

Respondent ID	Agent ID	Document	Comment (plain text)	TMBC responses
42521025		Table 9 - List of Sites - Hadlow and 0 East Peckham	The proposed allocations for Hadlow and East Peckham are the highest numbers for any of the wards covered by this plan, with in excess of 5,500 potential new houses having been identified, nearly all requiring building on Green Belt land. I would prefer for the more urban approaches outlined in Spatial Strategy Options 1 or 2 to be pursued, primarily to prevent removal of green belt land but also as the infrastructure within Hadlow cannot cope with existing residents' requirements.	Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
42521025		Table 9 - List of Sites - 0 Hadlow and	I do not believe that Hadlow is capable of supporting the potential development of over 5,000 new homes as detailed here, as existing infrastructure does not meet current population needs. As such I do not think sites 59811 and 59806 should be included.	Comments related to sites 59811 and 59806 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
42544833		Table 9 - List of Sites - Hadlow and 0 East Peckham	i would like to suport the development option 59806 which is more or less where the original East Peckham was sited. It provides a site that has very good transport links, moves traffic volume closer to the main M 20 links and will provide good local employment. I do believe it should be planned around a small village sqaure and extended towards the original east peckham church on the hill	Comments related to sites 59806 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
			59613/59837/59876 – This area is green belt land. Snollhatch and Addlestead roads are particularly narrow, with only footpaths on one side of the road. The roads are already congested with residential parking, forcing drivers and cyclists onto the wrong side of the road. Increased traffic heading towards the junction of Old road and Pound road will congest the centre of the village. This area is the hub of the village, with a church, library, butchers, chemist and takeaway shops. The increased traffic will greatly affect residents, particularly elderly, who will need to navigate busy streets. With local buses under threat and no rail service to the village, the enforced increase in traffic will prove hazardous to pedestrians, cyclists and road users. From the Getthedata site, this area falls into the medium to high risk of flooding. During prolonged or heavy rainfall, the existing storm drains are already unable to cope with excess water. Building on these sites will decrease the amount of green belt land capable of absorbing excess water. 59616 – Building new homes in a high risk flood area alongside the river Medway seems irresponsible. The A228/Boyle way was built to take traffic away from this area. 59742/59650/59782/59855 - The A228/Boyle way was built to take traffic away from this area. Hale street is a quiet Hamlet which will explode into a massive housing estate and be absorbed by East Peckham if these proposals are accepted. Tailbacks along Hale street/Maidstone road will be inevitable. There are no public amenities along that road, forcing more traffic into East Peckham. Church Lane will become congested and school children will be at risk as more vehicles use the road to access the village amenities.	
			59682/59813/59789 – Church lane is a pretty access road into East Peckham, bordered by green belt land. It leads to a wonderful park enjoyed by many and to the church and village school. It is a bus route with a footpath on one side only. The extent of the proposed house building in this area, along both sides of the lane and across to Bramley road, behind the playing field, will transform and ruin appearance of the village of East Peckham. The village neither boasts a doctors surgery or a dentist practice, forcing traffic further afield into already heavily populated areas. Ambles along public footpaths, alongside tranquil streams and through farmland and wooded areas will be spoilt forever.	Comments relating to access and flooding matters at sites 59613, 59837, 59876 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. These matters will be considered and reflected within the new transport modelling, flood risk and infrastructure evidence being prepared to support plan preparation.
42615009		Table 9 - List of Sites - Hadlow and 0 East Peckham		
42583393		Table 9 - List of Sites - 0 Hadlow and	Cannot find site 598&11	Comment noted.

Site59811
 Oxenhoath
 This proposed site is in designated parkland .
 Tiny lanes surround it on all sides. Only access to main Hadlow road is along lane with no passing places .
 Currently you have to reverse often for 50 yards or so to let a tractor pass and this usually involves reversing off the tarmac onto rough verge. Access to Hadlow Road cannot be widened without compulsory purchase of two houses at end adjoining main road . As capacity for this site is nearly 2,500 houses where are 5,000 car going ?
 This proposed site would be completely gridlocked.
 There is one tiny doctors surgery in Hadlow with no room to expand. It cannot take any more patients just now and it is virtually impossible to get an appointment.

There is only one tiny primary school with no room to expand. No secondary
 Poor bus service through Hadlow village which is already gridlocked much of the day.
 This site is not viable it is quite a ridiculous proposal.
 Currently land is used for food production either with animals grazing or with cherry apple and fruit production.
 It provides rural employment

42583393	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>It is important in its function for grassed areas of carbon capture and with carbon capture from the wooded areas within it. It has incredible wildlife . A refuge for Badger , deer , foxes and birdlife including Red kites and birds of prey. Completely unviable to introduce 2500 homes Regarding site 59789</p>	<p>Comments relating to parkland at 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42636769	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>The surrounding infrastructure could not cope with development on this site. Church lane is narrow and prone to regular flooding in the winter months. The field which runs between Coult Stream and Bramley Road floods regularly, so much so that the back gardens of Bramley Road properties have also been known to flood in more extreme weather. Building on this floodplain would be catastrophic. Furthermore the land is green belt land, which was previously used extensively by locals to walk dogs etc. until the farmer returned to cultivating the field for hay. There is no railway station nearby to service residents of any development on this land, nor is there a GP surgery in the village to accommodate them.</p>	<p>Comments relating to flooding at site 59789 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42646849	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>Re site 59811. North and East of Oxenhoath. This 'call for sites' proposed area is not only in a green belt / farmland area but is also a flood protection area with a network of ditches to take excess rainfall away. It is valuable farmland at a time when clearly as a country we need to be producing more of our own food. The land therefore has the dual advantage of not only being green belt but also important productive land for Food security. This should be protected.</p>	<p>Comments relating to 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>

42662081	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>Site 59811</p> <p>The whole of the proposed site is an area of beautiful farming countryside well away from any other villages or towns. The land is used for food production, both pastoral, with cows and sheep, and arable, with apples and raspberries. It provides employment in a rural area.</p> <p>The site is surrounded on all sides by narrow country lanes, single track in a number of places so that vehicles frequently have to reverse several yards to enable an oncoming vehicle to pass. The roads are already used by heavy farm vehicles and are wholly unsuitable to take any increased volume in traffic. They would become very dangerous indeed and the traffic would be likely to become gridlocked.</p> <p>The infrastructure is totally inadequate. The nearest village is Hadlow where there is a very small doctor's surgery with no capacity for additional patients and one small primary school where there is no room to expand. The nearest secondary schools are over 6 miles away. There is no train station anywhere near either and the bus service along the Hadlow Road is poor.</p> <p>The site is an important area for wildlife with a great many trees and hedgerows. It is overlooked by Gover Hill, a woodland area of outstanding natural beauty which is owned by the National Trust.</p> <p>It would be appalling to develop this area of pristine farmland in any way at all and it is totally ridiculous to consider it as a suitable site for what would in effect be a new town with up to 2,362 houses on it.</p> <p>I have the following comments on proposed Local Plan sites for East Peckham.</p> <p>9876, 59613 and site between village and 59613.</p> <p>These together will form a solid connection between the village and the hamlet of Snolls Hatch.</p> <p>59813, 59782,</p> <p>Together, a substantial build, larger than any other estate in the village. If, with 59682, access was to be to Church Lane considerable improvements would be needed to the lane.</p> <p>59682, 59789, current scaffold yard site.</p> <p>Another attempt to join Hamlets. The Village with Hale Street.</p> <p>59742</p> <p>An area very prone to flooding.</p> <p>59646</p> <p>Unclear what is and what isn't build. Appears to follow the river to a level of Barn Street.</p> <p>Any building on this site would ruin its beauty forever.</p> <p>It also abuts the proposed Paddock Wood extension to the Maidstone and Wetsted road roundabout, potentially joining East Peckham and Paddock Wood.</p>	Comments relating to 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
42686081	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>Building on these sites would seriously increase the size of the Village to the detriment of its current feel as a place to live.</p> <p>These sites are all on prime food producing agriculture land, land we cannot afford to lose forever. Without food we will not need housing!</p>	Comments relating to sites within the ward noted, including the role of sites 59876, 59613. Flooding at site 59742 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
42685985	Table 9 - List of Sites - 0 Hadlow and	<p>I am totally against Site ID 59811 and the proposal to build 2,300 homes. The infrastructure in the surrounding areas are not suitable for the influx of traffic. The thought of all the equipment to erect the homes would cause gridlock on the roads which are in some places only suitable for single file traffic.</p>	Comments relating to 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Comments for Hale Street sites 59855, 59650 and 59782.

