 the framework states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.</p> <p>What is apparent is that there is no policy support for simply maintaining the status quo and disbursing development solely on a proportionate basis based on past trends. In our view, Hildenborough represents a Rural Service Centre that could evolve further with the right investment.</p> <p>In addition to settlement characteristics, it must also be recognised that within Tonbridge & Malling there are two Housing Market Areas (HMAs): the Sevenoaks/Tonbridge/Tunbridge Wells HMA; and the Maidstone HMA and the needs for both will need to be addressed. Tonbridge is heavily constrained by areas at risk of flooding and so we consider Hildenborough best placed to absorb the growth in this area of the housing market.</p> <p>Given this context, there is Government support for a range of housing types and scales and this should be reflected in the future settlement strategy and distribution of growth. It should also be acknowledged that settlements that currently are lower tier settlements can only improve with additional growth and associated infrastructure.</p> <p>How should development be distributed across the borough?</p>	<p>Comment relating to the settlement hierarchy noted. This matter relates to the established settlement hierarchy, based on past approach and evidence, including that related to the two market areas. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. The council is undertaking a further Green Belt study which will provide further evidence on the performance of the Green Belt within the borough.</p> <p>Comments in relation to support for focus of development within settlements, but acknowledging other growth noted. Reference to the rolke of Hildenborough in supporting further growth noted. Support for options 3 and 4 and the dispersed settlement patterns noted. Comments relating to difficulties for local plan with new settlements under option 5 also noted.</p>
43745089	25240577	4.1.1 - 4.1.3, Figure 2	<p>1.3.5 The existing settlement hierarchy is outlined in figure 2 of the consultation document. However, the pattern of development was largely derived on a historic basis. Accordingly, it should not be assumed that it represents the most appropriate basis to disburse future growth.</p> <p>1.3.6 Naturally some settlements are better served by facilities than others, yet some underperforming villages could be elevated within the settlement hierarchy with appropriately planned and sustainable growth.</p> <p>1.3.7 Given the characteristics of TMBC as a semi-rural authority, a range of site locations and options are needed and the National Planning Policy Framework (NPPF) promotes balance. For example, paragraph 73 is clear that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Equally, para 69 acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and so at least 10% of their housing requirement should be met on sites no larger than one hectare. At para 78 the framework states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.</p> <p>1.3.8 In addition to settlement characteristics, it must also be recognised that within Tonbridge & Malling there are two Housing Market Areas (HMAs): the Sevenoaks/Tonbridge/Tunbridge Wells HMA; and the Maidstone HMA and the needs for both will need to be addressed.</p> <p>1.3.9 Given this context, there is Government support for a range of housing types and scales, and this should be reflected in the future settlement strategy and distribution of growth. Having regard to the issues, our client's land represents a small but deliverable site that fully reflects the type of development endorsed by para 69 of the framework. Furthermore, it will deliver homes within the Sevenoaks/Tonbridge/Tunbridge Wells HMA in a highly accessible and sustainable location.</p> <p>How should development be distributed across the borough?</p> <p>1.3.10 Having regard to the identified development needs of the area, the constraints in the borough and the two HMAs, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below.</p> <p>Option 1</p> <p>1.3.11 Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape.</p> <p>1.3.12 For the reasons outlined above we fundamentally object to the notion that Green Belt should not be released. If one looks at the settlement hierarchy, Tonbridge, Kings Hill, Snodland, Borough Green, East Peckham, Hadlow, Hildenborough and West Malling are all tier 1 and 2 settlements that fall within the Green Belt and would see development restricted by the option 1 approach. The edge of Ryarsh offers a quality offer of services and facilities that can be enhanced further with growth and there are distinct pockets of land, including our client's, that have no meaningful role in only on brown field sites.</p> <p>Please refer to my comments in Appendix 8 on potential developments affecting Mereworth</p> <p>* Spatial Distribution of Development</p>	<p>Comment relating to the settlement hierarchy noted. This matter relates to the established settlement hierarchy, based on past approach and evidence, including that related to the two market areas. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. The council is undertaking a further Green Belt study which will provide further evidence on the performance of the Green Belt within the borough.</p> <p>Comments in relation to support for focus of development within settlements, but acknowledging other growth noted. Reference to the rolke of Ryarsh in supporting further growth noted. Support for options 3 and 4 and the dispersed settlement patterns noted. Comments relating to difficulties for local plan with new settlements under option 5 also noted.</p>
43781249	43781441	4.1.1 - 4.1.3, Figure 2		
42368129	0	4.3.1 - 4.3.3		Comment noted.
42666881	0	4.3.1 - 4.3.3		Comment noted.
25296065	0	4.1.1 - 4.1.3, Figure 2	<p>4.2 How should development be distributed across the borough?</p> <p>Our preferred quantum option for the spatial strategy is Option A. Quantum 1 – Meeting Assessed Housing Need. We do not think with future population growth unknown that the council and the inhabitants of the borough should be burdened with a demand for a number of new dwellings any higher than that presently required by the government when the existing number will already place a great strain on those responsible for this development and on those who will have to live with it. The foreword to the Regulation 18 Local Plan states that the council will continue making the case to Government that the need to identify sites for 15,941 new homes ought to be reduced.</p> <p>Our preferred spatial strategy option is Option 4: the distribution of development across the borough with development focussed on previously-developed land then limited greenfield sites within the urban areas; rural service centres and other rural settlements; as well as adjacent to these settlements. We consider that development sequenced in this order would be a positive method so as to allow for a careful review of new development in its benefits and impacts before another phase began. The mixture of distribution in this way would mean that everyone across the borough would eventually share the burden of new development and create a feeling of joint embrace of the necessary increase needed in the number of dwellings.</p> <p>Please note that our Treasurer, [redacted], is not in agreement with our choice of option 4 for the spatial strategy option and she has expressed her own preference in her individual response to the consultation.</p>	<p>Support for Option A- OAN only, also acknowledging some of the council's text within the foreword.</p> <p>Support for Option 4 also noted with development focussed on previously developed land and a cascade approach would allow for sharing growth across the borough.</p>
42696769	0	4.3.1 - 4.3.3	NOT IN RURAL !! Please keep to urban sites where facilities, roadways, commuting links and health services already exist. Any development in rural will forever lose the character of Kent.	Comment noted.
42750113	0	4.3.1 - 4.3.3	A lot of the land round Tonbridge floods and should not be built on. Infrastructure including roads, medical, educational and social must also be included and prioritised.	Comment noted.
38330977	0	4.3.1 - 4.3.3	We reiterate that development should adjoin already developed land and isolated development in the Metropolitan Green Belt should be avoided.	Comment noted.
44200193	44200161	4.1.1 - 4.1.3, Figure 2	<p>The existing settlement hierarchy is outlined in figure 2 of the consultation document. However, the pattern of development was largely derived on a historic basis and settlement patterns that pre-date modern planning. Accordingly, it should not be assumed that it represents the most appropriate basis to plan future growth. Naturally some settlements are better served by facilities than others, with some underperforming villages could be elevated within the settlement hierarchy with appropriately planned and sustainable growth.</p> <p>Given the characteristics of TMBC, a range of site locations and options are needed, and the National Planning Policy Framework (NPPF) promotes balance. For example, paragraph 73 is clear that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Equally, paragraph 69 acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and so at least 10% of their housing requirement should be met on sites no larger than one hectare. At paragraph 78 the framework states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.</p> <p>[Insert of image of existing settlement hierarchy]</p> <p>What is apparent is that there is no policy support for simply maintaining the status quo and disbursing development solely on a proportionate basis based on past trends. In our view, Aylesford represents a rural settlement with characteristics that could evolve to Rural service status with the right investment. The same cannot reasonably be said for all settlements within this category.</p> <p>In addition to settlement characteristics, it must also be recognised that within Tonbridge & Malling there are two Housing Market Areas (HMAs): the Sevenoaks/Tonbridge/Tunbridge Wells HMA; and the Maidstone HMA and the needs for both will need to be addressed.</p> <p>Given this context, there is Government support for a range of housing types and scales, and this should be reflected in the future settlement strategy and distribution of growth. It should also be acknowledged that settlements that currently are lower tier settlements can only improve with additional growth and associated infrastructure.</p> <p>How should development be distributed across the borough?</p>	<p>Comment relating to the settlement hierarchy noted. This matter relates to the established settlement hierarchy, based on past approach and evidence, including that related to the two market areas. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. The council is undertaking a further Green Belt study which will provide further evidence on the performance of the Green Belt within the borough.</p> <p>Comments in relation to support for focus of development within settlements, but acknowledging other growth noted. Reference to the role of Aylesford in supporting further growth noted. Support for options 3 and 4 and the dispersed settlement patterns noted. Comments relating to difficulties for local plan with new settlements under option 5 also noted.</p>
42780257	0	4.3.1 - 4.3.3	I don't believe any green belt or area of natural beauty should be touched. Thats the reason why people have moved here, It shocks me that some of these suggestions have been put forward. The identity of our village and local area should be maintained. These developments are out of proportion.	Comment noted.
42794625	0	4.3.1 - 4.3.3	No comment	Comment noted.

			<p>As you will be aware, MBC is in the process of reviewing its adopted Local Plan (25 October 2017). The Maidstone Local Plan Review was submitted to the Secretary of State for independent examination on 31 March 2022. The examination hearings are currently in process. MBC has and will continue to work closely and constructively with Tonbridge and Malling Borough Council (TMBC) through the duty to cooperate on strategic matters pertinent to the authorities' respective local plans. We also look forward to working jointly with Kent County Council and National Highways given that there are clearly matters that fall within their remit and responsibility.</p> <p>Whilst it is acknowledged that TMBC have a requirement to meet identified needs, including for housing and economic development, the new Local Plan could have a significant impact on Maidstone Borough residents and businesses as well as the environment. It is therefore imperative that the potential effects of the plan on Tonbridge and Malling Borough and neighbouring authority areas, including Maidstone, are robustly considered. MBC would welcome the opportunity to continue working with TMBC to help ensure that any potential adverse impacts resulting from the emerging Local Plan are identified at an early stage so that these can be avoided and/or appropriately mitigated.</p> <p>The Regulation 18 document sets out several spatial options for distributing growth within Tonbridge and Malling Borough. It is noted that these options provide for areas that are proposed to be a 'focus of development'. Many of these include development in the northern and eastern parts of the borough in proximity to the Maidstone Borough boundary, for example, the areas the document identifies as Walderslade, Medway Gap, Kings Hill and East Peckham. Whilst at this stage in the plan process details as to the preferred spatial approach and quantum of development expected in different locations are yet to be confirmed, MBC raise concerns with the spatial options in terms of their impacts, particularly on the highway network and air quality (including in Air Quality Management Areas).</p> <p>As significant new development in the aforementioned areas is likely to exacerbate existing local issues of traffic and congestion, mitigating transport impacts on routes into Maidstone will be vital. This includes the A20, Hermitage Lane and the A26. Consideration should also be given to encouraging and enabling modal shift to support sustainable transport and to help reduce reliance on car use.</p> <p>Furthermore, the spatial options could result in the coalescence of settlements with those in Maidstone Borough. This matter should therefore be addressed in the assessment of spatial options along with any approaches required to support these, such as the review and potential release of Green Belt land and analysis of site allocation development capacities. The Local Plan should also include measures to address coalescence, for example, through provisions on retention and delivery of new open space, natural and semi-natural landscaping and air quality.</p> <p>The Regulation 18 document states that Tonbridge and Malling Borough shares a strategic housing market area with Maidstone, across the northern and eastern parts of the Borough. This is corroborated by the Maidstone Strategic Housing Market Assessment (2021). MBC welcomes that the diverse housing needs of the population in the wider market area will be considered as work on the plan progresses. MBC strongly supports TMBC's intention to meet the Borough's identified local housing need in full through the Local Plan. It also supports the addition of a contingency in</p>	<p>Comment noted. The council will continue to work with MBC through the duty to cooperate. No decisions have yet been made on the spatial strategy but options will be appropriately tested through the transport modelling work, and air quality issues also examined through out forthcoming air quality evidence. Further evidence being produced, such as that of the Green Belt, landscape and housing numbers will also influence the decision-making on the spatial strategy. Since the production of the Regulation 18 local plan the government has proposed some changes to the NPPF which will be reflected within the new Regulation B local plan, including the role of housing numbers and constraints.</p> <p>Comments relating to gypsy and traveller needs also noted. The council will be undertaking a dedicated call for sites process and will continue to work alongside MBC in relation to providing for these needs as much as is possible.</p> <p>The EDNS study will be updated with supply side analysis, alongside a focus on retail and town centres. The council will work with MBC in relation to the duty to cooperate, any cross-boundary issues which may arise as a result.</p>
44345089		0 4.1.1 - 4.1.3, Figure 2		
42798913		0 4.3.1 - 4.3.3	Necessary to study Appendix B before answering these questions	Comment noted.
			Hildenborough recently has had new houses built on sites not included in. I am not sure we need any more if i'm honest or whocan afford to but them?	Comment noted.
42810273		0 4.3.1 - 4.3.3	Also this questionnaire is quite long winded with long complicated questions.... is it necessary?	Comment noted.
			housing should be focused in ares where there is already good transport links and communities to be added to without eroding the fragile resource in Kent that is the green belt.	Comment noted.
38531361		0 4.3.1 - 4.3.3		Comment noted.
			You are also inviting comments on the potential for high density development which could help reduce the pressure on Green Belt land. It is noted that this approach may impact existing settlement characters, the character of the natural environment and landscape setting of settlements, and the setting of designated heritage assets, dependent on the density applied, but nevertheless this approach could contribute to reducing the net need for sites outside of these areas and the amount of greenfield land that would otherwise need allocating.	Comment noted.
42832193		0 4.3.1 - 4.3.3	Not in the local villages like Woudham . Your information is not up to date . We have plenty of housing here already . No bus service	Comment noted.
42833153		0 4.3.1 - 4.3.3	The site in Leybourne lakes should not be developed it is the main green space on the estate and is used regularly. The land is owned by Berkeley homes and they have no interest in developing for housing.	Comment noted.
42832929		0 4.3.1 - 4.3.3	I submitted my comments on the Sustainability Appraisal but the content was lost as the website shut it off. Much of the SA was inaccurate, especially in regards to proposals in the AONB.	Comment noted.
			Sustainability	Comment noted.
43412865		0 4.3.1 - 4.3.3	I do not agree with the sustainability report. Most of it makes no sense at all.	Comment noted.
43884609		0 4.3.1 - 4.3.3		Comment noted.
			My wife, [redacted] and I attended the joint Local Plan public meeting for Addington and Trottscliffe on 1 November .	
			The presentation was informative and welcome, but we were disappointed at the lack of time allowed for the public to digest the proposals before today's response deadline.	
			However, we have done our best to study and feedback on the fundamentals of the Local Plan and some of the offered sites, as mentioned above.	
			The Local Plan	
			Given that TMBC comprises 70% green belt land we tend to favour Options 1 or 2 (i.e. development of existing urban spaces predominantly outside the green belt or AONB boundaries) to provide the land to meet TMBC's new housing target. That said Kings Hill, in particular, has been progressively developed virtually from scratch since the 1990's and further expansion there would add unacceptable additional pressure onto West Malling and its already stretched primary care provision and local transport links and retail and road systems.	
			Specific sites - context	
42790337		0 4.1.1 - 4.1.3, Figure 2	We live in Addington village, abutting or very close to sites 59850 and 59604. I am also a member of both West Malling and Kings Hill Golf Clubs affected by sites 59850, 59800 & 59797. Our son [redacted] also lives on [redacted] in West Malling, adjacent to site 59699.	Support for options 1 and 2 and reasoning noted.
			Question 7 Policy Options	
43485857	43485921	4.3.1 - 4.3.3	Mr and Mrs Howard support policy options that would protect the existing green spaces of West Malling and elsewhere in the borough.	Comment noted.
			6.5 Findings of the individual site assessments: We have set out an analysis of the development opportunity north of Church Lane in comparison with the findings of the Interim Sustainability Appraisal. This illustrates that the more detailed analysis set out here returns a more positive scoring with no significant negative effects.	Comment noted.
45440929	45440705	4.3.1 - 4.3.3		Comment noted.
42107681		0 4.1.1 - 4.1.3, Figure 2	I am not clear on how much of the area surrounding Tonbridge and currently greenfield sites actually count as Tonbridge and therefore Urban? Haysden for example is greenfield.	Comment noted.
42144545		0 4.1.1 - 4.1.3, Figure 2	It is stated that in the 'Other Rural Settlements' development has been limited to minor projects . I question this in the case of Ryarsh where Ryarsh Park was developed and in the case of East Malling there is encroachment . by Kings Hill .	Comment noted.
42260865		0 4.1.1 - 4.1.3, Figure 2	This has been done very badly. No consideration has been given to whether the resources in already built up areas are at capacity.	Comment noted.
			Urban areas are already highly populated and to continue developing them threatens causing overload to our already stretched amenities. In Kings Hill the doctors surgery cannot cope with the numbers on its books and this will end in tears with more people being pushed to another overloaded service, A&E. The roads are constantly busy with little ongoing care given to potholes and similar. Many people have moved here from towns closer to London only to find it becoming slowly like what they hoped to leave behind. Stop ruining peoples lives and start building a new area elsewhere.	Comment noted. This matter will be considered and reflected within the Infrastructure Delivery Plan and other new evidence being prepared to support plan preparation.
42138017		0 4.1.1 - 4.1.3, Figure 2		Comment noted. Decisions relating to site selection will reflect the settlement hierarchy and will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
			I live in Burham and despair of the plans to further add to housing developments to of the Bell Lane and Eccles development. Please leave some green spaces for locals. There are no shops in the village barring a bakery, takeaway and garage. This will become a commuter village who pollute the air driving to facilities and jobs, which has reduced air quality due to the reduced green space to mitigate. Why not wait for the planned development to be built and settle, then do environmental impact studies, then consider everyone's health not just developers pockets.	Comment noted. Decisions relating to site selection will reflect the settlement hierarchy and will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42662401		0 4.1.1 - 4.1.3, Figure 2	Building on green spaces should always be the last resort. You have signed up to the kcc climate change action plan yet want to impact on the air quality further?	Comment noted. Decisions relating to site selection will reflect the settlement hierarchy and will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
			I think expanding the area sound St Peters Village would be a good thing. The area along the river is not especially picturesque and in some places is quite industrial. There is a space for much more housing without spoiling smaller villages by overpopulation. However it is essential that proper facilities, such as shops, schools suitable homes for the elderly and GP surgeries be built in the expanded St Peters village to ensure other facilities in local villages are not overwhelmed.	Comment noted. Decisions relating to site selection will reflect the settlement hierarchy and will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42758785		0 4.1.1 - 4.1.3, Figure 2	I also think some of the very small villages can absorb a small amount of housing, rather than just effectively choose one or two areas (so it would seem !!) E and W Malling !	Comment noted. Decisions relating to site selection will reflect the settlement hierarchy and will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.

45864993	25240577	4.1.1 - 4.1.3, Figure 2	<p>4.1.4 The existing settlement hierarchy is outlined in figure 2 of the consultation document.</p> <p>4.1.5 Nevertheless, the pattern of development was largely derived on a historic basis and settlement pattern that pre-dates modern planning. Accordingly, it should not be assumed that it represents the most appropriate basis to plan future growth. Naturally some settlements are better served by facilities than others, with some underperforming villages could be elevated within the settlement hierarchy with appropriately planned and sustainable growth.</p> <p>4.1.6 A range of site locations and options are needed and the National Planning Policy Framework (NPPF) promotes balance. For example, paragraph 73 is clear that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Equally, para 69 acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and so at least 10% of their housing requirement should be met on sites no larger than one hectare. At para 78 the framework states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.</p> <p>4.1.7 What is apparent is that there is no policy support for simply maintaining the status quo and disbursing development solely on a proportionate basis based on past trends.</p> <p>4.1.8 In addition to settlement characteristics, it must also be recognised that within Tonbridge & Malling there are two Housing Market Areas (HMAs): the Sevenoaks/Tonbridge/Tonbridge Wells HMA, and the Maidstone HMA and the needs for both will need to be addressed.</p> <p>4.1.9 Given this context, there is Government support for a range of housing types and scales and this should be reflected in the future settlement strategy and distribution of growth. It should also be acknowledged that settlements that currently are lower tier settlements can only improve with additional growth and associated infrastructure.</p> <p>4.1.10 In considering development options, we agree that the plan must seek to balance the need to support sustainable patterns of growth with the need to protect natural and heritage assets as far as possible. However, the scale of growth is unprecedented and so the only absolute constraints should be on areas of Special Areas of Conservation, Sites of Special Scientific Interest, Ancient Woodland, Listed Buildings and Scheduled Monuments.</p>	<p>Comment relating to the settlement hierarchy noted. This matter relates to the established settlement hierarchy, based on past approach and evidence, including that related to the two marker areas. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. Comments relating to difficulties for local plan with new settlements under option 5 also noted.</p>
45875041	25240577	4.1.1 - 4.1.3, Figure 2	<p>12.5 The existing settlement hierarchy is outlined in figure 2 of the consultation document, with Wrotham, where our client's land is located, being a third tier settlement. However, given its range of employment opportunities it represents an established hub and it should be afforded a high level of additional economic growth than the settlement hierarchy might otherwise suggest.</p> <p>How should development be distributed across the borough?</p> <p>12.6 Having regard to the identified development needs of the area, the constraints in the borough and the two HMAs, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below.</p> <p>Option 1</p> <p>12.7 Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape. 12.8 For the reasons outlined above we fundamentally object to the notion that Green Belt should not be released. If one looks at the settlement hierarchy, Tonbridge, Kings Hill, Snodland, Borough Green, East Peckham, Hadlow, Hildenborough and West Malling are all tier 1 and 2 settlements that fall within the Green Belt and would see development restricted by the option 1 approach. Furthermore, it seems illogical not to complement the established employment hub that already exists in Wrotham. 12.9 In respect of national policy, paragraph 140 of the NPPF states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>12.10 We acknowledge that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined all other reasonable options making as much use as possible of suitable brownfield sites and underutilised land; optimising the density of development and informed by discussions with neighbouring authorities. However, these exercises were carried out in detail as part of the previous Local Plan work and evidence established that Green Belt release is needed. 12.11 Notwithstanding the earlier decisions and evidence, housing or employments need can be an exceptional circumstance to justify a review of your Green Belt boundary. This principle was set out within the Hunston High Court judgment in St Albans.</p> <p>12.12 Case law, (Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin)) also provide guidelines for determining whether exceptional circumstances exist. The above judgement states: 'planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation</p>	<p>Comment relating to the settlement hierarchy noted. This matter relates to the established settlement hierarchy, based on past approach and evidence, including that related to the two market areas. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. The council is undertaking a further Green Belt study which will provide further evidence on the performance of the Green Belt within the borough.</p> <p>Comments in relation to support for focus of development within settlements, but acknowledging other growth noted. Reference to the role of Wrotham in supporting further growth noted. Support for options 3 and 4 and the dispersed settlement patterns noted. Comments relating to difficulties for local plan with new settlements under option 5 also noted.</p>
44275681	44277153	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>TMBC need to allocate a suite of sites that are deliverable to meet housing needs. This needs to be made up of a range of site sizes to meet different demands and maintain a rolling 5 year supply, and spread across the Borough to meet the different needs of the HMAs that influence the Borough. They also need to provide a range of tenures to meet the requirements of the Borough, including the affordable needs of the Borough, and they need to address the infrastructure requirements they generate. In respect of comments on other housing factors. It is essential that housing supply is boosted in line with the NPPF and sustainability agenda. This has been a consistent theme since the first NPPF was published. To achieve this, the standard method is in place to ensure that all LPAs provide the housing that is needed in their area. Affordable housing comes hand in hand with market housing and combined, these help to ensure sustainable, mixed and diverse communities.</p> <p>With regards to design, MMC is becoming more widely used as a method to build and deliver homes quicker. In some locations design can be more tightly controlled but, in most instances, flexibility is important to allow for innovation, use of more sustainable materials and techniques and to enable developments to come forward quicker. The NDG is a material consideration. It is not therefore necessary for separate local design policies unless relating to specific issues, characters or features of unique distinctiveness.</p> <p>With specific regard to Q19, only 5 can be selected but it is questionable whether only 5 should be shortlisted particularly as they relate to various issues focused around both housing needs and housing design. Ultimately TMBC must ensure that varying housing needs are being met across the borough through a range of sites that can deliver in the short, medium and longer term. The type of housing that should be delivered should be determined based on needs to ensure access to housing and choice for the community. MMC can be an important part of this and early delivery, and supporting sites such as site 59764 can help to deliver homes now, reducing heavy reliance on larger development sites that may not come forward for a long time.</p>	<p>Comment noted. It is acknowledged that boosting the supply of affordable housing comes alongside other tenures. The next version of the plan will include draft policies in relation to housing mix and affordable housing. The plan will also identify how design issues will be addressed within the borough, including the programme for design code/s. The plan is also likely to acknowledge a further role of MMC.</p>
42716705	0	4.3.1 - 4.3.3	<p>All of the proposed sites in and around East Malling and Broadwater Farm will have adverse landscape and visual impact with correspondent harm to the character and appearance of the local countryside in addition to the reduction of productive local farmland.</p> <p>Water supply is also becoming critical. The amount available this summer has been insufficient to meet existing needs and cannot cope with the additional demands of further development.</p> <p>Medical support is insufficient to cope with local demand. Proposed new surgeries in recent developments have not materialised.</p>	<p>Comment noted. Landscape and infrastructure issues will be considered and reflected within the new evidence being prepared to support plan preparation.</p>
25406881	0	4.1.1 - 4.1.3, Figure 2	<p>Development Location - Any development to meet the Government housing objectives should be spread across the wider Borough and not concentrated around a small number of hubs. Future development should maximise brownfield locations, whilst preserving the Borough's ability to attract viable retail, car parking facilities and sufficient employment opportunities. The use of Greenbelt land should be a consideration of last resort. TMBC should prioritise the provision of Affordable Housing needs so that the town does not become a 'Dormitory Location' for London. As a major landholder TMBC can play an effective role in raising the development experience for the borough if they make it a Planning requirement for all developers/contractors to be members of the UK's 'Considerate Contractors' Scheme. This premier scheme aims to raise the level of competence of Contractors during the build process.</p>	<p>Comment noted. Preference for dispersal of housing across the borough noted.</p>
42363585	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>I don't think green belt land should be considered at all, I also don't believe there are no other options. As someone who has worked in kings hill I know there is a large percentage of office space which has sat empty for many years has anyone consider buying these areas to build residential housing with further impact to the local area</p>	<p>Comment noted. Support for lack of green belt development noted.</p>
42820673	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>I've read through the local plan but have arguably left it too late for the questionnaire. I send this email as a summary of my thoughts and priorities.</p> <p>I agree with the majority of what is put forward, with preference for option 4 regarding development distribution. I do have further comments which I'll put below.</p> <p>Without wishing to disparage other people's views, I'm mindful that a majority of comments about development, both from public comments for Reg. 18 and for planning applications overall, are very much anti-development with a huge veneration to the Green Belt. Where I feel it important to recognise the importance of open space and preserving habitat, such sentiment isn't constructive and fails to address a number of socio-economic issues we face here in the Borough and nationally. The two issues which come to mind are soaring property prices and traffic congestion which together are hugely detrimental to physical and mental wellbeing, especially for the disadvantaged. What's more, one can have the most beautiful area but if only the rich can afford to eek out a life or the roads are overwhelmed, such positive aspects are hugely undermined.</p> <p>Green Belt was implemented at a time where development patterns were characterised by low density sprawling suburbs. The principal of Green Belt is justified especially when looking at North American cities, but years of rigid restrictions has led to a shortage in local supply with pressure on non Green Belt land with LPAs forced to overcompensate wherever there is 'no Green layer'.</p> <p>I won't suggest a removal of Green Belt, but a recognition that some flexibility will be needed when promoting places that fit the bill of the local plan priorities.</p>	<p>Comment noted. The council acknowledges the matters raised, in relation to impacts of property prices, traffic congestion and the historical role of the Green Belt. This matter will be considered and reflected within the new Green Belt evidence being prepared to support plan preparation.</p>
44131329	0	4.3.1 - 4.3.3	<p>Protected Landscapes and Site Allocations</p> <p>We note that Appendix B to the main document contains a long list of possible sites for development but that no decisions have been made yet around which to progress as allocations although each site has been assessed against the SA Objectives. We have reviewed the narrative around this as set out in paragraphs 5.19 - 5.23 of the SA and would argue that every effort should be made to avoid progressing sites likely to have significant, negative landscape impacts. We would fully encourage you to commission further evidence to better understand the potential landscape impact of possible future strategic scale allocations, and to inform site specific policies and will pick up what potential support we might be able to offer you in this process under separate cover. We would also encourage you to seek early engagement and advice from the High Weald and Kent Downs AONB Units on relevant site allocations.</p> <p>We have not had time to review the long list of sites in Appendix B in detail but we do note the inclusion of the previous Borough Green Gardens site (59830). Given its size, proximity to the Kent Downs AONB and the concerns raised about its inclusion in the previous draft plan this site will require particularly careful consideration.</p>	<p>Comment noted. The council is currently undertaking work on further evidence in relation to landscape analysis for key sites.</p>
42333569	0	4.1.1 - 4.1.3, Figure 2	<p>There are large open car parks by the railways which are owned by either Network Rail or SE Trains (both controlled by Dept of Transport). There is an opportunity to have car parking on the ground floor and build flats above the car spaces. The work could be done in phases thus keeping the car parks open. Due to changing working patterns and working from home, car spaces are under used. The benefits:-</p> <ol style="list-style-type: none"> 1) Development on Brown Field land; 2) Sustainable - High PTAL rating for accessibility; 3) NR SET could gain a capital receipt from the developer which could be ploughed back into the railways. Network Rail has done this in other towns; 4) Affordable housing created; 5) more business for local shops; <p>Borough Green Station car park is a prime candidate for such development.</p>	<p>Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance which includes making the most efficient use of land.</p>

