

Respondent ID	Agent ID	Document Part Name	Comment (plain text)	TMBC Response
				Comment noted.
42832833	42826433	5.12.5 - 5.12.10	Yes – but this should be included as part of securing the approach to Biodiversity Net Gain. We therefore suggest specific reference is made to this.	JK
38330625	0	5.12.5 - 5.12.10	Habitats - New developments should be required to include a range of habitat space for wildlife, including bee bricks, places for nesting birds and other wildlife encouragement measures. The creation of ponds can also contribute to local flood management as well as providing habitat for biodiversity.	Comment noted.The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance as well as the Environment Act
44309601	0	5.12.5 - 5.12.10	Yes. Hedgehog highways and dormouse bridges and the like would encourage more wildlife in the area and reduce the damage done by existing development.	Comment noted.
24927329	0	5.12.5 - 5.12.10	Trenport considers that integrating some habitat space into new buildings is possible (such as 'swift bricks'), with the exception of bat boxes, that are generally problematic for homeowners. Such habitat should be part of the natural greenspace of the development.	Comment noted.
44460673	0	5.12.5 - 5.12.10	Whilst we support the creation of new habitats within development proposals for wildlife, it is not always feasible for new developments to integrate habitat space within the fabric of the building itself. One such example of this is industrial buildings where there may be particular design and operational challenges which prevent the integration of bird boxes within the fabric of a building. Instead, new development should provide for a range of ecological mitigation measures to encourage wildlife within developments.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance as well as the Environment Act.
44417409	25392865	5.12.5 - 5.12.10	[Answering question 46 of the questionnaire]46.1 On the basis of Biodiversity Net Gain (BNG) and environmental policy, this measure would only be justified where a range of mitigation strategies had been considered, including the optimisation of greenspaces. Local policy should provide flexibility for any habitat and ecological enhancement that can be determined by an ecologist as being suitable for any given site. This should not be specified as in some circumstances such features may not be practical or appropriate. Consideration of any such policy would need to account for the requirement for BNG, and the viability of requiring additional features; thus, a flexible approach would be sensible. Instead, a more effective and justified policy, which was consistent with national policy would be a positively prepared policy encouraging/ requiring BNG, and ecological considerations. Through a site-specific masterplanning process, this could also be encouraged by site specific policy.	Comment noted.
44459553	0	5.12.5 - 5.12.10	[Company name] frequently provide habitat spaces for wildlife on its sites, with the exact provision dependent on the site circumstances and character. However, a requirement that features are integrated into the fabric of a building is overly prescriptive: such features are often best incorporated into gardens, trees and other parts of a wider site. [Company name] agree that new developments should integrate into the fabric of buildings habitat space for wildlife, such as migratory birds. However, the wording of an applicable development management policy must be worded in a sufficiently flexible way, so as to allow the applicant to propose measures that are appropriate for the particular development in question.	Comment noted.
42271969	42271649	5.12.5 - 5.12.10	Trees and hedges There is mention of trees in the consultation, but no mention of hedges. Trees give shade in Summer, remove carbon from the atmosphere, provided they are not cut down and turned into wood chippings and burned, and oak trees particularly, are havens for all kinds of wild life. There should also always be some evergreens, which provide habitat for birds and bats in Winter as well as Summer. Hedges are also important, provided they are kept trimmed so they become dense. They absorb carbon and also, it is reported, nitrogen oxides, as well as being havens for wildlife. They are also less of a maintenance problem than wooden fences, which tend to blow down in storms, which are likely to become more common in future.	Comment noted.
36594049	0	5.12.5 - 5.12.10	Bird and bat nest units can be incorporated into buildings.	JK
42770017	0	5.12.11-5.12.22		Comment noted.

