

Respondent ID	Agent ID	Document Part Name	Comment (plain text)	TMBC response
42213665	0	6.1.1 - 6.1.12	The issues raised regarding how development is managed are valid and well presented. Regarding viability, the requirements of the local plan across the full range of issues previously identified should not be watered down in the interests of the huge potential profits of developers.	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42353345	0	6.1.1 - 6.1.12	All too often developers agree to sustainability requirements but then fail to pass on these contractual obligations to their contractors.	Comment noted.
42442561	0	6.1.1 - 6.1.12	At the local level, it is important to appreciate that various infrastructure providers such as education, healthcare, and highways will have their own standards that need to be addressed when delivering development to make it acceptable. Having standards does not provide the required local infrastructure.	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. Comment noted.
42616033	0	6.1.1 - 6.1.12	all assume that development is sustainable	
42690369	0	6.1.1 - 6.1.12	Until significant infrastructure improvements are made to all major urban centres in Kent and surrounding towns and villages as part of a well considered unified plan between local authorities and Kent Council collectively, no new housing developments at all should be allowed. What are needed instead are whole new villages and towns well away from existing towns with major new roads serving the whole county. Local, regional and national authorities and the government need to see the bigger picture and work together. Until this happens, existing urban areas will become increasingly overdeveloped and strained and the effect of this will create more disharmony and negative	Comment noted. Presently when drafting a Local Plan, the Council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42617505	0	6.1.1 - 6.1.12	changes to the Building Regulations introduced in June 2022----will this be applied to all the property currently being built at Ditton Edge? If not why not? The fact that planning was granted last year (2021) should have no bearing on this. The houses have not been built at this time (october 22) Act quickly TMBC.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. Building Regulations are under separate legislation to Town Planning and comments on specific live planning applications are Development Management matters.

Whilst we completely understand that more homes need to be added and there is a need for development in Tonbridge we have some key points about the proposed areas, specifically

REF 59779 Tonbridge Road/Back Lane

REF 59827 Back lane/Reeds Lane

REF 59825 Back Lane/Upper Green Road

Back lane is a rural area next to a school that currently has only a handful of houses on it. The main reason for moving to this area was this so a proposition to add over 35-100 extra houses onto one road is significantly worrying and would directly effect the residents on this road.

Issue number one being the sheer volume of houses being added to a quiet, rural street which has fields opposite and a school on would be the damage to nature, wild life and untouched Greenland, replaced by significant noise, pollution and 100x more traffic on the current road. There is a school at the end of Back Lane, which is currently over subscribed and during school hours the street is full of teachers & school mums/visitors. During the hours of 8am-4pm its near impossible to park and during school drop off hours this street is incredibly busy with the mere 20 houses it has on the road. Adding a further 35-100 houses would put even further pressure on the school making it further over subscribed, significant rapid increase in traffic of approx 50+ cars trying to exit and enter the road daily.

42763841 0 6.1.1 - 6.1.12 The proposed developments would have a significant impact on trees, and the local environment by adding such a Michael Gove expressing government views 30 October 2022
Link to enable you to view full report
<https://www.telegraph.co.uk/politics/2022/10/30/conservatives-manifesto-target-300000-new-homes-year-still-stands/>

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

Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.

42538657 0 6.1.1 - 6.1.12 "What we critically need to do is to make sure that we have local communities consenting to development, and that Q 50. Any housing built should strive to mitigate Climate change. My priorities are:
Affordable housing
Energy efficiency
First homes
Renewable energy generation
Sustainable drainage.

Comment noted.

43412865 0 6.1.1 - 6.1.12 In conclusion,
I strongly object to the proposals. There has been no mention of extended infrastructure.
What about Improved roads, access to the motorway, (which would all need to come through Wrotham Heath which is already a bottle neck) not to mention schools, hospitals, doctors surgeries, drainage, water supply etc etc? The list goes on but nowhere in the report is any of this mentioned.