25349153	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>1.1.1. A Local Plan should be prepared in accordance with national planning policy within the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).</p> <p>1. Green Belt</p> <p>All of the 'countryside' sites, with the exception of those to the east of the High Street/St Leonard's Street are in the Metropolitan Green Belt. The relevant paragraphs of the NPPF state:</p> <p>* The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</p> <p>* Green Belt serves five purposes:</p> <p>a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p> <p>This submission examines the extent to which each site complies with any or all of the above. The NPPF also states:</p> <p>* Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p> <p>* When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.</p> <p>* A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:</p> <p>a) buildings for agriculture and forestry;</p> <p>b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;</p> <p>c) the extension or alteration of a building, provided that it does not result in disproportionate additions over and above the size of the original</p>	<p>Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, generally but also in reference to Green Belt and heritage issues raised. The council notes the comments in relation to particular West Malling heritage assets. It has also prepared a new Heritage Strategy which will support the new Regulation 18 local plan.</p> <p>Infrastructure demands and provision will be considered and reflected within the new evidence being prepared to support plan preparation. The council is also aware of the importance of the best agricultural land classifications and the relevant considerations within the NPPF.</p>
4602237	0 4.1.1 - 4.1.3, Figure 2	<p>Building on brownfield sites should be considered first not build on to small villages that struggle with lack of school places, shops, buses to take people into towns</p> <p>any developments need to be proportionate to the breadth and scale of existing current location and to respect and recognise the character and type of the existing housing stock as well as the character and appearance of the environs (e.g. rural surroundings).</p> <p>NPPF 2018 determines the need to avoid harm to the green belt and specifies that it is inappropriate to sanction developments therein. It is imperative for us all and the future generations to maintain green belt and aobn at all costs. -there is no going back once it is destroyed.</p>	<p>Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, which reflects this 'brownfield first' principle.</p>
42199073	0 4.1.1 - 4.1.3, Figure 2	<p>Possibly hand in hand with this is the common sense need to preserve viable good quality productive agricultural land for the future of the country, and from a practical land management and flood control perspective</p> <p>The National Planning Policy Framework (NPPF) [1] (EN11) [1] provides the overarching framework used for preparing Local Plans based on the Government's aims for the planning system, the purpose of which is to contribute to the achievement of sustainable development. It sets out in paragraph 8 that sustainable development has three interdependent objectives that need to be pursued in mutually supportive ways:</p> <p>* an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>* a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and</p> <p>* an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p> <p>So that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 states that for plan-making this means that all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.</p> <p>The Regulation 18 Local Plan sets out how the hierarchy of settlements should be used to guide decisions on where development should be focussed. It acknowledges that settlements at the top of the hierarchy (Urban Areas), are most likely to provide opportunities for sustainable development because they contain a variety of services, are well connected by public transport and offer opportunities for active travel. They also contain opportunities for making use of previously developed land. Beyond the Urban Areas are Rural Service Centres and Other Rural Settlements. At the bottom of the hierarchy are Rural Areas within the open countryside and where development should be restricted.</p>	<p>Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.</p>
46064513	0 4.1.1 - 4.1.3, Figure 2	<p>All these development proposals involve focussing on the Medway Gap, where we already have roads that clog up completely at peak hours, narrow lanes, a train service that is expected to decline and no buses. Option 4 is therefore the least bad, spreading out the development while option 5 requires abandoning the Green Belt, which is unacceptable and not likely to happen, even under the present government</p> <p>The National Planning Policy Framework (NPPF) provides the overarching framework used for preparing Local Plans based on the Government's aims for the planning system, the purpose of which is to contribute to the achievement of sustainable development. It sets out in paragraph 8 that sustainable development has three interdependent objectives that need to be pursued in mutually supportive ways:</p> <p>* a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>* b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and</p> <p>* c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p> <p>So that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 states that for plan-making this means that all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.</p> <p>The Regulation 18 Local Plan sets out how the hierarchy of settlements should be used to guide decisions on where development should be focussed. It acknowledges that settlements at the top of the hierarchy (Urban Areas), are most likely to provide opportunities for sustainable development because they contain a variety of services, are well connected by public transport and offer opportunities for active travel. They also contain opportunities for making use of previously developed land. Beyond the Urban Areas are Rural Service Centres and Other Rural Settlements. At the bottom of the hierarchy are Rural Areas within the open countryside and where development should be restricted.</p>	<p>Comment noted, including preference for Option 4. This matter will be considered and reflected alongside the new transport modelling evidence being prepared to support plan preparation.</p>
3877865	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>Areas intentionally left as green space in existing developments should be maintained as they would have been part of the original agreement to that development (i.e. planning permission was granted on the basis that there would be green space).</p> <p>Kings Hill golf course was an integral part of the original plan for the Kings Hill development as agreed between the developers and Kent County Council. It provides leisure facilities - apart from the golf, the surrounding bridal path is much used by walkers. It is a social hub used by locals and community groups. It provides a natural habitat for wildlife and employment for local people. Loss of the golf course would destroy much of the heart of Kings Hill and would fundamentally undermine the original planning concepts. It also does not fit with the stated objectives for the local plan.</p>	<p>Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The council will provide further detail on the settlement hierarchy alongside the Regulation 18 plan.</p>
46064257	0 4.1.1 - 4.1.3, Figure 2	<p>I have a strong preference for option 1 since it does not involve the loss of green belt or AONB. This should be combined with densification of housing in the existing urban centres.</p> <p>The whole approach here is flawed. All that Question 3 will show is that people living in the Green Belt will want the Green Belt protected, people living outside the Green Belt will not want to take the full burden of the housing allocation. So what?</p> <p>Furthermore, the choices are one "fully protect the Green Belt" option and four "don't fully protect the Green Belt" Options. This fragments the 'Non-Green Belt' vote. How are you going to deal with this?</p> <p>From comments on our Local Facebook page, it would seem that local residents in the North of the Borough are disillusioned with the whole planning process given recent planning events and decisions. Consequently, it seems likely that participation rates will be lower in this part of Borough and that could raise doubts about the validity of this exercise.</p> <p>Of course, the votes for each option should be reported, but it would be helpful if the same data could be presented for each ward and if participation rates could be presented for each ward. Given the percentage for each option in each ward, it would be appropriate to also calculate a composite outcome using population weighting.</p>	<p>Comment noted. The council is undertaking an exercise in relation to suitability and availability of development which is likely to further refine the potential from sites identified within Annex B.</p>
42730209	0 4.3.1 - 4.3.3	<p>4.3 Where should development be in the borough? Looking at Appendix B</p> <p>The most important section with relation to the TMBC area is the water environment in relation to building :-</p> <p>4.4 - 4.46 P39</p> <p>The River Medway and River Bourne are significant water resources within the borough and there are areas of Flood Zone 3 surrounding these watercourses. Many of these existing areas of flood risk may experience an increase in the number of flood events in the future due to climate change increasing rainfall intensity. The ecological quality of the borough's waterbodies is generally of moderate status, whilst the chemical quality is classified as 'fair'. Further development in the borough could lead to an increase in the amount of surface water runoff, including pollution, from urban areas and cause further degradation of the water quality of these watercourses.</p> <p>The SFRA site screening Level 1 table seems to show most risk for sites as 100% Flood zone 1 which is contrary to the assessment by site no. e.g. 59524 says all zone 3 SFRA table 97% zone 1?</p> <p>Looking at the list of sites I want to make the following observations: when choosing sites:</p> <p>[Entries added under relevant wards in Appendix B]</p>	<p>Support for Option 1 and reasoning noted.</p>
42809057	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>4.3 Where should development be in the borough? Looking at Appendix B</p> <p>The most important section with relation to the TMBC area is the water environment in relation to building :-</p> <p>4.4 - 4.46 P39</p> <p>The River Medway and River Bourne are significant water resources within the borough and there are areas of Flood Zone 3 surrounding these watercourses. Many of these existing areas of flood risk may experience an increase in the number of flood events in the future due to climate change increasing rainfall intensity. The ecological quality of the borough's waterbodies is generally of moderate status, whilst the chemical quality is classified as 'fair'. Further development in the borough could lead to an increase in the amount of surface water runoff, including pollution, from urban areas and cause further degradation of the water quality of these watercourses.</p> <p>The SFRA site screening Level 1 table seems to show most risk for sites as 100% Flood zone 1 which is contrary to the assessment by site no. e.g. 59524 says all zone 3 SFRA table 97% zone 1?</p> <p>Looking at the list of sites I want to make the following observations: when choosing sites:</p> <p>[Entries added under relevant wards in Appendix B]</p>	<p>Support for Option 1 and reasoning noted.</p>
25315361	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>4.3 Where should development be in the borough? Looking at Appendix B</p> <p>The most important section with relation to the TMBC area is the water environment in relation to building :-</p> <p>4.4 - 4.46 P39</p> <p>The River Medway and River Bourne are significant water resources within the borough and there are areas of Flood Zone 3 surrounding these watercourses. Many of these existing areas of flood risk may experience an increase in the number of flood events in the future due to climate change increasing rainfall intensity. The ecological quality of the borough's waterbodies is generally of moderate status, whilst the chemical quality is classified as 'fair'. Further development in the borough could lead to an increase in the amount of surface water runoff, including pollution, from urban areas and cause further degradation of the water quality of these watercourses.</p> <p>The SFRA site screening Level 1 table seems to show most risk for sites as 100% Flood zone 1 which is contrary to the assessment by site no. e.g. 59524 says all zone 3 SFRA table 97% zone 1?</p> <p>Looking at the list of sites I want to make the following observations: when choosing sites:</p> <p>[Entries added under relevant wards in Appendix B]</p>	<p>Comment noted. The questionnaire was designed to capture opinion in relation to Green Belt issues, amongst other things. This will be utilised alongside new Green Belt evidence and other evidence relating to housing need and market demands.</p>
42684641	0 4.3.1 - 4.3.3	<p>4.3 Where should development be in the borough? Looking at Appendix B</p> <p>The most important section with relation to the TMBC area is the water environment in relation to building :-</p> <p>4.4 - 4.46 P39</p> <p>The River Medway and River Bourne are significant water resources within the borough and there are areas of Flood Zone 3 surrounding these watercourses. Many of these existing areas of flood risk may experience an increase in the number of flood events in the future due to climate change increasing rainfall intensity. The ecological quality of the borough's waterbodies is generally of moderate status, whilst the chemical quality is classified as 'fair'. Further development in the borough could lead to an increase in the amount of surface water runoff, including pollution, from urban areas and cause further degradation of the water quality of these watercourses.</p> <p>The SFRA site screening Level 1 table seems to show most risk for sites as 100% Flood zone 1 which is contrary to the assessment by site no. e.g. 59524 says all zone 3 SFRA table 97% zone 1?</p> <p>Looking at the list of sites I want to make the following observations: when choosing sites:</p> <p>[Entries added under relevant wards in Appendix B]</p>	<p>Comment noted. The water environment of the borough is acknowledged. The spatial strategy will reflect the outcome of evidence within the SFRA Level 1 and Level 2 once site sites have been identified.</p>

			Tonbridge is already stretched with the amount of traffic within the town and the facilities that are available. There are no Doctors' surgeries located in the High Wood area of Tonbridge with many people having to travel into the town to visit a Doctor. The town already has six secondary schools which is disproportionate to the population. Given that 3 of these are selective and serve a wide area of the county, any children of secondary school age will have difficulty accessing secondary education. If another secondary school is built this will only exacerbate the traffic and congestion issues.	Comment noted. This matter for schools provision will be considered and reflected within the new Infrastructure Delivery Plan evidence being prepared to support plan preparation.
42774273	0	4.1.1 - 4.1.3, Figure 2	The settlement hierarchy should show a stronger reference to transport access. New developments should, firstly be limited to Brownfield sites and then be directed towards locations providing good available, walking and/or cycling, transport hubs to limit congestion and emission of greenhouse gases. This may mean the use of some Greenbelt land in those areas. All the settlements listed as "Rural Service Centres" provide both reasonable road and rail access save Hadlow and East Peckham. Development in either of those locations will increase traffic along an already congested A26 and on lanes around the two villages. As a result, those two villages ought to be listed under "Other Rural Settlements".	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. The role of transport and accessibility will be part of the consideration of the strategy and sites. This will be reflected within the next Regulation 18 document.
42726913	0	4.1.1 - 4.1.3, Figure 2	I am of the view that we should seek to protect as much of the countryside as is practically possible, and believe that the focus for development should be a combination of developing the main existing residential areas highlighted on Option 1 together with the town of Tonbridge, together with a modest level of infill development in existing villages where appropriate.	
42458241	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	In this respect, the growth of Kings Hill towards the North of the existing development as shown in Option 1 makes the most sense. At the moment, Kings Hill cannot be seen from the Medway Valley, and any further development to the South of Kings Hill would present the risk of these houses and in turn Kings Hill being seen from the Medway Valley, which would present a detrimental and irrecoverable change to the current panorama which is a vista that should be protected for both the current and future generations.	Support for Option 1 and reasoning noted.
42387809	0	4.1.1 - 4.1.3, Figure 2	Some of the Other Rural Settlement, such as West Peckham are very much smaller and more rural in character than others in the same category, such as Wrotham, Aylesford and should be better classified as Rural Areas.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document.
42590913	0	4.1.1 - 4.1.3, Figure 2	I think using this hierarchy to decide where to develop will put strain on areas already densely populated. The reasons these areas are desirable is that they have good connections but are NOT over populated, ie heavy traffic, difficulty getting into local schools, and currently have very low crime rates. So to develop these areas will make them less desirable in the future.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document.
42550049	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	I can't chose two, but feel what should be done is a combination of strategy 3 and 5. Yet sparing the Medway gap and Tonbridge somewhat. These settlements have grown too much for existing infrastructure, but also have no remaining space to retrospectively add the required infrastructure. Bringing the second tier up to similar size would reduce traffic across all of the Borough. Hate to say it as used to live in Ightham, but the idea of Borough Green Garden city might have to play a role. Good connection to roads, motorways, train lines, yet not built up too much as yet to be able to build a truly sustainable settlement. But only if it includes everything locally required, as otherwise the traffic impact on both Sevenoaks and Tonbridge would be huge. Schools, shops, a proper high street (not just supermarkets), recreation etc etc	Support for combination of options 3 and 5 noted. Infrastructure issues and requirements will be considered and included within the new Infrastructure Delivery Plan.
42683265	0	4.1.1 - 4.1.3, Figure 2	The existing size of settlements is not necessarily the best determinant for the location of new development. A settlement in an isolated location, away from rail or trunk road connections, is less suitable for new development than a smaller settlement with better communication links.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document.
42833953	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Development in an isolated settlement results in far more car journeys and causes further congestion all the way to the transport hubs. Any development in Hadlow just adds to congestion and pollution all along the A26, where as development at Hildenborough Station, or West Malling station places housing within walking distance of the rail network and allows cars to access the motorway or A21 without impacting any other settlements. It is incongruous therefore, that these settlements are on an equal tier for new development.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document.
42716289	0	4.1.1 - 4.1.3, Figure 2	Protecting the green belt should be of the utmost importance. Any distribution should take that into account. Option 1 is preferable.	Support for Option 1 and reasoning noted.
42736577	0	4.1.1 - 4.1.3, Figure 2	Other rural settlements - it should be high priority to prevent these areas being overdeveloped and changing their very nature. Rural areas, ie open green spaces should be maintained as an absolute priority to protect the separate nature of the other rural settlements and continue to provide a rural environment.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document.
42770017	0	4.1.1 - 4.1.3, Figure 2	It is entirely appropriate to prioritise future development in the current existing urban areas.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document.
43313889	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	This hierarchy has been in place for decades and reflects the transport links, facilities are placed in the correct centres to sustain the local population.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document.
42771681	0	4.1.1 - 4.1.3, Figure 2	SPATIAL STRATEGY I choose Option 1, all development should take place outside Greenbelt and AONB.	Support for Option 1 and reasoning noted.
42642785	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	This hierarchy makes very good sense. However, the maintenance of the open country between settlements is very important. If many new settlements are created, rather than enlarging existing settlements, there will need for significant new roads and other infrastructure to support them. As a result, in the end there would be a considerably greater erosion of open countryside which I believe would be hugely regrettable.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document.
42684641	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	I think it is important to look at all areas for their current and future ability to meet the needs of those new residents. Building in the areas which already have good infrastructure is surely key to TMBC, meeting it's targets with as much ease as possible. Options 2 & 3 appear to have the best scope for expanding on the existing settlement sites as they have good rail and bus networks plus local hospitals and schools that can cope with the increasing population (or are easier to further expand to cope). Options 4 & 5 would lose a considerable amount of the rural settlement status of those areas and it's also important to note that they no longer have the public transport infrastructure (most bus routes from the medway gap rural settlements have been withdrawn) and doctors/hospitals/dentists are no longer able to cope with the increased population that is already living there (following developments in snodland and peters village for example). By building on areas surrounding the existing urban settlements you are simply expanding those areas rather than starting the demise of the smaller rural settlements as once you start building around those, it will eventually eat up the entire area and risk encroaching on greenfield sites and areas of outstanding natural beauty.	Comments on the spatial options noted, and a preference for focus on brownfield sites noted.
42778017	0	4.1.1 - 4.1.3, Figure 2	4.29 Option 1 to maximize buildings in Tonbridge would be a better option as this would reduce carbon footprint. Developing villages with no train station and no very frequent bus services would not in the long term serve the borough well.	Support for Option 1 and reasoning noted.
43485985	25240577	4.1.1 - 4.1.3, Figure 2	Like many towns, Tonbridge has evolved in a series of concentric rings with the Castle area being at its centre. I'm guessing that, so far as housing is concerned, the plan will follow that pattern. There has been comparatively little industry in the area so there are fewer brownfield sites that can be developed before the countryside comes under attack.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document.
45932673	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	The existing settlement hierarchy is outlined in figure 2 of the consultation document, with Wrotham, where our client's land is located, being a third tier settlement. However, given its range of employment opportunities it represents an established hub and it should be afforded a higher level of additional economic growth than the settlement hierarchy might otherwise suggest.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document.
45379777	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	I consider the plan to be too heavily weighted to the north of the borough and that the proposal should be more evenly distributed across the entire borough.	Support for Option 1 and reasoning noted.
39011745	0	4.1.1 - 4.1.3, Figure 2	SPATIAL STRATEGY I choose Option 1, all development should take place outside Greenbelt and AONB. Kings Hill is NOT an urban area, but is classified as D1 Rural Town, and hence the primary premises of this document are incorrect.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Comments on infrastructure funding and Kings Hill also noted.
42586689	0	4.1.1 - 4.1.3, Figure 2	ONS Postcode Lookup, including Urban Rural Classification https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about Note that Kings Hill does NOT have the resources of an urban area, such as fire station, police station, hotels, post office, library etc. Note that Kings Hill does NOT have a road structure that allows it to be a centre for an Urban area, with the transport links for any settlement in the area needing to take a diverse route to get to Kings Hill, i.e. any development AROUND Kings Hill is NOT part of the area with regards to transport and identity.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Comments on infrastructure funding and Kings Hill also noted.
42584353	0	4.1.1 - 4.1.3, Figure 2	I note Kings Hill is top of the hierarchy, but I feel this area has been exploited as much as possible unless there are to be further improvements to the infrastructure, services and facilities. The local GP provision is extremely lacking, bus services are being reduced, mobile phone and broadband services are not up to standard needed just for basic phone use, let alone working from home. Secondary school provision is also lacking.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Comments on infrastructure funding and Kings Hill also noted.
42442241	0	4.1.1 - 4.1.3, Figure 2	I agree with this structure established by the council for sustainable development but the Rural Service Centres in my opinion are only suitable for small pockets of development on available sites (preferably brownfield, old industrial), i.e. no more than 10 houses or equivalent flats on most sites as the roads and existing health/school services are unable to support the existing population and could not serve larger numbers of people than 10 families at a time. There is no evidence from the Government that they have the necessary funding for full scale services to be provided and fulfilled in these development areas, in fact the opposite as it is detailed in the news today, it is racking up billions of pounds in debt every week and the economy is grinding to a halt.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Comments on infrastructure provision within Kings Hill noted.
45387777	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	I strongly disagree that Kings Hill is an urban area - it should not be classified or treated as such. Residents here consider it a small village - we moved here from Surrey to move away from business and to the quieter countryside, still accessible to London yes, but not an urban area. Kings Hill does not have urban amenities - it has no secondary school, no train station, no library, lower population density, limited variety of amenities (supermarkets aside) only a few shops, a GP surgery that is not coping, no secondary school etc. It should be classed as a rural settlement and protected as so. This is what we all wanted when we moved here, what Kings Hill & Liberty advertised it as, but the constant over-development of the village is leading to it losing its charm and character and leading to it being unable to adequately provide facilities to support the residents that live here.	Support for Option 1 and reasoning noted.
42667041	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	It is imperative that there is adequate infrastructure before development. Option 5 covers areas where the roads are narrow and there is a shortage of services. I would challenge that it is a viable option I choose option 1 that all development should take place outside Greenbelt and AONB.	comment, challenging option 5 as a viable option noted.
46064929	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Because these sites would be over development, inappropriate use as shortage of parking and facilities, inappropriate use of green spaces, AONB Greenbelt lack of suitable infrastructure. Infrastructure is crumbling and must be repaired, upgraded and improved before any further development occurs.	Support for Option 1 and reasoning noted.
43412865	0	4.2.13-4.2.18 & Q5-6	We need to utilise the brownfield sites for sustainable housing in line with the TMBC climate neutral 2030 strategy, and not build mass housing estates or large industrial or commercial developments that the local road networks cannot handle. Spatial Strategy. (Questions 5 & 6) My favoured option is OPTION 1: OUTSIDE OF GREEN BELT and AONB which must be protected at all costs.	Support for Option 1 and reasoning noted.

			<p>No.</p> <p>The first fact is that Kings Hill is NOT an urban area, either according to the definition by the Office for National Statistics https://geportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about or by the infrastructure of which it consists.</p> <p>According to the ONS, the area of West Malling and Kings Hill is designated as O1: Rural Town, an overlay of the latest map from ONS is shown below, with Blue being Urban, Brown being Rural Town, and Green being Rural.</p> <p>[Insert of a google Earth map of the borough]</p> <p>In addition, the population estimate for Kings Hill in 2020 is around 9,000, which does not include it in the definition of Urban.</p> <p>Typically, an urban area is characterized by a population that largely works locally. However, without the urban infrastructure, Kings Hill is largely a commuter belt, and the models that are applied to match transport, communications and resource access should be updated to reflect this; the assumptions in the existing Regulation 18 Local Plan are clearly inaccurate. The original design of a garden village has been abandoned in preference for higher immediate profits for developers with more residential development and removal of safeguarded employment land without the commensurate improvements for the infrastructure.</p> <p>The next question is whether it should be considered as a service centre. Given the limited nature of the resources provided, and the restrictions on access to those resources, I consider that King Hill should not be considered as a rural service centre but be considered as an "Other Rural Settlement". The resources available within Kings Hill are restricted in terms of availability, scope and access. Indeed, Kings Hill relies on multiple service centres around the area.</p> <p>Kings Hill does not have the resources for an urban area. Typical resources include a police station, fire station, library, hotels, department stores, DIY stores, petrol station, furniture stores, jewellers, clothing stores, pubs (Kings Hill only has one!), local shopping areas and the like; without such resources, an urban area is not sustainable, as it will result in excessive levels of traffic to other areas. Note that there are currently two supermarkets, with a third being built. These are covering very similar scopes (aiming to provide for a full weekly shop for a household), so completely fail to provide an overall service to the requirements of residents; indeed, it looks like the latest supermarket being built is resulting in consolidation in existing services, which will ultimately lead to a reduction in the choice for consumers. There are concerns about the sustainability of this setup.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Comments on infrastructure provision within Kings Hill noted.</p>
39011745		0 4.1.1 - 4.1.3, Figure 2		
42006241	42006241	4.1.1 - 4.1.3, Figure 2	<p>Q.2. Do you agree that this settlement hierarchy should be retained and inform the spatial strategy for the Local Plan? Yes/No Please explain.</p> <p>No. We believe that the existing settlement hierarchy as identified in Figure 2 (p13 of the Consultation document) is too narrow and does not offer an effective hierarchy in relation to areas identified as 'Other Rural Settlements'.</p> <p>The 'Other Rural Settlement' category is a substantial list - comprising 30 different villages/settlements. Within this list, there is a significant degree of variation with regard to size, sustainability and accessibility of villages. By way of example, areas such as Aylesford, East Malling and Watlington display significantly different (better) sustainability credentials than Plaxtol, Addington or Mereworth (for instance) with the former referenced locations all containing a Railway Station, amongst other things.</p> <p>Accordingly, we would suggest that a new tier is introduced as 'larger villages' that sits between Rural Service Centres and Other Rural Settlements. This list should be subject to a Settlement Study evidence base to identify appropriate criteria to distinguish between villages that offer a significant number of day-to-day services and to be identified as 'larger villages' and 'other rural settlements'.</p> <p>This additional tier will help the wider spatial strategy, as it will provide for a greater degree of clarity, focus and understanding that any future housing and employment distribution, is orientated towards the more sustainable locations and that housing numbers reflect the specific nature and characteristics of that location. At present, a number of options refer to spreading the housing distribution across the Borough to support the rural settlements. We support this approach, but it is clear that some of the locations that currently sit in 'Other Rural Locations', have the ability to accommodate greater levels of growth, and an amendment to the Settlement Hierarchy will demonstrate these locations.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Comments on the introduction of an additional tier of settlement noted.</p>
42804769		0 4.1.1 - 4.1.3, Figure 2	<p>This option 1 seems to be the best option put forward</p> <p>How can Kings Hill be considered as an urban area?</p>	<p>Support for Option 1 noted.</p>
42771873		0 4.1.1 - 4.1.3, Figure 2	<p>There aren't the services or infrastructure for it to be considered urban - no secondary school, GP surgery that has been struggling to cope for years, limited bus service that has seen cutbacks (probably due to under use, which in turn was due to it being such a poorly run service), roads that can't cope and cause gridlock the minute there is an issue (especially A228, Kings Hill to Mereworth) and a housing estate that has developed over a relatively short period with services not developing at the same rate.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Comments on transport and infrastructure provision noted and this matter will be considered and reflected within the new evidence being prepared to support plan preparation.</p>
42792865		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4	<p>I understand the pressure on the Council to allow more houses to be built. Options 1 to 3 make sense in terms of developing areas ndespill ear existing conurbations with relatively developed and appropriate infrastructure and other necessary services nearby. Options 4 & 5 would be much more difficult and expensive in terms of building new infrastructure and would ruin the rural areas so carefully protected by the Green Belt.</p> <p>Hildenborough has too high up this list. There is a large population but there are a significant lack of services compared the other places on here. Much fewer shops, much fewer recreation facilities for example. If Hildenborough is to be subject to greater development, it needs to have significant investment into infrastructure. It's very difficult to get around without a car, the station accessibility is awkward. The train service is being reduced and the schools are near capacity. For example Stocks Green Primary school had something like 22/23 out of c30 pupil places taken by siblings this year.</p>	<p>Support for Options 1 to 3 and reasoning noted.</p> <p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Comments on transport and infrastructure provision noted and this matter will be considered and reflected within the new evidence being prepared to support plan preparation.</p>
42807073		0 4.1.1 - 4.1.3, Figure 2	<p>Large scale development is best created on brownfield sites and those areas already developed. So Option 1.</p>	
42646849		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4	<p>That said I believe single additional property developments sympathetic in design to surrounding houses should be considered provided they do not adversely affect the neighbourhood in terms of quality of life of value of property.</p>	<p>Support for Option 1 and reasoning noted.</p>
4280001		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4	<p>We are waiting with trepidation for this final local plan. Our area (mainly Borough green/ightham) isn't holding up well with the present amount of traffic pushed through these villages because of the lack of JS slips to link the m25/26 with the A21.</p> <p>the village is in an ANOB in green belt and full of children who have to risk their lives in front of huge articulated lorries every morning /afternoon. putting more housing in these areas where new infrastructure cannot be added due to listed buildings, ANOB etc is just crazy.</p> <p>there seems to be plenty of land ripe for housing around Kings Hill surely this could handle more houses?</p> <p>We need better infrastructure first before we can even think about increasing the population in these small villages. put in the JS slips, alleviate these traffic concerns and widen the roads then we will be able to accept a large scale housing plan.</p> <p>Option 3 or 4 seems to fit the bill?</p> <p>please keep me informed</p>	<p>Support for options 3 or 4 and reasoning noted.</p>
42682465		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4	<p>of the options on offer Option 1 is preferable, but care needs to be taken as the boundaries and confines of existing development has been assessed in the past as the limit of development for local reasons. These boundaries should be reconsidered for individual local developments. I do not believe in blanket permissions for all existing developments.</p>	<p>Support for Option 1 and reasoning noted.</p>
42723233		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4	<p>Option one is preferred. If you build on sites near the edge of AONB then you begin to get a sprawl of housing and increased traffic which due to congested roads in the local area seeks out country lanes for cut throughs/shortcuts and also results in joyriders (both cars & motorbikes) that don't care about the safety of others. This all inevitably means that what were once idyllic, peaceful rural countryside experiences and beautiful quite lanes for residents to enjoy, instead become what High House Lane, Ashes Lane, Blackman's Lane, Oxenhoath and Roughway Roads have all become in recent years...noisy, dangerous and damaged roads, taking away from the very relaxing and enjoyable experience they are meant to be. Instead further development and expanding sites only result in negatively affecting the health and well being of the local wildlife populations.</p>	<p>Support for Option 1 and reasoning noted.</p> <p>Support for Option 1 noted.</p>
42745121		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4	<p>Option 1</p>	
25406913	25406817	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4	<p>Spatial Option 1. This approach will not achieve a distribution of growth across the district. It does not offer a choice of homes in different locations. It runs the risk of further expanding the affordability gap between the north and south of the district. Critically, it would ignore the main town of Tonbridge.</p> <p>There is an important distinction to draw between the Green Belt and the AONB when considering the spatial strategy options. These two designations should not be linked in importance or when considering impacts of development. The AONB should be protected from development that would detract from its special qualities. The Green Belt function is different as it is not a landscape quality policy. It must be reviewed to make sure the boundaries are suitably drawn and remain the most relevant whilst achieving sustainable development. As the majority of the land in the district is within Green Belt, it is necessary to undertake thorough urban capacity testing to demonstrate that exceptional circumstances existed to release GB land or safeguard land through that process. The early work that has been undertaken as part of the evidence gathering acknowledges that there is insufficient urban and brownfield sites to accommodate all the growth requirements to 2040. Spatial options 2 and 3 recognise the need to include greenfield land and we support the Councils case that exceptional circumstances exist to consider Green Belt release as an essential part of the final strategy.</p> <p>Spatial Option 2. We support the principle of an urban focused strategy. However the Towns and main centres are already intensified in line with market requirements as there is no policy impediment to this in principle. Plan-makers should be very cautious about making assumptions that intensification/densification will be delivered to meet housing requirements, since these assumptions are frequently unrealistic and are unlikely to lead to the housing requirement being met. If this scenario is considered for adoption it must be evidence-led, i.e. based on examples of where high density development has been delivered in similar circumstances. In establishing the base level of additional growth that can occur within existing sustainably located - settlements, it is imperative that assumptions made are transparent and backed up by clear evidence of a sites availability and suitability to deliver.</p> <p>Where intensification/densification is a possibility, again, reasonable assumptions should be made having regard to other environmental factors including heritage impacts, quality of life and health impacts. The role and importance of maintaining formal public open space and incidental open spaces/green areas within existing urban areas must not be underestimated within the urban capacity testing scenarios.</p> <p>It is likely that significant urban extension sites on greenfield (and greenbelt) land will be required to deliver this option. This may not achieve the required housing numbers.</p>	<p>Comments on the five spatial options noted. The council will be undertaking further work and evidence in relation to the future role of the Green Belt, and recognises the distinctions between landscape and other designations.</p> <p>Support for an urban focussed strategy noted. The future spatial strategy will be evidence-led including market related factors.</p> <p>Preference for option 3 noted, including the role of urban extensions within this option. Reference to the role of the higher tier centres accommodating the main levels of growth with secondary functions for other locations such as Hadlow, Borough Green and East Peckham noted. Reference to the role of Hilden Park also acknowledged.</p> <p>Comments relating to the outcomes of option 4 in distributing growth, and the delivery patterns associated with this, and infrastructure demands noted, including the role of Plaxtol in this.</p> <p>The council also acknowledges the lead in time for new settlements and their potential contribution over a plan period of 15 years post adoption. This will be considered alongside evidence as the spatial strategy is being formed.</p>
42758849		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4	<p>I support the Green Belt being extended around Kings Hill, East Malling and West Malling to protect individual character of the settlements and important green spaces (Option 1).</p> <p>We consider that the Local Plan should re-assess the status of some of these settlements. In particular, we believe that the built-up area of Addington should be extended to include the residential areas comprising The Links and Humphries Park Mitsubushi. It should also be extended southwards across the A20 down to the railway to include site 59604/59606. This would provide a long-term defensible boundary in line with NPPF guidelines. (xxx)</p>	<p>Support for Option 1 and reasoning noted.</p> <p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Addington also noted.</p>
42052833	42036737	4.1.1 - 4.1.3, Figure 2		
42440097		0 4.1.1 - 4.1.3, Figure 2	<p>Borough Green is not a rural service area; it is a village as are Ightham, Wrotham, Wrotham Heath and Crouch which border our village.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Borough Green also noted.</p>

