

Respondent ID	Agent ID	Document Part Name	Comment (plain text)	TMBC response
42728737		Table 9 - List of 0 Sites - Cage Green	<p>The proposed housing sites 59515 and 59516 in north Tonbridge would result in a totally unacceptable loss of valuable green open space in a very urban area. Both sites provide much needed and limited green spaces that improve quality of life for residents and a safe environment for animals and biodiversity. Both of these sites should be removed from further consideration.</p> <p>I am responding in respect to reference 59515 West Kent Avenue/Rochester Road, I am presuming the plan is to scale so my comments follow about the impact of any proposed planning/building.</p>	Comments noted
42779137		Table 9 - List of 0 Sites - Cage Green	<p>* The area highlighted runs along West Kent Avenue which already has residents parking on the grass verge which is not only damaging but causes some traffic congestion on the bus route, if you added housing on the other side of the road this would create increased issues, especially as the strip of land is very narrow and would not allow any space for additional parking.</p> <p>* The area highlighted has a footpath running across from Rochester Road to the church/bus stop on the bend in West Kent Avenue.</p> <p>* The area highlighted is a small piece of land but is used for recreational purposes, particularly dog walkers and people walking to the church/pre-school, there is also a young children's play ground</p> <p>* There are circa 20 established trees in the area which provide a haven for wild life, particularly Woodpeckers, Squirrels, Pidgeons and Magpies</p> <p>* Rochester Road is a narrow road and cul-de-sac, increased traffic would not be viable in the road without extensive road works which would encroach on existing house holders and probably be cost prohibitive.</p> <p>* In general terms any development would be minimal given the size of the land in question, I read in the report there was reference to 100 dwellings, unless they are sky scrapers I cannot see there is sufficient space for more than a handful of dwellings, which would not seem to be a viable economic proposition.</p> <p>My comments are in respect to reference; 59516:</p>	Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
42779137		Table 9 - List of 0 Sites - Cage Green	<p>The area is used for residential purposes, including walking/Dog walking, young Childrens play area, any building would disrupt these activities.</p> <p>Rochester Road is a narrow road and a cul-de-sac, if the road was going to be used for access to the new dwellings there would need to be major changes to it, which would encroach on the existing residents and reduce the number of trees and green spaces available to the local community.</p> <p>Squeezing new dwellings around a children's Play area, Church/Pre-School Building and dwellings for Old/Special Needs residents would severely impact these facilities and the people who use them.</p>	Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Site 59516 represents a plot of open green space embedded within the Cage Green/Higham Wood residential community in Tonbridge.

The site has been raised for consideration as part of the Urban Capacity Study Report, rather than as part of the general Call for Sites. The Urban Capacity Study lists Site 59516 as 'Vacant and Amenity Land' of roughly 0.75 Hectares.

In March 2018, Tonbridge and Malling Borough Council released the Open Space Evidence Base (available at <https://www.tmbc.gov.uk/downloads/file/973/open-space-evidence-base-march-2018>) - a report which has not been included or referenced within the Local Plan at this time. Within the Open Space Evidence Base, this Site is referred to as 'Amenity Green Space' 955. This Open Space Evidence Base referred to the 2015 and 2009 Qualitative Assessments of Existing Open Spaces, and the relative scores awarded to various Open Spaces in such Qualitative Assessments. In the 2015 Qualitative Assessment, this Site was given a score of 100/100 as an open green space, an increase of 37 points against the 2009 score. This was a higher score than Leybourne Lakes Country Park or Trosley Country Park, which I am quite sure are not being considered for development.

Despite having been given a qualitative score of 100/100 in the Qualitative Open Space Assessment in 2015, the land is being treated as simple vacant property for the purposes of the Local Plan.

This Site is in frequent amenity use by the local community, and its loss in order to make way for a maximum yield of 22 residences (as suggested in the Site Plan) would be an unacceptable loss of amenity for this community.

In order to avoid such misunderstanding in future, Site 59516 should be protected as a Local Green Space by way of the Local Plan.