43412865	0 5.12.11-5.12.22	Q 48. We have to protect our environment. We cannot keep building more and more housing to the detriment of the environment.	Comment noted.	JK
43417889	0 5.12.11-5.12.22	Q 48. We have to protect our environment. We cannot keep building more and more housing to the detriment of the environment.	Comment noted.	JK
45325537	0 5.12.11-5.12.22	We support the creation of new habitats within development proposals for wildlife, however, it is not always feasible for new developments to integrate habitat space within the fabric of the building itself. Therefore, a flexible policy approach should be used to allow new proposal to provide mitigatory measures where feasible and viable.	Comment noted.	JK
45742881	0 5.12.11-5.12.22	[Company name] agree that new developments should integrate into the fabric of buildings habitat space for wildlife, such as migratory birds. However, the wording of an applicable development management policy must be sufficiently flexible, to allow the applicant to propose measures that are appropriate for the particular development in question.	Comment noted.	JK
42213665	0 5.12.1 - 5.12.4	The Local Plan should be able to specify requirement based on the issues raised relating to climate change. A House of Commons committee report was published this year with the title "Building to net zero: counting carbon in construction". Section 5 of the report was concerned with the retrofit and reuse of buildings. It includes the following statements. Retrofit and reuse of existing buildings, where practicable, should be prioritised over new build to conserve resources, minimise embodied carbon emissions, reduce demolition waste and deliver cost-effective solutions. We recommend that circular economy statements including pre-demolition audits should be a requirement of planning applications which entail demolition of properties, This requirement should be introduced as soon as is practicable and not later than any package of reforms to the planning system which the Secretary of State for Levelling up, Housing and Communities is expected to introduce before the end of the current Parliament. Planning Application 22/00113/OAEA is currently proposing the demolition a 20-year-old school but offers no justification for this.	Comment noted. Comment noted. Current planning applications must be determined on the NPPF and policies contained within the Council's existing Development Plan. For such applications in the future this matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.	
25315361	0 5.12.1 - 5.12.4	The new Local Plan should have safeguards to preclude this possibility in future.		
42442561	0 5.12.1 - 5.12.4	development will increase human foot print and increase carbon emissions	Comment noted.	
42616033	0 5.12.1 - 5.12.4	development will impact climate change	Comment noted.	
42778945	42778497 5.12.1 - 5.12.4	Q.44. Do you agree that the Local Plan should set requirements for a certain proportion of development on major sites to be built using MMC? Yes/No Please explain No. As it is the choice of the housebuilder as to how they construct sites and meet the requirements of building regulations and planning policy. In many cases the reduced build times and costs it brings will drive house builders towards MMC. However, although some sites are delivered using MMC the manufacturing industry is not yet of a size that it can deliver a large quantity using MMC methods. Such a requirement could therefore make a site ineffective	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.	
42806945	0 5.12.1 - 5.12.4	The planning process should facilitate MMC	Comment noted.	
42832929	0 5.12.1 - 5.12.4	Climate Change is THE key issue of our age and must be front and centre of any plan, particularly one covering 15 years. The cost of not protecting our environment will outweigh any other costs.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.	

Comments noted.

Climate Change

Q 44 No. MMC currently means built down to a minimum. Standards are not always upheld by mass developers.

Q 45 Yes there should be a minimum requirement for tree canopy coverage and tree and hedge destruction should be blocked.

Q 46. Yes, Migratory birds should be a key issue, as is all habitat space for wildlife

Q 47.Climate Change Measure

Active travel opportunities (eg cycling and walking) connecting developments with other places and public transport
NO

Decentralised renewable and/or low carbon energy generation (photovoltaic cells, wind turbines etc) YES

Energy efficient, future-proofed buildings YES

Habitat creation – built fabric (eg swift bricks) YES

Habitat creation – natural (eg meadows, hedgerows) YES

Modern Methods of Construction (MMC) NO

Multi-functional green infrastructure (recreation, carbon sinks and biodiversity net gain)?

Passive design (orientation, layout, landscaping)YES

Sustainable drainage systems (SuDS) (eg green roofs, water butts, retention ponds)YES

Tree coverage - increasedYES

Other – please state and include

43412865 0 5.12.1 - 5.12.4

YES

Comments noted.