			SPATIAL STRATEGY	
45095841	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	I choose Option 1, all development should take place outside Greenbelt and AONB.	Support for Option 1 and reasoning noted.
43313313	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Question 3 & 4 I believe it is logical to expand current settlements where possible allowing the new properties access to the existing amenities, whilst of course improving the required infrastructure (sewage, drainage, roads, schools and the like). I think that is Strategy Option 2 as detailed. It is also pertinent to consider the spread of possible developments. To my mind it is best to spread the development across the county to avoid undue pressure on existing resources - roads, drainage, schools - which consolidated development in one area will create. I am given to understand that West Malling and Kings Hill only accounts for 1% of the area considered, but TMBC has provided over half of the development over the last 20 years.	Support for Option 2 and reasoning noted.
45474465	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	SPATIAL STRATEGY I choose Option 1, all development should take place outside Green Belt and AONB.	Support for Option 1 and reasoning noted.
42822561	0	4.1.1 - 4.1.3, Figure 2	Borough Green cannot be classified as a Rural Service Centre since it doesn't have the size or infrastructure of the other suggested parishes. It is a large village with the benefit of a (bad) rail link, a (good) medical centre and very little else. Retail is appalling. Borough Green acts as a hub for the local area, but can't be construed as providing services in any meaningful way. Housing Need Assessment. My preferred quantum option is OPTION 3 There is no sense in wasting land building houses to attract people who already have houses elsewhere. We should be building only for international migration, for affordable housing, for a sustainable amount of growth and/or replacing poor, existing housing.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Borough Green also noted.
43412865	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	1.2.6 Having regard to the identified development needs of the area, the constraints in the borough and the two HMAs, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below. Option 1 1.2.7 Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape. 1.2.8 For the reasons outlined above we fundamentally object to the notion that Green Belt should not be released. If one looks at the settlement hierarchy, Tonbridge, Kings Hill, Snodland, Borough Green, East Peckham, Hadlow, Hildenborough and West Malling are all tier 1 and 2 settlements that fall within the Green Belt and would see development restricted by the option 1 approach. Furthermore, it seems illogical not to compliment the established employment hub that already exists in Wrotham given its links to the strategic road network. 1.2.9 In respect of national policy, paragraph 140 of the NPPF states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. 1.2.10 Having regard to the identified development needs of the area, the constraints in the borough and the two HMAs, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below. Option 1 1.2.11 Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape. 1.2.12 For the reasons outlined above we fundamentally object to the notion that Green Belt should not be released. If one looks at the settlement hierarchy, Tonbridge, Kings Hill, Snodland, Borough Green, East Peckham, Hadlow, Hildenborough and West Malling are all tier 1 and 2 settlements that fall within the Green Belt and would see development restricted by the option 1 approach. 1.2.13 In respect of national policy, paragraph 140 of the NPPF states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. 1.2.14 We acknowledge that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined all other reasonable options making as much use as possible of suitable brownfield sites and underutilised land; optimising the density of development and informed by discussions with neighbouring authorities. However, these exercises were carried out in detail as part of the previous Local Plan work and evidence established that Green Belt release is needed. 1.2.15 Notwithstanding the earlier decisions and evidence, housing or employments need can be an exceptional circumstance to justify a review of your Green Belt boundary. This principle was set out within St Albans District Council v Hunston Properties Limited [2013] EWCA 116L. 1.2.16 Further case law, (Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin)) provide guidelines for determining whether exceptional circumstances exist. The above judgement states: 'planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters: (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important); (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development; (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt; (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent'.	Support for Option 3 and reasoning noted.
43485985	25240577	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	1.2.6 Having regard to the identified development needs of the area, the constraints in the borough and the two HMAs, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below. Option 1 1.2.7 Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape. 1.2.8 For the reasons outlined above we fundamentally object to the notion that Green Belt should not be released. If one looks at the settlement hierarchy, Tonbridge, Kings Hill, Snodland, Borough Green, East Peckham, Hadlow, Hildenborough and West Malling are all tier 1 and 2 settlements that fall within the Green Belt and would see development restricted by the option 1 approach. 1.2.13 In respect of national policy, paragraph 140 of the NPPF states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. 1.2.14 We acknowledge that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined all other reasonable options making as much use as possible of suitable brownfield sites and underutilised land; optimising the density of development and informed by discussions with neighbouring authorities. However, these exercises were carried out in detail as part of the previous Local Plan work and evidence established that Green Belt release is needed. 1.2.15 Notwithstanding the earlier decisions and evidence, housing or employments need can be an exceptional circumstance to justify a review of your Green Belt boundary. This principle was set out within St Albans District Council v Hunston Properties Limited [2013] EWCA 116L. 1.2.16 Further case law, (Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin)) provide guidelines for determining whether exceptional circumstances exist. The above judgement states: 'planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters: (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important); (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development; (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt; (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent'.	Comments on each spatial strategy option noted. In relation to the Green Belt the council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. The council is undertaking a further Green Belt study which will provide further evidence on the performance of the Green Belt within the borough. Comments in relation to support for focus of development within settlements, but acknowledging other growth noted. Reference to the role of Hildenborough in supporting further growth noted. Support for options 3 and 4 and the dispersed settlement patterns noted. Comments relating to difficulties for local plan with new settlements under option 5 also noted.
43487649	25240577	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Question 3 – Which spatial strategy option do you prefer? Question 4 – What are your reasons for selecting this particular spatial strategy option for the Local Plan (outline briefly)? Spatial Options – we support a sustainable form of development and growth, utilising brownfield, previously developed and despoiled land in proximity/adjacent to existing settlements in the first instance. Every effort should be made to ensure that the spatial strategy prioritises opportunities to re-use and recycle land which is not in agricultural production and is outside of AONB and Green Belt designations for development purposes, avoiding the need to develop on greenfield sites. G.3. Which quantum option for the spatial strategy do you prefer? We consider that 'Quantum 2' which seeks to meet the assessed housing need in full and provide a buffer of up to 10% is the only sound option of the two. G.4. What are your reasons for selecting this particular quantum option for the Local Plan (outline briefly)? In our opinion, Quantum 1 is a 'do minimum' and as a minimum this is not in the spirit of the NPPF or the Government's commitment to deliver a step change in the delivery of housing. It cannot be said that a 'do minimum' is positively prepared as the Framework requires. If the Council adopts Quantum 1, there is a very real prospect that the local plan will be found unsound, and the risk of an unsound local plan is too great in such dire economic times. In our view, the Council should propose to meet its needs in full and apply a buffer of 20% as required by the Framework when under-delivery has been experienced, as is the case in the borough.	Comments on each spatial strategy option noted. In relation to the Green Belt the council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. The council is undertaking a further Green Belt study which will provide further evidence on the performance of the Green Belt within the borough. Comments in relation to support for focus of development within settlements, but acknowledging other growth noted. Reference to the role of Hildenborough in supporting further growth noted. Support for options 3 and 4 and the dispersed settlement patterns noted. Comments relating to difficulties for local plan with new settlements under option 5 also noted.
43545921	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Question 3 – Which spatial strategy option do you prefer? Question 4 – What are your reasons for selecting this particular spatial strategy option for the Local Plan (outline briefly)? Spatial Options – we support a sustainable form of development and growth, utilising brownfield, previously developed and despoiled land in proximity/adjacent to existing settlements in the first instance. Every effort should be made to ensure that the spatial strategy prioritises opportunities to re-use and recycle land which is not in agricultural production and is outside of AONB and Green Belt designations for development purposes, avoiding the need to develop on greenfield sites.	Support for option 4 and reasoning noted.
43548193	38432225	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	G.3. Which quantum option for the spatial strategy do you prefer? We consider that 'Quantum 2' which seeks to meet the assessed housing need in full and provide a buffer of up to 10% is the only sound option of the two. G.4. What are your reasons for selecting this particular quantum option for the Local Plan (outline briefly)? In our opinion, Quantum 1 is a 'do minimum' and as a minimum this is not in the spirit of the NPPF or the Government's commitment to deliver a step change in the delivery of housing. It cannot be said that a 'do minimum' is positively prepared as the Framework requires. If the Council adopts Quantum 1, there is a very real prospect that the local plan will be found unsound, and the risk of an unsound local plan is too great in such dire economic times. In our view, the Council should propose to meet its needs in full and apply a buffer of 20% as required by the Framework when under-delivery has been experienced, as is the case in the borough.	Support for Option 2 OAN + 10% and reasoning noted.
43619329	43619297	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	(ii) The Spatial Strategy Options 2.42 The Council identified 5 spatial strategy options as illustrates on Figures 3-7 and the Table over Pages 19-20 of the Draft Plan. Linked to this the Table on Page 22 sets out two quantum options (Meeting LHN (Option A) and Meeting LHN + 10% (Option B). Rydon's views on quantum have been set out in sub-section (i) above. Clearly the Council needs to consider a further Option C that looks at LHN + 20%. 2.43 On the matter of spatial strategy options: 2.43.1 Option 1: This option is simply unsustainable. It would not deliver the required level of housing and employment development and would leave vast areas of the Borough without any growth. This option cannot be supported on any level. 2.43.2 Option 2: Although this option may appear to be attractive it too is inherently unsustainable. Focusing only on urban areas will not deliver the required level of housing and employment development and will lead to the loss of vital open space within those existing urban areas. 2.43.3 Option 3: This option would enable the delivery of more housing to meet needs but ignores those communities outside of the higher order settlements that also need housing and employment development to help sustain their vitality and viability. Equally there are a number of settlements that would not be included under this option that have potential to deliver housing in a sustainable manner whilst minimising environmental impact. 2.43.4 Option 4: This option would enable the delivery of the housing needed for the Borough and would also enable the location of development in settlements where it is required and that would achieve a sustainable pattern of growth. Greenfield development will be required in order to deliver the necessary level of new homes and in the right locations. 2.43.5 Option 5: Whilst a new settlement may seem like an attractive proposition for the Council that secures the required level of housing for the Borough in one foul swoop it is inherently high risk. In an authority like Tonbridge and Malling where there is already a significant shortfall in housing supply coupled with a poor track record of delivery a key objective for the Council must be early delivery from the Draft Plan. A new settlement will not give early delivery. Indeed there are a number of examples where Council's have previously relied upon new settlements, which have failed to deliver leading to ongoing problems in terms of supply. Waverley Borough in Surrey is a prime example where 2,600 dwellings are relied upon from the new settlement at Dunsfold. The Plan for Waverley was adopted in February 2018 and not a single dwelling has come forward in that new settlement. The Council has never been able to demonstrate a 5-year housing land supply including in the same year the Plan was adopted leading to numerous 578 Appeals. The new settlement approach is simply not the panacea that it might seem at first sight and should not be pursued in this authority. 2.44 In conclusion on the spatial strategy options it is Rydon's view that Option 4 and/or a combination of Options 3 and 4 represent the best and most sustainable approach for the Council to pursue. This option would also enable the Council to accommodate the LHN + 20% scenario advocated through these Representations.	Support for Option 4 and reasoning noted.
42798113	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Spatial strategies option 1, 2 and 3 are by far the best so that development can be supported by local facilities and transport. options 4 & 5 will cause more use of cars and be less green Q.5. Which spatial strategy option do you prefer? In our opinion 'Option 2' – "Urban: Development focussed on sites within (greenfield as well as previously-developed land) as well as adjacent to urban settlements" is the most preferable.	Support for Option 1 to 3 noted.
43548193	38432225	4.2.13-4.2.18 & Q5-6	Q.6. What are your reasons for selecting this particular spatial strategy option for the Local Plan (outline briefly)? For reasons related to the settlement hierarchy, it is logical in our view that new development should be directed towards urban areas as the first preference, and this should include locating development adjacent to settlements even if that land is greenfield and Green Belt.	Support for Option 2 and reasoning noted.
43412865	0	4.1.1 - 4.1.3, Figure 2	Q.2 No. Borough Green is not a Rural Service Centre. It is a Rural Settlement. The term Rural Service Centre indicates that the area appears large enough to justify 3000 Homes at BGCC whereas it does not.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Borough Green also noted.
42770881	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	I would like to see option 3 being adopted as a key element of the strategy for the region. Being close to key infrastructure, facilities and existing amenities would offer a more logical approach to providing practical housing rather than imposing developments in rural areas that will struggle with increased population density	Support for Option 3 and reasoning noted.

			Options for the Spatial Distribution and Quantum of Development – Consideration of Protected Landscapes This is the primary issue of those within our remit. We note that protected landscapes represent a significant consideration when planning development within the borough, with the Kent Downs and High Weald Areas of Outstanding Natural Beauty (AONBs) covering 26.84% by area. We understand you are continuing to make the case to Government that your housing target of 15,941 should be reduced to take account of this and other constraints. Given that this is the case we feel it would be challenging for the plan to provide for this objectively assessed housing need plus up to a further 10% (although it is appropriate that the SA has assessed this latter scenario as that likely to result in the most significant impacts). We are pleased to see that both the main consultation document and SA recognise the importance not only of the protected landscapes themselves but also of their setting (as set out in paragraph 5.9.21 of the main document for example). All five of the spatial distribution options proposed have the potential to impact the AONBs, either directly or through their setting. We appreciate that this is reflected in the draft SA. Options 4 and 5 have the greatest potential to increase development directly within the AONBs and we would remind you of the presumption against major development in such locations as set out in paragraph 177 of the National Planning Policy Framework (NPPF, 2021). Option 5 considers the potential for a new settlement or settlements within the borough, distinct from any existing towns and villages. Figure 7, which shows the broad area of search for such a new settlement, covers the entirety of the borough barring buffers around the existing settlements. For such a new settlement to make a meaningful contribution towards housing numbers and to be sustainable in terms of services, infrastructure etc. it would likely need to be of a size that would qualify as major development and we therefore question whether the area of search should include the AONBs. As the plan progresses we would expect you to consider fully how all five spatial options and both quantum options would impact. You should consider all alternatives to ensure that an overarching development strategy with the least environmental and landscape impact can come forward, including exploring what might be achieved through the Duty to Cooperate with neighbouring authorities.	Comments noted. This matter relates to the role of protected landscapes within the spatial strategy and the implications for housing delivery above the OAN.
44131329	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.		
43417889	0	4.1.11 - 4.1.3, Figure 2	Q.2 No. Borough Green is not a Rural Service Centre. It is a Rural Settlement. The term Rural Service Centre indicates that the area appears large enough to justify 3000 Homes at BGCC whereas it does not.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Borough Green also noted.
42824065	0	4.1.11 - 4.1.3, Figure 2	There is a marked difference within the 'other rural settlements' between fairly urban areas - Burham, Aylesford - and brand new blots on the landscape - Peters Village and Leybourne - and the genuine rural villages. The latter should be protected entirely from creeping urbanisation so perhaps there should be a further category to distinguish these.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Burham, Aylesford, Peters Village and Leybourne also noted.
42832833	42826433	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Q.3. Which spatial strategy option do you prefer? Option 4 (Distributed): Development focussed on sites within (greenfield as well as PDU) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities). We note the options provided are: Option A - Quantum 1 – Meeting Assessed Housing Need Option B - Quantum 2 – Meeting Assessed Housing Need + up to 10% Option C - Quantum 3 – Meeting Assessed Housing Need + up to 20% Given the commentary in the R18 Plan at para 5.3.13 – 5.3.16 about housing affordability, and the current housing land supply (HLS) situation and past delivery rates, as set out in the HLS Position Statement (March 2021), we believe there is a real need for the plan to review the need to deliver the Assessed Housing Need + up to 20% rather than that promoted in question 5. Our rationale for this is set out below: Local Housing Need and the Minimum Housing Requirement Whilst the starting point for determining the Local Housing Need ("LHN") is the Government's Standard Method, which for TMBC currently equates to 839 dpa1, PPG is clear that the Standard Method identifies the minimum annual housing need figure2. I.e. it is just the starting point and should not be treated as the housing requirement figure. To this end PPG identifies a number of instances where it might be appropriate to plan for a higher housing need figure than the Standard Method indicates3. This, the PPG makes clear, will need to be assessed prior to and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). To this end PPG suggests that circumstances where this may be appropriate include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of: • growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth; • strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or • an authority agreeing to take on unmet need from neighbouring authorities, as set out in a Statement of Common Ground;	Support for Option 4 and reasoning noted.
44275681	44277153	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.		Comment identifying a need to promote housing delivery in excess of the OAN, and up to around 20% noted. Since publication of the Regulation 18 local plan the government has proposed some changes to the NPPF in relation to housing delivery. These will need to be reflected within the next Regulation 18 local plan, which may include housing delivery to reflect constraints within the borough.
42588129	0	4.1.11 - 4.1.3, Figure 2	I do not agree that Kings Hill is classified as an Urban Area. It has no secondary school, no thoroughfare, and only two roads into the area.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
44275681	44277153	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Strategy Option 1. Option 2. Description Optimise densities on development sites within Tonbridge, particularly on those sites within the town centre, maximising their potential for residential and mixed-use development. Conservative densities on development sites within Tonbridge, Consequence for the need for additional development land Minimise the need for the release of green field sites beyond the outer edge of Tonbridge, in the Green Belt, primarily for residential development. Increase the need for the release of green field sites at and beyond the outer edge of the intensification of s for residential Tonbridge, in the Green Belt, primarily for residential development. The sustainability benefits of Option 1 are recognised, though this is not as deliverable option owing to land availability. Thus the most sustainable option is a combination of both Options 1 and 2, to ensure modest densities and appropriate Green Belt release.	Support for a combination of options 1 and 2 noted. This includes recognition for the role of Tonbridge as the principal town.
42684641	0	4.1.11 - 4.1.3, Figure 2	I would not put East Peckham and Hadlow as a Rural Service Centre greatest opportunity at the defined 'Urban Areas', with more development development at 'Rural Service Centres' then 'Other Rural Settlements'. 3.2 The Consultation states (paragraph 4.1.3) its intention to continue with this hierarchy approach; however in the context that 70% of the Borough is designated Green Belt and there is little available brownfield land in existing built up areas, Ramac Holdings is concerned that limiting the Council's spatial approach to that of the previous (and very dated) development plan, before exploring other options of how sustainable development could be delivered, is premature. 3.3 The Consultation presents five options being considered for the spatial distribution of development across the Borough. Option 1 – Development Beyond the Green Belt. 3.4 Option 1, to focus growth in and adjacent to settlements outside of the Green Belt boundary and the Area of Outstanding Natural Beauty (AONB), must be the Council's first approach to where development should be located. 3.5 Framework paragraph 141 requires that all reasonable options for meeting its identified need for development (i.e. Option 1) must be exhausted (with regard still to consequences of sustainable development) before 'exceptional circumstances' may exist to justify changes to Green Belt boundaries. 3.6 Figure 3 of the Consultation shows the focus of where development would be located through Option 1, across which available and suitable sites should be preferred by the Council. For Ramac Holdings it is noted and significant that this area of focus includes the Site, as promoted for employment development under planning application reference 21/03066/OA. Option 2 – Development Adjacent to Urban Areas 3.7 Option 2 comprises development adjacent to 'Urban Areas', whether or not located in the Green Belt. This would require 'exceptional circumstances' to exist for settlements in the western or southern parts of the Borough, but that could only be demonstrated once the sustainable opportunity for development on sites beyond the Green Belt (but still adjacent to settlement confines) as shown in Figure 3 of the Consultation has been exhausted. 3.8 For the Council to consider whether or not 'exceptional circumstances' exist, the courts have ruled that this test is 'very stringent'. Most recently the judgement of Mr Justice Hay1 is relevant in presenting tests to help navigate when 'exceptional circumstances' could be justified. These include 'the consequent difficulties of achieving sustainable development without impinging of the Green Belt'; thus it follows that where sustainable development can be accommodated on non-Green Belt land such sites must be preferred ahead of those with the Green Belt. Option 3 – Development Adjacent to Urban Areas and Rural Service Centres 3.9 Option 3 includes development on the edges of 'Rural Service Centres' as well as 'Urban Areas', whether or not they are in the Green Belt. 3.10 Similar comments as to Option 2 are made – that before development on the edges of 'Urban Areas' and 'Rural Service Centres' in the Green Belt can be justified, there must be no other options for sustainable development elsewhere and the stringent tests of the Calverton Judgement must be satisfied. Option 4 – Development Adjacent to Urban Areas, Rural Service Centres and Other Rural. 3.11 Option 4 is a more distributed pattern of development, which seeks development on the edges of less sustainable locations, whether or not in the Green Belt. This dispersed approach, with	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. Comments on each of the 5 spatial strategy options noted, including support for Option 1 and a focus of development outside the green belt first. The matter of Green Belt and exceptional circumstances will be considered and reflected within the new evidence being prepared to support plan preparation, but also reflect the requirements of the NPPF.
44462081	44462081	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.		Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to East Peckham also noted.
42723105	0	4.1.11 - 4.1.3, Figure 2	East Peckham should not be a rural service centre as it is a small hamlet close to, but separate from, Snoll Hatch, Hale street and Peckham Bush.	
42443041	0	4.1.11 - 4.1.3, Figure 2	I think that Waterybury and East Peckham are on a par in terms of their size and facilities and that they should be in the same category. Waterybury in fact has better transport connections both by bus and train than East Peckham, creating better opportunities to reach Tonbridge and Maidstone than for East Peckham. Waterybury is also in a greater secondary school catchment area as it feeds into the grammar schools at Maidstone whereas in East Peckham the catchment is for Mascalas at Paddock Wood for which there is not a good bus service. Secondly I think that Kings Hill is not an urban area on a par with the other urban areas listed. I think it is a rural service area. Kings Hill has relatively few facilities (e.g. no post office or library, an over-subscribed GP, no dentists) and not very good public transport connections to the major towns in the area.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to East Peckham and Kings Hill also noted.