In order to meet the threshold as a Local Green Space, the following tests must be met:

1. The land has to be 'reasonably close to the community it serves'.

Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

42832481

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[Site reference 59515 and 59516]

2. Summary of objections to sites 59515 and 59516

Loss of Public Open space

Two sites have been proposed as prospective development sites which have a combined yield of 27 dwellings. Both these land parcels are currently used as public open space and are invaluable to the local community.

Figure 1 – street scene image of site 59516 from Salisbury Road taken from Google Streetview

National Planning Policy Framework 2021

Open space is defined within the NPPF as ‘all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.’

Paragraph 93 states that;

To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;’ (underlined for our emphasis)

Paragraph 93 therefore requires LPAs to plan for the provision of open space (amongst other facilities) to ensure the health and well-being of their communities. We believe it is important to maintain existing open spaces as well as create new ones.

Paragraph 99 states that;

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or

b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of

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Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

I write on behalf of the Site Promoter, Bowyers Field Developments Ltd, to formally submit the above Site, Land at Postern Quarry, Tonbridge as part of Tonbridge and Malling Borough Council's Call for Sites. This Cover Letter provides clarification in respect of land ownership, background on the Site History and details of the development proposals. This letter should be read in conjunction with the supporting technical information and promotional document which accompany this submission.

The Site & Background

The Site as a whole measures a total of 63ha and is situated immediately to the east of the urban area of Tonbridge. The Site is bounded to the north by the River Medway which flows downstream away from Tonbridge towards Yalding and Maidstone to the east. To the south of the site is Postern Lane, a small single track road and to the east by Hartlake Road, a route connecting Tudely to the A26.

43072865 42278305 Table 9 - List of Sites - Cage Green

The vast majority of the Site is a former quarry that operated for approximately 40-years and has recently closed. The Site is subject to a Restoration Plan; that was originally approved in 1987 and amended in 1996. However, the approved restoration was not completed and the Site has been left with incorrect land levels and unsuccessful and incorrect planting. The Site as it currently sits has undergone an element of natural regeneration; however, this is not reflective of the benefits that should have been brought about by the completion of the restoration scheme. Consequently, the former operator submitted a revised restoration scheme to address the breach in planning control. This was approved in Summer 2021; however, will not be implemented as the Operator no longer has the rights to access the land to complete the works. The quarry was accessed from a road to the north, crossing the River Medway via a Bailey bridge, which is still in place. Access onto the A26 is still in place; however, is currently restricted by a locked gate. The Site extends up to the urban edge of Tonbridge. The eastern end of Tonbridge is largely occupied by industrial estates and commercial premises. The A26 runs around the eastern side of Tonbridge and provides the main access point into the industrial estates. The Site is located in Flood Zones 2 and 3 and currently experiences flooding which has been exacerbated by the landforms [59515]

Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

I am writing to inform you of my concerns regarding the proposed development of houses on the green space between Royal West Kent Avenue and Rochester Road.

My concerns are as follows:

- * The green space is currently used by a number of organisations, such as the local Scout group and the children in the nursery, which is in Church.
- * Rochester Road already has issues with more than a dozen cars being parked on the road by those who do not live here, on a daily basis. This includes commercial vehicles. As a result the road becomes a single lane road in certain places which causes issues for the local residents when coming in and out of their driveways.
- * The Ridgeway is already an extremely busy road. And it can take up to 15 minutes to turn out of the road at peak times. This new development will make this situation even worse.
- * The demand on the local GP surgeries is already at a premium such that any new residents in the last couple of years have had to look further away for a GP.
- * The Covid pandemic and subsequent lockdowns have highlighted the need for open spaces for the mental and physical health of us all.
- * I understand that the mature trees at the edge of Rochester Road will be cut down. This will have a negative effect on the environment and the clean air they help protect in this area.