1. Building on these sites goes against established anti coalescence policy, the hamlet of Hale Street must be kept separate from East Peckham.
2. These sites are in flood zones 2 and 3.
3. These sites are isolated from village services during times of flooding.
4. Surface water discharge into surrounding watercourses can cause flooding downstream.
5. High ground water levels mean the use of soakaways are likely to be unsuitable for this area.

Table 9 - List of Sites - Hadlow and

42696865

0 East Peckham

6. The roads are narrow in this area.
 7. These sites are Green Belt land.
- Additional comments for Hale Street sites 59855, 59650 and 59782

1. Sites 59855 and 59782 contain the CLH pipeline system.
2. There is no rail station nearby.
3. There is no parking at the nearest station.
4. There is no lighting or pavement on the road to the station.
5. The roads to the station flood.

Table 9 - List of Sites - Hadlow and

42696865

0 East Peckham

6. The village has no GP Surgery.
7. The village should be downgraded from a rural service centre to a rural settlement.

Re Site 59811

We have lived on Hamptons Road for 27 years and live on the crossroads with High House Lane and Oxenhoath Road and would like to make the following observations about the potential proposed residential site 59811

- lack of suitable infrastructure: no mains gas; no mains sewerage; no bus route ; no pavement to the village; several points along the road are single track and struggles with existing traffic flow let alone additional pedestrians and cyclists (the increased traffic along the road whilst the A 26 has been closed has caused chaos!); poor road conditions for much of the year with standing water from the run off from the fields which leads to slippery and often icy conditions; High House lane is a designated quiet road, extremely narrow and with several blind corners and prone to flooding and would become a short cut to the College and free school.

Table 9 - List of Sites - Hadlow and

42715745

0 East Peckham

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Comments relating to sites 59855, 59650 and 59782, including flood risk and access noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Comments relating to sites 59855, 59650 and 59782 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. These matters will be considered and reflected within the new infrastructure evidence being prepared to support plan preparation.

Comments relating to 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

NO DEVELOPMENT should occur in Hadlow as the A26 running through the centre of the village will become even more congested as traffic already has a negative effect both through pollution, noise and the detrimental effect on the listed buildings directly adjacent to the road, especially through the vibration of larger speeding lorries.

38332545	Table 9 - List of Sites - Hadlow and 0 East Peckham	During the three weekends where roadworks (we believe un-necessary due to cost), have caused the road to be closed, it is a perfect example of what the village could be like without through traffic! A by-pass is needed!!	Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.
38332545	Table 9 - List of Sites - Hadlow and 0 East Peckham	New development should only be made where there are good accessible rail links such as west Malling and The A26 running through the centre of Hadlow is temporarily closed to through traffic over three weekends. The quality of life is improved, a bypass would ensure this would remain. The village is unsuitable for further development as it is not near any rail stations. New developments should be near settlements such as Hildenborough and West Malling that have these rail links. Site ref 59811	Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. Transport modelling will be conducted to support the local plan.
42663073	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>our objections are as follows.</p> <p>This area along with many others suggested lack the following</p> <p>suffient water supply</p> <p>roads completely un suitable for more traffic</p> <p>lack of rural doctors surgeries and indeed “doctors”</p> <p>lack of schools and teachers</p> <p>lack of fire fighters</p> <p>refuse collection issues</p> <p>off grid area requiring houses to heat with oil or gas adding yet more global issues</p> <p>area of outstanding natural beauty</p> <p>prime agricultural ground where we should be growing crops to feed people not house them</p>	Comments relating to site 59811 and infrastructure concerns noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.

1. Building on these sites goes against established anti coalescence policy, the hamlet of Hale Street must be kept separate from East Peckham.
2. These sites are in flood zones 2 and 3.
3. These sites are isolated from village services during times of flooding.
4. Surface water discharge into surrounding water courses can cause flooding downstream.
5. High ground water levels mean the use of soakaways are likely to be unsuitable for this area.
6. The roads are narrow in this area.
7. These sites are green belt land
8. Sites 59855 and 59782 contain the CLH Pipeline System
9. There is no rail station nearby
10. There is no parking at the nearest station.
11. There is no lighting or pavement on the road to the station.

Comments relating to sites 59855, 59650 and 59782 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. These matters will be considered and reflected within the new flood risk and infrastructure evidence being prepared to support plan preparation.

42718465
 Table 9 - List of Sites - Hadlow and 0 East Peckham

12. The roads to the station flood.
13. East Peckham has no GP surgery.
 Wow, there's barely a corner of Hadlow that won't see infilling, and it will end up being a town bigger than Tonbridge, yet no railway station. There does seem to be plenty of choice for building plots here, but the developments will need a segregated cycle route to a mainline station (Like Paddock Wood or Tonbridge) and a reliable bus service along the A26 to serve Hadlow-Tonbridge-Maidstone.

38539137
 Table 9 - List of Sites - Hadlow and 0 East Peckham

How can you say that the parcel of land 7a5026 is ok to build on? All the homes will need to be built on stilts to avoid floods!

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

With reference to Site 59795 Residential:

* 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 an ever increasing range of unsuitable vehicles using the narrow lane with it's blind, sharp bends including: 4x4 cars, articulated lorries, huge car transporters, coaches, large vans and motorbikes all of which either race through the lane/struggling 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 exesparate 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 further 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

Table 9 - List of Sites - Hadlow and 0 East Peckham

42723233

Comments relating to 59795 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Site 59811 is a huge intrusion into the Green Belt and would destroy designated historic parkland, valuable agricultural land and biodiversity.

<https://mapsat.tmbc.gov.uk/maps/heritageassets/>

Oxon Hoath house, gardens and park are heritage sites listed Grade 11* (Historic England list entry numbers 1363044 and 1001355). The proposed site comes within 16 mtrs of the building and is adjacent to the east lawn and the north driveway and is 18mtrs from the unique parterre rose garden. The site can be seen from 3 aspects of the house – north, south and east. Therefore site 59811 would detract badly from the historic setting of Oxon Hoath.

The site would be highly detrimental to the quiet retreat business of Oxon Hoath, a significant local employer that brings some 2,500-3,000 visitors to the area every year and has done for 23 years.

Oxon Hoath is home to The Meditation Trust (Charity no. 1193276) who have been using the retreat exclusively for 22 years. They will not come during the proposed building works and if housing is established on the north and eastern boundaries then the cherished peace and quiet will be lost forever. Many of Oxon Hoath's customers will feel the same. They come for the peaceful environment, the rare quality of silence and the natural setting.

Site 59811 is not sustainable. There is totally inadequate infrastructure to support such a huge development or even one a quarter of the size. The area is surrounded by tiny lanes and narrow roads. The only local school is fully subscribed as is the doctor's surgery.

Table 9 - List of Sites - Hadlow and 0 East Peckham

42609569

The impact of an additional 3000 cars (1.33 per household) would be massive. Half of these cars would hit the already busy A26 every weekday causing further jams at Kings Hill, Hadlow and Tonbridge.

Comments relating to 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

CFS ref - 6c92b0Postcode - TN11 0JLSite ID - 59806Potential Yield - 3289

I strongly object to this potential development site. Whilst I understand the need for additional homes in Kent, this particular area is totally unsuitable for a development of this size.

This location is an extremely pretty rural area with farming being the predominant use of land. There is virtually no infrastructure to support a development of such vast magnitude and it would totally spoil the landscape without adding any benefit.