			<p>6.1 Berkeley believes that the local housing need (LHN) figure arrived at using the standard method should be a minimum requirement for the new local plan. 5.2 A 10% uplift to the LHN would allow for some flexibility in plan making at this stage, would help to meet additional affordable housing need, and the need of specific parts of the community. This option could therefore be supported. However, it is difficult to ascertain from the evidence published to date (including the Housing Needs Assessment), why 10% has been alighted upon and so the level of uplift requires clarification and justification to garner full support. 7.1 To determine the number of homes for which to plan, Tonbridge & Malling Council will need to start from the minimum local housing need arrived at using the Standard Method. The Council's evidence suggests the following: "The latest standard method calculation results in a minimum need of 839 dwellings each year. This compares with delivery of an annual average of 591 over the 5 years to 2020/21."</p> <p>7.2 Berkeley agrees that this quantum of growth is a reasonable starting point. However, as is set out in guidance for the Standard Method, when considering its own needs, the Council will need to carefully assess economic growth both expected, and aspired to, in Tonbridge & Malling and what this means for the housing requirement. It is not clear from the evidence published to date whether any implications of economic strategies have been considered. The Housing Needs Assessment only references the effects of the current economy – house prices, activity on the high street etc. There is limited assessment of job growth and what this might mean for housing needs.</p> <p>7.3 Moreover, the Council will also need to assess the specific needs for certain parts of the community, such as the elderly, disabled people and those who do not live in 'bricks and mortar' homes. The Housing Needs Assessment does consider these matters, and summarises its conclusions as follows:</p> <p>"...there are three main policy areas that require particular attention from both a planning policy and social policy perspective:</p> <ul style="list-style-type: none"> • the challenge of enabling the quantity and mix of housing that needs to be delivered, including an appropriate level of affordable housing; • the challenge of ensuring that the housing and support needs of older people are met going forward; and • the challenge of ensuring that the needs of people with disabilities is appropriately addressed." <p>7.4 On the face of it, it would appear that there is some evidence here to include an uplift from the LHN to reach an appropriate housing requirement in the Local Plan. The justification for choosing a 10% uplift is currently unclear, however, and requires further explanation.</p> <p>7.5 The Council will also need to keep in mind that from this starting point it will need to consider whether there are any unmet needs in neighbouring areas that also need to be included in the housing requirement. The Council will need to clearly demonstrate cooperation on strategic matters including potential unmet housing needs with neighbours.</p>	Support for a housing delivery target in excess of OAN acknowledged, including seeking clarification of how the 10% figure has been arrived at. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.
25366913	25366913	4.2.13-4.2.18 & Q5-6	<p>consistent with allocating Broadwater Farm (site ID: 59740) as a strategically significant development opportunity, as evidenced in these submissions, and the previous (now withdrawn) plan for Tonbridge & Malling.</p> <p>5.1 The most sustainable locations for growth are those that have good access to services and facilities. A mix within the strategy will ensure a wide range of sites, both in terms of size and location, delivered to support a vibrant and diverse housing market. There are substantial advantages in identifying strategic development opportunities, especially those (like Broadwater Farm site ID: 59740) that can make an early contribution to housing land supply (in a location where growth is needed). Pragmatically, this location can accommodate growth, and development on the fringes of Kings Hill would be consistent with the successful spatial policy approach previously established. There is no need for emerging strategic options to 'reinvent the wheel' – in fact, to do so, would seriously delay and complicate the delivery of housing, employment, and infrastructure. This last point militates against option 5.</p> <p>5.2 Hereunder, each option is considered in some more detail.</p> <p>Strategy Option 1: Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty.</p> <p>5.3 This option follows the provisions of the Framework at chapters 13 and 15, whereby in the first instance development should be focused away from the Green Belt and nationally important areas like AONB. This approach would see greater levels of development being focussed in locations like Broadwater Farm (site ID: 59740) but it would be somewhat imbalanced in terms of distribution of growth across the wider Borough including in relation to Housing Market Areas. It would not facilitate development in some sustainable locations such as the Rural Service Centres and its very limited approach would mean the Borough's housing needs are less likely to be met.</p> <p>Strategy Option 2 - Urban: Development focussed on sites within (greenfield as well as previously-development land) as well as adjacent to urban settlements 5.4 This option provides for a strong opportunity to deliver significant development at sustainable locations like Broadwater Farm (site ID: 59740). Urban extensions are a well-recognised way of delivering development at scale that is close to existing services and facilities, but which can also provide additional facilities and infrastructure to complement what is available in urban areas (as is referenced in the Framework at paragraph 73). It would however limit development in some sustainable locations such as the Rural Service Centres.</p> <p>Strategy Option 3 - Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements. 5.5 It is likely that this option strikes a better balance between supporting the urban, and rural, communities of the Borough as well as across the two Housing Market Areas. There remains a significant opportunity in this option to deliver development at locations like Broadwater Farm (site ID: 59740).</p> <p>5.6 Supporting some development at settlements further down the settlement hierarchy allows for a balanced housing distribution and for development to aid in sustaining rural services and facilities. Therefore Option 3 is Berkeley's preferred option.</p>	Support for option 3 noted, including reasoning behind this that a focus of development should be locations with good access and facilities. Comments on each option and the implications of each also noted.
25366913	25366913	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>strategy options have been identified. We respond on the merits of each of these below.</p> <p>Option 1. Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape.</p> <p>For the reasons outlined above we fundamentally object to the notion that Green Belt should not be released. If one looks at the settlement hierarchy, Tonbridge, Kings Hill, Snodland, Borough Green, East Peckham, Hadlow, Hildenborough and West Malling are all tier 1 and 2 settlements that fall within the Green Belt and would see development restricted by the option 1 approach. Similarly, East Peckham also offers a good quality offer of services and facilities that can be enhanced further with growth. In respect of national policy, paragraph 140 of the NPPF states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>We acknowledge that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined all other reasonable options making as much use as possible of suitable brownfield sites and underutilised land; optimising the density of development and informed by discussions with neighbouring authorities. However, these exercises were carried out in detail as part of the previous Local Plan work and evidence established that Green Belt release is needed. Notwithstanding the earlier decisions and evidence, housing or employment need can be an exceptional circumstance to justify a review of your Green Belt boundary. This principle was established in the judgement of <i>St Albans District Council v Hunton Properties Limited</i> [2013] EWCA 1163. Further case law, (<i>Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council</i> [2015] EWHC 1078 (Admin)) also provide guidelines for determining whether exceptional circumstances exist. The above judgement states:</p> <p>"Planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:</p> <ol style="list-style-type: none"> i. the acuteness/intensity of the objectively assessed need (matters of degree may be important) ii. the inherent constraints on supply/availability of land prime facie suitable for sustainable development iii. (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt iv. (the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably <p>The allocation of Eccles as an 'other rural settlement' is meaningless if (as has happened) the Council or would-be-developer can redefine the current 'Area of Opportunity' to arbitrarily include any part of the immediate locality.</p>	Comments on each spatial strategy option noted. In relation to the Green Belt the council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. The council is undertaking a further Green Belt study which will provide further evidence on the performance of the Green Belt within the borough.
44426049	25240577	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>the allocation of Eccles as an 'other rural settlement' is meaningless if (as has happened) the Council or would-be-developer can redefine the current 'Area of Opportunity' to arbitrarily include any part of the immediate locality.</p>	Comments in relation to support for focus of development within settlements, but acknowledging other growth noted. Support for options 3 and 4 and the dispersed settlement patterns noted. Comments relating to difficulties for local plan with new settlements under option 5 also noted.
25315361	0	4.1.1 - 4.1.3, Figure 2	<p>Eccles should be dealt with separately as a special case. The potential area for large scale development should be clearly defined and the area outside of that boundary should have the strongest possible protection. The current definition of the Area of Opportunity impinges upon some 50% of the village boundary. The new plan should vigorously defend the remaining 50%.</p>	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Eccles also noted.
42821345	42821281	4.2.13-4.2.18 & Q5-6	<p>Standard Method requirement of circa. 950 dwellings per annum. There is clearly justification for testing a housing requirement figure which goes beyond the "minimum" requirement. The Reg 18 LP partly reflects this, noting at para 4.2.15 that there should be flexibility built into the Local Plan strategy to enable it to be resilient to unforeseen changes that may occur during the latter years of the Plan period. On this basis, 2no. options are to be tested through the Sustainability Appraisal process, (1) meeting housing needs; or (2) meeting housing needs plus up to 10%. Paragraph 4.4 and 4.5 of the Interim Sustainability Appraisal similarly identifies: The Council also wishes to assess a higher figure to see what is realistically achievable in the context of the local housing markets and being mindful of the need for flexibility to be able to adapt to rapid change. [paragraph 4.5] No option has been considered or assessed that promotes development below the 839 dwellings per annum as it is considered an unreasonable alternative in the context of national policy and local evidence on housing affordability. In addition, given the large pool of sites currently identified and their potential yield, the borough will likely have sufficient available land to deliver the amount of development that the evidence shows is needed (paragraph 4.6). We agree with this approach, albeit question why this has been capped at only 10%. In the context of the uncapped Standard Method figure, which reflects past failures to address housing needs in full.</p> <p>We therefore believe it would be appropriate for a further option for housing requirements to be assessed which looks at delivering the Standard Method plus 20% which would align well with the uncapped Standard Method figure and assist in providing flexibility for resilience, assist in addressing housing affordability and, if required, address unmet need from neighbouring authorities and London, both as detailed below.</p> <p>b. Housing affordability. As referenced above, the Standard Method figure for the Borough is capped at the maximum 40%. The uncapped, market signals, uplift is currently 59% which, in itself, shows a significant issue with affordability across the Borough. The Reg 18 LP recognises this with Table 3 identifying the housing affordability ratio (median) in 2021 (13.39) was considerably higher than the Kent (11.16), South East (11.12) and England (9.05) averages and para 5.3.16 confirming that affordability continues to worsen which affects not only first time buyers but existing homeowners.</p> <p>We support the identification at para 5.3.16 that the Local Plan can make a difference by making adequate provision to address assessed, how consider addressing housing affordability should be identified as a key priority of the emerging Plan. It should be recognised that this can only be address through the emerging Plan going beyond the "minimum" housing requirements established by the Standard Method.</p> <p>The Standard Method plus 20% housing requirement scenario referenced above would strongly assist in addressing the existing and worsening issue of affordability across the Borough.</p> <p>c. Unmet need. As referenced above, unmet need is one of the circumstances appropriate to take into consideration when considering if actual housing need is higher than the Standard Method indicates. In this respect, consideration will be needed as to whether, not only is an uplift appropriate to address any unmet need from neighbouring authorities, including Sevenoaks and Gravesham, but also in response to London's unmet needs which is significant. This should be completed as part of the effective and ongoing engagement with these authorities as part of the Duty to</p>	Support for a housing delivery target in excess of OAN acknowledged. Comments suggesting that there should be capacity within the borough to achieve this acknowledged, however this full site analysis and site selection processes have not yet been completed so the council is not able to comment on this as yet.

36594049	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>The 5 Spatial Strategy options to meet housing demands before 2040 are not equal in proportion throughout the Borough, the greater concentration of development opportunities being towards the Northeast.</p> <p>Medway Gap and Valley including Aylesford Parish will be adversely affected by all of the options, the least worst option being 4 without considering moving green belt boundaries, which the Parish Council is aware can be moved if justified.</p> <p>Alternatively Spatial Strategy option 5 which includes moving Green Belt boundaries to allow development in more rural areas, probably should not be considered for development, however designated Green Belt land in some locations is no longer natural habitat, locally appreciated and cared for or reasonability maintained, therefore increasingly blighted by unacceptable levels of fly-tipping and other anti-social behaviour that Councils have to deal with on a routine basis. Therefore, should careful consideration be given to whether such Green Belt areas would be better purposed for development needs?</p> <p>Already within the Medway Gap and Valley there are a number of developments with outline planning permission that will adversely affect Aylesford Parish communities and increase the density of housing and create additional transport congestion.</p> <p>The local plan baseline assumes that the Medway Gap and Valley has the required local infrastructure and current services available, as it's suggesting these will play a key role in further development plans and transport requirements. These assumptions the local plan makes are inaccurate.</p> <p>Today it can be demonstrated that bus routes are being retracted where it's no longer commercially viable to operate between local villages and towns. Local facilities including medical facilities are being closed or relocated elsewhere, Water Utilities imply that current infrastructure capacity is insufficient to deal with the waste water that new developments will produce.</p> <p>Without investment and improved infrastructure combined within development plans, it is difficult to see how local areas and population within the Northeast, Medway Gap and Valley will not disproportionately be discriminated against, where other areas within the Borough won't experience similar development levels of change.</p>	<p>Comment noted. The five options are a representation of the spatial strategies, decisions relation to the proportion of the development across these areas have not yet been made, and will be based on the evidence and outcomes of the consultation. Comments relating to the quality of the Green Belt acknowledged, and further evidence will be taken forward to address the future role of the Green Belt. This matter infrastructure support alongside development will be considered and reflected within the new Infrastructure Delivery Plan evidence being prepared to support plan preparation.</p>
39101889	0	4.1.1 - 4.1.3, Figure 2	<p>The text does not give a definition of Rural Service Centres; it is questionable whether Hildenborough can be considered to be a Rural Service Centre as it has only one shop/post office compared to West Malling which has a busy centre with a variety of shops and a major supermarket.</p> <p>It is notable the Standard Method calculation is 'capped' at the maximum 40%. The uncapped market signals uplift would be 59%, equating to a Standard Method requirement of circa. 950 dwellings per annum. There is clearly justification for testing a housing requirement figure which goes beyond the "minimum" requirement.</p> <p>The Reg 18 LP partly reflects this, noting at para 4.2.15 that there should be flexibility built into the Local Plan strategy to enable it to be resilient to unforeseen changes that may occur during the latter years of the Plan period. On this basis, 2no. options are to be tested through the Sustainability Appraisal process, (1) meeting housing needs; or (2) meeting housing needs plus up to 10%.</p> <p>Paragraph 4.4 and 4.5 of the Interim Sustainability Appraisal similarly identifies: The Council also wishes to assess a higher figure to see what is realistically achievable in the context of the local housing markets and being mindful of the need for flexibility to be able to adapt to rapid change. [paragraph 4.5] No option has been considered or assessed that promotes development below the 839 dwellings per annum as it is considered an unreasonable alternative in the context of national policy and local evidence on housing affordability. In addition, given the large pool of sites currently identified and their potential yield, the borough will likely have sufficient available land to deliver the amount of development that the evidence shows is needed [paragraph 4.6]</p> <p>We agree with this approach, albeit question why this has been capped at only 10%. In the context of the uncapped Standard Method figure, which reflects past failures to address housing needs in full. We therefore believe it would be appropriate for a further option for housing requirements to be assessed which looks at delivering the Standard Method plus 20% which would align well with the uncapped Standard Method figure and assist in providing flexibility for resilience, assist in addressing housing affordability and, if required, address unmet need from neighbouring authorities and London.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Hildenborough also noted.</p>
44819617	42821281	4.2.13-4.2.18 & Q5-6	<p>Q.4. What are your reasons for selecting this particular spatial strategy option for the Local Plan (outline briefly)?</p> <p>Option 4 will allow the distribution of housing growth across the Borough that will also disperse the effects of development, rather than focus this predominantly on a single area – which could ultimately lead to negative impacts such as traffic congestion, noise and air pollution and stretched community resources/infrastructure – for example.</p> <p>Such an approach will also ensure the spatial strategy accords with paragraph 68 of the NPPF in allocating "a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability".</p> <p>Subsequently, this will provide the basis for the Council to deliver a robust SYHLS by allocating specific and deliverable sites and in respect of the release of the Site from the Green Belt, will accord with the NPPF at paragraph 79, in that, it will provide "opportunities for villages to grow and thrive, especially where this will support local services."</p>	<p>Comments noted, including support for testing housing delivery options above the OAN, but questioning why this has been capped at 10%. It is acknowledged that the SA did not test an option below OAN at this stage.</p>
42832833	42826433	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<ul style="list-style-type: none"> Option 1: Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty; Option 2 Urban: Development focussed on sites within (greenfield as well as previously - development land) as well as adjacent to urban settlements; Option 3 Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements; Option 4 Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities; and Option 5 New Settlement: Development focussed on sites within (greenfield as well as PDL) urban areas, rural service centres and other rural settlements, as well as a new settlement/s <p>In reflection of the significant needs of the Borough we believe the spatial distribution of development across the Borough necessitate growth at all sustainable locations across the Borough, through a diverse strategy which includes elements of all the options identified above (i.e. a 'hybrid' growth option). This will include the need for Green Belt release and reflects there are likely to be very few opportunities to accommodate needs within existing built-up areas (as suggested by the Urban Capacity Study discussed in Section 4), as well as limited unconstrained sites adjoining settlement boundaries outside of the Green Belt.</p> <p>If the individual Options are being tested (whether alone or together as a 'hybrid' option) we strongly recommend Option 5 be amended to consider potential for a new settlement/s remote from existing towns and village and strategic-scale expansion of existing towns and villages. The latter, expansion, option is currently not referenced and risks suitable and sustainable options for growth being missed, including those previously identified as a suitable option by TMBC through its previous Local Plan (withdrawn) i.e. Policy LP29: Strategic Site – Borough Green Gardens. This site is supported by the Government's Garden Communities programme which has and continues to provide funding to TMBC, as such it should at least be considered / tested through the emerging Local Plan.</p>	<p>Support for Option 4 and reasoning noted.</p>
44819617	42821281	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<ul style="list-style-type: none"> Option 1: Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty; Option 2 Urban: Development focussed on sites within (greenfield as well as previously-development land) as well as adjacent to urban settlements; Option 3 Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements; Option 4 Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities; and Option 5 New Settlement: Development focussed on sites within (greenfield as well as PDL) urban areas, rural service centres and other rural settlements, as well as a new settlement/s <p>The Spatial Options are supported by indicative maps provide "broad representation" of these, to give an indication of the distribution of development and where it would be focused. We consider these maps lack detail sufficient to fully appreciate the range of options identified, i.e. no detail of major infrastructure (i.e. motorways and rail stations). The housing trajectory trends detailed at Section 6 of Housing Market Delivery Study demonstrate there will be a significant decline in housing supply across both HMAs across the Plan period, with very limited supply post 2030. It is acknowledged additional allocations will therefore be needed to meet growth needs. In reflection of the significant needs (as detailed in Section 4) we believe the spatial distribution of development across the Borough necessitate growth at all sustainable locations across the Borough, through a diverse strategy which includes elements of all the options identified above (i.e. a 'hybrid' growth option). This will include the need for Green Belt release and reflects there are likely to be very few opportunities to accommodate needs within existing built-up areas (as suggested by the Urban Capacity Study discussed in Section 4), as well as limited unconstrained sites adjoining settlement boundaries outside of the Green Belt.</p> <p>As para 4.2.3 of the Reg 18 LP notes "a sustainable pattern of development should seek to address the need where it arises". Whilst we do not consider there needs to be, nor is there likely to be a robust justification for, a distinctive boundary between the HMAs, housing delivery should be broadly distributed across the Borough rather than focused on a single area / HMA. In this regard, Option 1, which focused growth only to the north-east of the Borough, outside of the Green Belt, would fail to address growth needs of the wider Borough. Further Option 1 is likely lead to significant impacts on the character and the appearance of this area, as well on the individual settlements.</p> <p>The remaining options all indicate a need (to some degree) for Green Belt release, the principle of this is supported, albeit it is considered any Green</p>	<p>Comment supporting growth in all sustainable locations noted. The role and extent of Green Belt release will depend on the outcomes of the NPPF consultation and the new Green Belt evidence. The options as presented within Regulation 18 were not considered to be finite and it is likely that some refinement will be required, including in relation to the proportion of development to be focussed in different locations.</p>
42821345	42821281	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>well as the two HMAs, making best use of previously-developed land, as well as the range and character of existing communities and settlements as set out by the Core Strategy in the adopted settlement hierarchy".</p> <p>3.26 The identified Spatial Options are: • Option 1: Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty;</p> <ul style="list-style-type: none"> Option 2 Urban: Development focussed on sites within (greenfield as well as previously-development land) as well as adjacent to urban settlements; Option 3 Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements; Option 4 Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities; and Option 5 New Settlement: Development focussed on sites within (greenfield as well as PDL) urban areas, rural service centres and other rural settlements, as well as a new settlement/s <p>The Spatial Options are supported by indicative maps provide "broad representation" of these, to give an indication of the distribution of development and where it would be focused. We consider these maps lack detail sufficient to fully appreciate the range of options identified, i.e. no detail of major infrastructure (i.e. motorways and rail stations). The housing trajectory trends detailed at Section 6 of Housing Market Delivery Study demonstrate there will be a significant decline in housing supply across both HMAs across the Plan period, with very limited supply post 2030. It is acknowledged additional allocations will therefore be needed to meet growth needs. In reflection of the significant needs (as detailed in Section 4) we believe the spatial distribution of development across the Borough necessitate growth at all sustainable locations across the Borough, through a diverse strategy which includes elements of all the options identified above (i.e. a 'hybrid' growth option). This will include the need for Green Belt release and reflects there are likely to be very few opportunities to accommodate needs within existing built-up areas (as suggested by the Urban Capacity Study discussed in Section 4), as well as limited unconstrained sites adjoining settlement boundaries outside of the Green Belt.</p> <p>As para 4.2.3 of the Reg 18 LP notes "a sustainable pattern of development should seek to address the need where it arises". Whilst we do not consider there needs to be, nor is there likely to be a robust justification for, a distinctive boundary between the HMAs, housing delivery should be broadly distributed across the Borough rather than focused on a single area / HMA. In this regard, Option 1, which focused growth only to the north-east of the Borough, outside of the Green Belt, would fail to address growth needs of the wider Borough. Further Option 1 is likely lead to significant impacts on the character and the appearance of this area, as well on the individual settlements.</p> <p>The remaining options all indicate a need (to some degree) for Green Belt release, the principle of this is supported, albeit it is considered any Green</p>	<p>Comments noted, including support for a hybrid options which includes the need for Green Belt release in the context of supply within centres and other unconstrained sites. Comments supporting a distribution of housing across the borough noted as well as comments relating to a limited role of the HMA in determining location. Support for the role of Borough Green in meeting needs, with potential to amend option 5 to reflect this as a potential location of a new settlement/expansion.</p>
42641505	0	4.1.1 - 4.1.3, Figure 2	<p>I would challenge Hildenborough as a Rural service centre. The state primary schools and GP are at capacity, there is no secondary school. There are no shops of a capacity to fulfil the entire village needs and walking and cycling infrastructure are poor at best.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Hildenborough also noted.</p>

42819617	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>3.10 As set out in greater detail below, we are of the view that Option 4, is the most suitable growth option.</p> <p>Q.4. What are your reasons for selecting this particular spatial strategy option for the Local Plan (outline briefly)?</p> <p>3.11 As it stands, TMBC has provided 5 growth options. These are summarised below:</p> <ul style="list-style-type: none"> Option 1: Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty Option 2: Urban: Development focussed on sites within (greenfield as well as previously-development land) as well as adjacent to urban settlements. Option 3: Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements. Option 4: Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities. Option 5: New Settlement: Development focussed on sites within (greenfield as well as PDL) urban areas, rural service centres and other rural settlements, as well as a new settlement/s. <p>3.12 To date, the council has endeavoured to make best use of previously-developed land in built up areas such as Tonbridge. While we fully support brownfield land coming forward for development, it is important that the Council identify a range of sites suitable for housing delivery in the short, medium and long term.</p> <p>3.13 Deliverable brownfield sites are not only less readily available, but they are often heavily constrained and subject to delays. By its very nature, brownfield land is often constrained by awkward redline boundaries and the effects of previous uses which impacts viability and site layout. As a result, brownfield sites are better suited to deliver higher density flats rather than family dwellings. It is important the development strategy recognises the importance of allocating a mix of both greenfield and brownfield sites.</p> <p>3.14 In addition to this, the Urban Capacity study has been carried out and identifies 75 potential development sites, with an overall optimised capacity of 1,946 residential dwellings. Even in a scenario where each of these sites comes forward during the plan period and is developed to full capacity, which is unlikely, this would only deliver enough homes to make up 12% of the housing target. This evidence demonstrates that greenfield land will need to come forward as part of TMBC's growth strategy.</p>	Support for Option 4 and reasoning noted.
42778529	0 4.1.1 - 4.1.3, Figure 2	<p>I believe that Hildenborough should not be categorised as a Rural Service Centre, it is not served by an A road and the roads servicing the area are already regularly congested.</p> <p>Hildenborough Parish Council would like to comment on how they see the Village fits into Tonbridge & Malling Borough Council's Local Plan. Hildenborough sees itself as a rural service centre along with Borough Green, East Peckham, Hadlow and West Malling. Historically Hildenborough has been a rural community providing housing, industry and agriculture. It has developed along the now B245 (prior to the main trunk A21 road being built in the 1960s), due to the good road and rail connections with urban areas and London. Currently it has three main settlement areas, Hilden, Brookmead and Riding areas. At the Hilden and Brookmead end there are shopping and petrol facilities and at the Riding area, shops, restaurant, village hall (heavily used for educational and creative purposes for children and adults), a library, Medical Centre, petrol station and a number of local businesses. There are 3 primary schools and one secondary school.</p> <p>To support this thriving area there are good connections to urban centres (Tonbridge and Sevenoaks) as well as rural areas and their villages. Transport links are good, with a station providing services to London, Tonbridge and the coastal towns of Hastings and Folkestone/Dover as well as connections with the Redhill line via Tonbridge.</p> <p>The Parish Council recognize the need for housing and commercial development and the pressure Tonbridge & Malling Borough Council is under to meet current housing needs. As can be observed from the past, the Parish Council will, in the future, be prepared to accept suitable housing development with the requisite infrastructure.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Hildenborough also noted.</p> <p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Hildenborough also noted.</p>
42166849	0 4.1.1 - 4.1.3, Figure 2	<p>Kings Hill is a rural settlement not an urban area.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.</p>
42423233	0 4.1.1 - 4.1.3, Figure 2	<p>I strongly disagree that Kings Hill should be categorised as 'Urban'. Whilst we have certain facilities here, we are far from being a town. We have supermarkets but no town centre as such. We are a car ride from the nearest train station, we have no library, police station, fire station, department store, clothing store etc which would normally be found in an urban area, and I therefore consider Kings Hill to be a 'Rural Service Centre'.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.</p>
42820673	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>A preference for Option 4</p> <p>There will always be a need for development no matter what for as long as people have children and people move to the UK seeking better opportunities. Only allowing development in non-designated areas will put too much pressure, both literally and policy wise, to develop those areas beyond what is appropriate.</p> <p>Green Belt was designed to stop London sprawling as development at the time was centered around low density, car dependent settlements. However this has resulted in hugely inflated property prices from capped supply whilst overloading areas which are not Green Belt like Maidstone.</p> <p>Allowing 'some' development across all settlements around the borough, especially those which are accessible like Tonbridge or Borough Green, will distribute the need more evenly. The reason I did not pick option 5 is because it would seem to result in medium to large developments being built with no amenities with poor access, which would just result in car dependent areas in the middle of nowhere offering no benefit to anyone else.</p>	Support for Option 4 and reasoning noted.
42819617	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>3.20 As set out in greater detail below, we are of the view that Option 4, is the most suitable growth option.</p> <p>Q.4. What are your reasons for selecting this particular spatial strategy option for the Local Plan (outline briefly)?</p> <p>3.21 As it stands, TMBC has provided 5 growth options. These are summarised below:</p> <ul style="list-style-type: none"> Option 1: Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty Option 2: Urban: Development focussed on sites within (greenfield as well as previously-development land) as well as adjacent to urban settlements. Option 3: Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and Rural Service Centre settlements. Option 4: Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, Rural Service Centres and other rural settlements to support a range of communities. Option 5: New Settlement: Development focussed on sites within (greenfield as well as PDL) urban areas, Rural Service Centres and other rural settlements, as well as a new settlements. <p>3.22 To date, the council has endeavoured to make best use of previously-developed land in built up areas such as Tonbridge. While we fully support brownfield land coming forward for development, it is important that the Council identify a range of sites suitable for housing delivery in the short, medium and long term.</p> <p>3.23 Deliverable brownfield sites are not only less readily available, but they are often heavily constrained and subject to delays due to constrained boundary lines and the impacts of previous uses. This can impact the site's layout and the viability of a site. As a result, brownfield sites are better suited to deliver higher density flats rather than family dwellings. It is important the development strategy recognises the importance of allocating a mix of both greenfield and brownfield sites.</p> <p>3.24 In addition to this, the Urban Capacity study has been carried out and identifies 75 potential development sites, with an overall optimised capacity of 1,946 residential dwellings. Even in a scenario where each of these sites comes forward during the plan period and is developed to full appropriate strategy. Section a) of that paragraph details that another soundness requirement is to provide a positively prepared strategy that – as a minimum – seeks to meet the area's objectively assessed needs.</p> <p>Paragraphs 5.3.23 – 5.3.26 and Figure 9 of the Reg 18 LP neatly describe two HMAs in the borough of Tonbridge and Malling, and demonstrate the change in extent (around Borough Green) as compared to the TM Strategic Housing Market Assessment (2014). The existence of two HMAs is, in Fernham Homes' view, fundamental to the determination of which spatial strategy is not only the most appropriate strategy, but further precludes a number of the options as justified or positive as they fail to meet the needs for each HMA. At this juncture, it is considered appropriate to relay Fernham Homes' concern at the approach taken in the Housing Market Delivery Study to estimating housing need in each HMA, as summarised at paragraphs 1.19 – 1.26. The first key step has been to use the proportion of households living in each HMA based on 2011 census data. However, and as set out above at paragraph 3.06 b), this approach does not reflect the fact that since 2011 there has been a substantial imbalance in the delivery and supply of housing between the two HMAs, with the vast majority having been focused on the Maidstone HMA. This means that housing need in the West Kent HMA will – in fact – now be even greater than that in the Maidstone HMA as it has not been addressed to the same extent. Accordingly, it is considered that the proportions as set out in Table 2 of the Executive Summary of the Housing Market Delivery Study are re-examined to inform the Reg 19 LP.</p> <p>Preferred Option</p> <p>The preferred option is Option 3: Urban and Rural Service Centres: "Development focussed on sites within (Greenfield as well as PDL) as well as adjacent to urban areas and rural service centres". The reasoning for this is set out below.</p> <p>Paragraph 60 of the NPPF requires that a sufficient amount and variety of land can come forward to deliver housing, with paragraphs 69 and 73 setting out how the delivery from small, medium or larger sites can all play a role in contributing to delivery. Paragraphs 16 b), 20 a) and 35 a) are clear that strategies should – as a minimum – seek to meet an area's identified needs, whilst paragraphs 105, 92, 98 and 142 are clear that significant development should be focused on locations which are or can be made sustainable (105) and promote sustainable patterns of development (142), and provide access to key cultural, social, recreational and sporting facilities (92 and 98).</p> <p>For Tonbridge and Malling that means having sufficient variety of land around those most sustainable key settlements in each HMA to meet the needs within that HMA.</p> <p>Option 1 Accordingly, the above immediately excludes Option 1 "focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside the Area of Outstanding Natural Beauty (AONB)" as this is entirely within the Maidstone HMA: it will mean that the needs for the West Kent HMA cannot be met.</p> <p>Options 2 and 3 Option 2 "Urban: Development focussed on sites within (Greenfield as well as previously-development land) as well as adjacent to urban settlements" has considerable merit, would accord with paragraphs 105, 92, 98 and 142 of the NPPF, and opportunities for allocations within</p>	Support for Option 4 and reasoning noted.
44459553	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.		<p>Comments relating to the role and methodology of the Housing Market Delivery Study, in particular in relation to 2011 census data. Support for option 3 and reasoning behind this preference also noted, in particular comments relating to the impacts of delivery outside the green belt only on the housing market areas. Support for the expansion into sites adjacent to Tonbridge also noted. Next preference for option 4 and comments around the deliverability within the plan period of option 5 also noted.</p>