Climate Change

Q 44 No. MMC currently means built down to a minimum. Standards are not always upheld by mass developers.

Q 45 Yes there should be a minimum requirement for tree canopy coverage and tree and hedge destruction should be blocked.

Q 46. Yes, Migratory birds should be a key issue, as is all habitat space for wildlife

Q 47.

Climate Change Measure

Active travel opportunities (eg cycling and walking) connecting developments with other places and public transport
NO

Decentralised renewable and/or low carbon energy generation (photovoltaic cells, wind turbines etc)YES

Energy efficient, future-proofed buildingsYES

Habitat creation – built fabric (eg swift bricks)YES

Habitat creation – natural (eg meadows, hedgerows)YES

Modern Methods of Construction (MMC) NO

Multi-functional green infrastructure (recreation, carbon sinks and biodiversity net gain)?

Passive design (orientation, layout, landscaping)YES

Sustainable drainage systems (SuDS) (eg green roofs, water butts, retention ponds)YES

Tree coverage - increasedYES

43417889 0 5.12.1 - 5.12.4

Other – please state and include YES

Q.44. Do you agree that the Local Plan should set requirements for a certain proportion of development on major sites to be built using MMC? Yes/No Please explain

Comment noted.

43548193 38432225 5.12.1 - 5.12.4

No. We consider that matters of technical construction should be left to Building Regulations.

25296065	0 5.12.1 - 5.12.4	<p>5.12 Climate Change</p> <p>We strongly support the provision in the Local Plan to provide a positive, supportive framework for development that can help lower carbon emissions, and agree that this can be achieved at the strategic level through the spatial strategy by supporting development at locations close to services and jobs where there are opportunities for sustainable active travel including cycling and walking to destinations. At the local, site-specific level, this should include clear and measurable policies that support low carbon design through the layout, building orientation, massing and landscaping of developments.</p>	<p>Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.</p>
42684641	0 5.12.1 - 5.12.4	<p>5.12.4</p> <p>MMC is a very good idea and the Germans have been doing this for years. Huf Haus is a brilliant construction. Not sure about a UK equivalent? Normally there is a lot of glass involved which provides good light to homes. sustainable fuels (wood chip) and biodiversity off-setting, playing its part in tackling the climate and ecological emergency. This will lead to the enhancement of existing assets and creation of new ones which will be under environmental stewardship for some time.</p> <p>6.2 This presents both Sevenoaks and TMBC with a strategic planning opportunity should they wish to explore it under their Duty to Cooperate processes. The [Company] is strategically located in that it links Kemsing Station with Kemsing proper, Wrotham and West Kingsdown which means these communities can be linked by a dedicated cycle and pedestrian route. This active travel corridor would provide a safe link between communities, employment opportunities and the local railway hub, reducing car-based travel and carbon emissions as well as improving health and well-being. Moreover, the link can connect new green infrastructure opportunities on the Estate to these communities.</p> <p>6.3 The sustainable travel link and stewardship could be funded by additional [company] development opportunities within both Districts, which could be viewed as one strategic approach to assist in the delivery of the infrastructure.</p> <p>6.4 The Consultation Document focuses on improving active transport infrastructure as a means of supporting environmentally sustainable travel. [The compny] are in full support of this approach and would invite TMBC and Sevenoaks to engage with [the company] to explore this concept further.</p> <p>6.5 As set out in the Consultation Document, the NPPF states that planning policies should identify and protect routes which could be critical in developing infrastructure to widen transport choice. To support this, the NPPF also states that plans should be shaped by early, proportionate and effective engagement with infrastructure providers.</p> <p>6.6 [Company] is potentially able to provide one such critical infrastructure route, and therefore TMBC should seek to continue engagement with the [company] to ensure this opportunity is supported and brought forward as the Local Plan develops.</p> <p>6.7 In specific response to Question 22 posed within Consultation Document, the transport issues that matter most to [company] are:</p>	<p>Comment noted.</p> <p>Comments noted. These matters will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>
44345345	44345409 5.12.1 - 5.12.4	<ul style="list-style-type: none"> ● Rail – improving station access and links with cycling and walking routes. 	