42730881	Table 9 - List of Sites - Hadlow and 0 East Peckham	This site should not be considered for future development.	Comments related to sites 59806 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
42740929	Table 9 - List of Sites - 0 Hadlow and	Hadlow has already had new housing this year and due to the infrastructure should not have any more designated sites. It would also add to the increasing problems with congestion on roads accessing the A26	Comment noted.
42529089	Table 9 - List of Sites - 0 Hadlow and	Site 59811 is difficult to comprehend as a serious proposal for development. Access by road is difficult; all infrastructure is inadequate and, if it isn't classed as an AONB it should be. The National Trust owns a small area overlooking the Bourne Valley. The view is spoken of as one of the best in Kent.	Comments relating to 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
42751073	Table 9 - List of Sites - 0 Hadlow and	Hadlow and East Peckham are at risk of surface water flooding. The hills surrounding the villages drain down causing flooding in the Villages and surrounding areas. Surface water can't escape to the Bourne/ Medway. Extra housing on any of the flood plains will and has already created serious flooding problems. The southern part of Site 59646 seems to cross the boundary into Capel Parish and thus Tonbridge Wells Borough. Please could you check your data and inform the Parish Manager and Clerk at Capel Parish Council clerk@capel-pc.org.uk of any developments under the site, the Tunbridge Wells section of which is designated under the emerging Capel Neighbourhood Plan.	Comments relating to flood risk in the area noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.
42758433	Table 9 - List of Sites - Hadlow and 0 East Peckham	The site is also adjacent to one of the Strategic Sites in the Tunbridge Wells Local Plan as well as adjoining land proposed for development by Maidstone BC. We are concerned about a potential concentration of development in this area which is prone to flooding and lacks the infrastructure to support it.	Comments relating to the southern part of site 59646 and the boundary noted. This will be checked.

owned by the Tregothnan Estate in the local plan for building up to 2,362 residential houses. Considering the magnitude of the proposal and its devastating impact on the surrounding area, I am shocked that no one in the locality has been informed about it.

The whole of the proposed site is an area of beautiful farming countryside well away from any other villages or towns. The land is used for food production, both pastoral, with cows and sheep, and arable, growing apples and raspberries. It provides employment in a rural area.

The site is surrounded on all sides by narrow country lanes, which are already quite dangerous. They are single track in a number of places so that frequently vehicles have to reverse several yards to enable an oncoming vehicle to pass. The lanes are in constant use by heavy farm vehicles and are wholly unsuitable to take any increased volume of traffic. They would become very dangerous indeed and the traffic would be likely to become gridlocked.

The surrounding infrastructure is totally inadequate. The nearest village is Hadlow where there is a very small doctor's surgery with no capacity to take on additional patients and one small primary school where there is no room to expand. The nearest secondary schools are over 6 miles away. There is no train station anywhere near and the bus service along the Hadlow Road is poor.

The site is an important area for wildlife with a great many trees and hedgerows. It is overlooked by Gover Hill, a woodland area of outstanding natural beauty which is owned by the National Trust.

It would be utterly appalling to develop this area of pristine farmland in any way at all and it is totally shocking that it could be considered as a suitable site for what would in effect be a new town with up to 2,362 houses on it.

I trust that the proposed site will be removed from the draft local plan.
A comment on site: 59646

I have been told that Tarmac are preparing plans for quarrying (as at 2022).

Capel are liaising with the Wildfowl and Wetlands Trust (WWT) to create a new, managed, wetlands and flood control in this area.

The agreed neighbourhood plan, used for Tunbridge Wells Borough Council planning permission for the adjoining area is here: <https://capel-pc.org.uk/neighbourhood-plan/>

The site adjoins Capel Parish which has a neighbourhood plan stipulation that planning permission granted for quarrying should make good the land afterwards in a manner suitable for Wetlands.

I would encourage Tonbridge and Malling to work closely with Capel Parish and consult their neighbourhood plan to coordinate planning permission caveats for imminent quarrying.

I am happy to be the contact point for Capel in this matter, please get in touch. -
geoff.j.turner@gmtsystems.com or 0777 577 7660.

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

Comments relating to site 59646 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. The council will continue to work with stakeholders through the duty to cooperate.

42662081

Table 9 - List
of Sites -
Hadlow and
0 East Peckham

42773697

Table 9 - List
of Sites -
Hadlow and
0 East Peckham

I am writing with respect to the site being considered for development in Ashes Lane at TN11 9QU CfS reference 30e57d. My comments on the site are as follows:

* It is debateable whether it is a greenfield or brownfield site. All there is currently no evidence above ground now, the site was historically used for industrial purposes ie. brick making or similar. trial pits in the site would most likely reveal evidence of building foundations and former industrial use of the site.

* The site is currently pasture with a significant number of mature oak trees.

* Access to the site is from Ashes Lane, a country lane with potential fast moving traffic.

* Services for residential use of the site are generally available along Ashes Lane.

* The site is generally set in agricultural rural land, but with neighbouring relatively small detached properties on the southern edge of Ashes Lane.

* In my opinion, given the above comments, this site is not suitable for 26 properties as indicated on the Local Plan. I consider that the site would be suitable for just a few residential properties, say 2 or 3 at maximum.

* I consider that it would be more appropriate to allow the current owner to develop the site to contain 2 or 3 sustainable detached properties.

Comments relating to site 59795 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

42780289

Table 9 - List of Sites - Hadlow and 0 East Peckham

I strongly object to the above site being included in the TMBC Local Plan for the reasons given below:

* This site sits within established Green Belt Land. Paragraph 140 of the NPPF states: "Once established Green belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified". It goes on to say that "the policy making authority should be able to demonstrate that it has examined fully all other reasonable options" these include: "suitable brownfield sites" and "other locations well served by public transport" etc. This site sits firmly in a rural area, on an isolated site away from any existing dwellings, surrounded by country lanes, no public transport and within the Green Belt.

* Furthermore, the Report on Urban Capacity Study undertaken by Urban Intelligence for TMBC in July 2022 has gone some way in identifying potential sites for TMBC to reach the housing requirement within the borough by 2040. This states that TMBC is 71% covered with Green Belt Land. This study has identified sites within the existing urban areas and rural service centres, most importantly looking at suitability, capacity and density optimisation in the most accessible locations. They have identified a number of potential sites. Page 3 states "No sites were identified in the rural service centres of Hildenborough and Hadlow". Page 29 Summarises findings for Hadlow – Point "7.1 - No sites identified by Hadlow". They did however find other potential sites in the borough. Therefore site 59811 has not been recommended in a hugely detailed study, undertaken by a company paid by TMBC, with the expertise required to advise them on urban capacity and viability analysis.

* The 5 purposes of Green Belt designation are:

* To restrict unrestricted urban sprawl,

* Prevent coalescence of neighbouring settlements,

* Safeguarding the countryside,

* Protect the setting and character of historic towns,

* Assist or encourage urban regeneration. As stated above by Urban Intelligence there are far more suitable sites within the TMBC local area requiring urban regeneration and which are far better served by public transport and access routes than site 59811.

Comments relating to site 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. This Green Belt matter will be considered and reflected within the new evidence being prepared to support plan preparation.

42786433

Table 9 - List of Sites - Hadlow and 0 East Peckham

Site 59811 - this large site is in a very rural, unspoilt area only accessible from small and very narrow lanes. Any development would require significant investment in proper roads which would not only spoil the rural area but also be extremely costly due to their size. There are no shops, schools, medical or other facilities within easy reach and the infrastructure required would be very significant. There is also a tenanted farm with a large herd of dairy cows which would become unviable if the surrounding land was developed.

Site 59595 - this site is only accessible from Matthews Lane, a very narrow and long lane which would require significant alteration if any large scale development was permitted. The same lack of appropriate infrastructure as for Site 59811 above also applies. The site is occupied by a tenant who has run a small business supplying hay and other small animal feed to pet shops for over 30 years. Development of this site as indicated would seriously threaten the livelihood of this tenant as well as ruining the rural piece and tranquility of the surrounding area of unspoilt countryside. The site is extremely boggy, prone to flooding and otherwise unsuitable for any large scale development.

The road system and infrastructure are already considerably overloaded and will not sustain any further development. The traffic lights in Wateringbury are already reputedly one of the most polluted interchanges in the area. No comment on this can be seen in the assessment for these sites. A significant increase in very large lorries has also been noted more recently, with vehicles often mounting the pavement due to their width. The Villages should retain their rural identity, and it would be illogical to allow development on what is incredibly fertile agricultural land, together with the immense amenity of the Green belt land. The nearby extensive development of Kings Hill should not be allowed to obliterate these thriving rural communities.

Sites 59747, 59846 and (particularly) 59806 would have a significantly detrimental impact on the green spaces between Mereworth, Hadlow and East Peckham, adding to site 59749.
Site ID 59811 / TN11 9SS / ef3bac – reasons why this site should not be included in the local development plan.

1. From what I can tell from the map in Appendix A, the entire 194.46 hectare site is situated within designated Green Belt.

2. With the exception of relatively easy access to the A26, the site is bordered by narrow lanes which are single track in many places – creating usable access and multiple entry points would involve destroying miles of hedgerows causing huge loss of habitat for local wildlife.