			<p>Answer: Option 5</p> <p>Q.4. What are your reasons for selecting this particular spatial strategy option for the Local Plan (outline briefly)?</p> <p>Much of the increase is due to the high price/earnings ratio, which is primarily associated with the Tonbridge region. The instructions associated with the uplift are that the intention is for brownfield sites in urban areas to be used for the uplift. Thus, the plans are not consistent with the government guidelines. Brownfield sites must be used where available, even if they are in green belt, such as the sand pits around Borough Green, and other areas around Tonbridge. Much has been made of the success in the prevention of the development of brownfield sites in Tonbridge, which is contrary to Government guidelines.</p> <p>Much of the development over the last few decades has been oriented around extensions to existing towns and villages with limited enhancement of resources within those locations. This has resulted in significant pressure on the majority of resources in those towns and villages. This includes primary healthcare, parking, roads (especially rural roads that are include those assigned as quiet lanes).</p> <p>There are brownfield sites in green belt areas which should be considered as a priority for such development, in the same way as development of Bluewater shopping centre and the neighbouring housing developments.</p> <p>The number of required dwellings is in excess of the resources required to be available in the various habitation centres, and as such, a new habitation centre should be considered.</p> <p>The continuous development around existing settlements without adequate uplift in infrastructure, such as parking, has meant that additional development would be unsustainable. The concentration, based on avoiding green belt where possible, on the best agricultural area in the borough is inappropriate, and an overall review of approach is critical.</p> <p>My interpretation of the TMBC Housing Market Delivery Study is that TMBC has had a higher level of CAGR (Compound Annual Growth Rate) for new builds than most of Kent (approximately 50% higher than the average for the South East). Much of the increase in demand for housing is coming from people moving out of London. The primary purpose of the green belt is to avoid the London sprawl destroying the surrounding countryside, and I consider that this aim is important to maintain. However, the result, where locations closer to London are being built on because of the shape of the green belt, means that the result is actually in contradiction to the Green Belt. Based on the TMBC report, I believe that the high rate of new builds in the borough is actually encouraging the moves from London to the borough, and this is exacerbating the issue, and</p>	
39011745		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.		Support for Option 5 and reasoning noted.
42634113		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>Option 5.</p> <p>I feel after 25 years plus in the Aylesford area, enough is enough off development in this area, we are saturated with new developments , and road infrastructure is NOT coping, and this needs to be sorted out first, plus more surgery's , and start finding development lands, south off tmbc.</p>	Support for Option 5 and reasoning noted.
45440929	45440705	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>2.8 The consultation document proposes five spatial options. Option 1 and Option 2 represent an especially concentrated strategy at the defined urban centres only [FN1 - Tonbridge, Medway Gap, Kings Hill, Snodland, Waldersdale]. Whilst it is recognised that these settlements represent locations where a sustainable pattern of development can be achieved, to concentrate development solely at those settlements fails to recognise that a wider dispersal of development could equally achieve this by meeting the needs that arise in the more rural parts of the Borough. For this reason, we do not support this Option.</p> <p>2.9 Option 3 achieves a greater balance in this regard by directing development to both the urban centres and the Rural Service Centres [FN2 - Borough Green, East Peckham, Hadlow, Hildenborough, West Malling]. As a matter of principle, we support this Option.</p> <p>2.10 Option 4 proposes an even greater level of dispersal and directs new housing to a great many more rural settlements in addition to those higher order settlements. On the one hand this strategy could meet rural needs but in comparison with Option 2, such an extensive distribution of development could foster an unacceptable dispersal across smaller settlements with limited services and facilities which in turn relies on greater travel to larger settlements. This Option would be less efficient, could cause widespread change in character with associated environmental effects. For these reasons, we do not support this Option.</p> <p>2.11 Option 5 proposes a new settlement. As a matter of approach, a new settlement can only represent part of a development strategy in the longer term; experience from elsewhere in the country suggests lead in times from policy formulation to development being in the order of 15 to 20 years. As such, a new settlement cannot represent a means of meeting short and medium terms needs. This Option would inevitably need to be complementary to development at existing settlements which are suitable as a matter of principle and the development opportunities that exist in those locations should be fully explored and identified accordingly in the first instance. For these reasons we do not support Option 5.</p>	Comments on the five spatial options noted, including comments on the efficiency of option 4. The council is aware of the long lead in times for new settlements in terms of the contribution over the plan period. Decisions on spatial strategy will reflect new evidence, market data and site availability.
45440929	45440705	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>6. Summary</p> <p>6.1 These representations have been prepared on behalf of Hallam Land Management Limited. They concern the future role of East Peckham in the new Local Plan's Spatial Strategy and its suitability as a location for new housing, particularly to the north of Church Lane.</p> <p>6.2 Spatial strategy: We support Option 3. This achieves a greater balance of new development across the Borough by directing development to both the urban centres and the Rural Service Centres. East Peckham, as one the Rural Services Centres, is a suitable location to accommodate new housing.</p>	Support for Option 3 and reasoning noted.
42690369		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Option 5.	Support for Option 5 noted.
42166177		0 4.1.1 - 4.1.3, Figure 2	Kings hill should not be classified as an urban area- it is a large village or rural town.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42443457		0 4.1.1 - 4.1.3, Figure 2	<p>Kings Hill shouldn't be in the top tier of hierarchy for development as there are insufficient services to support further expansion eg healthcare, secondary schools, shops</p> <p>We have reviewed the five spatial strategy options set out in the plan. We support the existing Settlement Hierarchy, on page 13, as a basis for informing the Plan.</p> <p>It is our view that Option 3, which provides for increased housing within the existing urban areas and rural service centres that have access to existing services and facilities, is optimal.</p> <p>It provides the fairest basis for spreading the new build burden across the Borough and its infrastructure, although we recognise that within this option some of the areas for focussing new development will prove problematical. Options 1 and 2 could be too restrictive and Options 4 and 5 are too fragmented. We believe that TMBC need to ensure that the growth of the local economy goes hand in hand with increased housing. It needs to find ways to promote the re-location to the area of larger businesses that provide sustainable employment opportunities; the impact of Covid on work practices may well provide a medium- term platform to achieve this provided it is supported with efficient road and other infrastructure needs.</p>	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
45710145	42599649	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>4.1.12 Having regard to the identified development needs of the area, the constraints in the borough and the two HMAs, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below.</p> <p>Option 1</p> <p>4.1.13 Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape.</p> <p>4.1.14 For the reasons outlined above we fundamentally object to the notion that Green Belt should not be released. If one looks at the settlement hierarchy, Tonbridge, Kings Hill, Snodland, Borough Green, East Peckham, Hadlow, Hildenborough and West Malling are all tier 1 and 2 settlements that fall within the Green Belt and would see development restricted by the option 1 approach.</p> <p>4.1.15 In respect of national policy, paragraph 140 of the NPPF states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.</p> <p>4.1.16 We acknowledge that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined all other reasonable options making as much use as possible of suitable brownfield sites and underutilised land; optimising the density of development and informed by discussions with neighbouring authorities. However, these exercises were carried out in detail as part of the previous Local Plan work and evidence established that Green Belt release is needed.</p> <p>4.1.17 Notwithstanding the earlier decisions and evidence, housing or employment need can be an exceptional circumstance to justify a review of your Green Belt boundary. This principle was established in the judgement of St Albans District Council v Hunton Properties Limited [2013] EWCJ 1161. Case law, (Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin)) also provide guidelines for determining whether exceptional circumstances exist. The above judgement states: 'planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters: (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important);</p>	Support for Option 3 and reasoning noted.
45864993	25240577	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.		Comments on each spatial strategy option noted. In relation to the Green Belt the council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The council is also required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including in relation to the Green Belt. The council is undertaking a further Green Belt study which will provide further evidence on the performance of the Green Belt within the borough.
42470433		0 4.1.1 - 4.1.3, Figure 2	<p>I strongly disagree that Kings Hill is an urban area - it should not be classified or treated as such. Residents here consider it a small village - we moved here from Surrey to move away from business and to the quieter countryside, still accessible to London yes, but not an urban area. Kings Hill does not have urban amenities - it has a few shops, a GP surgery that is not copying, no secondary school etc. It should be classed as a rural settlement and protected as so. This is what we all wanted when we moved here but the constant over-development of the village is leading to it losing its charm and character and leading to it being unable to adequately provide facilities to support the residents that live here.</p>	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42488033		0 4.1.1 - 4.1.3, Figure 2	<p>Kings Hill may have many dwellings now but it is not an urban area similar to Tonbridge. It has not 'developed' over many years but rather has had rapid, exponential growth driven by housebuilding alone. As a result, its current infrastructure is insufficient for the area it serves. There are only two entrance/exit points to Kings Hill, both which lead to the A228, which narrows from a dual carriageway to a small rural road from Kate Reed Wood onwards. When there is an accident, the area becomes gridlocked and it is impossible for emergency services to navigate, never mind residents/workers being able to commute to and from.</p>	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42430081		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>Options 3,4,5 and totally unacceptable as they propose far too much compromise on greenbelt land / green areas. The need to more dwellings is understood but this needs to be balanced with each village's/Town's identity to avoid them being swallowed up in a large sprawl. There is also a question of adequate infrastructure - with shrinking Dg group practices and proposed increase in dwellings service infrastructure first needs to be increased and improved before construction is undertaken.</p> <p>Options for Distribution of Development</p> <p>It is noted that the council has set out five different options for the distribution of housing across the borough. Of the options set out, it is considered that option 4 would be the most effective in meeting the established housing requirement in the most sustainable way. This option seeks to distribute development to greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements, as well as adjacent to these settlements. Whilst there is non-green belt land on the eastern side of West Malling towards the station where several sites are being considered, this land is equally, if not more constrained, by close proximity to the Conservation Area, numerous listed buildings and areas of flood risk.</p>	Support for Options 1 and 2 and reasoning noted.
46103169	46103137	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.		Support for option 4 and reasoning noted.

47544865	0 4.1.1 - 4.1.3, Figure 2	I believe Kings Hill is a rural area as it is a D1 classification.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
38532513	0 4.2.13-4.2.18 & Q5-6	I would prefer to meet housing need and no more, because I think that will be quite challenging.	Support for Option A (OAN) noted.
38882465	0 4.1.1 - 4.1.3, Figure 2	Kings Hill is a village, not an urban area and should not be treated as such. It is still currently marketed as a village by the developer. The Office of National Statistics classifies Kings Hill as Rural Village.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42470433	0 4.1.1 - 4.1.3, Figure 2	I strongly disagree that Kings Hill is an urban area - it should not be classified or treated as such. Residents here consider it a small village - we moved here from Surrey to move away from busyness and to the quieter countryside, still accessible to London yes, but not an urban area. Kings Hill does not have urban amenities - it has a few shops, a GP surgery that is not copying, no secondary school etc. It should be classed as a rural settlement and protected as so. This is what we all wanted when we moved here but the constant over-development of the village is leading to it losing its charm and character and leading to it being unable to adequately provide facilities to support the residents that live here.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42627585	0 4.1.1 - 4.1.3, Figure 2	Kings Hill should not be considered urban	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42230369	0 4.2.13-4.2.18 & Q5-6	Question 2 - Settlement hierarchy The reference to "Rural Areas" is incorrect to describe a settlement hierarchy. It should refer instead to (for example) "existing scattered groups of houses in the countryside".	Support for Option 1 and reasoning noted.
42498817	0 4.2.13-4.2.18 & Q5-6	Quantum A Kings Hill is not an urban settlement as it lacks the following A secondary school Library Good transport links High population density It was also sold to the community as a village	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42616033	0 4.1.1 - 4.1.3, Figure 2	[59874] Snodland is currently identified as a Tier 1 Settlement in the existing settlement hierarchy and is therefore considered to be a sustainable location to accommodate growth. Snodland is a constrained settlement, namely: AONB and an extended area of Green Belt to the west; Green Belt to the north; and, a Strategic Gap and Flood Zone 3 to the east and south. Therefore, the submitted site is a logical, sustainable and relatively unconstrained extension to Snodland in the context of these natural and physical constraints. The existing settlement hierarchy in the adopted Development Plan is sound and accords with Central Government Guidance. It is important to focus growth from this sound basis. We consider that spatial strategy options 2, 3 and 4 as put forward in the Regulation 18 Consultation are the most sustainable and deliverable. The main settlements in the borough are highly sustainable in that they have a variety of transport options, service facilities, employment opportunities and social infrastructure. It is important that growth is delivered in sustainable ways and therefore these settlements therefore provide the most sustainable options for growth. Making the most of brownfield land and appropriate greenfield sites around the edges of the settlements is a sustainable approach. There are sites, such as Kitewood's land to the west of Hays Road in Snodland, which would deliver sustainable development and which do not perform soundly against green belt purposes. In such circumstances such land should be removed from the green belt to fulfil development needs in the borough. Arup's report 'Stage 2 Green Belt Assessment Exceptional Circumstances (Strategic) Note' prepared for Tonbridge and Malling Council in July 2022 notes that the 'demand for housing is high and growing, it is also geographically spread across the Borough. There is currently a significant undersupply of homes in the Borough, and this appears to be worsening.' However it explains that the Green Belt boundary is tightly drawn around the existing settlements in the Borough, minimising the potential for the settlements to accommodate growth over the long-term without alterations to the existing Green Belt boundaries. It concludes that these factors support 'the case that exceptional circumstances exist which justify alterations to the Green Belt boundary'.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Support for options 2-4 noted.
44546305	44546401 4.2.13-4.2.18 & Q5-6		
42483273	0 4.1.1 - 4.1.3, Figure 2	Not sure I would consider Kings Hill to be Urban in the same way that Tonbridge is.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42730209	0 4.1.1 - 4.1.3, Figure 2	Kings Hill should not be identified as an urban area. It does not have sufficient facilities to be identified as such. The doctors surgery has more patients than they can service satisfactorily - getting an appointment is tortuous, which in turn adds pressure to the local hospital. The schools are over-subscribed. Bus services are being cut and the train station is over a mile away. We are already seeing increasing incidents of anti-social behaviour on Kings Hill - this is as a result of over-development and lack of facilities.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42766465	0 4.1.1 - 4.1.3, Figure 2	Kings Hill is NOT an urban settlement - it was conceived and designed as a "garden village" and should be included in the Rural Settlement group. The general thrust of the proposed plan seems to be to try and turn it into an urban settlement so the above hierarchy can be retro-fitted.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42801825	0 4.1.1 - 4.1.3, Figure 2	I do not agree that Kings Hill should be categorised as an Urban Area. This is rural development surrounded by green belt, ancient woodland and working farm land.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42778945	42778497 4.2.13-4.2.18 & Q5-6	Q.6. What are your reasons for selecting this particular quantum option for the Local Plan (outline briefly) Neither of the options are appropriate and the council should be aiming for meeting the assessed housing need plus 20%. This would be in line with NPPF para 74 'maintaining supply and delivery of housing'. The councils Housing Land Supply position statement 2021 identifies at para 4.1 that the council currently has a 3.17 year supply of housing and at para 2.4 states that 'As a consequence of this HDT measurement, a 20% buffer must be applied to the housing need for the five-year period 2021-2026. This means the need against which the projected supply is assessed increases from 4,195 dwellings to 5,034 dwellings'. This 20% buffer should be applied to the housing needs identified within the local plan to ensure delivery within the early part of the plan, this should be as a minimum for the first 5 years, given the shortfall of housing delivery currently and that this shortfall is likely to continue for the next few years given that the existing adopted Core Strategy only met the timescale from 2007-2021.	Comment relating to a need to deliver in excess of OAN homes is noted.
42830913	0 4.1.1 - 4.1.3, Figure 2	I do not agree that Kings Hill is an Urban Area. It is a housing development within a rural area. It is already too large and adversely impacting on the area so no further building in the vicinity should be allowed. I also do not agree that West Malling is a Rural service centre. It is a village whose character should be preserved. Again, there should be no building in this area.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42682465	0 4.2.13-4.2.18 & Q5-6	As I have stated, I believe that the starting assessment is now two years out of date and further provision has been made in that time. I feel it is reasonable to assume that Quantum Option A will meet the requirements of the borough	Support for quantum A- OAN only noted.
42806945	0 4.2.13-4.2.18 & Q5-6	I have in earlier responses indicated that the Assessed housing need is unreliable, especially in the present political circumstances. I can see no reason for adding 10 %	Support for quantum A- OAN only noted.
43313313	0 4.1.1 - 4.1.3, Figure 2	I appreciate that Kings Hill is an urban area, but the golf course and clubhouse is an amenity used by its many members, their friends, children and grandchildren. The course offers coaching for juniors which is very popular providing entertainment and social and physical development opportunities for local children. Not all are going on to be champions, but golf gives them a structure and purpose and there are many who play throughout the summer holidays keeping them out of mischief and allowing their parents to work.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
43873729	0 4.1.1 - 4.1.3, Figure 2	[X] object to Kings Hill being classified as an urban settlement (Q.2 Local plan question) as it does not have the facilities to support its status - it does not have the facilities that would be required to support the additional population that would be added as a result of its classification.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42662081	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Option 4 and 5 would destroy large parts of precious green belt with no benefits. Option 1, 2 or 3 would be preferable as it would be much better to focus on new building near to existing urban areas where there is quick access to major roads and it is easier to provide additional schools, doctor's surgeries etc.	Support for Options 1 to 3 and reasoning noted.
44309601	0 4.1.1 - 4.1.3, Figure 2	https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about or by the infrastructure of which it consists. According to the ONS, the area of West Malling and Kings Hill is designated as D1: Rural Town; an overlay of the latest map from ONS is shown below, with Blue being Urban, Brown being Rural Town, and Green being Rural. In addition, the population estimate for Kings Hill in 2020 is around 9,000, which does not include it in the definition of Urban. Typically, an urban area is characterized by a population that largely works locally. However, without the urban infrastructure, Kings Hill is largely a commuter belt, and the models that are applied to match transport, communications and resource access should be updated to reflect this; the assumptions in the existing Regulation 18 Local Plan are clearly inaccurate. The original design of a garden village has been abandoned in preference for higher immediate profits for developers with more residential development and removal of safeguarded employment land without the commensurate improvements for the infrastructure. The next question is whether it should be considered as a service centre. Given the limited nature of the resources provided, and the restrictions on access to those resources, Kings Hill Parish Council consider that King Hill should not be considered as a rural service centre but be considered as an "Other Rural Settlement". The resources available within Kings Hill are restricted in terms of availability, scope, and access. Indeed, Kings Hill relies on multiple service centres around the area. Kings Hill does not have the resources for an urban area. Typical resources include a police station, fire station, library, hotels, department stores, DIY stores, petrol station, furniture stores, jewellers, clothing stores, pubs (Kings Hill only has one!), local shopping areas and the like; without such resources, an urban area is not sustainable, as it will result in excessive levels of traffic to other areas. Note that there are currently two supermarkets, with a third being built. These are covering very similar scopes (aiming to provide for a full weekly shop for a household), so completely fail to provide an overall service to the requirements of residents; indeed, it looks like the latest supermarket being built is resulting in consolidation in existing services, which will ultimately lead to a reduction in the choice for consumers. There are concerns about the sustainability of this setup. Kings Hill residents use the services in West Malling, including shopping and hospitality, post-office and library.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
45009345	0 4.1.1 - 4.1.3, Figure 2	Urban Area Hierarchy: Kings Hill is listed under this category, however, 2(soon to be 3) supermarkets, a few shops/restaurants, office/industrial units, a primary school and one doctor's surgery are insufficient numbers for this area to be classified as 'Urban'.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.

43545921		0 4.2.13-4.2.18 & Q5-6	Question 5 - Which quantum option for the spatial strategy do you prefer? Quantum Options – we support Option 2 – meeting assessed housing need + up to 10%	Support for option 2 - OAN plus 10%
46121761		0 4.1.1 - 4.1.3, Figure 2	We object to Kings Hill being classified as an urban settlement (Q.2 Local plan question) It does not have the facilities that would be required to support the additional population that would be added as a result of its classification.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
42722753		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Options 1-3 - Prioritising urban settlements and previously developed land here services and infrastructure is better, seems the only way to go and to use green belt agricultural land and AONB/ AONB setting land should be avoided at all costs.	Support for Options 1 to 3 and reasoning noted.
42832833	42826433	4.2.13-4.2.18 & Q5-6	Q.5. Which quantum option for the spatial strategy do you prefer? Option B (Quantum 2 – Meeting Assessed Housing Need + up to 10%).	Support for Option B- OAN+ noted.
46129473		0 4.1.1 - 4.1.3, Figure 2	How can the council classify Kings Hill as an urban settlement when we do not have the facilities at the moment to support that status let alone once all this building has been completed. I think we need to be classified as a village.	Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.
44415649	42006241	4.2.13-4.2.18 & Q5-6	We recognise Option A meets the minimum requirements, but for reasons set out below, we consider Option B is preferred (of the two options). However we consider an alternative Option C should be considered, which comprises meeting Option A, plus windfall allowance. Q.6. What are your reasons for selecting this particular quantum option for the Local Plan (outline briefly) 2.18 Option A seeks to meet the minimum housing need requirement. This is of course welcomed but offers little flexibility in the event of failure to deliver on housing allocations, especially if large scale housing is proposed to be released. 2.19 In this instance, we consider that Option B is the preferred Option, as it seeks to introduce a buffer or flexibility in the housing requirement and offers a more robust approach to meeting the housing target. 2.20 However, the critical element of actually meeting housing needs is not necessarily 'what' the overall number is, but 'how' it is anticipated to meet that number. It is noted that the Local Plan seeks to rely on a significantly high proportion of windfall development to meet its housing need. The Windfall Allowance methodology paper sets out in Table 3 that the total windfall allowance is a total of 3,102 units during the plan period which is made up of 1,050 units from small sites and 2,052 units from large sites. This equates to 172dpa. 2.21 The total housing need for Tonbridge and Malling as detailed in the Local Plan is 15,941 dwellings or 839dpa, meaning that the windfall allowance is 19.5% of the overall housing need. 2.22 Whilst we are not challenging the Windfall methodology, we do not consider it appropriate that such a high % of the local plan housing need is to be met by unplanned and unidentified development. We therefore propose that an Option C is considered, which is that the windfall allowance is applied to offer the flexibility in the plan housing numbers, and that sufficient specific allocations are made to meet the housing requirement under Option A. Accordingly, the windfall development becomes the flexibility built into the plan, which the methodology paper sets out the justification for. 2.23 We therefore propose that an Option C is considered, which is that the windfall allowance is applied to offer the flexibility in the plan housing numbers, and that sufficient specific allocations are made to meet the housing requirement under Option A. Accordingly, the windfall development becomes the flexibility built into the plan, which the methodology paper sets out the justification for. 2.24 This option means that the minimum housing needs are likely to be met, as sufficient allocations have been made to meet this figure, with the top up / flexibility / buffer, being absorbed by the windfall development. 2.25 Such an approach would also provide for a more robust Housing Land Supply position as it would be less reliant on windfall sites coming forward and allow for more sites to go into the forward trajectory.	Support for a quantum option of OAN plus a windfall allowance supported. Comments relate to the extent of the windfall allowance of 19% also noted.
42006241	42006241	4.2.13-4.2.18 & Q5-6	Q.5. Which quantum option for the spatial strategy do you prefer? We recognise Option A meets the minimum requirements, but for reasons set out below, we consider Option B is preferred (of the two options). However, we consider an alternative Option C should be considered, which comprises meeting Option A, plus windfall allowance. Q.6. What are your reasons for selecting this particular quantum option for the Local Plan (outline briefly) Option A seeks to meet the minimum housing need requirement. This is of course welcomed but offers little flexibility in the event of failure to deliver on housing allocations, especially if large scale housing is proposed to be released which can take time to deliver. In this instance, we consider that Option B is the preferred Option, as it seeks to introduce a buffer or flexibility in the housing requirement and offers a more robust approach to meeting the housing target. However, the critical element of actually meeting housing needs is not necessarily 'what' the overall number is, but 'how' it is anticipated to be met. It is noted that the Local Plan seeks to rely on a significantly high proportion of windfall development to meet its housing need. The Windfall Allowance methodology paper sets out in Table 3 that the total windfall allowance is a total of 3,102 units during the plan period which is made up of 1,050 units from small sites and 2,052 units from large sites. This equates to 172dpa. The total housing need for Tonbridge and Malling as detailed in the Local Plan is 15,941 dwellings or 839dpa, meaning that the windfall allowance is 19.5% of the overall housing need. Whilst we are not challenging the Windfall methodology, we do not consider it appropriate that such a high % of the local plan housing need is to be met by unplanned and unidentified development. We therefore propose that an Option C is considered, which is that the windfall allowance is applied to offer the flexibility in the planned housing numbers, and that sufficient specific allocations are made to meet the minimum housing requirement under Option A. Accordingly, the windfall development becomes the flexibility built into the plan, which the methodology paper sets out the justification for. This option means that the minimum housing needs are likely to be met, as sufficient allocations have been made to meet this figure, with the top up / flexibility / buffer, being absorbed by the windfall development. Such an approach would also provide for a more robust Housing Land Supply position as it would be less reliant on windfall sites coming forward and allow for more sites to go into the forward trajectory.	Support for a quantum option of OAN plus a windfall allowance supported. Comments relate to the extent of the windfall allowance of 19% also noted.
44415649	42006241	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	2.6 We prefer Strategy Option 4 – Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities. Q.4. What are your reasons for selecting this particular spatial strategy option for the Local Plan (Outline briefly)? 2.7 Option 4 is the most suitable strategy as it allows for development to occur across the Borough at a scale that supports each location. A more even distribution of development allows for a better range of development to come forward including smaller sites. These smaller sites offer an appropriate level of growth and support SME developers. 2.8 This option represents the most effective strategy to meet housing needs across the Borough, whilst also minimising the impacts on any one or two locations i.e. each settlement plays its part and thus share the growth and share the impacts. 2.9 This option facilitates the support for SME developers, who are more finely tuned to deliver smaller scale developments in rural locations. SME developers tend to deliver higher quality bespoke developments that can meet the design requirements of rural locations as well as delivering at a scale that is more appropriate to these settlements. 2.10 In this respect (coupled with the above amendment to the Settlement hierarchy), it is considered that the requirements of Paragraph 69 can be more easily met under this strategy and that 10% of the housing requirement (1,594 dwellings) are to be allocated on smaller sites of 1ha or less. This scale would suit a wider distribution of development. 2.11 Appropriate levels of growth of the right type of housing can help support these communities in the long term. 2.12 It is recognised that SMEs deliver high quality homes and can diversify the housing market. SMEs tend to bring forward bespoke products that reflect the characteristics of a local area either through size, tenure and design. Importantly, SMEs deliver quickly, support local trade suppliers and local job growth and are flexible in their approach. Unlike Volume Housebuilders, SMEs do not tend to take long term strategic options on land. However, this means that SMEs are disadvantaged at the Plan Making stage, as they neither have the land itself to promote, cannot invest the time, risk or expense of promoting a site through the Local Plan process (which is lengthy and competitive) or the available land is at lower tier settlements due to Volume Housebuilders taking long term land options in higher tier settlements and thus SME site typology is marginalised. 2.13 SME site typology for the Kent SME Network tends to be located in rural fringe locations due to the availability of land, lack of brownfield opportunities and that Volume PLC housebuilders or Strategic Promoters have already secured long term land options in urban fringe locations. 2.14 As a consequence, SMEs are pushed to the margins in respect of land availability and suitability, and it is often found that SMEs need to work harder to justify a site's sustainability credentials. Whilst a rural fringe location may result in increased car trips, these car trips are short in length on uncongested roads. The automatic assumption is often therefore that the reliance on the car, results in increased emissions and an application is Q.3. Which spatial strategy option do you prefer and; Q.4. What are your reasons for selecting this spatial strategy option for the Local Plan (Outline briefly)? We prefer Strategy Option 4 – Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities. We consider option 4 to be the most suitable strategy as it allows for development to occur in proportion with existing settlements and ensures that one area is not overburdened. A more even distribution of development allows for a better range of development to come forward including smaller sites. These smaller sites offer an appropriate level of growth and support SME developers. In order to be effective, this strategy needs a more refined focus for the settlement hierarchy and scale as discussed at question 2. This option represents the most effective strategy to meet housing needs across the Borough, whilst also minimising the impacts on any one or two locations i.e. each settlement plays its part and thus share the growth and share the impacts. We also consider this option would facilitate the support for SME developers, who are more finely tuned to deliver smaller scale developments in rural locations. SME developers tend to deliver higher quality bespoke developments that can meet the design requirements of rural locations as well as delivering at a scale that is more appropriate to these settlements. In this respect (coupled with the above amendment to the Settlement hierarchy), it is considered that the requirements of Paragraph 69 can be more easily met under this strategy and that 10% of the housing requirement (1,594 dwellings) are to be allocated on smaller sites of 1ha or less. This scale would suit a wider distribution of development. Furthermore, the allocation of sites throughout will help maintain the vitality and viability of rural locations, which have seen a cycle of decline in services (pub closures, post office closures etc) and suffer from aging populations as the housing stock in these locations is not renewed to allow for downsizers or for people that grow up in these locations to stay in these locations. Appropriate levels of growth of the right type of housing can help support these communities in the long term.	Comments noted including support for option 4 as this allows development to be distributed across the borough. Comments setting out that this option enables support for SME developers also noted and their role in delivery of small sites, and their role in housing market diversification noted.
42006241	42006241	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Q.3. Which spatial strategy option do you prefer and; Q.4. What are your reasons for selecting this spatial strategy option for the Local Plan (Outline briefly)? We prefer Strategy Option 4 – Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities. We consider option 4 to be the most suitable strategy as it allows for development to occur in proportion with existing settlements and ensures that one area is not overburdened. A more even distribution of development allows for a better range of development to come forward including smaller sites. These smaller sites offer an appropriate level of growth and support SME developers. In order to be effective, this strategy needs a more refined focus for the settlement hierarchy and scale as discussed at question 2. This option represents the most effective strategy to meet housing needs across the Borough, whilst also minimising the impacts on any one or two locations i.e. each settlement plays its part and thus share the growth and share the impacts. We also consider this option would facilitate the support for SME developers, who are more finely tuned to deliver smaller scale developments in rural locations. SME developers tend to deliver higher quality bespoke developments that can meet the design requirements of rural locations as well as delivering at a scale that is more appropriate to these settlements. In this respect (coupled with the above amendment to the Settlement hierarchy), it is considered that the requirements of Paragraph 69 can be more easily met under this strategy and that 10% of the housing requirement (1,594 dwellings) are to be allocated on smaller sites of 1ha or less. This scale would suit a wider distribution of development. Furthermore, the allocation of sites throughout will help maintain the vitality and viability of rural locations, which have seen a cycle of decline in services (pub closures, post office closures etc) and suffer from aging populations as the housing stock in these locations is not renewed to allow for downsizers or for people that grow up in these locations to stay in these locations. Appropriate levels of growth of the right type of housing can help support these communities in the long term.	Comments noted including support for option 4. Comments supporting this option as it allows for distribution across the borough and support for SME builders also noted. Comments relating to the need to maintain vitality of rural areas also noted.