		<p>Q44. Do you agree that the Local Plan should set requirements for a certain proportion of development on major sites to be built using MMC?</p> <p>The [Company] is generally supportive of the use of modern methods of construction (MMC). The home building industry is a progressive industry that has, for many years, adopted a range of innovative methods to improve the sustainability, efficiency, and reliability of materials and processes in the lifecycle of a construction. This ranges from the use of digitally enabled house type designs delivered through partnerships with offsite manufacturers and the wider supply chain, to the use of new building methods or assemblies. Due to this variety of methods encompassed under the broad umbrella of MMC there can be confusion as to the true extent that it is already taking place in the homebuilding industry. Research published by the National Housebuilding Council (NHBC) Foundation back in 2016 found that the majority of house builders and housing associations are using, or have considered, at least one MMC approach within their recent build programmes.</p> <p>However, it is also important to note that the ability to scale up the delivery of MMC is determined by external factors rather than the appetite of home builders to take forward alternative approaches to construction. In particular it will be more difficult for smaller house builders to deliver MMC given the supply side constraints in the market. These supply side issue need to be a clear consideration in the approach to MMC and would suggest that whilst it should be encouraged there should be no specification as to how new homes should be built. The Council will also need to consider how the promotion of MMC would sit alongside other policies particularly those in relation to design or housing mix. As the need to create variety of individually designed homes for each authority or area within an authority, along with the appropriate mix of homes to meet the local need is often at odds with the volumetric construction required by MMC which requires repetitive or standardised designs in order to be effective.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The Council acknowledges the points made on housing mix and design and considers MMC can be useful in helping meet its housing need which will be considered further as the Local Plan develops as well as through design codes.</p>
25378817	0 5.12.1 - 5.12.4	<p>24.1 No. [Company] considers this to be a problematic policy approach, as there is only a limited amount of understanding and research available to support it. [Company] has a modular housing factory at [place] and is a pioneer in this area of construction but, as the modules are not appropriate for every location and type of development, their use should be market-led. The Local Plan could be supportive of MMC in general but a requirement for a specific proportion should not be included.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>
44463361	25366913 5.12.1 - 5.12.4	<p>24.2 [Company] would be pleased to comment on further on this issue if that would be of assistance.</p> <p>Despite the Climate Change Emergency declared by TMBC on July 19th 2019, there seems to be little emphasis on this in the Local Plan consultation document.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>
36594049	0 5.12.1 - 5.12.4	<p>[Parish Council] strongly supports efforts to mitigate the effects of Climate Change and for this reason, and the recent rises in gas and electricity costs, is keen to see all housing developments meet or exceed the standards demanded by government, especially in the light of the changes to the Building Regulations in respect of the conservation of fuel</p>	
46022337	0 5.12.1 - 5.12.4	<p>The more houses that are built the more pollution that can lead to health issues. Knocking down existing housing to make room for more houses is not cost efficient. Improvements to existing housing that has been left empty should be your first priority.</p>	<p>Comment noted.</p>
46022337	0 5.12.1 - 5.12.4	<p>Kent was always known as the garden of England, that garden is now getting very small and will soon disappear unless something is done to stop the building of all theses new houses.</p>	<p>Comment noted.</p>
46090945	0 5.12.1 - 5.12.4	<p>Climate change should be in the forefront of any development planning. Number one Priority. Destruction of woodland and ancient trees by developers who then say they will replace them should be avoided.</p>	<p>Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.</p>
42330785	0 5.12.5 - 5.12.10	<p>How can ancient woodland be replaced? It has taken centuries to build its diversity</p>	<p>Comment noted.</p>