3. The site is not within easy walking distance of any existing facilities.

4. The site is in a beautiful, remote area, and is surrounded by equally beautiful, unspoilt countryside. To create even a small housing development here would have a large knock-on effect on the surrounding area, simply because it is such a peaceful and undeveloped place.

5. The site is currently farmed as arable and orchards, and grazing for a dairy herd. Development here would cause the loss of 194.46 hectares of valuable agricultural land.

6. Flood risk – the entire site is situated on a steep hill. Reduction of natural ground cover would inevitably cause flash flooding due to run-off, having a severe impact on land at the bottom of the hill.

7. Huge negative impact on natural environment and biodiversity.

8. If, as a planner, you are in any doubt I would urge you to visit this site and the area that surrounds it – I would hope that it speaks for itself as to why it should not be included within the local development plan.

Comments relating to site 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. This matter will be considered and reflected within the new transport modelling evidence being prepared to support plan preparation.

Comments noted. This matter will be considered and reflected within the new transport modelling evidence being prepared to support plan preparation.

Comments related to green spaces at sites 59747, 59846 and 59806 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Comments relating to site 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. The matter of flood risk is being considered through the Strategic Flood Risk Assessment being prepared to support plan preparation.

42792865

Table 9 - List of Sites - Hadlow and 0 East Peckham

42801185

Table 9 - List of Sites - Hadlow and 0 East Peckham

42666881

Table 9 - List of Sites - 0 Hadlow and

42591041

Table 9 - List of Sites - Hadlow and 0 East Peckham

I strongly object to the proposals to build thousands of houses in and around West Peckham. It would totally ruin the last vestiges of countryside in this part of Tonbridge and Malling. It would mean it was just another satellite urban area to Kings Hill. Again, I would question the need for so many houses. You have not adequately shown that there is even the need for thousands of houses in the district. Surely rather than greenbelt you should be building on brownfield sites that contain adequate infrastructure.

West Peckham and Watringbury do not have the infrastructure to cope and Watringbury is already suffering from dangerous pollution levels on the A26. The quality of life for residents would be drastically reduced if these sites were developed. With climate change such a high priority I don't understand why you are going to destroy valuable and fertile land and create more damage to the environment.

42723809
Table 9 - List of Sites - Hadlow and 0 East Peckham

This area has very fertile land which should be retained for agriculture and forestry, not developed for housing. We need to be improving our sustainability but these plans would do the opposite.

Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.

All the roads around Mereworth are under extreme pressure due to the existing large scale development at Kings Hill and are already inadequate for the volume of traffic using them to access the motorways ie. M20 and M26. The proposed development would add to highways pressure on the A26, B2016 and the A228 and to congestion on The Street in Mereworth which is a cut-through used to/from the B2016 and A228. There are longstanding issues with the Kent Street/A228 junction which would be exacerbated by development on this scale. The crossroads at Watringbury on the A26 is already under pressure with very poor air quality and few options to expand it. This development would exacerbate pressure on the crossroads at Watringbury. The site is in a rural area with only 2 cottages currently adjacent which were historically farmworkers cottages for Grove Farm, and a few historic buildings at Forge Farm which consist of two farmworkers' cottages, the old forge and an oast house. The development at Forge Farm is particularly characteristic of the farming heritage of this area and should be preserved within the landscape of open fields. The proposed development would turn this rural area into a housing estate almost as big as the whole of Mereworth village (c300 dwellings) and as such would in itself create a village-sized development. The development would mean the permanent loss to the community of high quality agricultural land.

There is the following infrastructure missing from this site: water supply, mains drainage, electricity, mains gas, broadband. The following amenities are missing from this site: school/preschool/secondary school, post office, shop, dentist, doctor, pub. The site is on a main A road which would afford poor cycling options for residents to access any services. Walking to the services is too far (nearest is Hadlow). Therefore the site would not encourage sustainable means of transport and would lead to huge additional numbers of vehicles on the road, both residents' vehicles and delivery vehicles to the properties. There is as a public footpath by-way from West Peckham to Forge Farm that is an historic track that should be preserved in its character, having high hedge to one side and bordered by very old trees, as well as a pretty stream running through the site that is forded by the by-way.

42443041
Table 9 - List of Sites - Hadlow and 0 East Peckham

Site 59806 – east of A26 near Killinggrove Cottages, 3289 homes All the roads near to Mereworth are under extreme pressure due to the existing large scale development at Kings Hill and are already inadequate for the volume of traffic using them to access the motorways ie. M20 and M26. The proposed development would add

Comments related to the role of agricultural land at sites 59806, 59801 and 59747 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Hadlow medical centre is full with no room for expansion and dentist not taking on NHS patients.
 Proposed developments in Tonbridge, Hadlow and in neighbouring wards will lead to higher traffic volume and increased air pollution, especially along the A26 in Hadlow. Active travel and much improved bus services would be essential to mitigate this to some degree.
 2/3 of sites are within flood zone 3.
 2/3 of sites on grade 1, 2 or 3 agricultural land.

Specific site comments:

59410 (<https://www.tmbc.gov.uk/downloads/file/2623/site-59410>) : Housing development of 25 homes already complete.

59601 (<https://www.tmbc.gov.uk/downloads/file/2695/site-59601>) : Originally safeguarded because of its amenity value for the setting of the village & the Grade 1* listed Hadlow Tower. Has a high water table & is in the flood plain of the river Bourne. The owner has enhanced its biodiversity by planting trees. He does not want to build on the land. Run off & increased risk of flooding of surface water, swelling the river level, which will affect properties further downstream at Little Mill and East Peckham.

59605 (<https://www.tmbc.gov.uk/downloads/file/2700/site-59605>) One part of a much bigger field lying along the A26 recently taken over by travellers. Entire field has been wild grazed by horses. Bordered on the west side by a series of ponds connected to streams & ponds to the north. Site helps to absorb flood water of run-offs from West Peckham parish. Any further development can only result in more flooding. No foot or cycle path to connect to Hadlow.

59635 (<https://www.tmbc.gov.uk/downloads/file/2725/site-59635>) A planning application is already under consideration & has been objected to, principally on the grounds of inadequate road access/congestion, inadequate health & schooling facilities & inappropriate design features.

59637 (<https://www.tmbc.gov.uk/downloads/file/2729/site-59637>) Previously used for fruit growing. Land I object to site 59806 (along A26 to East Peckham)

There is a real lack of infrastructure in this area to support the number of suggested houses and would need a significant amount of funds invested to provide schools, doctors, dentist. There are no bus stops, sewage, gas, street lighting, fast internet and the area floods every couple of years blocking the A26 for emergency vehicles, buses and general traffic at Grove Close. It is also an agricultural site that has public footpaths that run through it leading to heritage sites which would be significantly disrupted if a site of this site was filled with houses!

Comments relating to sites 59410, 59601, 59605, 59635, 59637, 59637, 59638, 59686, 59647, 59776, 59795, 59811, 59842, 59853, 59859 noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Comments related to sites 59806 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.

42772225
 Table 9 - List of Sites - Hadlow and 0 East Peckham

42824801
 Table 9 - List of Sites - Hadlow and 0 East Peckham

1.3 Site 59855 – Land East of Hale Street, East Peckham

Location and Surroundings

1.3.1 The site is located adjacent to Hale Street, north of East Peckham. Whilst the two settlements are identified separately in the existing and emerging Plan (the former being a rural settlement and the latter a Rural Service Centre), in functional terms the reality is that Hale Street benefits from its close proximity to East Peckham and the facilities and services it provides.

1.3.2 The site is currently agricultural land, bound to the south and west by existing residential development. The eastern boundary in part abuts the A228 with intervening woodland to the south east. The Hale Street roundabout junction with the A228 lies to the north, with a small intervening triangular parcel of land, separated from the subject site by a watercourse.

1.3.3 The site is flat and benefits from roadside frontage directly onto Hale Street.

Proposals

1.3.4 The proposals seek the allocation of the site for up to c. 21,000sqm of industrial development. It is envisaged that the site would be well suited to provide a mix of industrial uses comprising B8 warehouse and distribution, B2 general industrial and E(g) (iii) light industrial uses. A range of unit sizes including some larger units and a number of smaller units, suited to start-up businesses, are anticipated. There is also potential for a portion of the site to include live/work elements, although this potential would be confined to the parts of the site that lie within Flood Zone 1 only.