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Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

42700225

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Green

1. Site ID 59735 overlaps with site IDs 59798, 59804 and 59835 under the ward of Hildenborough yet has numerous different assessment outcomes, which does not appear to be credible or logical.
2. For site ID 59735 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).
3. Horns Lodge Lane, which abuts site ID 59735, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of this areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.
4. Site ID 59735 assessment shows minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.
5. Development of site ID 59735 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.
6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site ID 59735 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.

Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

I am writing to raise my concerns regarding the proposed residential development at TN10 4NU and TN10 4PB.

The green spaces in question are frequently used for local residents and visitors for socialising and exercise, and by local groups such as the Rainbows, Brownies, Guides and Scouts, amongst others. It would be a significant loss to the community from a health, wellbeing and social perspective to lose these spaces. There are many residents along Royal West Kent Avenue who have little access to private green spaces and for whom the field and playground are essential for caring for their children in a close and age-appropriate environment.

42759425

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The Ridgeway and surrounding roads are already under pressure from road traffic. On Rochester Road there is typically a line of between 4-10 cars towards the entrance to road, reducing it to a single lane, with more cars parked on the road further down. There is little space for car parking that wouldn't impede the access of existing residents to their houses. Introducing new houses would increase traffic pressure on not only Rochester Road and Royal West Kent Avenue, but also for all residents of The Ridgeway and the various roads coming off it. It is standard to wait between 5 and 20 minutes to exit The Ridgeway onto Hadlow Road or Shipbourne road due to queues of cars waiting to turn out and sporadic opportunities to join the heavy flow of traffic. Not only would the traffic burden increase, but the combination of losing the plants, mature trees and green space and introducing more cars and traffic would increase air pollution in the area, not to mention loss of habitat for local wildlife.

Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

I'd also like to note that the proposed development sites are referenced as being near to medical facilities, however as a resident who moved to the area 2 years ago we were told that the nearby surgery (Warders) was oversubscribed and that we would have to register further afield. The same would be true for any new residents moving to the area.

42800481	Table 9 - List of 0 Sites - Cage Green	<p>We understand that the area around TN10 4NU is officially designated as an Important Green Space in North Tonbridge. Building on this would have a severely detrimental effect on residents' enjoyment of the environment. Many residents, especially dog owners, use this space for recreation. There are a large number of very mature trees which are beneficial to the environment for carbon capture: these would have to be cut down to build the houses. Even if new trees were planted, they would not compensate for the damage done.</p> <p>My family and I would strongly recommend that this vital community asset is retained. We are also concerned that houses built behind our property would be very close and would overlook our windows.</p> <p>1.1 Introduction</p> <p>1.1.1 This representation is prepared on behalf of Mr & Mrs R Walker in response to the Tonbridge and Malling Borough Council (TMBC) Local Plan (Regulation 18) consultation which runs until 3rd November 2022.</p> <p>1.1.2 We understand from the document that TMBC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040, and that the Council is asking for views on principles that should determine where development should be directed and how it can deliver infrastructure improvements across Tonbridge and Malling.</p> <p>1.1.3 Our client controls 'Little Postern, Tonbridge (Site 59701)' which we believe represents a suitable and sustainable future location for employment led mixed use development. This is a site that is well known to the Council having been proposed for allocation within the previous pre-submission draft TMBC Local Plan.</p>	Comments noted.
25240641	25240577 Table 9 - List of Sites - Cage Green	<p>1.1.4 Whilst that process did not reach a successful conclusion, this was not as a result of an unsound approach to the proposed allocation of Little Postern and as such we consider the site should continue to be advanced.</p> <p>1.1.5 Notwithstanding our client's interest, we recognise that the consultation document is of a focussed nature. Accordingly, for the purpose of this consultation we simply provide a detailed response to the questions posed by the Council within the consultation document and how our site fits within the spatial options being considered.</p> <p>1.3 Conclusion</p> <p>1.3.1 For the reasons set out in this Statement the site is considered suitable for a proportionate scale commercial led development.</p> <p>1.3.2 Commercial development would make a contribution to the economic needs of the borough, which is tantamount to the exceptional circumstances needed to justify the proposal site being developed within the Metropolitan Green Belt.</p>	Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.