25315361	0 5.12.5 - 5.12.10	A local developer on the East Bank of the Medway is currently pushing to build on one site subject to flood on the basis it can provide flood protection but is arguing that it should displace development on a different site away from the river due to flood risk. The Council need to find a consistent and robust formulation to prevent developer's cherry picking their way through the current regulations.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42584193	0 5.12.5 - 5.12.10	With regard to flooding any proposed development should be assessed to ensure it does not increase the potential of flooding in adjacent existing housing areas.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42584737	0 5.12.5 - 5.12.10	With regard to flooding any proposed development should be assessed to ensure it does not increase the potential of flooding in adjacent existing housing areas.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42442561	0 5.12.5 - 5.12.10	In terms of flood risk, assessments at the strategic level should take account of all sources of flood risk and the current and future impacts of climate change. That we have flooded roads during periods of inclement weather provides evidence that local flooding is already unacceptable, ultimately without significant investment in new infrastructure will be pump more sewage into our rivers and sea. Potable water is also under stress, as evidenced by local water company hose pipe bans and until such time as the infrastructure is developed we need to avoid any further development.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The Council has undertaken a Strategic Flood Risk Assessment which considers all sources of flooding and will be preparing a Infrastructure Delivery Plan.
42616033	0 5.12.5 - 5.12.10	further development will increase flooding and contamination of river and sea	Comment noted.
		The potential impact on [place] Residents by increasing flood risk.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The Council has undertaken a Strategic Flood Risk Assessment which considers all sources of flooding.
		We all have a responsibility to manage and control the impact of intensive development on the environment and our community, as flooding is increased by:	
		* Development, which causes towns and cities to have more impermeable surfaces.	
		* Removal of trees and vegetation which reduces the amount of water absorbed into the land and increases run-off.	
		Rain falling on developed areas of Hildenborough will:	
		* flow across the surface of the ground, which occurs when the surface doesn't allow water to penetrate. This surface run-off is more likely to occur when:	
		* rain falls on areas of hard-standing (ie drives, patios etc.)	
		* the ground is saturated with water or when the ground is impermeable.	
		* or, if falling on roofs or drained surfaces (roads and car parks) discharge into the drainage system very quickly.	
		These factors increase the risk of watercourses backing up which exacerbates the severity and speed of flooding.	
		Rain falling on undeveloped land infiltrates into the soil and then flows more slowly back to the Hawden Stream than surface run-off, this is beneficial because it delays water reaching the watercourses.	
42795361	0 5.12.5 - 5.12.10	The removal of trees and vegetation from fields and undeveloped land increases the risk of flooding to village residents.	

42778017	0	5.12.5 - 5.12.10	I have commented above about the flood risk. This should not be underestimated particularly as climate change is changing out weather patterns. The Leigh barrier can only do so much, particularly as its main aim is to smooth out the peaks in river flow.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The Council has undertaken a Strategic Flood Risk Assessment which considers all sources of flooding.
42806945	0	5.12.5 - 5.12.10	The green environment is very important and should be supported by the TMBC wherever possible Q.45. Do you agree that the Local Plan should set a minimum requirement for tree canopy coverage on new developments? Yes/No Please explain No, we consider that this is overly prescriptive, and each site should deliver on its merits. Trees planted too close to homes can invalidate warranties and trees located too close to highways and/or street lighting can raise other issues. The matter of tree coverage should not be sought in a prescriptive way or it runs the risk of preventing the other aims of the local plan from being delivered. Q.46. Do you agree that new developments should integrate into the fabric of buildings habitat space for wildlife, such as migratory birds?	Comment noted. Comments noted.
43548193	38432225	5.12.5 - 5.12.10	Yes, it is a fairly simple task to incorporate swift or swallow boxes for example.	Comments noted.
42832833	42826433	5.12.5 - 5.12.10	Q.45. Do you agree that the Local Plan should set a minimum requirement for tree canopy coverage on new developments? Yes/No Please explain No – this approach is too onerous on a developer and could affect the potential layout/density of development. Q.46. Do you agree that new developments should integrate into the fabric of buildings habitat space for wildlife, such as migratory birds? Yes – but this should be included as part of securing the approach to Biodiversity Net Gain. We therefore suggest specific reference is made to this.	