1.3.5 As the concept diagram below illustrates, access would be taken from Hale Street to the west, providing good connectivity to the A228 and wider strategic highway network beyond. Parking on site would be provided in line with the applicable parking standards. Additionally, the site is able to utilise local bus services and at the scale envisaged, could also potentially deliver additional bespoke shuttle services to Paddock Wood where there is an even greater range of services, and regular mainline train service.

43676929	43676897	Table 9 - List of Sites - Hadlow and East Peckham	[site location and plans]	Comments relating to 59855 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
42583393	0	Table 9 - List of Sites - Hadlow and East Peckham	[Local plan site 59811]	Comments relating to 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
42583393	0	Hadlow and East Peckham	Why has this site not been identified as Parkland on the key diagram Appendix A [59811]	
			Further to my previous email This is the link to Historic England’s list of the official entry showing that much of this proposed residential Local plan site 59811 lies on Grade 11* listed Heritage Category Park and Garden. Please remove this area from you maps and plan	
42583393	0	Table 9 - List of Sites - Hadlow and East Peckham	https://mapservices.historicengland.org.uk/printwebservicehle/StatutoryPrint.svc/1391/HLE_A4L_Grade HLE_A3L_Grade.pdf?_gl=1*16x7z56*_ga*MTlwODMzMDEwLjE2NjY4Nzg4Mzc.*_ga_023M0W1F6Y*MTY2Njg3ODgzNi4xLjEuMTY2Njg3ODk2NS42MC4wLjA.&_ga=2.204477840.1210318233.1666878839-120833011.1666878837	Comments relating to 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

[59811]

Half of the proposed site is Grade11* listed under the Historic Buildings and Ancient Monuments Act1953 within the Register of Historic Parks and Gardens by Historic England for its special historic interest.

Please have the site removed from the proposal.

[Contact details redacted]

42583393	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>https://mapservices.historicengland.org.uk/printwebservicehle/StatutoryPrint.svc/1391/HLE_A4L_Grade HLE_A3L_Grade.pdf?_gl=1*16x7z56*_ga*MTlwODMzMDEwLjE2NjY4Nzg4Mzc.*_ga_023M0W1F6Y*MTY2Njg3ODgzNjg3ODk2NS42MC4wLjA.&_ga=2.204477840.1210318233.1666878839-120833011.1666878837</p> <p>[59811]</p> <p>We give below our comments and objections to the proposed residential development of 2362 homes on site 59811, near Oxenhoath.</p> <p>The Local Plan The Local Plan states it will help protect special areas of conservation, ancient woodland, nature reserves and areas of outstanding natural beauty and will contribute to a network of green infrastructure that supports a diverse range of habitats and species. The Environment Act sets out the specific requirement to provide 10% net gain in biodiversity for all new developments. The plan also states it will play a key role in responding to climate change by addressing issues like flood risk, energy efficiency and carbon emissions. The proposed development site runs counter to all these aims and involves the destruction of a large swathe of precious protected countryside and important farmland, in what really is an area of outstanding natural beauty. It also runs against the central aim of the Green Belt to prevent urban sprawl.</p> <p>As for being an accessible location where there are options for safe walking and cycling to local services, there are no near-by local services and we know from bitter experience that the already high volume of traffic on the narrow lanes makes walking and cycling extremely dangerous.</p> <p>With regard to community facilities and infrastructure, it is stated that ensuring the necessary community facilities and infrastructure are in place is essential. However, there are no facilities in relation to education, health and transport within easy reach of the proposed site. Moreover, the education and health facilities that do exist in the wider area lack the capacity to cope with any increase in demand. There is no bus service in the immediate area, the nearest bus services being Borough Green, Hadlow and Plaxtol, with the latter service under threat of being axed in the near future, potentially causing huge problems for children getting to and from school.</p>	<p>Comments relating to 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p> <p>Comments relating to 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
44049057	Table 9 - List of Sites - Hadlow and 0 East Peckham		

change. If the site is to be allocated, residential development should be restricted to the area of the site currently shown to be within FZ2.

Site 59859: Flood Risk Comments: The entire site is within Flood Zone 3 and may also be Fz3B/functional floodplain. We would object to any form of built development at this location.

Site 59806: Flood Risk Comments: The site is bisected by a watercourse and area of FZ3. Development should be restricted areas of FZ1

Site 59613: Flood Risk Comments: The site is FZ2 and risk is likely to increase with climate change. If the site is allocated, mitigation will be required.

Site 59837: Flood Risk Comments: The site is FZ2 and risk is likely to increase with climate change. If the site is allocated, mitigation will be required.

Site 59876: Flood Risk Comments: 20% in FZ3 and 80% in FZ2. Risk will increase with climate change. More vulnerable forms of development should be restricted to FZ2 with appropriate mitigation to accommodate potential increased flood risk. Area of FZ3 should be restricted top open space.

Site 59616: Flood Risk Comments: The site is within FZ3B. We would object to any form of built development at this location.

Site 59782: Flood Risk Comments: A small section is within FZ3. Built development should be restricted to the area of FZ1.

Site 59650: Flood Risk Comments: 50% is within FZ3. Built development should be restricted to the area of FZ1 as we would object to development within the area of FZ3.

Specific comments relating to flood risk at the sites within the Hadlow and East Peckham ward noted including the objections. The site specific flooding matters raised will be taken into consideration. All the sites have been screened to assess all forms of flooding including the impact of climate change which will be taken into account in the site analysis and site selection processes using the sequential and exceptions test in accordance with the NPPF.

Table 9 - List
of Sites -
Hadlow and
0 East Peckham

25333345

Hadlow

Largest sites 59806 and 59646 . Both are flood zone 3 but 59806 is in Greenbelt and bordered by 2 main roads not great for air quality and would be out of both villages . Poor location.

59646 is in such a poor position and the site would be underwater very easily. Very poor location. Daft 59635 59853 and 59857 all down court lane Hadlow. This is old college land I believe and you could build some nice bungalows for the older generation . This would be ideal for this kind of accommodation as car usage would be reduced/limited. The access at the A26 / Court lane junction is tight . Travel is by bus or car from this village and the A26 road through Hadlow is a real problem . Air quality must be poor if anyone bothered to measure it

59601 and 59859 are zone 3 and would be underwater if not in the river so forget those.

59776 is agricultural land flood zone 3 and a greenfield site. Houses already built along this road and now occupied cannot register at the surgery as it is full. The access to the A26 from carpenters Lane is really dangerous and to have more houses trying to drive o to the A26 is madness. The junction just cannot cope . 59410 is also along Carpenters Lane and should not be built on gor the same reason. It is packed along that area.

Sites 59637 , 59638 , 59686 and 59842 are all Flood Zone2/ 3 . Building a large number of homes on these sites which are agricultural land and a sink for all the water around the existing houses would be wrong. The soil is different to the other side of the A26 and I think you would need to pile and build houses again from the first floor which would overwhelm the look of the village. Not great sites.

59605 and 59795 are both small sites on which you could build a few houses on 59795- one on 59605- which is on the outer boundary of the village.

59846 is the ex college fishery area and is all zone 3 and out of the village only road access, Would not be a good spot and just add to road traffic and houses liable to flood, Not the best of sites.

Hadlow has limited opportunity for growth. Suffers from the A26 running through it which causes much congestion and probably poor air quality as a result. (Monitor). Access from the roads onto the A26 in the village is tight and Hadlow has flooded very badly in the past- hence not a good area to expand. Limited access East Peckham When I first moved to this area 30 years ago one of my abiding memories is a badly flooded East Peckham. So why I ask myself would anyone want to build on59846,59525,59613,59876,59616 59742 and 59753. All Flood zone 3 and a crazy choice . Why would young families buy when they could encounter large insurance premiums and struggle to sell? The safest areas have already been built on so apart from a few infills like the example below- built somewhere else.