25378817	0 4.2.13-4.2.18 & Q5-6	<p>the Local Plan? The Council propose two options with regards to the number of homes it should plan for – meeting assessed needs or meeting assessed needs plus 10%. Whilst we would support the inclusion of additional homes in supply to address flexibility, at present it is not clear whether or not this is the Council's intention, but the Council must ensure a distinction between what is required and the level of supply that is needed to meet that requirement – in essence the buffer between what is required and the expected level of supply. Both these issues are considered further below.</p> <p>The housing requirement. The HBF would agree with the Council's calculation of the local housing needs assessment (LHNA) using the standard method as being 839 dwellings per annum (dpa). As the council is aware this is the minimum number of homes it should deliver and, in line with national policy and guidance consideration needs to be given as whether there are any circumstances that indicate that the level of housing need is higher than that calculated using the standard method. In order to ensure the plan is sound the Council will need to take into account:</p> <ul style="list-style-type: none"> • Whether it is appropriate to cap the housing requirement given the poor affordability of housing and levels of past under delivery; • Affordable housing needs; and • Any unmet needs in neighbouring areas. <p>Uncapped housing needs. Paragraph 2a-007 of PPG outlines that the application of the cap relates to delivery and does not reduce the level of need itself. The same paragraph goes on to outline that where the LHNA is subject to cap consideration can still be given by the local planning authority as to whether a higher level of housing need could be delivered. Without the cap the level of housing need in Tonbridge and Malling is 947 dpa – roughly 13% higher than the capped figure.</p> <p>When considering the application of the cap it must be recognised that the affordability uplift in the standard method is included to take account of any past level of under delivery that has in turn led to worsening affordability in an area. As such the capped LHNA does not reflect the full impact of under supply in an area and as a consequence the capped LHNA is unlikely to have positive impact on housing affordability in the borough. The most that can be hoped for is that the rate at which affordability is worsening is slowed.</p> <p>As the Council will be aware the affordability of housing in Tonbridge and Malling has worsened significantly since 2009. During this period, the median housing price to income ratio increased from 7.79 to 13.39 and the lower quartile house price to income ratio from 8.77 to 13.17. What is also apparent is that since 2009 delivery of new homes has fallen short of meeting the minimum required for the area and has been well below the circa 840 homes what has been the Council's housing requirement since the introduction of the standard method in 2018.</p> <p>(Insert of a table of housing delivery requirement) Table 1: Housing delivery and requirement 2009/10 to 2020/21</p>	<p>Comments relating to the OAN and how this should be considered noted. Including comments relating to the affordability cap, and what the figure would look like without this cap (at 947) and the implications for affordability across the borough. Comments relating to unmet needs from neighbouring area also noted. This matter will be considered and reflected within the new housing targets evidence being prepared to support plan preparation.</p>
42819617	0 4.2.13-4.2.18 & Q5-6	<p>Q5. Which quantum option for the spatial strategy do you prefer? 3.20 For the reasons set out below, we are of the view that Option B is the most suitable quantum for housing need. This includes meeting assessed housing need + up to 10%.</p> <p>Q.6. What are your reasons for selecting this particular quantum option for the Local Plan (outline briefly)? 3.21 We fully support TMBC's approach to housing numbers and their openness to consider not only meeting housing need but also considering growth scenarios that exceed this figure.</p> <p>3.22 As set out in the National Planning Policy Framework, Local Plans should as a minimum provide for objectively assessed needs for housing and other uses, including retail, leisure, office and other main town centre uses.</p> <p>3.23 According to the latest Housing Land Supply Position Statement published in March 2021, TMBC can currently only demonstrate a 3.17 year housing land supply. A recent appeal decision, issued in April 2022, determined that TMBC has a 3.02 year housing land supply (appal ref: PP/H2265/W/21/328805). Furthermore, the 2021 Housing Delivery Test result for TMBC was 63%. This reveals that housing delivery in the last three years (2018-2021) was substantially below the housing requirement for that period.</p> <p>3.24 Evidentially, TMBC has consistently struggled to meet housing need targets in the past. This has triggered a presumption in favour of sustainable development resulting in a number of speculative applications coming forward across the Borough on land outside of the Green Belt. Given TMBC's history of housing delivery, we would recommend planning towards a higher housing target. The additional 10% would act as a buffer and should the delivery rate slow down, the Council would be able to demonstrate a 5 year housing land supply.</p> <p>3.25 In addition to this, there are a number of benefits associated with setting higher growth targets. These include:</p> <ul style="list-style-type: none"> • Making in-roads in addressing affordability; • Labour force growth facilitating business investment / inward investment; • More sustainable local finances; • Funding the delivery of strategic infrastructure; and • Growth to support Town Centre regeneration. 	<p>Comments supporting approach to OAN plus 10% noted, and reasoning of support also noted.</p>
44459553	0 4.2.13-4.2.18 & Q5-6	<p>Quanta to be tested Paragraph: 018 Reference ID: 11-018-20140306 of the PPG sets out that any SA "needs to consider and compare all reasonable alternatives as the plan evolves...". The justification given for only testing two quanta of development at paragraph 4.5 of the ISA are noted. However, for robustness – and noting that examination of the SA is one of the key tests of legal compliance at the Examination – it is recommended that TMBC considers both a lower amount than the standard methodology derived housing need, and a higher need than plus 10%. The former is so TMBC can understand the consequences of not meeting housing need (e.g. through determining that it will not release Green Belt) and the latter is due to the likelihood that TMBC will be requested to accommodate need from elsewhere. This request may either be as unmet need, or through an adjacent LPA (such as SDC) making a request whilst addressing the requirements of paragraph 141 of the NPPF as part of its own considerations for Green Belt release.</p> <p>Preferred quantum The preferred quantum is Meeting Assessed Housing Need + up to 10%. The reasoning for this is set out below: a) the housing need as derived through the standard method for TMBC is subject to the 40% cap: accordingly actual need is higher; b) there will – invariably – be some sites which are allocated in a Local Plan which are not deliverable (for various reasons), or their delivery is delayed, including during times of economic uncertainty as at present. Therefore it is highly prudent to allocate additional housing in order to provide a "buffer", to ensure that the housing need as derived through the standard method is delivered; c) for the reasons set out in response to Q1, affordability and affordable housing need in Tonbridge and Malling borough is acute and worsening (influenced by recent under delivery, a poor housing supply (only 2.2 – 2.58 years), and an imbalance in housing delivery and supply between the West Kent and Maidstone HMAs), and any delivery over the standard method derived housing need would assist in addressing such matters; d) as set out in response to Q1, given the previous discussions held with other authorities in the HMAs (particularly the West Kent HMA), together with the position of London, it is highly likely that there will be requests to assist in meeting housing need from other authorities. Any surplus housing provision would assist in the wider delivery of housing within the HMA or within adjacent HMAs. This is a matter which could assist TMBC in its DC.</p> <p>Having regard to the above, it is recommended that TMBC in fact consider planning for the "Meeting Assessed Housing Need and more than 10%", and potentially to 20%.</p>	<p>Comments suggesting testing within the SA of a lower than OAN noted. Preferred approach of OAN plus 10% noted as actual need is higher, some sites may be undeliverable so should allow for a buffer. Comments also suggesting it is likely that the council will be asked to assist with other unmet need also noted. This matter will be considered and reflected within the new housing targets evidence being prepared to support plan preparation.</p>
42166177	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>All of these contain an option to develop Kings Hill further, as an urban area, which I do not agree with. Kings Hill should be contained as a village and not connected up to further developments. Each new development site should be built to a self contained area to add value and enable effective infrastructure.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.</p>
42766209	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>Only one of the Council's spatial strategic options respects the real world green belt protection imperative. All other options make no mention of the green belt and, apparently, pay little or no heed to this key national policy.</p> <p>What is even more concerning is that, having written spatial strategic policy options 2-5 inclusive without mention or proper regard to the green belt, the Council may seek to argue that anyone choosing any of options 2-5 may be indicating that the green belt is not that important. Options 2-5 may all contain elements that could have merits – particularly in an ideal non green belt constrained world – and people may quite possibly agree with some, thinking that the green belt is not relevant following the way the options are drafted by the Council.</p> <p>Any move by the council to aggregate non option 1 choices as indicative of collective downplaying of the importance of green belt protection, will be vigorously challenged, including through the employing by local constituents of public law specialist solicitors, as necessary.</p> <p>It is unfortunate, in this respect, that no options have been put forward that expressly put the green belt protection foremost but also allow for some limited development in the green belt (ie not 3-4k unit Rural Service Centre scenarios), if this was absolutely necessary.</p> <p>The council may feel it is necessary to allocate some limited green belt land even while confining most development outside, if they are think they have to follow the current target for housing (even though that may shortly not be necessary and the local plan process should be temporarily halted for this reason, as noted above).</p> <p>In the circumstances, failure to provide such a Green belt first but with limited development (backup) option is a significant shortcoming in the Council's Reg 18 consultation process.</p> <p>NPPF – duty to examine fully all other reasonable options This is a highly significant element and prescription of national policy for the Council's formulation of local development framework policies. In the case of the borough's land area, the Council should focus on provision in its non green belt area first and foremost.</p> <p>If, after fully exhausting all potential for land outside the green belt boundary (land either within the borough or in an adjacent borough or district with agreed capacity), the Council concludes that a limited amount of development needs to entail the destruction of a part or parts of the green belt and the openness it is designed to preserve, the Council must rank potential candidate sites on the basis of their relative harm to the openness of the green belt. Sites should be considered both individually and – where a cumulative effect on openness would be entailed – in aggregate.</p> <p>Due to time limited by illness, as noted above, and also due to the lack of a borough wide candidate site location map – a failing by the Council to properly allow constituents to assess borough wide site options against each other), these submissions cannot assess many sites – either individually or in relation to each other. The general principles need noting however, as they are not set out in the Reg 18 consultation.</p> <p>The green belt is a metropolitan green belt formulated to prevent urbanizing sprawl from London and there can therefore be considered an implicit presumption that development nearer to London would be more harmful than development nearer to the outer boundaries further from the main built up area of London.</p>	<p>Comments highlighting the importance of the Green Belt designation in the drawing up and selection of options noted. Comments relating to the ranking of green belt sites if some limited release is proposed also noted. This matter will be considered and reflected within the new Green Belt evidence being prepared to support plan preparation. Comments in relation to the form of the consultation and the lack of a comprehensive site map also noted.</p>
42470433	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>I don't agree with any of these distributions because none of them offer to not over develop Kings Hill. All of these strategies class Kings Hill wrongly as an Urban area (which it is not and neither do residents want it to be) and all strategies involve over developing this village. This is purely money led. Kings Hill is not urban and does not have sufficient infrastructure to support new homes. It's already impossible to get GP appts, people are having to travel to other villages to get seen by Drs because our surgery is so over subscribed, all the primary schools are full, there is no secondary school, there are not enough community spaces and your plan is to build over the ones that are there.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.</p>

			<p>housing need of net. 15,941 dwellings across the plan period from 2021-2040.</p> <p>EMT is supportive of development distribution strategy Option 1 seeking development in and adjacent to settlements beyond the outer Green Belt boundary and outside the Areas of Outstanding Natural Beauty (AONB); development distribution strategy Option 2 where development is focussed on greenfield and previously-developed land adjacent to urban area settlements; and development distribution strategy Option 4 which seek to facilitate development on greenfield and previously-developed land within and adjacent to urban areas, rural service centres and other rural settlements.</p> <p>These three development distributions strategies are supported by EMT as they seek to facilitate development on greenfield sites which lie adjacent or close to existing settlements which can be readily delivered without the need to release Green Belt land or AONB land and in close proximity to existing services and community facilities. At the heart of the NPPF is the focus on sustainability both in the development of Local Plans and decision making. It is considered that the release of greenfield land immediately adjacent to existing settlements which have ready access to existing physical and social infrastructure represents a sustainable approach to place making across the borough which would positively support TMBC meeting its housing need across the borough.</p> <p>As outlined in the Vision Document prepared by Savills Urban Design and previously provided to TMBC, the Residential Site offers a significant positive opportunity to deliver an urban extension to Ditton and Aylesford in a sustainable manner. The Residential Site is bounded by the edge of the settlement of Aylesford to the north, Hermitage Lane to the east, the East Malling Research Station to the west and railway line to the south, which acts as an existing barrier and a refined settlement edge. This site provides an invaluable opportunity to deliver a highly sustainable extension to the existing settlement.</p> <p>Tonbridge and Malling Borough Council had been minded to allocate the sustainably located greenfield land (the Residential Site) in the TMBC Local Plan (Regulation 22 Submission dated January 2019) as a strategic development site to the south of Aylesford and Ditton as an "area of opportunity". The Vision Document prepared by Savills Urban Design outlines that development at this location could facilitate delivery of a significant number of residential dwellings, alongside a commercial / village centre and a new primary school servicing the new community. As previously stated, all landowners are in agreement with the promotion of site A. Locational Characteristics The NPPF outlines that sustainability is at the heart of development and as such it is imperative that new development is located in areas which benefit from good connectivity in terms of both physical and social infrastructure. The Residential Site is located to the south of Aylesford in close proximity to existing transport services, notably Barning Station and East Malling Station. The site benefits from good connection onto Klin Barn Road and Hermitage Lane. The Call for Sites response to EMT's submission of the Employment Site (Site ID: 59856) acknowledged that the site represents a sustainable location for employment and research development to support the ongoing operation of the East Malling Research Station. Given the proximity of the Residential Site with the Employment Site, it is considered that both sites represent sustainable development locations and would facilitate bringing in new jobs to the area.</p> <p>3.29 Which quantum option for the spatial strategy do you prefer?</p> <p>3.30 For the reasons set out below, we are of the view that Option B is the most suitable quantum for housing need. This includes meeting assessed housing need + up to 10%.</p> <p>3.31 We fully support TMBC's approach to housing numbers and their openness to consider not only meeting housing need but also considering growth scenarios that exceed this figure.</p> <p>3.32 As set out in the National Planning Policy Framework, Local Plans should as a minimum provide for objectively assessed needs for housing and other uses, including retail, leisure, office and other main town centre uses.</p> <p>3.33 According to the latest Housing Land Supply Position Statement published in March 2021, TMBC can currently only demonstrate a 3.17 year housing land supply. A recent appeal decision, issued in April 2022, determined that TMBC has a 3.02 year housing land supply (appeal ref: PP/H2265/W/21/3288065). Furthermore, the 2021 Housing Delivery Test result for TMBC was 63%. This reveals that housing delivery in the last three years (2018-2021) was substantially below the housing requirement for that period.</p> <p>3.34 Evidentially, TMBC has consistently struggled to meet housing need targets in the past. This has triggered a presumption in favour of sustainable development resulting in a number of speculative applications coming forward across the Borough on land outside of the Green Belt. Given TMBC's history of housing delivery, we would recommend planning towards a higher housing target. The additional 10% would act as a buffer and should the delivery rate slow down, the Council would be able to demonstrate a 5 year housing land supply.</p> <p>3.35 In addition to this, there are a number of benefits associated with setting higher growth targets. These include:</p> <ul style="list-style-type: none"> • Making in-roads in addressing affordability; • Labour force growth facilitating business investment / inward investment; • More sustainable local finances; • Funding the delivery of strategic infrastructure; and • Growth to support Town Centre regeneration. 	<p>Support for option 1 and a focus away from the Green Belt, option 2 where focussed on greenfield and brownfield land; and option 4 within and adjacent to urban areas, rural service centres and rural settlements noted. Reasoning for the support in terms of location on greenfield sites without the need for Green Belt release or AONB development noted. Site specific comments noted, including that in relation to previous decisions to allocate within the withdrawn plan. Comments relating to focussing development to edge of settlement locations also noted. No decisions have yet been made on the spatial strategy or sites for inclusion and will be subject to further analysis of evidence, SA and consultation responses.</p>
44914561	44914657	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>3.30 For the reasons set out below, we are of the view that Option B is the most suitable quantum for housing need. This includes meeting assessed housing need + up to 10%.</p> <p>3.31 We fully support TMBC's approach to housing numbers and their openness to consider not only meeting housing need but also considering growth scenarios that exceed this figure.</p> <p>3.32 As set out in the National Planning Policy Framework, Local Plans should as a minimum provide for objectively assessed needs for housing and other uses, including retail, leisure, office and other main town centre uses.</p> <p>3.33 According to the latest Housing Land Supply Position Statement published in March 2021, TMBC can currently only demonstrate a 3.17 year housing land supply. A recent appeal decision, issued in April 2022, determined that TMBC has a 3.02 year housing land supply (appeal ref: PP/H2265/W/21/3288065). Furthermore, the 2021 Housing Delivery Test result for TMBC was 63%. This reveals that housing delivery in the last three years (2018-2021) was substantially below the housing requirement for that period.</p> <p>3.34 Evidentially, TMBC has consistently struggled to meet housing need targets in the past. This has triggered a presumption in favour of sustainable development resulting in a number of speculative applications coming forward across the Borough on land outside of the Green Belt. Given TMBC's history of housing delivery, we would recommend planning towards a higher housing target. The additional 10% would act as a buffer and should the delivery rate slow down, the Council would be able to demonstrate a 5 year housing land supply.</p> <p>3.35 In addition to this, there are a number of benefits associated with setting higher growth targets. These include:</p> <ul style="list-style-type: none"> • Making in-roads in addressing affordability; • Labour force growth facilitating business investment / inward investment; • More sustainable local finances; • Funding the delivery of strategic infrastructure; and • Growth to support Town Centre regeneration. 	<p>Support for OAN plus 10% noted. This matter will be further considered and reflected within the new housing constraints evidence being prepared to support plan preparation.</p>
42819617		0 4.2.13-4.2.18 & Q5-6	<p>Every one of your options has Kings Hill as a focus of development. Why is there no option where it isn't? No option = no choice. You say each option is assessed against sustainability objectives, but there is literally nothing sustainable about significant development on a site that is already without the necessary level of infrastructure, that has been marketed off the back of its leafy green spaces, and now faces being turned into something completely different.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.</p>
42442241		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>I don't agree with any of these distributions because none of them offer to not over develop Kings Hill. All of these strategies class Kings Hill wrongly as an Urban area (which it is not and neither do residents want it to be) and all strategies involve over developing this village. This is purely money led. Kings Hill is not urban and does not have sufficient infrastructure to support new homes. It's already impossible to get GP appts, people are having to travel to other villages to get seen by Drs because our surgery is so over subscribed, all the primary schools are full, there is no secondary school, there are not enough community spaces and your plan is to build over the ones that are there.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Kings Hill also noted.</p>
42470433		0 4.2.13-4.2.18 & Q5-6	<p>3.9 TMBC has included the existing settlement hierarchy as set out below:</p> <p>3.10 First, it is important to note that we fully support the inclusion of a settlement hierarchy as part of the spatial strategy. A settlement hierarchy identifies the most sustainable settlements and can be used to distribute development across the Borough. However, we are of the view that the above settlement hierarchy fails to fully recognise the sustainability credentials of some settlements, namely, Wateringbury.</p> <p>3.11 The hierarchy recognises 'other rural settlements' as small in size with limited services which are generally more remote. 'Rural Service Centres' are considered to contain an array of services including schools, shops and healthcare and are well connected in terms of public transport and opportunities for active travel such as cycling and walking to destinations. They are also contain opportunities for making use of previously-developed land.</p> <p>3.12 Wateringbury contains a number of services and facilities including, schools, shops and healthcare. Key services include:</p> <ul style="list-style-type: none"> • Wateringbury Post Office; • Wateringbury Church of England Primary School; • Wateringbury Village Hall; • Wateringbury Scout Group; • Premier Inn Maidstone Hotel; • The Wateringbury Pub; • Shell Garage; and • Wateringbury Football Club. <p>3.13 Wateringbury also benefits from a railway station which is served by South Eastern. Regular services run to Tonbridge (within 20 mins) every 30 minutes during peak times and every hour during off-peak times. There are also regular services to Strood (within 35 minutes) every hour. Travel time into London Charing Cross and London St Pancras is approximately 75 minutes.</p> <p>3.14 There are also a number of bus routes which serves Wateringbury and there are number of bus stops located along Tonbridge Road and Bow Road.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Wateringbury also noted.</p>
42429217		0 4.1.1 - 4.1.3, Figure 2	<p>The Medway Gap is not an Urban Area, it has always been a collection of small villages despite your best efforts to change that.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Medway also noted.</p>
42830721		0 4.1.1 - 4.1.3, Figure 2	<p>Offham is a rural settlement, surrounded by green belt which should not be used for building houses as we are in great need of being self supporting in food and agriculture.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Offham also noted.</p>
42016897		0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>I really resent that where I live is now called the Medway Gap which from what I have seen will no longer be a gap we are distinct communities Ditton is one I am furious its as though now labelled Medway we can be treated as ripe for over development and loss of our communities disgusting. Maybe West Malling Kings Hill and Offham can be rebounded the Tonbridge gap? I bet the residents of those communities would find this equally unacceptable. At the rate of building there will soon be no gaps or is this the plan.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to the strategic gap also noted.</p>
46090945		0 4.1.1 - 4.1.3, Figure 2	<p>Any development should be in larger towns like Tonbridge.</p> <p>I believe the purpose of the MGB is to prevent urban sprawl and the council needs to protect this</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Tonbridge also noted.</p>
42819617		0 4.1.1 - 4.1.3, Figure 2	<p>Settlement Hierarchy</p> <p>The inclusion of West Malling as a 'Rural Service Centre' is supported. However, it is relevant that West Malling is the largest and is considered to be most sustainable settlement in comparison to the other Rural Service Centres (Borough Green, East Peckham, Hadlow, and Hildenborough).</p> <p>Accordingly, West Malling should therefore be the focus of targeted housing growth through appropriate allocations over and above other settlements within this tier of the hierarchy.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to West Malling also noted.</p>
46103169	46103137	4.1.1 - 4.1.3, Figure 2	<p>Statement 4.1.2 is incorrect. As an 'other rural area' Wouldham should have only had 'minor' development. However, the whole of Peters Village has been built in Wouldham already trebling the size of the village. But no adequate infrastructure or services have been delivered although many promises were made and not kept by either planners or developers.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in relation to Wouldham also noted.</p>
42527265		0 4.1.1 - 4.1.3, Figure 2	<p>'other rural settlements' are presented as too small a group, there are opportunities in many settlements to infill and increase densities without significant effect on infrastructure or landscape, specially suitable for homeworkers, small businesses and farmworkers.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in the classification of rural settlements also noted.</p>
42587585		0 4.1.1 - 4.1.3, Figure 2	<p>'other rural settlements' are presented as too small a group, there are opportunities in many settlements to infill and increase densities without significant effect on infrastructure or landscape, specially suitable for homeworkers, small businesses and farmworkers.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments in the classification of rural settlements also noted.</p>

			<p>4.1 The local plan is making already built local homes worse and reducing quality of life for residents by building on beautiful green spaces where communities come together e.g. small green spaces on tower view in Kings Hill. These are a vital part of community life: children play games here, in the snow families sledge together here, people buy lunches from waitrose and sit on this green space and spend time relaxing or with friends. Your plans involve ruining these areas. I am for the building of new homes, but not at the detriment to current homes. Our home is one of those homes on the green and when we bought it, we called KCC and Liberty Trust to ask if they would ever build on that land to which they responded no they wouldn't, it was planned green space for communities to enjoy. You are taking away these spaces, planning to ruin communities and devalue homes.</p> <p>3.1 believe all these are important however I do not believe your Local Plan delivers on this. It may in certain areas of the Borough but I live in Kings Hill and in this area you are planning to turn it into a town (which it is not) - residents moved here to be part of a village. You are planning on over developing it and specifically you are planning to build on top of our few current green spaces and biodiversity spaces and community activity spaces. Kings Hill does not have the infrastructure to cope with 6000 new homes. You have classified it as similar to Tonbridge just so that you can over develop it. This is purely money led and does not think about life for those who live here, many of whom moved here to move away from the hustle and bustle of city life and to a small village community. You have plans to build on vital green space on Tower view. These are a vital part of community life: children play games here, in the snow families sledge together here, people buy lunches from waitrose and sit on this green space and spend time relaxing or with friends. Your plans involve ruining these areas. Also as you drive into Kings Hill down Tower view, it is the first green space that you come to, after you pass all the businesses, Aldi and the huge new building of homes for those over 50+. This first green space is what makes Kings Hill seem like a residential area on that entrance, rather than some weird business park. Your plans, plan to ruin it and people will stop wanting to live here and will move away.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy and the implications for the spatial strategy. This will be reflected within the next Regulation 18 document. Specific comments on the role of Kings Hill also noted.</p>
42470433	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>The hierarchy should be informed by an up-to-date settlement role and function study.</p> <p>Nevertheless, from its knowledge of the borough, Fernham Homes considers that Hadlow remains a key settlement as a RSC and that Tonbridge remains a key settlement as an urban area, and Hildenborough as a RSC.</p> <p>Paragraph 31 of the NPPF requires local plans to be underpinned by relevant, up-to-date and proportionate evidence. The evidence on which the hierarchy is based is extremely old: it reflects the hierarchy from the Core Strategy 2007. There have been substantial changes to settlements during that time, including most recently as a result of societal changes post the Covid pandemic.</p> <p>It is therefore important that an up-to-date settlement role and function study is undertaken: it is understood from correspondence with TMBC that this is being commissioned. This is welcomed.</p> <p>Notwithstanding the above, from its detailed knowledge of the borough, Fernham Homes considers that Hadlow remains a RSC and represents a suitable location for substantial growth. The settlement contains a primary school, Hadlow college, NHS doctors and dentists' surgeries, shops, and community facilities. It also benefits from very good connections to public transport: there are bus services (the No.7) running at least every 30 mins between Tunbridge Wells/Tonbridge and Maidstone (06.30 – 23.00 Monday to Friday, 08.00 – 23.00 Saturday, 09.00 – 17.30 Sunday), with more (No. 77) between at Tunbridge Wells/Tonbridge and Kings Hill at peak times. The settlement is well served by pedestrian footways, linking to the settlement centre where the majority of services are located.</p> <p>From its detailed knowledge of the borough, Fernham Homes considers that Tonbridge remains a key settlement as an urban area: it has by far the greatest number of services and infrastructure, and is a significant public transport node. Hildenborough is a RSC and represents a suitable location for substantial growth. The settlement contains schools, local shops and services such as a hairdresser and pub, a pharmacy and a cafe, a day care nursery, cultural services including churches, meeting places (village hall) and library. Hildenborough Station provides direct train services to London, Sevenoaks and Tonbridge, with a number of buses serving the settlement itself. This means that, together with the ability to access the major and strategic highway network, the site has excellent connections to the West Kent HMA.</p>	<p>Comment noted. This matter relates to the established settlement hierarchy, based on past approach and evidence. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy.</p>
44459553	0	4.1.1 - 4.1.3, Figure 2	<p>I live in Kings Hill and in this area you are planning to turn it into an urban area (which it is not) - residents moved here to be part of a village. You are planning on over developing it and specifically you are planning to build on top of our few current green spaces and biodiversity spaces and community activity spaces. Kings Hill does not have the infrastructure to cope with 6000 new homes. You have classified it as similar to Tonbridge just so that you can over develop it. This is purely money led and does not think about life for those who live here, many of whom moved here to move away from the hustle and bustle of city life and to a small village community.</p> <p>You have plans to build on vital green space on Tower view. These are a vital part of community life: children play games here, in the snow families sledge together here, people buy lunches from waitrose and sit on this green space and spend time relaxing or with friends. Your plans involve ruining these areas. They are some of the few green spaces in phase 2 and you plan to take them away. Also the lovely green at the end of Braeburn way is another space where families and children play. Also as you drive into Kings Hill down Tower view, the green with the hills near Woodford Grove, on Tower view is the first green space that you come to, after you pass all the businesses, Aldi and the huge new building of homes for those over 50+. This first green space is what makes Kings Hill seem like a residential area on that entrance, rather than some weird business park. Your plans, plan to ruin it and people will stop wanting to live here and will move away.</p>	<p>Comment noted. This matter relates to the settlement hierarchy and the role of King's Hill.</p>
42470433	0	4.3.1 - 4.3.3	<p>I live in Kings Hill and in this area you are planning to turn it into an urban area (which it is not) - residents moved here to be part of a village. You are planning on over developing it and specifically you are planning to build on top of our few current green spaces and biodiversity spaces and community activity spaces. Kings Hill does not have the infrastructure to cope with 6000 new homes. You have classified it as similar to Tonbridge just so that you can over develop it. This is very short-sighted and does not think about life for those who live here, many of whom moved here to move away from the hustle and bustle of city life and to a small village community. Nor does it consider that the loss of the essence/attraction of the area will negatively impact the local economy and see wealth leave the area.</p> <p>You have plans to build on vital green space on Tower view. These are a vital part of community life: children play games here, in the snow families sledge together here, people buy lunches from waitrose and sit on this green space and spend time relaxing or with friends. Your plans involve ruining these areas. They are some of the few green spaces in phase 2 and you plan to take them away. Also the lovely green at the end of Braeburn way is another space where families and children play. Also as you drive into Kings Hill down Tower view, the green with the hills near Woodford Grove, on Tower view is the first green space that you come to, after you pass all the businesses, Aldi and the huge new building of homes for those over 50+. This first green space is what makes Kings Hill seem like a residential area on that entrance, rather than some weird business park. Your plans, plan to ruin it and people will stop wanting to live here and will move away.</p>	<p>Comment noted. This matter relates to the settlement hierarchy and the role of King's Hill.</p>
42442241	0	4.3.1 - 4.3.3	<p>3. The amount of new housing to be provided</p> <p>3.1 The consultation document refers to the housing requirement as 15,941 new homes between 2021 and 2040. This is derived from a per annum requirement of 839 new homes. §61 of the Framework indicates this to be the "minimum number of new homes needed". On this basis, the consultation document raises the proposition of increasing the amount of new housing by 10% (§4.2.16), but no justification is given for this particular level of increase.</p> <p>3.2 There is a suggestion that this would in part be associated with (1) assisting neighbouring authorities in the Housing Market Areas that are facing similar challenges to addressing their assessed needs; (2) the need to provide a diverse range of housing supply to provide resilience and (3) the need to provide flexibility over the longer term to account for unforeseen changes.</p> <p>3.3 This explanation conflates the level of housing that should be provided and the amount of land needed to ensure that level of housing is in fact built.</p> <p>3.4 Whatever the strategic requirement is defined to be, the amount of land allocated will need to be greater still to provide flexibility or contingency. This reflects the fact that not all sites identified at the outset of the plan are developed, they may be developed in part only, or they may be developed for alternative uses. The extent of contingency required will need to reflect the extent of risk that the housing supply strategy entails. For example, reliance on a small number of large sites would require a high degree of contingency.</p> <p>3.5 It is instructive that the consultation document draws attention to the relative and worsening affordability in the Borough in comparison with surrounding areas. Were the decision taken not to meet this level of housing need in full, this existing position would be exacerbated; this would not accord with the principles of sustainable development. Conversely, increasing the long-term supply of housing land will ensure additional affordable housing with the associated social benefit that result from this.</p>	<p>Comment noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation, including that in relation to housing numbers and site selection. The council acknowledges the risks associated with reliance on a small selection of large sites to meet requirements, and intends to ensure a flexible supply of sites.</p>
45440929	45440705	4.2.13-4.2.18 & Q5-6	<p>6.3 Quantum of new development: The consultation document refers to the housing requirement as 15,941 new homes between 2021 and 2040. This is derived from a per annum requirement of 839 new homes. §61 of the Framework indicates this to be the "minimum number of new homes needed". On this basis, the consultation document raises the proposition of increasing the amount of new housing by 10% (§4.2.16), but no justification is given for this particular level of increase. We agree with the principle of increasing the housing requirement and ensuring that the housing land supply strategy is sufficiently robust to ensure the delivery of that requirement with appropriate levels of contingency.</p> <p>6.4 It is instructive that the consultation documents draws attention to the relative and worsening affordability in the Borough in comparison with surrounding areas. Were the decision taken not to meet this level of housing need in full, this existing position would be exacerbated; this would not accord with the principles of sustainable development.</p>	<p>Comment noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation, including that in relation to housing numbers and the housing markets acting within the borough.</p>
45440929	45440705	4.2.13-4.2.18 & Q5-6	<p>2.1 Central to the new Local Plan will be provision of sufficient development land to meet Tonbridge and Malling Borough Council ('Borough') future housing needs. Current estimates indicate a need to construct almost 16,000 new homes between now and 2040. This equates to some 840 new homes which is an increase from that proposed in the now withdrawn Local Plan (13,920 new homes) and the much earlier Core Strategy (at least 6,375 new homes). In simple terms, and as the Council has acknowledged, additional housing land will need to be identified through this new Local Plan to that which was proposed previously.</p> <p>2.2 As the consultation document acknowledges, this gives rise to the question of how new development is distributed across the Borough in order to achieve a sustainable pattern of development as required by inter alia §105 of the National Planning Policy Framework ("the Framework").</p> <p>2.3 Allied to this is the characteristics of the Borough: the consultation document describes a diverse area extending between Walderslade and the Kent Downs Area of Outstanding Natural Beauty (AONB) to the north, to Tonbridge and the High Weald AONB in the south and the Medway Gap in the east. The Core Strategy describes the Borough in the following terms: - Nearly three-quarters of the Borough is covered by the Metropolitan Green Belt; expansion of existing settlements is tightly restricted. - The part of the Borough outside the Green Belt includes the important Strategic Gap separating the Medway Gap from Maidstone and the Medway Towns, extensive parts of the AONB, areas of "best and most versatile" agricultural land and areas of national and local nature conservation interest. - Much of the lower lying land in the Medway Valley lies within the floodplain of the River Medway and is subject to varying degrees of flooding constraint.</p> <p>2.4 These are characteristics that endure to the present day and continue to frame discussion of how best to accommodate new development for which there is a social and economic imperative.</p> <p>2.5 Successive development plan strategies have applied a hierarchy of settlements as a way of distributing development. This principle continues to be appropriate, but in the context of the amount of new housing that should be provided, the extent to which a narrow concentration of development is possible is now more limited.</p>	<p>Comment noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation, including that relating to housing constraints. Further detail to the settlement hierarchy and spatial strategy will be provided alongside the next version of the local plan.</p>
45440929	45440705	4.1.1 - 4.1.3, Figure 2	<p>2.6 New housing in rural areas is also an important consideration in its own right and limits the relevance of an excessive urban focus. The Framework intends that planning policies are responsive to local circumstances and support housing that reflects local needs (§78). Moreover, to Conceptually agree in general. Some higher hierarchy areas are bottlenecked by communications - eg Kings Hill where physical flow in any direction apart from the N / NE is often restricted due to a variety of factors ranging from volume of traffic to flooding / flooding risk and impact in Mereworth (A228 corner) / beyond.</p>	<p>Comment noted. This matter will be considered and reflected within the new Infrastructure Delivery Plan and other evidence being prepared to support plan preparation.</p>
42724257	0	4.1.1 - 4.1.3, Figure 2	<p>Improving general communications will allow more opening up across the area rather than focussed in fewer, increasingly dense areas, where infrastructure is already struggling - eg Kings Hill - 11+ aged schooling particularly for those having passed the Kent Test, doctors surgeries/ability to recruit and retain, slow trains to London, loss of green habitat etc.</p>	<p>Comment noted. This matter will be considered and reflected within the new Infrastructure Delivery Plan and other evidence being prepared to support plan preparation.</p>