All development plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes. Plans should also apply a sequential, risk-based approach to the location of development by taking into account all sources of flood risk. They should also consider the current and future impacts of climate change so as to avoid, where possible, flood risk to people and property.

Specially, we wish to draw your attention to the Medway Estuary and Swale Strategy (MEAS), which includes part of the Tonbridge and Malling Borough Council area from Aylesford to Halling and Wouldham. This sets out a programme of tidal flood risk management and infrastructure which will encourage growth and development across the whole area, whilst supporting local communities, businesses, infrastructure, and protecting the environment and wildlife. However, this planned investment of £100million will require significant partnership funding to be secured.

Due to hydraulic connectivity and the impact on designated habitats, activity in one place will impact other locations across the strategy area. We want to work with Swale Borough Council, Medway Council and Tonbridge and Malling Borough Council to develop consistent principles and approaches to development and aspirational plans to identify opportunities and act on them and ensure consistency and fairness across the strategy area.

The MEAS Programme has a partnership funding need of more than £50million over the next 10 years and will require direct and in-kind contributions from a variety of partners and other funding sources. New development since January 2012 does not attract Flood Defence Grant in Aid (FDGiA) funding from government and must be resilient to flooding. Although new development sites must not be reliant on the MEAS schemes in order to be safe for their lifetime, they will benefit indirectly from the MEAS programme as it will improve protection to infrastructure which services developments, such as:

- * road and rail access
- * utilities (water and power supply, waste water services, telecoms)

Flood risk

Missing information and reference:

Complete omission of acknowledgement of The Medway Estuary and Swale Coastal Flood and Erosion Strategy; a document that approaches the preferred options for coastal erosion and flood risk management over the next 100 years. Tonbridge and Malling Borough Council are an implementation partner; and as such must be seen to protect the delivery of the Strategy.

General comment:

We recommend the option for investigating and implementing natural based solutions, including natural flood management schemes in upper catchment areas for adapting to flood issues (both inland rivers and coastal environments). Again, where applicable restoring open river channels, by opening up culverts can reduce local flood risk as well delivery environmental net gains.

Comment - Tree Coverage wording:

Caution when promoting concepts around increased tree planting and landscaping to support resilience to climate change, i.e. there is a trend to incorporate non-native species for their natural advantages for tolerating drought, however this approach would not be appropriate for use around sensitive habitats, such as riverine or wetland habitats, or indeed most Priority Habitats.

There should be a clarifying line somewhere to specify appropriateness in species chosen.

Comment noted. The Council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The Council has undertaken a Strategic Flood Risk Assessment which considers all sources of flooding and will also be carrying out a Level 2 Flood Risk Assessment for a more detailed assessment of sites. The Council acknowledges the Medway Estuary and Swale Strategy (MEAS) and the Council is currently in discussions with Environment Agency about its role in the strategy.

25333345 0 5.12.5 - 5.12.10

Comment noted. The Council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The Council has undertaken a Strategic Flood Risk Assessment which considers all sources of flooding. The Council is also currently preparing evidence on biodiversity and Green Infrastructure as well as climate change adaptation that will consider nature based solutions for flood management. The Council acknowledges the Medway Estuary and Swale Coastal Flood and Erosion Strategy and the Council is in discussions with Environment Agency about its role in the strategy.