59639 is Flood zone 1 so that seems ok to build on.- small infill

42684641

Table 9 - List of Sites - Hadlow and 0 East Peckham

42684641

Table 9 - List of Sites - Hadlow and 0 East Peckham

Comments relating to sites 59806, 59646, 59601, 59859, 59410, 59605, 59795, 59637 , 59638 , 59686, 59842, 59846 and 59646 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

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

This Regulation 18 Representation Statement has been prepared by Knight Frank on behalf of the Corporation of Hadlow College and the Corporation of West Kent and Ashford College – both in liquidation (referred to hereafter as ‘the client’ / ‘the Colleges’ / ‘landowners’) who are the existing landowners of Court Lane Nurseries, Court Lane, Hadlow, TN11 0RF (‘the site’ / ‘Court Lane Nurseries’). 1.2 A site location plan is provided at Appendix 1. 1.3 This Statement is submitted to the Regulation 18 Local Plan (‘new Local Plan’) public consultation currently being undertaken until 3rd November 2022 by Tonbridge and Malling Borough Council (‘the Council’ / ‘the Borough’ / ‘TMBC’). Landowner Details 1.4 Hadlow College and the Corporation of West Kent and Ashford College (‘the Colleges’) are the landowners of the site and have previously used the site for educational purposes. A full breakdown of existing uses is provided in Section 2. 1.5 The landowners also own a number of other sites in the Borough, including Hadlow College Practice Area located to the north of continuing Hadlow College (now owned and operated by North Kent College). 1.6 On 22nd May 2019 and 16th August 2019, the Colleges were placed into Education Administration. The Education Administrators initially continued to operate the Colleges, with financial support from the Department for Education (‘DfE’) to achieve their statutory purpose of avoiding or minimising disruption to the existing students. 1.7 In order to achieve the statutory purpose, the on-going education provision operated by the Colleges was transferred, via three transactions (the ‘Merger Transactions’), to each of Capel Manor College, East Kent College and North Kent College (‘NKC’). NKC took on the on-going education provision operated from both the Hadlow and Tonbridge campuses. The final transaction completed in August 2020. 1.8 Since this date, NKC has occupied Court Lane Nurseries, in Hadlow, under the terms of short-term peppercorn leases, whilst they transitioned the remaining education provision to the Hadlow main campus site. These leases expired on 30th September 2022 and NKC vacated the site. NKC have confirmed that they no longer require use of the property for educational purposes. 1.9 During the Education Administration process, it was established that consolidating the Court Lane

Comments relating to 59853 and 59857 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. Comments noting a need to meet needs in full and the role of Hadlow in the settlement hierarchy noted. The role of the Green Belt will be considered and reflected within the new evidence being prepared to support plan preparation. Support for option 3 which focusses on greenfield and brownfield land also noted. Support for a quantum approach of the need and up to 20% buffer also noted. The council engages with its neighbouring authorities through the duty to cooperate and the approach of the National Planning Policy Framework and associated planning practice guidance. The SA report will be used as evidence to support the local plan. Community facilities and infrastructure, Green Belt and Housing should be the three priority strategic matters for the new Local Plan also noted. Comments warning against over-reliance on strategic sites noted, including the role of small and medium sites, and a mix of dwelling types. The matters of infrastructure demand and transport issues will also be considered within new evidence being prepared to support plan preparation. Comments relating to seeking 10% biodiversity net gain also noted. The next stage in plan preparation will be a second Regulation 18 document but the Regulation 19 Local Plan will be supported by a housing trajectory.

Table 9 - List of Sites - Hadlow and

44336545 42807969 East Peckham

It provides a description of the site and the surrounding area, summarises relevant planning designations, provides an overview of planning history and outlines the proposals for future development. Site Description

The Site 2.2 The site address is Court Lane Nurseries, Court Lane, Hadlow, TN11 0RF. It is located on the eastern edge of Hadlow (a Rural Service Centre), to the northeast of Tonbridge town, the main urban centre within the Borough. 2.3 The site is c.6.5 hectares in size (16.1 acres). The eastern section of the site (c. 3.7 hectares / 9.11 acres) is owned by The Corporation of West Kent and Ashford College – in liquidation - with the western section of the site (c.2.8 hectares / 7.02 acres) owned by the Corporation of Hadlow College – also in liquidation. 2.4 A site location plan is shown in Figure 2.1 below. Figure 2.1 – Site Location Plan 2.5 The site currently comprises a range of uses including horticultural glasshouses and associated agricultural structures / areas of hardstanding; a children’s nursery; a number of building and structures previously used in the provision of education; and a number of structures used for commercial uses. As such, elements of the site are considered to be “previously developed land”. 2.6 To the north of the site is Court Lane, to the east of the site is Victoria Road, to the south of the site is fields / orchard and the west of the site adjoins the settlement boundary of Hadlow (a Rural Service Centre / Tier 2 settlement within TMBC). 2.7 Also, adjoining the site to the west and southwest is a live outline planning application for 57 dwellings, including affordable housing, new children’s day nursery and pre-school alongside landscaping, access and public open space (LPA Reference: 22/01474/FL). This site previously formed a draft allocation in the emerging Local Plan (allocation LP25(s)) for 66 dwellings, although this Plan was withdrawn in July 2021. This is discussed further below Access to the site is via Court Lane to the north which provides both vehicular and pedestrian access. 2.9 The topography of the site is flat, shown by the existing built form which has previously been built on site (although now mostly vacant, as we discuss below).

Surroundings largest settlement in the Borough and offers a substantial amount of services and facilities including a train station. This provides frequent South Eastern services towards London Charing Cross or London Bridge via Ashford International in c.30 minutes. Tonbridge also offers an array of employment opportunities. 2.14 The A26 also dissects through Hadlow providing connections to the M20 and M26 to the north.

Table 9 - List of Sites - Hadlow and East Peckham

44336545

42807969

Comments relating to sites 59853 and 59857 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Introduction

4.1 There is a strong case on both a strategic and site-specific level for allocating the site at Court Lane Nurseries, Hadlow.

4.2 Taking the previous section into consideration, we have sought to demonstrate the quantum of development the site could feasibly take; justify the reasons why an allocation at the site is appropriate; and how it could assist in helping to make the new Local Plan sound.

Deliverability Assessment

4.3 The site represents a clear deliverable and developable residential development opportunity and we consider it should be released from the Green Belt and allocated as part of the new Local Plan.

4.4 The NPPF requires new Local Plans to provide a five-year supply of deliverable land for housing.

'Deliverable' and

'developable' are defined within the NPPF as follows:

- "Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
- Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."

4.5 The site is available; offers a suitable location for development; and can deliver approx. 120-160 dwellings in the

Table 9 - List of Sites - Hadlow and

first five years of the Plan period.
4.6 In identifying land for new homes, Para. 67 of the NPPF requires planning policies to "identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability". Part (a) of Para.

44336545

42807969 East Peckham

Comments relating to sites 59853 and 59857 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

by On Architecture, for Hadlow College Court Lane Nurseries (Site 1) and Hadlow College Practice Area and Allotments, Land to the East of the River Bourne (Site 2) within Hadlow, Tonbridge. Site 1 Site 1 is approximately 6.5 hectares (16.1 acres) in size. The site is bounded by Court Lane to the north; Victoria Road to the east; undeveloped agricultural land to south; and by the settlement edge of Hadlow to the west. The site predominantly comprises horticultural glasshouses and associated agricultural structures with areas of hardstanding. An existing pedestrian and vehicular access to the site is along Court Lane, to the north. The existing surrounding context consists of agricultural land to the south, commercial buildings, to the north and east, while the surrounding area, to the west, is Hadlow, which is predominantly residential. Site 2 Site 2 is approximately 3 hectares (7.59 acres) in size. The site is bounded by undeveloped land, to the north and south; by the settlement edge of Hadlow, to the east; and by Hadlow College (a further and higher education college specialising in land-based courses and qualifications), to the west. The site features existing mature trees and planting along the western and southern boundaries. The site is bisected north-south by the River Bourne and is therefore located entirely within Flood Zone 3. Hadlow is predominantly residential and features a range of local amenities, including schools, community facilities, public houses and convenience stores. Both of the sites have access to public transport, with the closest bus stops located along Tonbridge Road. Services running from these stops provide direct connectivity to Maidstone, Tonbridge, Tunbridge Wells, and West Malling. The distance from Site 1 to these bus stops is 0.6 kilometres, which is approximately a 9 minute walk, while the distance from Site 2 to these bus stops is 0.5 kilometres, which is approximately a 6 minute walk. Site 1 There is existing access along Court Lane into the site, which can be utilised for the proposed development. A spine road through the site will provide access to minor roads and private drives within the development. Also, it would link to a possible secondary access along Victoria Road. The site is well linked along Court Lane, which leads into the centre of Hadlow, with access to local amenities and bus stops along Tonbridge Road. Site 2 The access into the site is through the grounds of Hadlow College via a small bridge over the River Bourne. The access through the college buildings and car park leads onto Bourne Grange Lane, which connects to Tonbridge Road. The use of the two sites has been carefully considered within this proposal, in

Table 9 - List of Sites - Hadlow and East Peckham

44336545

42807969

Comments relating to sites 59853 and 59857 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

[SITE: 59525 - WESTWOOD]

[submission under SA response but logged as Appendix B as does not include reference to SA objectives]]

East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt.