Comment noted.

43417889 0 6.1.1 - 6.1.12 Q 50. Any housing built should strive to mitigate Climate change. My priorities are:
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First homes
Renewable energy generation
Sustainable drainage.
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		Q.49. Which local policy requirements are most important to you? Other – Housing.	Comment noted.
		Q.50. What are your reasons for selecting these particular local requirements as priorities for the Local Plan (outline briefly)?	
43548193	38432225 6.1.1 - 6.1.12	We note that market housing is not cited in the list, and this is not right. The Council must deliver market housing in addition to the accessible, adaptable, affordable, energy efficient, first, specialist, self-build and custom homes cited.	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The Council acknowledges the HBF briefing note on viability and has now commissioned external consultants to undertake a viability evidence base (which will take into consideration the briefing note) and be carried out in accordance with good practice.
		The Council are still to undertake a viability assessment. As the Council note in paragraph 6.1.8 this will need to take account of all the policy costs, both national and local, that will impact on development in Tonbridge and Malling. Whilst we will comment in more detail on the study when it is published, we would like to make some broad comments on viability in relation to the approach established in the NPPF and its supporting guidance to help inform the viability assessment. To support local planning authorities in preparing their viability evidence the [Company] has prepared a briefing note, attached to this response, which sets out some common concerns with viability testing of local plans under the latest guidance and how these should be addressed. Whilst this note focuses on all aspects of the viability testing of the residential development and should be taken into account, we would like to highlight four particular issues with whole plan viability assessments.	
		The first issue is with regard to the approach taken to abnormal infrastructure costs. These are the costs above base construction and external costs that are required to ensure the site is deliverable. Prior to the 2019 iteration of the NPPF viability assessments have taken the approach that these cannot be quantified and were addressed through the site-by-site negotiation. However, this option is now significantly restricted by paragraph 58 of the NPPF. As such these abnormal costs must be factored into whole plan viability assessments. We recognise that the very nature of an abnormal costs means that it is impossible to quantify them accurately, but it is a fact that they are often substantial and can have a significant impact on viability. Where and how these costs arise is also variable. They can occur in site preparation but can also arise with regard to the increasing costs of delivering infrastructure, such as upgrades to increase the capacity of utilities. It is also the case that abnormal costs are higher on brownfield sites where there can be a higher degree of uncertainty as to the nature of the site and the work required to make it developable.	
25378817	0 6.1.1 - 6.1.12	Whilst we recognise that national policy expects abnormal costs to come off the land value, we are concerned that if abnormal costs are high then it can result in sites not being developed as the land value will be insufficient to incentivise the landowner to sell. It is therefore important that a significant buffer is included within the viability assessment to take account of these costs if the Council are to state with certainty that those sites allocated in the	Comments noted. Appropriate active travel policy wording will be incorporated into the detail of the reg 18b Local Plan. Once available the Council's emerging LCWIP which will be included within the evidence base, this will be of assistance in identifying and prioritising cycling and walking infrastructure opportunities, including the improvement of PRoWs.
		PRoW Local requirement priorities play a significant role as development comes forward, and greatly assist in understanding the needs of the communities. The County Council considers that existing PRoW must be protected in the event of any development, but development should also present opportunities to enhance the existing PRoW network and boost connectivity for communities – giving Active Travel options for all NMUs. Specific requests for section 6.1: • Necessary protection should be offered through the Local Plan for existing PRoW, but also opportunities explored to deliver network improvements to boost connectivity.	
44422593	0 6.1.1 - 6.1.12	The requirements set out are all important factors, and properly planned development should address each of these.	Comment noted.
44459553	0 6.1.1 - 6.1.12	However, for the reasons set out elsewhere in this representation, the delivery of housing (including affordable	Comment noted.
38523009	0 6.1.1 - 6.1.12	Q49 page 87 - Active Travel – including equestrians	