

Respondent ID	Agent ID	Document Part Name	Comment (plain text)	TMBC Response
42330785		0 5.10.1 - 5.10.15	Wildlife corridors are important and should be considered when planning developments as these allow the safe movement of wildlife from one area to another	Comment noted
42213665		0 5.10.1 - 5.10.15	The built an historic environment are vitally important areas as they will affect the enjoyment of the areas in which people live and work. The listed criteria must all be satisfied for the Local Plan to be effective in delivering sustainable developments.	Comment noted
42807073		0 5.10.1 - 5.10.15	I would extend this to also include the older buildings in Tonbridge town centre. There's already been too many buildings lost without significant gain. Built, Rural & Historical Environment Design Guides.	Comment noted. Consideration of non designated heritage assets are considered in the heritage strategy Comment noted
43412865		0 5.10.1 - 5.10.15	Q 37. All are equally important. Built, Rural & Historical Environment Design Guides.	Comment noted
43417889		0 5.10.1 - 5.10.15	Q 37. All are equally important. Q.37. Which design matters are most important to you? We consider that all of the stated aims are of equal importance. Q.38. What are your reasons for selecting these particular design matters as priorities for the Local Plan (outline briefly)?	Comment noted
43548193	38432225	5.10.1 - 5.10.15	As above, we consider that all of the stated aims are of equal importance.	
42832833	42826433	5.10.1 - 5.10.15	Q.37. Which design matters are most important to you? All are equally important	Comment noted
42832833	42826433	5.10.1 - 5.10.15	Q.38. What are your reasons for selecting these particular design matters as priorities for the Local Plan (outline briefly)? Each of the design matters are intrinsically linked to achieving the aims and objectives of the NPPF and must be delivered together. Design Matters - High quality design is vital in order for new developments to gain the consent of the local community and to create civic pride in new structures as they are added to a settlement.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
38330625		0 5.10.1 - 5.10.15	Development should have environmental sustainability at its heart, employing all practical and economically viable measures to save energy, reduce heat loss and reduce water consumption. For example, WMPC is of the view that all new builds should include photovoltaic panels on their roofs and larger developments should make appropriate use of large ground-source heat systems.	

The County Council welcomes the commitment within paragraph 5.10.19 to the development of a heritage strategy. This will be an essential resource for helping the Borough Council identify ways that the Borough's historic environment can enhance life in the Borough. The County Council would recommend that the Strategy includes the following goals:

- To identify and describe the key themes of relevance of the heritage of the Borough and the heritage assets that represent them
- To assess the role that these can play in regeneration, tourism and life in the Borough
- To identify both their vulnerabilities and the opportunities they provide
- To inform site allocations within the Borough
- To support policy development

The County Council, in respect heritage conservation, recommends the Local Plan considers the following:  
Development

A key issue is the need to take account of any existing historic character of proposed development sites. This is crucial to ensuring high quality developments are properly integrated into the existing towns and villages. The Local Plan should require that such schemes be sympathetic to any existing structures and in character with other buildings. Development should be in keeping with the scale of the surroundings and in character with any existing traditional and historic buildings on the site. KCC would also recommend materials used in the design are appropriate to the existing character, if possible, by using locally sourced and traditional materials.

Non-designated heritage assets

At present, KCC considers the text focuses rather heavily on designated heritage assets. However, the vast majority of heritage assets in the Borough are non-designated. These nonetheless play a critical role in the character of the Borough as they are known to local people and have been part of their communities for generations. They provide opportunities to connect new growth and development with existing settlement and thus integrate new residents with the existing community. To ensure these assets are not sacrificed to development, the Local Plan should ensure that it includes a policy on non-designated assets so that decision-making is supported effectively.

Climate Change

44422593 0 5.10.1 - 5.10.15 The historic environment has a significant role to play in the conservation of resources required for development,

[Answer to question 37 of the questionnaire]

37.1 Whilst not wishing to comment in detail on this point, we nonetheless believe that all the design issues highlighted in section 5.10.15 are important when considering the issue of design, and can confirm they would form part of Redrow's design considerations when looking to develop a site. To this end the attached document look to demonstrate how the initial development proposals for the land east of Carpenters Lane/ north of The Paddock, Hadlow could accommodate these design matters.