25333345 0 5.12.5 - 5.12.10

			Tree canopy coverage - Trees provide a win-win option; they act as a long-term carbon sink and at the same time contribute to mitigating the effects of climate change for residents by temperature reduction, improved air quality, increased biodiversity and an overall enhancement of wellbeing. Trees also protect against flash flooding which is predicted to be more frequent and more severe.	Comments noted.
38330625	0 5.12.5 - 5.12.10		Hedgerows and verges, agricultural land, grazing and meadows also act as carbon sinks and habitat and should be valued accordingly. 5.12.10	Comment noted.
42684641	0 5.12.5 - 5.12.10		Flood risk in this area is very high. A lot of fields provide sumps for water growing trees is a brilliant idea and should be started now.	Comments noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
			25.0 QUESTION 45: DO YOU AGREE THAT THE LOCAL PLAN SHOULD SET A MINIMUM REQUIREMENT FOR TREE CANOPY COVERAGE ON NEW DEVELOPMENTS? 25.1 The principle of encouraging tree canopy coverage is supported, but [Company] would add a note of caution that a 'minimum requirement' would need to be supported by evidence that considered its viability effects, and indeed if it meant that some sites – especially smaller sites with less space – could not come forward how this might affect the housing trajectory, and overall housing delivery in Tonbridge & Malling. 25.2 On a technical point, it is not clear how a minimum requirement would be set. [Company] therefore requests some further explanation as to whether the requirement might be as a proportion of the site area, or as a number of trees. It could be that any requirement is based on a landscape assessment and strategy for each site.	
			26.0 QUESTION 46: DO YOU AGREE THAT NEW DEVELOPMENTS SHOULD INTEGRATE INTO THE FABRIC OF BUILDINGS HABITAT SPACE FOR WILDLIFE, SUCH AS MIGRATORY BIRDS? 26.1 [Company] supports this idea, in principle, but further evidence (and specific local testing) is required to demonstrate that it would not adversely affect viability and can be feasibly delivered, as a plan strategy and on a site-by-site basis.	
44463361	25366913 5.12.5 - 5.12.10		your proposal to build over green belt land and historic woodland is another example of political misjudgement on the value of grasses areas and woodland in carbon capture . The lungs of the country are the grasslands and woodlands. They must remain protected.	Comment noted.
42583393	0 5.12.11-5.12.22			Comment noted.
			Increased housing & infrastructure development will mean physically more roads, roof areas & pavements as well as cycle lanes, therefore there will clearly be less area of green land to absorb rainfall. SUDS, Green, Blue Roofs & other initiatives etc, will only have limited effect at slowing the volume of water into the sewerage & effluent system likely leading to pollution of Rivers over the next 40 years etc as there have been many years of under investment in the filtration, sewerage & water disposal system.	
42443361	0 5.12.11-5.12.22			

		<p>Q.47. Which climate change measures are most important to you? From the list, we consider these are the most important three criteria:</p> <ul style="list-style-type: none"> • Active travel opportunities (e.g. cycling and walking) • Connecting developments with other places and public transport • Other – please state ‘locating development in sustainable locations’. <p>Q.48. What are your reasons for selecting these particular climate change measures as priorities for the Local Plan (outline briefly)?</p> <p>In our opinion, the ability to locate development on the edge of town centres is the most important climate change measure of all. There is simply no point in having the highest standards of energy efficient homes if they are sited in unsustainable locations.</p> <p>We believe that development should be sited on the edges of town centres to provide the best opportunities for walking and cycling to and from new homes and the day to day services and facilities that the occupants use. To help address climate change today, we firmly believe that the ability to locate development adjacent to existing settlements should be of more importance than a Green Belt that was conceived over a hundred years ago.</p> <p>We consider that there are exceptional circumstances that justify a review of the Green Belt and in our view, the release of land from Green Belt around key settlements is a key way to reduce the overall energy demands of new residents.</p>	<p>Comments relating to the role of the location of development being crucial in responding to climate change noted.</p>
43548193	38432225 5.12.11-5.12.22		
		<p>Climate change Local – Flood Risk 5.12.13 Missing information: Leigh Barrier capital scheme should also refer to the wider scheme which encompasses Hildenborough embankment too. Here. Suggested Climate Change measure:</p> <ul style="list-style-type: none"> • River restoration – delivers habitat creation, contributing to improving the water environment condition (quality, quantity and flood risk), reconnecting fish migration routes. • Floodplain reinstatement/reconnectivity and Natural Flood Management schemes (particularly as ‘up catchment’ measures which can also deliver habitat creation and carbon capture). 	<p>Comments noted. As well as the Leigh Barrier flood protection, the Council also fully acknowledges the wider scheme of the Hildenborough embankment and the additional flood protection this will create. The Council is also commissioning further evidence on Climate Change adaptation and a Green Infrastructure Strategy that will consider a variety of different climate change adaptation and mitigation measures that the Local Plan can potentially adopt.</p>
25333345	0 5.12.11-5.12.22		
		<p>5.12.22 Comment- building on flood plains zone 3 is plain wrong UNLESS houses are built high above the ground with suitable warning systems.</p>	<p>Comment noted. The Council is required to use the sequential and exceptions test set out in the National Planning Policy and National Planning Policy Guidance to steer development to the areas of lowest flood risk.</p>
42684641	0 5.12.11-5.12.22		