This is not a suitable site for development because:

The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm.

Objective 1 states a positive to human health and well-being. There would be no positive impact to human health and wellbeing by developing this land. It is a much used and treasured community green. To develop this site would deny an entire community the health and wellbeing the green has offered and enabled for decades.

Westwood Green (site 59525) meets NPPF criteria to be designated a green space and East Peckham Parish Council applies to TMBC to have site 59525 designated as a local green space to be preserved.

It is an important green to the immediate community. Singing groups, keep fit workout sessions, Salvation Army events and community social events are a regular. As is meeting and relaxing on the benches. The surrounding community, especially those in the flats and of ill health, are reliant on this green to provide an outside area of nature, peace, recreation and relaxation. Children from the local community are always playing on Westwood Green, and goal posts have been a regular sight over the years. The trees house much wildlife and the green is regularly visited by foxes. The Green

Table 9 - List
of Sites -
Hadlow and
0 East Peckham

38330913

Comments relating to green space at site 59525 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

SA but entered under Appx B] East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence

planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt.

This is not a suitable site for development because: Objective 9 states the site is brownfield. The Site is green belt, not brownfield. The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm.

Objective 2 states fair accessibility. This is incorrect, accessibility is poor. The only access roads are narrow and regularly flood from the Bourne and Medway Rivers, and flash flooding occurs from run off from hills to the north and east of the Site.

Other end of Snoll Hatch area.

Snoll Hatch Rd, junction with the Pound. Tonbridge Rd route to Snoll Hatch Addlested Rd by Snoll Hatch

Snoll Hatch Hatches Lane

All the above roads are the only access to the area that contains site 59613. All are unsuitable for extra traffic, and all will leave the site isolated and inaccessible during the regular flooding. Flooding occurs on this site from both the River Bourne and River Medway, and also from run off from surrounding higher land. The Leigh Barrier does not protect this area nor will any works to raise the height of the barrier. The majority of flooding of this area is travelling downhill on its way to the Medway. Much does not reach the Medway and therefore sits in Snoll Hatch for days. The site falls within flood zones 2 and 3. Policy CPI0 states within the floodplain, development should first seek to make use of areas of no or low risk to flooding before areas of higher risk. Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Ground water tables are very high in this

Comments relating to the form and accessibility of site 59613 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. These matters will be considered and reflected within the new transport modelling, infrastructure and flood risk evidence being prepared to support plan preparation.

Table 9 - List
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Hadlow and
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rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt. This is not a suitable site for development because: The site falls within flood zone 3. Policy CP10 states within the floodplain development should first seek to make use of areas of no or low risk to flooding before areas of higher risk.

Any discharge of surface water from this site into surrounding watercourses will create extra flooding of properties downstream. A main river, the Medway, runs through this site and regularly floods the site together with surrounding footpaths, roads, properties, Medway Meadows, Branbridges and Yalding. Medway Meadows and Riverside Mews are especially at risk. During flooding, Pinkham Lane, Old Rd and Medway Meadows become part of the river. This flood water exits Medway Meadows area directly opposite site 59616. Any construction on this site will potentially block the exit of flood water, and in doing so displace water to worsen flooding in the aforementioned areas.

Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The proximity of Medway Meadows and Riverside Mews must also be considered in regard to light and noise pollution. Current employment units on the Branbridges estate are blocked by trees, however, site 59616 is in full view of residential properties and their rear gardens. The kind of lighting normally associated with employment units would be unsuitable for the location. The properties in Riverside Mews are directly on the opposite bank of the Medway and mere yards from the site 59616. In July 2022 a stable block at Riverside Mews was refused planning permission by TMBC due to location, flood risk, displacement of flood water and green belt policy. This same policy must therefore apply to site 59616. [copy of planning decision and photos provided]

Table 9 - List of Sites - Hadlow and 0 East Peckham

Site 59616 is green belt and also consists of grade 1 and 2 agricultural land. The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public

Comments relating to flood risk at site 59616 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. These matters will be considered and reflected within the new Green belt and flood risk evidence being prepared to support plan preparation.

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East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt. This is not a suitable site for development because: Site 59639 is green belt and also consists of grade 1 and 2 agricultural land. The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open'

can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm. The Local Development Framework (para 6.3.35) states the Hamlets of East Peckham must be kept separate and not filled in by housing. Developing site 59639 will contribute to adjoining Peckham Bush to East Peckham and therefore be in opposition to current anti-coalescence policy. Roads that access site 59639 are unlit, very narrow and have no pavements. To the north is Stanford Lane and Bullen Lane, both of which can flood. Bush Rd, from which the site is accessed, is also narrow and floods during heavy rainfall. To the South is Church Lane that regularly floods and is impassable during periods of heavy rain. Vehicle wedged in Stanford Lane.

Ground water tables are high in this area. A recent application for a major development on the nearby Church Lane (ref 21/03353/FL highlighted the unsuitability of SuDS as there is not enough clearance between maximum groundwater levels and the underside of soak ways. Site 59639 may need considerable ground build up (500mm) to achieve the minimum clearances as stated in the SuDS Manual. This will have the knock-on effect of displacing surface and flood water into existing properties.

An animal sanctuary is within 100 metres of site 59639 and development would harm the nature and environment in which these animals reside. Site 59639 has an ancient pilgrimage trail running directly adjacent

Table 9 - List of Sites - Hadlow and 0 East Peckham
to it and is close by to many heritage assets. There is a proposed new town on the A26, sites 59806 and 59811, should these sites be developed the Bush Rd area will become at risk of serious flooding by the proposed new town directly uphill from site 59639.

Comments related to site 59639 noted. Comments relating to the cumulative impact of sites 59806 and 59811 and the flooding impacts also noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

38330913

[SITE: I 59640 (BUSH ROAD)]

East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt. It is an area renowned for its flooding, fertile ground, oasts and history in hop picking.

This is not a suitable site for development because:

Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

Site 59640 is green belt and also consists of grade 1 and 2 agricultural land. The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the

absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm.

The Local Development Framework (para 6.3.35) states the Hamlets of East Peckham must be kept separate and not filled in by housing. Developing site 59640 will contribute to adjoining Peckham Bush to East Peckham and therefore be in opposition to current anti-coalescence policy.

Roads that access site 59640 are unlit, very narrow and have no pavements. To the north is Stanford Lane and Bullen Lane, both of which can flood. Bush Rd, from which the site is accessed, is also narrow and floods during heavy rainfall. To the South is Church Lane that regularly floods and is impassable during periods of heavy rain.

Table 9 - List of Sites - Hadlow and 0 East Peckham
Vehicle wedged in Stanford Lane
Ground water tables are high in this area. A recent application for a major development on the nearby Church Lane (ref 21/03353/FL highlighted the unsuitability of SuDS as there is not enough clearance between maximum groundwater levels and the underside of soak ways. Site 59640 may

Comments related to site 59640 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

38330913

[SITE: 59646 Hop Farm Land]

East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt.

This is not a suitable site for development because:

Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Site 59646 sits within flood zone 3.

The proposed site of 59646 acts as a flood plain that helps protect the village of East Peckham. The Medway River is along its entire northern border and development upon it could cause serious flooding consequences for the village by displacing flood water back into the village.

Below are some areas of the village that flood directly from the Medway as it travels through site 59646:

During times of flooding site 59646 is completely cut off from the amenities and services in the village.

Site 59646 is green belt. The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm.

The 6000-8000 homes being built in the Capel and Paddock Wood developments are within 3 miles of East Peckham. This will cause flooding and traffic issues within East Peckham as well as place huge strain on infrastructure. This housing will meet need in the East Peckham area, and to build more

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Site comments (59646) noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

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Peckham is a rural community that consists of nine Hamlets. Established anti coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, and flooding of roads and residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt.