			<p>I understand the concept but care needs to be taken when reviewing the hierarchy. Some areas eg Kings Hill, are constrained by communications in any direction apart from N / NNE. Road infrastructure is often bottlenecked around Mereworth, Watringbury etc and Mereworth/East Peckham/ etc are prone to flooding, further complicating travel.</p> <p>Improving communications across the borough will allow greater spreading of development and reduce the burden on some areas where infrastructure is not keeping pace with the existing development plans eg Kings Hill - secondary school / 11+ passed provision & time to travel to grammar schools, doctor surgery performance /ability to attract and retain staff, slow trains to London for the majority of the geography etc</p> <p>We in Aylesford may live in an urban area but we have inadequate healthcare, a section of the main A20 road that totally clogs up at peak hours, and narrow lanes connecting Aylesford to Eccles, Burham, Wouldham and Medway with no bus. After the withdrawal of the 155 bus, we have one bus each way 2 days a week. The most remote village in the mountains of North East Pakistan, the last village before K2, manages to have a better bus service than that, using specially built, small buses on a 4x4 chassis.</p>	<p>Comment noted. This matter will be considered and reflected within the new Infrastructure Delivery Plan and other evidence being prepared to support plan preparation.</p>
42724257	0	4.1.1 - 4.1.3, Figure 2		
38377665	0	4.1.1 - 4.1.3, Figure 2		<p>Comment noted. This matter will be considered and reflected within the new Infrastructure Delivery Plan and transport modelling evidence being prepared to support plan preparation.</p>
42716577	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4	<p>Hildenborough is already facing issues with overdevelopment. With large developments currently in progress, the main road through is already busy and we were unable to get into the local doctor surgery. The plans to include Hildenborough would make local services such as Doctors or schools impossible to get into (with potential for hundreds more houses). I have two young children and the prospects are already challenging. Part of the reason to move here was the schools and green space to walk and enjoy. The village of Hildenborough will likely be destroyed by development plans if included. All the proposed development areas in and around Hildenborough include green belt land, "exceptional circumstances for development are not satisfied by house development needs when there are many other local brownfield sites available. Continued destruction of green land will lead to a local ecological collapse, just for some more houses.</p> <p>The infrastructure in TMBC cannot support any more houses! There is minimal strength internet and phone signal in the area. This does not support the properties in the area let alone more and businesses!</p> <p>Infrastructure needs to be improved before any more houses are developed! Houses developed also need to be affordable and not 1 million + houses! It should not be for those that are rich or those that claim benefits! TMBC will populate areas where they can make the most money and village locations will attract wealthier people meaning bigger and more unaffordable housing in the local areas.</p> <p>I write this as it has taken me 1 hour to drive from Kings Hill school to the airfield estate where I have had to abandon my car due to traffic gridlock along the a228. It cannot cope with the volume of traffic it currently has let alone more!</p> <p>We do not support any housing developments in the field spaces in Mereworth. Kings Hill has complained about the access points for years and there is no development of infrastructure there. Once houses are built the infrastructure is totally forgotten! Mereworth along with other villages do not wish for this to occur.</p> <p>From the ME18 postcode, all secondary school are over subscribed and taking children above their PAN. It is virtually impossible to get an NHS doctors appointment. NHS dentists do not exist in the local area!</p>	<p>Comment noted. This matter will be considered and reflected within the new Infrastructure Delivery Plan evidence being prepared to support plan preparation.</p>
42520801	0	4.2.13-4.2.18 & Q5-6		<p>Comment noted. This matter will be considered and reflected within the new Infrastructure Delivery Plan evidence being prepared to support plan preparation.</p>
42716577	0	4.3.1 - 4.3.3	<p>Hildenborough is already facing issues with overdevelopment and should not be included in the area for further development. With large developments currently in progress, the B245 road is already busy and further development would create traffic issues and delays into Tonbridge. The plans to include Hildenborough would make local services such as Doctors or schools impossible to get into (with potential for hundreds more houses) which are already full (I had to join a Doctor miles away... and not in my village). I have two young children and the prospects are already challenging to get into the local schools due to capacity issues. Part of the reason to move here was the schools and green space to walk and enjoy. The village of Hildenborough will likely be destroyed by development plans if included. All the proposed development areas in and around Hildenborough include green belt land, "exceptional circumstances for development are not satisfied by house development needs when there are many other local brownfield sites available. Continued destruction of green land will lead to a local ecological collapse, just for some more houses.</p>	<p>Comment noted. This matter will be considered and reflected within the new Infrastructure Delivery Plan evidence being prepared to support plan preparation.</p>
42585473	0	4.3.1 - 4.3.3	<p>The Hildenborough area is in my view completely unsuitable for development, the area at present has a very poor infrastructure, no cycle lanes, lack of footpaths alongside rural roads, susceptible to flooding, the B245 is a single carriageway road which is at peak times apparently at capacity, it is very difficult to join the road and there are a great deal of accidents on this stretch of road due to its nature, it appears able to invite high speeds despite the limits imposed, it is very difficult to merge with, it regularly acts as the main diversion route if the A21 is closed between Tonbridge and Sevenoaks, each time that happens the road becomes impassable it simply cannot cope with traffic volume, any substantial increase in housing would make this a regular occurrence leading to increased journey times and increased pollution. Local schools are over subscribed and doctors are apparently at capacity already. The area is poorly served by bus routes which cease by 7.30 pm making it difficult to get to Tonbridge or Hildenborough station other than by car.</p>	<p>Comment noted. This matter will be considered and reflected within the new Infrastructure Delivery Plan evidence being prepared to support plan preparation. This will include analysis relevant to the infrastructure requirements of Hildenborough and Tonbridge.</p>
42504929	0	4.2.13-4.2.18 & Q5-6	<p>In broad terms, I object to any building on green belt land and the infilling of land between villages to create a sprawl. The local infrastructure around Borough Green and Ightham will not support more traffic or more school children (who will travel to Tonbridge, making the transport situation even worse than the current debacle). If there are urban areas where housing can be built without damaging our countryside or causing transport chaos, I would support that. However, the area of the Borough in which I live (Ightham) does not offer facilities or jobs and so any increase in housing leads to more traffic on the roads which leads to pollution and significant congestion. Housing needs to be built near urban hubs where people can walk or use public transport.</p>	<p>Comment noted. This matter will be considered and reflected within the new Infrastructure Delivery Plan evidence being prepared to support plan preparation. This will include analysis relevant to the infrastructure requirements of Ightham and Borough Green.</p>
25390689	0	4.1.1 - 4.1.3, Figure 2	<p>What is the evidence for Borough Green as a rural service centre? People tend to go from Borough Green to places like West Malling, Kings Hill, Tonbridge. What numbers come to Borough Green and from where?</p>	<p>Comment noted. This matter will be considered and reflected within the new town centres evidence being prepared to support plan preparation.</p>
42148897	0	4.1.1 - 4.1.3, Figure 2	<p>Although Tonbridge is the largest urban area in the Borough it actually only has two roads going North to South through it because of the River Medway. The A21 bypasses the town but the A26 is routed to the south and then through the industrial estate on Cannon Lane. The other North-South road is the High Street. Any development in Tonbridge needs to take account of the considerable pressure these two routes are already under and avoid further congestion. If development in smaller places is limited by the lack of services then perhaps the services need to be put in place to facilitate development. Continually loading more onto Tonbridge will make it an increasingly unpleasant place to live.</p>	<p>Comment noted. This matter will be considered and reflected within the new Infrastructure Delivery Plan evidence being prepared to support plan preparation.</p>
43884609	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4	<p>Development sites and policies which may eventually be in peripheral areas within close proximity to the Tonbridge Wells borough boundary should only be formally allocated or drafted where full consideration has been given to the impacts on the highway network, air quality, infrastructure, landscape character, biodiversity/ecology, flood risk and the amenity of the area as a whole.</p> <p>Lumping settlements together in this way does not allow their individuality to be enhanced. Tonbridge is a historic town with a Main Street, shopping area and commercial areas, very different from Kings Hill which is primarily residential and commercial. Medway Gap and Snodland equally distinct areas. This really makes no sense.</p>	<p>Comment noted. This matter will be reflected within the next Regulation 18 document.</p>
42038785	0	4.1.1 - 4.1.3, Figure 2	<p>I feel the appraisals of sites shows a fundamental lack of knowledge of the East side of the borough and many of the objective make inaccurate assumptions. There has already been at least a doubling of dwellings with little or no infrastructure provision. A bus stop does not mean there is a bus service, a school does not mean residents children will have access to it if it is already full. If the medical facility is already unable to cope with the current resident, how can additional dwellings even be considered?</p> <p>The lack of public transport requires most households to have at least 2 cars, increasing emissions and additional strain on an already saturated rural road network. Any development in the 'other rural' hierarchy should stipulate any 2/3 bed dwellings have at least 2 parking spaces. Any Travel Plans require full scrutiny. It is pointless stating that there will be increased cycle travel if there are no cycle lanes and the road are too dangerous to use as well as not having any linking infrastructure.</p>	<p>Comment noted. This matter will in relation to infrastructure support and requirements will be considered and reflected within the new Infrastructure Delivery Plan evidence being prepared to support plan preparation.</p>
42527265	0	4.3.1 - 4.3.3	<p>Brownfield sites must take priority for development.</p> <p>Infrastructure in rural areas is crumbling, with narrow roads taking volumes of traffic which was never conceived previously.</p> <p>Any of the smaller developments chosen, must consider the impact of any increased traffic and services required to make any site viable.</p> <p>Services (water/drainage and electricity) are operating at the top end of their limits in the villages; for which major infrastructure developments could be horrendously expensive.</p> <p>Communications infrastructure is at its limit, the village overhead cabling is representative of a third world country! At least opting for Options X; this will offer easier solutions to providing good (cheaper) infrastructure opportunities.</p>	<p>Comment noted. This matter will in relation to infrastructure support and requirements will be considered and reflected within the new Infrastructure Delivery Plan evidence being prepared to support plan preparation.</p>
42804769	0	4.3.1 - 4.3.3		
42716001	0	4.3.1 - 4.3.3	<p>Areas identified around Tonbridge and Hildenborough are of real concern. There has already been large developments in Tonbridge. Hildenborough at present is having an additional 241 dwellings which is a big increase for a village. Around the identified area there is a real danger of flooding, which still happens in large weather events despite the flood barrier. Adding large developments in this area is not sustainable as areas that help absorb water will be concreted over which in turn causes more surface water run off. Climate change is only going to add to this problem. In heavy rainfall at present, in the lower areas of Hildenborough, including the Stocks Green Primary school, water backs up into the sewage system causing the school to be closed and the children's education interrupted.</p>	<p>Comment on the role of Tonbridge and Hildenborough in future growth noted.</p>
44546305	44546401	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4	<p>Any areas considered for development should be well away from the flood plain in order not to cause huge expense and destruction from flooding.</p> <p>(59874)</p> <p>The National Planning Policy Framework emphasises the pressing need for more housing. It is vitally important that all boroughs in the UK play their part in meeting housing needs, as confirmed by the Inspector reviewing the previous draft local plan in Tonbridge and Malling. The whole country is also now in economic decline, with some experts predicting that the recession could last for 10 years; this is a substantial period of the plan and not just a short economic slump. This means that development viability could be challenging for many years. In order to have the best chance of constant housing delivery in these circumstances, it is important that a variety of sites are identified for development (small, medium and large), with the focus not just in one area or on a particular type of site. Over identification of housing sites to meet needs is required in order to ensure that at least minimum needs are met, albeit we consider that more than minimum needs should be sought to be met due to the pressing UK housing need.</p>	<p>Comment relating to a need to allocate/identify further sites above housing needs noted.</p>
42641505	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4	<p>4.2.2 mentions "exceptional circumstances" this should be clear what that means or I could argue me wanting a castle as a home in the village would meet that criteria.</p> <p>Question 6 - What are your reasons for selecting this particular quantum option for the Local Plan (outline briefly)?</p> <p>The strategy requires to be flexible. As has become very apparent in recent times with economic volatility and the pandemic, development is subject to many external factors which may have dramatic effects and can seriously impact on delivery rates and levels over a very short period of time. Accordingly, this in turn requires strategic and longterm planning policies to be able to respond to such variations and changes to ensure that a range of development opportunities are brought forward across the Borough, whilst prioritising brownfield, previously developed and despoiled land in sustainable locations.</p> <p>Planning for an allowance above the specified assessed housing need will assist if delivery on some sites is delayed or is not possible for any reason and will provide flexibility to maintain a steady and deliverable supply of dwellings for a range of houses to meet the needs of the population (eg first time buyers, families, elderly persons) and deliver suitable levels of affordable housing in sustainable locations.</p>	<p>Comment relating to definition of 'exceptional circumstances' noted.</p>
43545921	0	4.2.13-4.2.18 & Q5-6	<p>Housing Need Assessment. My preferred quantum option is OPTION 3</p> <p>There is no sense in wasting land building houses to attract people who already have houses elsewhere.</p>	<p>Comment relating to housing figures and the need for flexibility to economic change noted.</p>
43417889	0	4.2.13-4.2.18 & Q5-6	<p>We should be building only for international migration, for affordable housing, for a sustainable amount of growth and/or replacing poor, existing housing.</p>	<p>Comment relating to housing figures noted.</p>
42832833	42826433	4.2.13-4.2.18 & Q5-6	<p>Q.6. What are your reasons for selecting this particular quantum option for the Local Plan (outline briefly)?</p> <p>The requirement of delivering 839 dpa should be clearly recognised as a minimum requirement as set out at paragraph 11b of the NPPF which states, "strategic policies should, as a minimum, provide for objectively assessed needs for housing". Thus, in ensuring the 839 dpa or indeed 923 dpa is a minimum (+10%), this will provide the basis to allow affordability to improve across the Borough which currently sits at 13.39 (property price to earnings ratio). The Council therefore needs to do everything it can to ensure the target used is the minimum and that there is "a sufficient supply and mix of sites" (NPPF, paragraph 68) allocated which are deliverable across the Plan period to improve affordability. This is vital.</p>	<p>Comment relating to housing figures noted.</p>

42791105	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	I just think it is important to note that if the huge Capel development goes ahead Tonbridge will be flooded with additional people and traffic from this development and if TMBC also plans further development in Tonbridge, im not sure the current infrastructure will cope, by this i mean, roads, trains, schools, medical facilities etc. most of which are already at capacity or breaking point. I appreciate Capel is Tunbridge Wells borough council, but due to the location of the proposed development site, the impact on Tonbridge will be enormous and should be considered along with any proposed development in Tonbridge and surrounding villages.	Comment relating to impact of development outside the borough at Capel noted.
38330625	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Given the recent vulnerability of West Malling and the surrounding area to unwanted and inappropriate development, we would ask Tonbridge and Malling Borough Council (TMBC) to increase the protection of the Green Belt and Conservation Area for our historic town within this Local Plan.	Comment relating to protection of the Green Belt noted.
42585729	0	4.3.1 - 4.3.3	Planned development would likely jar against the character of the small area of existing dwellings. All access roads are narrow and access to the A26 (from Pizien Well Road) is unsuitable for increased weight of traffic. The topography of Pizien Well Road at the junction with the A26 exacerbates the difficulty of safely joining the A26 (vehicles queuing up-hill). This will increase the number of homes in Wateringbury by a MINIMUM of 12% (stresses on services and traffic issues and schools). Access to bus stop would be via a road unsuitable for pedestrians (i.e. no footpaths and extra volume of cars from new development would increase danger). Site 59799, in particular, appears to cover an area containing woodland, so possible habitat loss. Also, site 59799 has a watercourse running through it, so issues surrounding pollution could arise (run-off etc) and loss of trees / concrete could increase flood risk in this area. Sites 59654, 59664 and 59700 Any new homes this close to the crossroads would have a huge impact on the traffic in an area which is already problematic at many times throughout the day. Not to mention that the construction period would be a disaster in terms of traffic at the crossroads. The crossroads area in Wateringbury is already known for its high pollution and poor air quality (The Tonbridge & Malling Air Quality Management Area No. 3 ORDER 2005), so any building this close would a) increase the problem due to more cars and b) not be a healthy area to live. New residents in this proposed sites would likely want to register specifically with Wateringbury Surgery, due to its close proximity, which will put more pressure on this local surgery and make it even harder for existing residents to access its services. Site 59700 also appears to contain wooded areas, so building here would result in loss of habitat and increase risk of flooding due to tree loss. Sites 59728 and 59729 Significantly increase the footprint of the village outside of current boundaries (by around 10%). Changing from agricultural to residential usage will negatively affect the character of the village. Removal of crops / fruit trees will likely affect drainage on the hill, leading to more water run-off into the existing village of Wateringbury to an area that already prone to flooding (e.g. Where Memories Meet). Any new homes this close to the crossroads would have a huge impact on the traffic in an area which is already problematic at many times throughout the day. Not to mention that the construction period would be a disaster in terms of traffic at the crossroads. The crossroads area in Wateringbury is already known for its high pollution and poor air quality (The Tonbridge & Malling Air Quality Management Area No. 3 ORDER 2005), so any building this close would a) increase the problem due to more cars and b) not be a healthy area to live. I have personally seen skylarks, adders and slowworm in this area, which	Comment relating to specific site noted.
42787713	0	4.3.1 - 4.3.3	* SGN have informed me this summer that the gas network is not a high priority for investment even though regular disruptions are experienced at the Wateringbury lights relating to 'spot' needs to replace the gas pipe as it is not sufficient for the village * To build on this site would ignore a considerable number of uncertain or certain negatives. Positives are potentially a school and railway, and that is it. However, these are only potential as the consultation documents are vague on capacity for education * The supporting documentation is too vague re conserving character and landscape. The village has green boundaries and this will be affected... not to mention additional traffic and infrastructure burden * The site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would. * There are lines of sight from an important Grade II* listed heritage asset to the proposed site. Being so close, this site would present a negative impact on cultural assets * The site has a significant negative being within 100m of AQMA * Any development would not be able to deliver Bio-Diversity policy drivers locally. Any Bio-Diversity Credit approach would need to remain in the village rather than in another territory and it is not clear how this can be achieved * Only a fair accessibility band... not a minor negative due to urban capacity and transport issues. A burden on current infrastructure * No evidence of any additional economic benefit to the village * There is a significant health and environmental impact concern due to the high levels of Nitrogen Dioxide levels present near the Red Hill, Bow Road and Tonbridge Road intersection. Nitrogen Dioxide forms acids that can be corrosive to building materials at high concentrations. This point specifically relates to proximity to vulnerable heritage assets. In addition, Nitrogen dioxide can affect visibility due to the formation of secondary particles called nitrates that cause haze and reduce visibility. This would be a significant issue in Wateringbury Village.	Comment relating to specific site noted.
44415649	42006241	4.1.1 - 4.1.3, Figure 2	2.1 The following section responds to specific questions posed within the Regulation 18 Local Plan document. Q.2. Do you agree that this settlement hierarchy should be retained and inform the spatial strategy for the Local Plan? Yes/No Please explain. 2.2 The Network is well placed to deliver high quality bespoke homes in many locations across the Borough. Accordingly, the spatial strategy is key to help and support SMEs in delivering these homes, which typically tend to lean towards tier 2, 3 or 4 settlements due to availability of land and scale of sites available or appropriate in these locations. (more detail set out below in response to the next question). 2.3 Notwithstanding, it is noted that the hierarchy of settlements is quite 'flat', with only 4 tiers of settlements. It is noted that the 'Other Rural Settlement' category is disproportionately vast and covers an array of settlements that have varying degrees of sustainability credentials and capability to absorb some form of growth (appropriate to its specific characteristics). 2.4 Accordingly, we consider that an additional layer of hierarchy is added which identifies 'larger villages'. This list should be subject to a Settlement Study evidence base to identify appropriate criteria to distinguish between villages that offer a significant number of day to day services and to be identified as 'larger villages' and 'other rural settlements'. 2.5 This additional tier will help the wider spatial strategy deliver an appropriate scale of growth in these locations and offer a refined strategy that meets the needs of all locations and all needs in an appropriate way.	Comment relating to the hierarchy and 'flat' nature of this noted. This matter relates to the established settlement hierarchy, based on past approach and evidence. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy.
43487649	25240577	4.1.1 - 4.1.3, Figure 2	Q2. Do you agree that this settlement hierarchy should be retained and inform the spatial strategy for the Local Plan? 1.2.5 The existing settlement hierarchy is outlined in figure 2 of the consultation document. However, the pattern of development was largely derived on a historic basis and settlement functions that pre-date modern planning. Accordingly, it should not be assumed that it represents the most appropriate basis to plan future growth. Naturally some settlements are better served by facilities than others, with some underperforming villages could be elevated within the settlement hierarchy with appropriately planned and sustainable growth. 1.2.6 Given the characteristics of TMBC, a range of site locations and options are needed and the National Planning Policy Framework (NPPF) promotes balance. For example, paragraph 73 is clear that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Equally, para 69 acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and so at least 10% of their housing requirement should be met on sites no larger than one hectare. At para 78 the framework states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. 1.2.7 What is apparent is that there is no policy support for simply maintaining the status quo and disbursing development solely on a proportionate basis based on past trends. In our view, Hildenborough represents a Rural Service Centre that could evolve further with the right investment. 1.2.8 In addition to settlement characteristics, it must also be recognised that within Tonbridge & Malling there are two Housing Market Areas (HMA): the Sevenoaks/Tonbridge/Tunbridge Wells HMA; and the Maidstone HMA and the needs for both will need to be addressed. Tonbridge is heavily constrained by areas at risk of flooding and so we consider Hildenborough best placed to absorb the growth in this area of the housing market. Page 4 of 15 1.2.9 Given this context, there is Government support for a range of housing types and scales and this should be reflected in the future settlement strategy and distribution of growth. It should also be acknowledged that settlements that currently are lower tier settlements can only improve with additional growth and associated infrastructure.	Comment relating to the settlement hierarchy noted. This matter relates to the established settlement hierarchy, based on past approach and evidence, including that related to the two marker areas. Further detail and evidence will be provided in the next version of the Regulation 18 local plan and the Regulation 19 version will, in time be supported by a background paper on the settlement hierarchy.
42830721	0	4.3.1 - 4.3.3	Logistics should be taken into account - main road routes, rail services, medical services. Those which will not require a great deal of infrastructure which would in its self consume more land.	Comment relating to the role of logistics noted.
42793409	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	Greenbelts should not be available for building homes. This land should remain protected	Comment seeking Green Belt protection noted.
42758785	0	4.3.1 - 4.3.3	As I have said previously I think developing St Peters village into a small town like Kings Hill would be my preference Q3. Which spatial strategy option do you prefer?	Comment supporting development at Peters Village noted.
25378817	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	HBf cannot comment on which spatial option is preferable. However, it will be necessary for the Council to ensure that whichever strategy is taken forward it is deliverable. Therefore, those strategies that are more reliant on strategic sites to meet needs will need to ensure that there is a sufficient buffer to take account of the higher risk of not meeting housing needs and not being able to show a five-year land supply from such a strategy. The strategy should also ensure that it provides a consistent supply of homes across the plan period in order to avoid the use of a stepped trajectory. This can only be achieved effectively by allocating a variety of sites both in terms of size and location. Planning Practice Guidance (PPG) outlines at paragraph 68-021 the circumstances where a stepped trajectory may be appropriate, but the inference is that this should be the exception and that local planning authorities should be looking to establish flat trajectories that do not unnecessarily push back the delivery of new housing. Therefore, if the Council allocates larger sites that deliver towards the end of the plan period it must balance this with the allocation of smaller sites that will meet needs earlier in the plan period. This balanced approach is also consistent with a plan that includes a buffer as we advocate in below. It is an inevitable part of bringing forward sites for development that there can be delays at any point. Such delays can lead to shortages in supply on adoption of the local plan or in the early years as timetables are pushed back. However, a reasonable buffer in supply resulting from the allocation of small and medium sized sites will ensure that the plan has sufficient flexibility to address any delays in strategic allocations. This does not mean that the Council should avoid the identification of, for example, a new settlement just that the strategy should not be overly reliant on the delivery from one or two large allocations at the cost of smaller sites that will come forward earlier in the plan period.	Comments noted. The council will ensure that the spatial strategy is deliverable, providing a varied and consistent supply of sites to meet requirements. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance, including the role of buffers, where relevant.