44417409 25392865 5.10.1 - 5.10.15

Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The Council is currently preparing a Heritage Strategy that will fulfill the NPPF and NPPG requirements in consultation with KCC, Historic England and local groups. These matters will also be considered and reflected (where required) within the new evidence and policy development being prepared to support plan preparation.

Comment noted.

		<p>The Reg 18 LP is not accompanied by any heritage assessment work or similar seeking to understand the Borough's Historic Environment, however paras 5.10.6 – 5.10.7 of the Reg 18 LP acknowledges that the Historic Environment is integral to the built environment and a positive strategy for conservation and enjoyment of the Historic Environment should be set by the Local Plan (as directed by the NPPF).</p> <p>Paragraph 5.10.12 notes the foundations of well-designed places will be set through core evidence to include a Heritage Strategy, ensuring development is to be located in sustainable locations and respond to the Borough's differing environments.</p> <p>We welcome TMBC's identification that a Heritage Strategy will be prepared but recommend this be supported by Heritage Impact Assessment work which reviews Growth Options and individual sites to consider how these would be appropriate (or could be made appropriate) in light of designated heritage assets or known archaeological resources within or near to options / sites. The absence of this information from the now withdrawn Local Plan 2018 was criticised by several parties.</p>	<p>Comment noted. A Heritage Strategy is currently being drafted to support the Local Plan. These matters will also be considered and reflected (where required) within the new evidence and policy development being prepared to support plan preparation.</p>
42821345	42821281 5.10.1 - 5.10.15	<p>Heritage I Historical - Any new Tonbridge development must respect the views from and of the Castle as defined in the NPF [2015]. TMBC should look to include views from the upper slopes of Quarry Hill, Deakin Leas and adjoining roads that give substantial views over the towns roofscape within the Planning Application process.</p> <p>THS proposes that TMBC put in place a Borough wide Local List of non-designated historic assets [LLHA] in accordance with Historic England's schedule. The LLHA should be made available to developers and members of the public to view - similar to Sevenoaks and Tunbridge Wells. This should give added protection to the various Victorian, Edwardian, 1930's plus WW1 and WW2 structures that are currently not covered by National Historic Listing.</p> <p>Any proposed changes and new buildings etc taking place within conservation areas or other significant buildings should be highlighted to KCC Heritage and Planning as a matter of course and any finds are duly identified and recorded.</p>	<p>Comment noted. A Heritage strategy is currently being drafted to support the Local Plan. These matters will also be considered and reflected (where required) within the new evidence and policy development being prepared to support plan preparation.</p>
25406881	0 5.10.1 - 5.10.15	<p>Q37 Which Design Matters are most important to you?</p> <ul style="list-style-type: none"> <li>•The design matters listed are all important</li> <li>•It should be the responsibility of professional planning staff to ensure developers' understand and adhere to such matters during preplanning processes</li> <li>•There must be proper enforcement of such design factors when developments are actually built</li> <li>•Designs should be sympathetic to the existing area with a view on how these properties will enhance, not diminish, the character of the area.</li> </ul>	<p>Comment noted.</p>
45217569	0 5.10.1 - 5.10.15	<p>The protection of heritage sites is very important. Every effort should be made to protect them and where opportunities arise to enhance them and make them accessible to the local population they should be grasped.</p>	<p>Comment noted.</p>
42213665	0 5.10.16-5.10.23	<p>St. Mary's Abbey should be included in the list in 5.10.17</p>	<p>Comment noted. A Heritage Strategy is being prepared which refers to St Mary's Abbey.</p>
25349153	0 5.10.16-5.10.23	<p>However you repeatedly try to build on Kings Hill protected green belt areas, ancient woodland spaces, protected woodland, non-listed ancient buildings, open green spaces where communities gather - all which is leading to a loss of desirable and prosperous places to live, work and visit.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>
42470433	0 5.10.16-5.10.23	<p>Why is an application to built on a listed grade11* parkland area being considered to build houses on Ref Oxenhoath.</p>	<p>Comment noted. This matter will be reflected within the next Regulation 18 document. No decision has been made yet on individual site allocations.</p>
42583393	0 5.10.16-5.10.23	<p>half of proposed site is listed with Historic England listing ref1001355</p>	