Climate change measures – Q47. Which climate change measures are most important to you? And Q.48. What are your reasons for selecting these particular climate change measures as priorities for the Local Plan
All the measures set out in the table at Q47 will have varying degrees of impact on development and on climate change. Some will be relatively low cost whilst others could require significant additional costs or a loss of developable land on a site. All these factors will need to be taken into account when developing the policies to be included in the local plan ensuring that they are viable and sufficiently flexible to ensure the plan is deliverable.

With regard to the energy efficiency standards for new homes the [Company] supports the Government's approach set out in the Future Homes Standard. The [Company] recognises the need for new development to reduce its carbon emissions and to help the industry achieve the Government's already challenging targets set out in the Future Homes Standard established the Future Homes Hub (www.futurehomes.org.uk/). The Future Homes Hub will allow the house building industry to work with partners in other sectors to develop the necessary supply chains and skills required to meet the Future Homes Standard.

The Government have set out a clear roadmap to low carbon homes that will alongside the decarbonisation of the national grid ensure that the Government can meet its commitments to net zero by 2050. The way forward be taken by the Government recognises that the improvements in energy efficiency of new homes should be a transition which ensures that new homes continue to come forward to meet housing needs whilst still be sufficiently challenging to significantly reduce the carbon emissions of new homes from 2025. As such there is no need for additional standards to be placed on development through local plans.

Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The Council is commissioning further evidence on climate change to consider the impacts of climate change and how possible ways to include adaptation measures into developments.

27.1 [Company] supports aspirations towards carbon neutrality and tackling the major national and international issues of climate and ecological emergencies. All of the suggested measures have their value. [Company] makes the following comments on some of the measures:

Active (and low carbon) transport

27.2 Reducing the need to travel by private vehicles makes a significant contribution to creating an active (low carbon) transport network. [Company] considers that a successful strategy of co-locating new homes and jobs can make a significant contribution to producing an active (and low carbon) transport network, reducing the need to travel long distances. This will be key to ensuring that cycle and walking options are obvious and safe for new and existing residents.

Renewable and low carbon energy

27.3 [Company] supports in principle the aspiration to maximise the use of renewable energy in new developments. [Company]'s approach is to follow the energy hierarchy by investing in building fabric efficiency so as to use less energy overall before then incorporating renewable technologies. It is recommended this approach is reflected in the new Local Plan.

27.4 Any policy which follows this aspiration will be required to demonstrate that its chosen strategy is deliverable and strikes the appropriate balance of social, economic and environment factors in the aim of achieving sustainable development.

Development design (energy efficient, future-proofed buildings and passive design)

27.5 [Company] supports a design principles approach to climate resilience. It uses a range of energy efficient features in its new homes (including at Broadwater Farm site ID: 59740) as standard, from water efficient and energy efficient fittings and fixtures, to recycling facilities, cycle storage and electric car charging points.

Habitat protection / creation and nature recovery

27.6 [Company] supports the principle of habitat creation and nature recovery, and it recognises the importance of Green and Blue Infrastructure networks. This can and should be considered at an early stage of masterplanning development sites. However, due regard will also need to be given to the eventual scope of housing and employment, which is yet to be established in Local Plan 2040, and an appropriate balance will need to be struck.

Multi-functional green infrastructure

Comments noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.

44463361 25366913 5.12.11-5.12.22