25240641	25240577	4.1.1 - 4.1.3, Figure 2	<p>a top tier settlement. Given its range of services it should be afforded a high level of additional economic growth and our client's land represents a relatively unconstrained opportunity as acknowledged by the previous draft Local Plan. 1.2.6 Having regard to the identified development needs of the area, the constraints in the borough and the two HMAs, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below.</p> <p>Option 1 1.2.7 Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release any land from the Green Belt as well as avoiding development within a protected landscape. 1.2.8 For the reasons outlined above we fundamentally object to the notion that Green Belt should not be released. If one looks at the settlement hierarchy, Tonbridge, Kings Hill, Snodland, Borough Green, East Peckham, Hadlow, Hildenborough and West Malling are all tier 1 and 2 settlements that fall within the Green Belt and would see development restricted by the option 1 approach. 1.2.9 In respect of national policy, paragraph 140 of the NPPF states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. 1.2.10 We acknowledge that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined all other reasonable options making as much use as possible of suitable brownfield sites and underutilised land, optimising the density of development and informed by discussions with neighbouring authorities. However, these exercises were carried out in detail as part of the previous Local Plan work and evidence established that Green Belt release is needed. 1.2.11 Notwithstanding the earlier decisions and evidence, housing or employment need can be an exceptional circumstance to justify a review of your Green Belt boundary. This principle was set out within the Hunston High Court judgment in St Albans.</p> <p>1.2.12 Case law, (Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin)) also provide guidelines for determining whether exceptional circumstances exist. The above judgement states: "planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters: (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important); (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development; (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt; (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and</p>	Comments noted. The role of Tonbridge as the principal town and within the top tier of settlement is acknowledged within the hierarchy. Further detail around this will be provided with next version of the local plan. The Green Belt matter will be considered and reflected within the new evidence being prepared to support plan preparation.
42538657	0	4.2.13-4.2.18 & Q5-6	<p>Green Belt</p> <p>Recent decisions re Fosse Bank application and Oakhill House developments in Hildenborough have made significant comments re harm to Green Belt.</p> <p>Building houses alone, should not constitute exceptional circumstances</p> <p>The government has not set out to redefine the policy considerations in respect of Green Belt so there is a strong case to argue that Green Belt land should not be included in the local plan simply to satisfy government requirement for new homes.</p> <p>The policy planning department have confirmed to me that Of the initial 291 sites put forward, 174 are on Green Belt land. That gives 117 sites not on Green Belt land.</p>	Comments relating to the extent of Green Belt sites noted.
25349153	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>around 1km is St. Leonard's tower, another Scheduled Ancient Monument, which was built in 1077-1100. The town itself includes 152 listed buildings (7 Grade I, 11 Grade II* and 134 Grade II (Source: Gladman's Heritage Statement -TM/19/02856/OA).</p> <p>Para 1.1.2 of the Local Plan states: "In order to conserve and protect the environmental and heritage assets in the borough, the following designations, as far as possible, should be avoided: ...Conservation Areas, Listed Buildings, Scheduled Monuments, Historic Parks and Gardens, and Grade 1 agricultural land".</p> <p>Para 5.11.9 states: "As part of the review we need to consider the outer boundary of the Green Belt in the north-east part of the borough. In particular, the character of the area beyond the outer boundary in terms of the defined rural settlements and historic and natural assets. The process needs to consider the most effective way of preventing the coalescence of these settlements and preserving the setting of historic places such as St Mary's Abbey, in the context of the development pressures arising from the assessed needs".</p> <p>NPPF Para 200 states: "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional".</p> <p>It is therefore of paramount importance for TMBC to avoid any harm to the setting of our two Ancient Monuments or to the 152 listed buildings in the town.</p> <p>The whole of the town lies in the West Malling Conservation Area and much of the land surrounding it is Grade 1 of the Best and Most Versatile Value, both of which the NPPF advises must be preserved and protected. Para 5.9.14 of the Local Plan states: "However, there are also some areas of Grade 2: 'Very Good' with areas of Grade 1: 'Excellent' agricultural land predominantly around West Malling and Wateringbury (as illustrated on the Key Diagram in Appendix A). The Local Plan should seek to avoid allocating sites or development on land that would result in significant development of high-quality agricultural land.</p> <p>Plan for examination on 23 January 2019. The Local Plan was withdrawn as the appointed inspectors concluded that the Council had failed to meet the legal Duty to Cooperate (DTC) requirements in respect of addressing the issue of unmet housing need arising in the neighbouring district of Sevenoaks. Therefore, TMBC does not have an up-to-date Plan in place and is in the process of reviewing and updating the work undertaken previously, with a view to submit their Local Plan for examination in 2024.</p> <p>3.2 TMBC are now preparing their Local Plan and a new evidence base to support it, which in principle, is an approach we commend. The previous evidence base is considerably lacking, and the evidence base documents that were provided are often poor and did not provide sufficient analysis to support policy. Starting afresh with the local plan evidence base is considered appropriate in order to meet the test of soundness as set out in paragraph 35 of the NPPF which requires plans to be adequately justified.</p> <p>3.3 It is therefore crucial to stress, at this early stage in the plan preparation process, that TMBC should avoid adopting the same strategy as the previous plan. Instead, TMBC should reconsider their approach to allocating sites, particularly Green Belt sites in order to recognise the potential for greenfield sites in sustainable locations. Sites, such as the Land off Crouch Lane, are suitable to accommodate a practical level of growth within the new emerging Local Plan and represents a logical extension to the existing settlement, complementing the development of the Borough Green along Crouch Lane, while systematically creating a defensible boundary for the Green Belt. It is our view that this site is suitable to come forward for development in the Local Plan process.</p> <p>3.4 We have reviewed the Regulation 18 Plan and its supporting evidence base and have provided our comments and feedback to support the production of a Local Plan that will meet the NPPF test of soundness. While we have not addressed all questions presented in the Regulation 18 document, we have addressed the key themes which we consider of importance at this stage of the Local Plan preparation.</p> <p>Spatial Strategy</p> <p>3.5 TMBC has identified a housing need of 15,941 dwellings (839 dps). This figure is based on the Standard Method, as set out in National Planning Policy. It is significantly above the previous requirement of 501dps and TMBC has confirmed that the new Local Plan will seek to meet this target.</p> <p>3.6 It is important to recognise that Tonbridge and Malling contains policy constraints including significant areas of Green Belt. Parts of the Borough outside the outer Green Belt boundary include extensive environmental constraints, such as; parts of the Kent Downs Area of Outstanding Natural Beauty (AONB), two Special Areas of Conservation (SACs), land and areas of national and local nature conservation interest.</p> <p>3. Development Scenarios and Strategic Priorities</p> <p>It is understood that this Regulation 18 consultation is necessarily high-level and focuses on a number of potential development options and strategic priorities. In terms of the five development options, these can be summarised as: 1 Focusing growth outside of the Green Belt/AONB (towards the East of the borough) 2 Focusing on urban areas (5 top tier settlement including Tonbridge, Kings Hill and Medway Gap 3 Focusing growth on the 10 top tier settlements (including Tonbridge, Hildenborough and Borough Green) 4 Dispersed growth across all settlements 5 New settlement</p> <p>In terms of impacts upon the District, the nearest settlements to our boundaries are Borough Green and Hildenborough/Tonbridge, which are connected by the A25 and A21 corridors respectively and also the railway line. It is imperative that if these areas become the focus of development, corresponding infrastructure investment is crucial, to ensure that need for health, education and other facilities is not exported across administrative boundaries. Investment in transport infrastructure is equally important and SDG is committed to working together with TMBC to ensure that growth proposals are considered on a strategic, cross-boundary basis via joint-working on the Strategic Transport Assessment. Future engagement and joint-working in relation to the development of the Infrastructure Delivery Plan (IDP) will be important to ensure a joined-up and co-ordinated approach to timely infrastructure provision to support planned growth.</p> <p>It is for TMBC to select the most appropriate growth strategy, but it is noted that if future development is too dispersed (option 4), this is likely to provide a challenge for the provision of strategic infrastructure. At the other end of the scale, if development is too concentrated in a single (option 5) or very few locations (option 1), this can also cause issues for infrastructure provision, where existing services can be overwhelmed or new facilities take time to come on-stream. Therefore it is suggested that a degree of concentration of growth is likely to be appropriate, distributed in accordance with the settlement hierarchy (options 2 or 3).</p>	Comments relating to the heritage, and agricultural land constraints of the West Malling noted.
42819617	0	4.1.1 - 4.1.3, Figure 2	<p>1. Development Scenarios and Strategic Priorities</p> <p>It is understood that this Regulation 18 consultation is necessarily high-level and focuses on a number of potential development options and strategic priorities. In terms of the five development options, these can be summarised as: 1 Focusing growth outside of the Green Belt/AONB (towards the East of the borough) 2 Focusing on urban areas (5 top tier settlement including Tonbridge, Kings Hill and Medway Gap 3 Focusing growth on the 10 top tier settlements (including Tonbridge, Hildenborough and Borough Green) 4 Dispersed growth across all settlements 5 New settlement</p> <p>In terms of impacts upon the District, the nearest settlements to our boundaries are Borough Green and Hildenborough/Tonbridge, which are connected by the A25 and A21 corridors respectively and also the railway line. It is imperative that if these areas become the focus of development, corresponding infrastructure investment is crucial, to ensure that need for health, education and other facilities is not exported across administrative boundaries. Investment in transport infrastructure is equally important and SDG is committed to working together with TMBC to ensure that growth proposals are considered on a strategic, cross-boundary basis via joint-working on the Strategic Transport Assessment. Future engagement and joint-working in relation to the development of the Infrastructure Delivery Plan (IDP) will be important to ensure a joined-up and co-ordinated approach to timely infrastructure provision to support planned growth.</p> <p>It is for TMBC to select the most appropriate growth strategy, but it is noted that if future development is too dispersed (option 4), this is likely to provide a challenge for the provision of strategic infrastructure. At the other end of the scale, if development is too concentrated in a single (option 5) or very few locations (option 1), this can also cause issues for infrastructure provision, where existing services can be overwhelmed or new facilities take time to come on-stream. Therefore it is suggested that a degree of concentration of growth is likely to be appropriate, distributed in accordance with the settlement hierarchy (options 2 or 3).</p>	Comments suggesting that the spatial strategy of the withdrawn plan should not be adopted, noted. The spatial strategy will reflect the constraints highlighted. More detail on the settlement hierarchy will be provided in support of the new Regulation 18 local plan. The green belt matter, particular to this site off Crouch Lane, will be considered and reflected within the new evidence being prepared to support plan preparation.
44635745	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>1. Development Scenarios and Strategic Priorities</p> <p>It is understood that this Regulation 18 consultation is necessarily high-level and focuses on a number of potential development options and strategic priorities. In terms of the five development options, these can be summarised as: 1 Focusing growth outside of the Green Belt/AONB (towards the East of the borough) 2 Focusing on urban areas (5 top tier settlement including Tonbridge, Kings Hill and Medway Gap 3 Focusing growth on the 10 top tier settlements (including Tonbridge, Hildenborough and Borough Green) 4 Dispersed growth across all settlements 5 New settlement</p> <p>In terms of impacts upon the District, the nearest settlements to our boundaries are Borough Green and Hildenborough/Tonbridge, which are connected by the A25 and A21 corridors respectively and also the railway line. It is imperative that if these areas become the focus of development, corresponding infrastructure investment is crucial, to ensure that need for health, education and other facilities is not exported across administrative boundaries. Investment in transport infrastructure is equally important and SDG is committed to working together with TMBC to ensure that growth proposals are considered on a strategic, cross-boundary basis via joint-working on the Strategic Transport Assessment. Future engagement and joint-working in relation to the development of the Infrastructure Delivery Plan (IDP) will be important to ensure a joined-up and co-ordinated approach to timely infrastructure provision to support planned growth.</p> <p>It is for TMBC to select the most appropriate growth strategy, but it is noted that if future development is too dispersed (option 4), this is likely to provide a challenge for the provision of strategic infrastructure. At the other end of the scale, if development is too concentrated in a single (option 5) or very few locations (option 1), this can also cause issues for infrastructure provision, where existing services can be overwhelmed or new facilities take time to come on-stream. Therefore it is suggested that a degree of concentration of growth is likely to be appropriate, distributed in accordance with the settlement hierarchy (options 2 or 3).</p>	Comments supportive of the role of areas close to railway lines being the focus of development noted. Comments relating to the future infrastructure requirements supporting development noted, and will be considered and reflected within the new Infrastructure Delivery Plan evidence being prepared to support plan preparation.
42039457	0	4.3.1 - 4.3.3	<p>Sites 59617 and 59703 are identically marked out on the plan. Is this a duplication?</p>	Duplicates noted.
43417889	0	4.2.13-4.2.18 & Q5-6	<p>I am writing to OBJECT most strongly to the proposal to build in excess of 3,000 new homes at the Borough Green Garden city site. I am a resident.</p> <p>My objections to the proposals are as follows:</p> <p>Q.1. Landscapes and open countryside are to be respected especially our Green Belt and AONB. Without these, the quality of life, health and well-being of all people would be adversely affected.</p> <p>Q.2. No. Borough Green is not a Rural Service Centre. It is a Rural Settlement. The term Rural Service Centre indicates that the area appears large enough to justify 3000 Homes at BGCC whereas it does not.</p>	Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
42149505	0	4.3.1 - 4.3.3	<p>I strongly object to any building on the land identified as SITE 59494 ME20 GGZ, Larkfield North</p> <p>The land is not suitable for development and would have a significant detrimental impact on the local housing and area. I am concerned that this proposal will have an impact on the value and saleability on the local housing</p> <p>The land is maintained by a development company, Omnicraft, and is paid for by a maintenance contract with the properties on the development. As such I question the legality of any proposed building on that site.</p>	Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

42632897	0 4.3.1 - 4.3.3	<p>I struggle to understand why you have sites earmarked that you TMBC have won appeals against e.g site 59630 Fields north of Amber Lane ...what is going on</p> <p>you also list parcels of land that are owned by people who have never indicated they wish to sell e.g site 59547 part of this land is owned by Kings Hill Park Ltd</p> <p>If you go through the call for sites list with the sustainability report this is not consistent with the SFRA Level 1 site screening as the call for site report says for example:</p> <p>59524 call for sites says Flood zone 3 and then the SFRA report says it is 97% in Zone 1.</p> <p>In fact the SFRA says most sites are zone 1 which is utter rubbish. I have serious issues with the data available for Flood risk assessment. Also it would be helpful to be in number order. Please redo this SFRA report.</p> <p>With reference to Site 59795 Residential:</p> <ul style="list-style-type: none"> * Poor accessibility * Ashes Lane residents have a detailed history of protracted consultations with the Parish Council and KCC in respect of speeding traffic on the lane; in recent years the speed limit has been reduced twice in an attempt to make life on the lane safer and more bearable for residents and locals, a significant development such as that outlined in proposal 59795 will only add to the high volume of traffic which has increased significantly over recent years, putting further pressure on the lane and jeopardising the safety of pedestrians and workers who regularly use the lane to access local amenities and transport links * Ashes Lane has in recent years seen an increase in the volume of traffic (and increasingly High House Lane which is meant to be a Quite Lane) too, an ever increasing range of unsuitable vehicles use Ashes Lane with its narrow, blind and sharp bends including: 4x4 cars, articulated lorries, huge car transporters, coaches, large vans and motorbikes all of which either race through the lane/struggle to pass stationary vehicles belonging to local residents, a large development outlined in proposal 59795 will only result in a huge increase of resident vehicles and exacerbate existing problems further * Local residents have been encouraged by the Council during past consultations to park their vehicles on the road in order to discourage non residents to slow down, with an additional potential 26 new properties being built on the lane there will be a significant increase of residents utilising one/two+ vehicles per household, further increasing traffic and causing even more bottlenecks on the lane * Emergency services and agricultural vehicles frequently need to use the lane and are already negatively impacted by the sheer volume of traffic on the lane * There is insufficient soft infrastructure in the local Hadlow community to support a proposal of this size * The lane has insufficient digital infrastructure to support a developing community, especially in these days of remote working <p>With reference to Site 59795 Residential:</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42684641	0 4.3.1 - 4.3.3	<p>* Poor accessibility</p> <p>* Ashes Lane residents have a detailed history of protracted consultations with the Parish Council and KCC in respect of speeding traffic on the lane; in recent years the speed limit has been reduced twice in an attempt to make life on the lane safer and more bearable for residents and locals, a significant development such as that outlined in proposal 59795 will only add to the high volume of traffic which has increased significantly over recent years, putting further pressure on the lane and jeopardising the safety of pedestrians and workers who regularly use the lane to access local amenities and transport links</p> <p>* Ashes Lane has in recent years seen an increase in the volume of traffic (and increasingly High House Lane which is meant to be a Quite Lane) too, an ever increasing range of unsuitable vehicles use Ashes Lane with its narrow, blind and sharp bends including: 4x4 cars, articulated lorries, huge car transporters, coaches, large vans and motorbikes all of which either race through the lane/struggle to pass stationary vehicles belonging to local residents, a large development outlined in proposal 59795 will only result in a huge increase of resident vehicles and exacerbate existing problems further</p> <p>* Local residents have been encouraged by the Council during past consultations to park their vehicles on the road in order to discourage non residents to slow down, with an additional potential 26 new properties being built on the lane there will be a significant increase of residents utilising one/two+ vehicles per household, further increasing traffic and causing even more bottlenecks on the lane</p> <p>* Emergency services and agricultural vehicles frequently need to use the lane and are already negatively impacted by the sheer volume of traffic on the lane</p> <p>* There is insufficient soft infrastructure in the local Hadlow community to support a proposal of this size</p> <p>* The lane has insufficient digital infrastructure to support a developing community, especially in these days of remote working</p> <p>With reference to Site 59795 Residential:</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42723233	0 4.3.1 - 4.3.3	<p>* Poor accessibility</p> <p>* Ashes Lane residents have a detailed history of protracted consultations with the Parish Council and KCC in respect of speeding traffic on the lane; in recent years the speed limit has been reduced twice in an attempt to make life on the lane safer and more bearable for residents and locals, a significant development such as that outlined in proposal 59795 will only add to the high volume of traffic which has increased significantly over recent years, putting further pressure on the lane and jeopardising the safety of pedestrians and workers who regularly use the lane to access local amenities and transport links</p> <p>* Ashes Lane has in recent years seen an increase in the volume of traffic (and increasingly High House Lane which is meant to be a Quite Lane) too, an ever increasing range of unsuitable vehicles use Ashes Lane with its narrow, blind and sharp bends including: 4x4 cars, articulated lorries, huge car transporters, coaches, large vans and motorbikes all of which either race through the lane/struggle to pass stationary vehicles belonging to local residents, a large development outlined in proposal 59795 will only result in a huge increase of resident vehicles and exacerbate existing problems further</p> <p>* Local residents have been encouraged by the Council during past consultations to park their vehicles on the road in order to discourage non residents to slow down, with an additional potential 26 new properties being built on the lane there will be a significant increase of residents utilising one/two+ vehicles per household, further increasing traffic and causing even more bottlenecks on the lane</p> <p>* Emergency services and agricultural vehicles frequently need to use the lane and are already negatively impacted by the sheer volume of traffic on the lane</p> <p>* There is insufficient soft infrastructure in the local Hadlow community to support a proposal of this size</p> <p>* The lane has insufficient digital infrastructure to support a developing community, especially in these days of remote working</p> <p>With reference to Site 59795 Residential:</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42723233	0 4.3.1 - 4.3.3	<p>I have an objection to the following proposed sites:</p> <p>59842 (https://www.tmbc.gov.uk/downloads/file/2917/site-59842)</p> <p>59686 (https://www.tmbc.gov.uk/downloads/file/2769/site-59686),</p> <p>59637 (https://www.tmbc.gov.uk/downloads/file/2729/site-59637)</p> <p>59638 (https://www.tmbc.gov.uk/downloads/file/2731/site-59638)</p> <p>I have concerns about these particular proposed sites as they all rely on the use of small and impractical access roads, they would be built on existing green belt land and would materially impact on the nature of the surrounding countryside which is what makes Hadlow an attractive town to live in. In addition the lack of capacity in the local schools, surgery and amenities will cause significant pressure on all local services and significant problems with traffic.</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42770881	0 4.3.1 - 4.3.3	<p>Planned development would likely jar against the character of the small area of existing dwellings. All access roads are narrow and access to the A26 (from Pizien Well Road) is unsuitable for increased weight of traffic. The topography of Pizien Well Road at the junction with the A26 exacerbates the difficulty of safely joining the A26 (vehicles queuing up-hill). This will increase the number of homes in Wateringbury by a MINIMUM of 12% (stresses on services and traffic issues and schools). Access to bus stop would be via a road unsuitable for pedestrians (i.e. no footpaths and extra volume of cars from new development would increase danger). Site 59799, in particular, appears to cover an area containing woodland, so possible habitat loss. Also, site 59799 has a watercourse running through it, so issues surrounding pollution could arise (run-off etc) and loss of trees / concrete could increase flood risk in this area.</p> <p>Sites 59654, 59664 and 59700</p> <p>Any new homes this close to the crossroads would have a huge impact on the traffic in an area which is already problematic at many times throughout the day. Not to mention that the construction period would be a disaster in terms of traffic at the crossroads. The crossroads area in Wateringbury is already known for its high pollution and poor air quality (The Tonbridge & Malling Air Quality Management Area No. 3 ORDER 2005), so any building this close would a) increase the problem due to more cars and b) not be a healthy area to live. New residents in this proposed sites would likely want to register specifically with Wateringbury Surgery, due to its close proximity, which will put more pressure on this local surgery and make it even harder for existing residents to access its services. Site 59700 also appears to contain wooded areas, so building here would result in loss of habitat and increase risk of flooding due to tree loss.</p> <p>Sites 59728 and 59729</p> <p>Significantly increase the footprint of the village outside of current boundaries (by around 10%). Changing from agricultural to residential usage will negatively affect the character of the village. Removal of crops / fruit trees will likely affect drainage on the hill, leading to more water run-off into the existing village of Wateringbury to an area that already prone to flooding (e.g. Where Memories Meets). Any new homes this close to the crossroads would have a huge impact on the traffic in an area which is already problematic at many times throughout the day. Not to mention that the construction period would be a disaster in terms of traffic at the crossroads. The crossroads area in Wateringbury is already known for its high pollution and poor air quality (The Tonbridge & Malling Air Quality Management Area No. 3 ORDER 2005), so any building this close would a) increase the problem due to more cars and b) not be a healthy area to live. We have seen skylarks, adders and slowworm in this area, which are all</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42772033	0 4.3.1 - 4.3.3	<p>I am not specifically commenting on any particular site, except those relating to the proposed area of the so-called 'Borough Green Garden City'. This is fully within the Green Belt and should not even be considered. It has within it various old sand workings. There have been many in this part of the Borough, which traditionally have been back filled and returned to agriculture. They should not be regarded as Brown Field Sites and therefore developable. If not returned to agriculture, these should be preserved for the huge variety of insect and other wildlife they support. The area between Borough Green/Ingham and Wrotham is extremely important in preserving the rural nature surrounding the existing settlements, areas of the Borough. The Howlands ex-allotment site is scheduled for release, whilst the Wings of the Morning and Coney Shaw Farm sites have been submitted as part of the October/November 2022 Call for Sites exercise.</p> <p>Howlands. 5.2 The Howlands site was a Safeguarded site in the existing Local Plan but is now released under the terms of that policy. This was confirmed as an allocated site in the now withdrawn Local Plan (site ai). In light of its sustainable location and status, we fully expect the site to be included within the Regulation 18 Local Plan as a residential site with a potential yield of 34 units (Site ID: 59751), albeit we are coming forward with a planning application for its development and will be consulting locally soon.</p> <p>Figure 1. Extract of Location Plan for the Howlands site. Wings of the Morning 5.3 The 'Wings of the Morning' site is located between the M20 and London Road. This site is currently undeveloped, being used for agriculture and occasional festivals/events.</p> <p>5.4 The site has been assessed to be suitable for both residential and commercial development. The current capacity study concludes that the site could support 50 residential units (1.7 ha), and there is a total site area of 2.85 ha available for commercial development. 5.5 The Wings of the Morning is in a highly sustainable location for a new employment hub – it is adjacent to significant road infrastructure and opposite an existing industrial estate. Furthermore, it's position in the landscape means it is not very visible, whilst the existing pylons and mast already compromise the visual amenity of the site. 5.6 The proposed employment space at Wings of the Morning would support St Clare's activity within the film industry. The Estate is a sought after location for filming, and arising from this there is significant demand for studio production space. The new buildings would be agricultural in form and appearance and utilise materials and detailing consistent with local character. Figure 2. Extract of Wings of the Morning Site Capacity Study.</p> <p>Coney Shaw Farm. 5.7 The Coney Shaw Farm site, located off Kensing Road, is currently used for St Clare's functional and commercial activities as well as being home to small-scale residential development, including staff housing. A manufacturing and distribution company are occupying the commercial space on the site, and a grain barn supports the Estate's farming activity. The site has been successful in terms of housing new commercial enterprises in modern fit-for-purpose accommodation, as well as providing characterful and high quality housing for local people, including employees of the Estate. 5.8 This site is sufficiently discrete that it has potential to support more of these vital uses without detriment to the rural character.</p> <p>5.9 To improve the functionality of its existing forestry business, the Estate hopes to provide a new, fit-for-purpose forestry shed at Coney Shaw Farm. This will replace the poor-quality facility currently at Heaverham Forestry Yard. It is also hoped that the provision of commercial floorspace at this location can be expanded, which may include new office barn space. 5.10 Alongside this, the site could accommodate at least 10 dwellings to complement the farmstead character of the existing development. Some of this housing would be dedicated to estate employees. 5.11 This proposed residential and employment development will create a sustainable farmstead with on-site employment generating opportunities to live and work in the same place. To continue to maintain the character of the Tonbridge & Malling landscape, residential and employment development must remain within CP11 and CP12 settlements. Any development in CP13 will directly compromise the Sustainability of the region: land use, agriculture, air quality, biodiversity, wildlife.</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42806945	0 4.3.1 - 4.3.3	<p>I am not specifically commenting on any particular site, except those relating to the proposed area of the so-called 'Borough Green Garden City'. This is fully within the Green Belt and should not even be considered. It has within it various old sand workings. There have been many in this part of the Borough, which traditionally have been back filled and returned to agriculture. They should not be regarded as Brown Field Sites and therefore developable. If not returned to agriculture, these should be preserved for the huge variety of insect and other wildlife they support. The area between Borough Green/Ingham and Wrotham is extremely important in preserving the rural nature surrounding the existing settlements, areas of the Borough. The Howlands ex-allotment site is scheduled for release, whilst the Wings of the Morning and Coney Shaw Farm sites have been submitted as part of the October/November 2022 Call for Sites exercise.</p> <p>Howlands. 5.2 The Howlands site was a Safeguarded site in the existing Local Plan but is now released under the terms of that policy. This was confirmed as an allocated site in the now withdrawn Local Plan (site ai). In light of its sustainable location and status, we fully expect the site to be included within the Regulation 18 Local Plan as a residential site with a potential yield of 34 units (Site ID: 59751), albeit we are coming forward with a planning application for its development and will be consulting locally soon.</p> <p>Figure 1. Extract of Location Plan for the Howlands site. Wings of the Morning 5.3 The 'Wings of the Morning' site is located between the M20 and London Road. This site is currently undeveloped, being used for agriculture and occasional festivals/events.</p> <p>5.4 The site has been assessed to be suitable for both residential and commercial development. The current capacity study concludes that the site could support 50 residential units (1.7 ha), and there is a total site area of 2.85 ha available for commercial development. 5.5 The Wings of the Morning is in a highly sustainable location for a new employment hub – it is adjacent to significant road infrastructure and opposite an existing industrial estate. Furthermore, it's position in the landscape means it is not very visible, whilst the existing pylons and mast already compromise the visual amenity of the site. 5.6 The proposed employment space at Wings of the Morning would support St Clare's activity within the film industry. The Estate is a sought after location for filming, and arising from this there is significant demand for studio production space. The new buildings would be agricultural in form and appearance and utilise materials and detailing consistent with local character. Figure 2. Extract of Wings of the Morning Site Capacity Study.</p> <p>Coney Shaw Farm. 5.7 The Coney Shaw Farm site, located off Kensing Road, is currently used for St Clare's functional and commercial activities as well as being home to small-scale residential development, including staff housing. A manufacturing and distribution company are occupying the commercial space on the site, and a grain barn supports the Estate's farming activity. The site has been successful in terms of housing new commercial enterprises in modern fit-for-purpose accommodation, as well as providing characterful and high quality housing for local people, including employees of the Estate. 5.8 This site is sufficiently discrete that it has potential to support more of these vital uses without detriment to the rural character.</p> <p>5.9 To improve the functionality of its existing forestry business, the Estate hopes to provide a new, fit-for-purpose forestry shed at Coney Shaw Farm. This will replace the poor-quality facility currently at Heaverham Forestry Yard. It is also hoped that the provision of commercial floorspace at this location can be expanded, which may include new office barn space. 5.10 Alongside this, the site could accommodate at least 10 dwellings to complement the farmstead character of the existing development. Some of this housing would be dedicated to estate employees. 5.11 This proposed residential and employment development will create a sustainable farmstead with on-site employment generating opportunities to live and work in the same place. To continue to maintain the character of the Tonbridge & Malling landscape, residential and employment development must remain within CP11 and CP12 settlements. Any development in CP13 will directly compromise the Sustainability of the region: land use, agriculture, air quality, biodiversity, wildlife.</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
44345345	44345409 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>character of the existing development. Some of this housing would be dedicated to estate employees. 5.11 This proposed residential and employment development will create a sustainable farmstead with on-site employment generating opportunities to live and work in the same place. To continue to maintain the character of the Tonbridge & Malling landscape, residential and employment development must remain within CP11 and CP12 settlements. Any development in CP13 will directly compromise the Sustainability of the region: land use, agriculture, air quality, biodiversity, wildlife.</p>	<p>Site specific comments noted. Former proposed allocations within the now withdrawn local plan will undergo the same analysis as all other sites and the site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42696769	0 4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>Support for development focus at upper tier settlements noted.</p>	<p>Support for development focus at upper tier settlements noted.</p>

46128161	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>Primarily I would prefer to adopt the development of Urban areas. There is enough space if we can use the brownfield sites and compel developers who are just sitting on land till it's profitable enough to develop!</p> <p>Secondly, Rural service centres but NOT on Greenbelt land.</p> <p>AONB and Greenbelt was supposed to be to stop the development of centres nudging into the countryside.</p> <p>Once this is fractured it will never stop due to 'exceptional circumstances' a phrase I heard can be put into the planning vocabulary to help development taking place.</p>	Support for focussing development within existing settlements noted.
45185953	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>I was unable to attend the presentation at Trottscliffe in person but have now had all relevant matters from the presentation explained to me and as there are only two days remaining to respond, hence I am sending this e-mail.</p> <p>Of the five spatial strategies under consideration my strong preference is for future development to take place within existing conurbations as much as possible. This is not a case of not in my back yard but simply we do not have the infrastructure in place for a large amount of development. The lanes in Trottscliffe are in the main single track and already the road between the A20 and the A227 is used as a "rat run" which is totally unsuitable for the amount of traffic at present without adding any more.</p> <p>The residents of Trottscliffe are in the main retired and we do know by experience not to go out around school dropping off and picking up times as it can be very difficult to get in or out of the village. I think therefore we all have a responsibility to make sure this does not get any worse.</p>	Support for focussing development within existing settlements noted. The matter of infrastructure demand will be considered and reflected within the new Infrastructure Delivery Plan evidence being prepared to support plan preparation.
45897441	0	4.2.1 - 4.2.12, Figures 3-7 & Q.3-4.	<p>Of the five spatial strategies under consideration my strong preference is for future development to take place within existing conurbations as much as possible. The supporting infrastructure will already be in place and will be far easier to upgrade if necessary in a cost effective way if this option is selected.</p> <p>Any development of areas within the green belt and AONB should be avoided because these are already under pressure from excessive motor traffic and any further increase will be intolerable. Trottscliffe is already used as a "rat run" between the A20 and the A227, and the lanes are unsuitable for this level of traffic. More houses would mean more cars adding to an existing problem, whereas development within existing urban areas will mean that people are closer to the places of employment and more likely to be able to walk or cycle to work, thereby reducing overall road traffic.</p> <p>A large proportion of Trottscliffe residents are retired people who are not using the roads routinely every day to go to work and this ameliorates the problem. On the odd occasions when I have ventured out by car at the time of school drop-off or pick-up I have experienced near grid lock. I think we all have a responsibility to make sure that this does not get any worse.</p>	Support for focussing development within existing settlements noted. This matter will be considered and reflected within the new transport modelling evidence being prepared to support plan preparation.