42716705	0 5.10.16-5.10.23	The built and historic environment in Malling is constantly under threat from new developments. What is left needs to be preserved to avoid the total destruction of the rural nature of the area. All of the sites put forward for potential development in East Malling and Broadwater Farm, together with the further expansion of Kings Hill, will, if allowed, have a significant and irreversible negative impact on the area.	Comment noted. This matter will be reflected within the next Regulation 18 document.
42687073	0 5.10.16-5.10.23	I am very pleased that the Council proposes to take a positive stance to preserving the historical assets in the borough which have tended to be ignored in my part of it -- Tonbridge -- in the interests of development. I urge planners to be mindful of how the value of historical assets like the castle are compromised by allowing tall new buildings to adversely affect views across the town from vantage points like the castle and parish church.	Comment noted. This matter will be reflected within the next Regulation 18 document.
42556065	0 5.10.16-5.10.23	I live in grade 2 Listed Building built in 1480. Increased traffic through the village of Ightham and on the nearby A25 can only have a detrimental effect on my property and numerous others. These buildings need protecting and preserving.	Comment noted. This matter will be reflected within the next Regulation 18 document.
42768321	0 5.10.16-5.10.23	There is no mention of famous historical sites such as Oldbury Hill a local National Trust site (the largest Iron Age fort in South East England built 1st century BC) or Ightham Mote also a National Trust site being in the Borough and both of which within very close proximity to proposed sites. Large developments such as those proposed sites in Borough Green and in Ightham may spoil the attractiveness of the local village and its history.	Comment noted. A Heritage Strategy is being prepared which refers to such Heritage Assets.
42795649	0 5.10.16-5.10.23	East Malling Village has a large number of Listed Buildings which need to be protected and this is not helped by the large amount of traffic which cuts through Chapel Street and the High Street. Additional developments especially close by such as 59715 are going to make this worse and could cause potential damage to properties such as the listed building next to the road in the High Street unless traffic is reduced	Comment noted. This matter will be reflected within the next Regulation 18 document. No decision has been made yet on individual site allocations.
42806945	0 5.10.16-5.10.23	It is important, not least for future generations to protect historic sites	Comment noted.
43548193	38432225 5.10.16-5.10.23	Q.39. Are there any other locally significant built, historic issues or sites which you consider are important to the borough and should be addressed in the Local Plan? Yes/No Please explain No comment.	Comment noted.

Thank you for your email of 22 September 2022 inviting comments on the above consultation document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans. We support the proposition that the historic environment should be a priority matter in the Tonbridge and Malling Local Plan.

There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. We note that as an early stage in the formulation of a local plan the current document may be subject to significant change and consequently we consider it appropriate to limit our comments to more general matters; we will comment more specifically and in detail at later stages in the plan making process as appropriate. In this respect, you should not take the comments below as the definitive view of Historic England on the matters contained in the plan; they are provided for general guidance in the iterative process of preparing appropriate policies for the historic environment.

In the comments below, Historic England focusses on the objective of the Paragraph 190 of National Planning Policy Framework to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

25408321 0 5.10.16-5.10.23 c) the desirability of new development making a positive contribution to local character and distinctiveness; and [Heritage]

Ightham is regularly listed in the most attractive villages in Kent - surely it is our job to preserve the beauty and heritage of these villages for future generations and not destroy them by surrounding them with acres of new builds, losing forever green land that we should be cherishing.

45474465 0 5.10.16-5.10.23

[59740]

Heritage asset protection

\* Land within Site 59740 includes the New Barns and Broadwater Farm Conservation Area the visual amenity of which, from both within and without was a strong factor in its classification.

\* At the eastern side of the Site 59740, is a second Conservation Area, Mill Street, including the historic hamlet of Well Street with its very large proportion of listed buildings e.g. 'The Barracks' reputed to be a militia house from the English Civil War.

45509121 0 5.10.16-5.10.23 \* Any development in this green space will impact Geology (Hydro)\*, Wildlife, Access, Roads Infrastructure\*

Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The Council is currently preparing a Heritage strategy that will fulfill the NPPF and NPPG requirements in consultation with Historic England. These matters will also be considered and reflected (where required) within the new evidence and policy development being prepared to support plan preparation.

Comment noted.

Comment noted. This matter will be reflected within the next Regulation 18 document. No decision has been made yet on individual site allocations.