This is not a suitable site for development because: Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

Site 5950 is located next to a busy two lane roundabout at the northern extremity of Hale St. Site 59650 is within an area of high and medium flood risk Policy CPI0 states within the floodplain development should first seek to make use of areas of no or low risk to flooding before areas of higher risk. Site 59650 is green belt and also consists of grade 1 and 2 agricultural land. The Revised NPPF (2021) indicates at paragraph 137 that openess as an essential characteristic of the Green Belt. The openess of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openess can be harmed even when development is not readily visible from the public realm. Ground water tables are high in this area. A recent development application (ref 21/03353/FL) highlighted the unsuitability of SuDS as there is not enough clearance between maximum groundwater levels and the underside of soak ways. Site 59650 may need ground build up to achieve the minimum clearances as stated in the SuDS Manual. Any discharge of surface water from this site into nearby watercourses could create extra flooding downstream. The Coult Stream and Boroughs Oaks Stream regularly flood Hale St, Smithers Lane and further into the Clubbs Quarry. Smithers Lane The Coult blocking access to quarry and Medway View

Quarry and public footpath Hale St and Smithers Lane As can be evidenced by photos above, during times of flooding there is no access to the site except from the north. This leaves the village and its resources inaccessible from the site. Site 59650 is not protected by Leigh flood barrier. Site 59650 is located within 100 metres of numerous heritage assets.

Comments relating to sites 59650 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan. This matter will be considered and reflected within the new flood risk and Green Belt evidence being prepared to support plan preparation.

Table 9 - List of Sites - Hadlow and 0 East Peckham

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rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt.

This is not a suitable site for development because: The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm.

- 1) Greenbelt
- 2) Flooding Risk
- 3) Highways Safety, Road Access, Traffic Generation
- 4) Site Location/Site Accessibility
- 5) Ecological Survey/Wildlife

These are considered in detail below.

- 1) Greenbelt
 - a. This site is in the greenbelt and is Flood zone 2 and 3 land. It should only be used if more suitable land is not available, in accordance with the 'sequential' or 'exceptions' test. There is much non-flood zone land elsewhere within the Borough.
 - b. Anti-coalescence policy should remain in place as per the Local Development Framework (para 6.3.35) which states current policy demands that East Peckham, Snoll Hatch Road and Hale Street must be kept separate and not filled in by housing. This clearly supports the proposition that East Peckham is comprised of a number of smaller hamlets and should not be subject to infilling.
- 2) Flooding Risk

Table 9 - List of Sites - Hadlow and 0 East Peckham

Comments relating to sites 59682 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. This matter will be considered and reflected within the new flood risk, infrastructure and Green Belt evidence being prepared to support plan preparation.

38330913

[SITE: 59742 (BEHIND BROOKSIDE)]

East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt. This is not a suitable site for development because: The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm.

Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Site 59742 sits within flood zone 2 and 3. During times of flooding, site 59742 is can be cut off from the amenities and services in the village. Below are photos of some roads into the village centre: Hale St (north) at Smithers Lane junction Hale St south Village centre

Old Rd

The nearest train station is 2.4km from the site, and is not a commuter station. The roads to it are narrow, without lighting or pavement and regularly flood making it impassable to pedestrian and vehicle. There is no parking at the station. No booking office. No telephone. No toilets. No wheelchair availability. No step free access. No accessible taxis. No impaired mobility set down. No staff. Beltring Rd (road to station) Beltring Rd (road to station) The 6000-8000 homes being built in the Capel and Paddock Wood developments are within 3 miles of East Peckham. This will cause flooding and traffic issues within East Peckham as well as place huge strain on infrastructure. This housing will meet need in the East Peckham area, and to build more locally will completely overwhelm the area in every way imaginable. Flooding, traffic and housing need calculations from the Capel and Paddock Wood developments to be taken into account whilst considering site 59742.

Table 9 - List of Sites - Hadlow and 0 East Peckham

Comments related to flooding, infrastructure and access issues at site 59742 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

38330913

East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt.

This is not a suitable site for development because:

The sheer size and extent of site 59747 deeply concerns East Peckham Parish Council. The site sits upon the catchment area of two watercourses that regularly flood within parts OF East Peckham and its development can only increase that flood risk.

The Three A26 sites (59747, 59806 and 59846) would create a new settlement of over 3000 homes, without an existing identity. The parish of East Peckham consists of 1300 homes spread over nine hamlets each with its own character and identity. Established ani-coalescence policy dictates those

hamlets must stay separate. To create a new settlement of that size, within a small, historic parish would dwarf the existing village and destroy its character. Unlike the creation of Kings Hill, which was originally built on brownfield sites, the creation of a new settlement within the parish of East Peckham would destroy hundreds of acres of grade 1 and 2 agricultural land, as well as green belt. Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

Below are photos caused by flooding from the location of site 59747 and of nearby lanes to the south of the site:

Site 59747 contains areas which are within flood zone 3. Policy CPIO states within the floodplain, development should first seek to make use of areas of no or low risk to flooding before areas of higher risk.

Site 59747 is green belt. The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that

Table 9 - List
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Comments related to site 59747 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

[SITE: I 59753 (BUSH ROAD)]

East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt and is an area renowned for its flooding, fertile ground, oasts and history in hop picking.

This is not a suitable site for development because:

Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

Site 59753 is green belt and also consists of grade 1 and 2 agricultural land. The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the

absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm.

The Local Development Framework (para 6.3.35) states the Hamlets of East Peckham must be kept separate and not filled in by housing. Developing site 59753 will contribute to adjoining Peckham Bush to East Peckham and therefore be in opposition to current anti-coalescence policy.

Roads that access site 59753 are unlit, very narrow and have no pavements. To the north is Stanford Lane and Bullen Lane, both of which can flood. Bush Rd, from which the site is accessed, is also narrow and floods during heavy rainfall. To the South is Church Lane that regularly floods and is impassable during periods of heavy rain.

Vehicle wedged in Stanford Lane

Ground water tables are high in this area. A recent application for a major development on the nearby Church Lane (ref 21/03353/FL highlighted the unsuitability of SuDS as there is not enough

Table 9 - List
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Hadlow and
0 East Peckham

Comments related to site 59753 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

38330913

[SITE: I 59753 (BUSH ROAD)]

East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt and is an area renowned for its flooding, fertile ground, oasts and history in hop picking.

This is not a suitable site for development because:

Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

Site 59753 is green belt and also consists of grade 1 and 2 agricultural land. The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the

absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm.

The Local Development Framework (para 6.3.35) states the Hamlets of East Peckham must be kept separate and not filled in by housing. Developing site 59753 will contribute to adjoining Peckham Bush to East Peckham and therefore be in opposition to current anti-coalescence policy.

Roads that access site 59753 are unlit, very narrow and have no pavements. To the north is Stanford Lane and Bullen Lane, both of which can flood. Bush Rd, from which the site is accessed, is also narrow and floods during heavy rainfall. To the South is Church Lane that regularly floods and is impassable during periods of heavy rain.

Vehicle wedged in Stanford Lane

Ground water tables are high in this area. A recent application for a major development on the nearby Church Lane (ref 21/03353/FL highlighted the unsuitability of SuDS as there is not enough

Table 9 - List
of Sites -
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Comments related to site 59753 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

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[SITE: 59789 CHURCH LANE ROBINS FIELD]

East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt.

This is not a suitable site for development because:

The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm.

Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The site falls within

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INTERIM SUSTAINABILITY APPRAISAL CONSULTATION: 59789 Church Lane Robins Field

flood zones 2 and 3. Policy CPIO states within the floodplain, development should first seek to make use of areas of no or low risk to flooding before areas of higher risk.

Ground water tables are very high in this area. A recent development application (ref 21/03353/FL) on land adjacent to site 59789 highlighted the unsuitability of SuDS as there is not enough clearance between maximum groundwater levels and the underside of soakaways. Site 59789 will likely need considerable ground build up (500mm) to achieve the minimum clearances as stated in the SuDS Manual. This will have the knock on effect of displacing surface and flood water into existing properties adjacent to site 59789

Table 9 - List of Sites - Hadlow and 0 East Peckham
Any discharge of surface water from this site into surrounding watercourses will create extra flooding of properties downstream. A main river, the Coult Stream, runs through this site and regularly floods footpaths, properties, Hale St, Smithers Lane and further into the Clubbs Quarry. Smithers Lane

Comments related to flooding and surface water issues at site 59789 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

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East Peckham is a rural community that consists of nine hamlets which established anti-coalescence policy dictates must remain separate from each other. East Peckham has the three main rivers of the Borough running through it all of which regularly flood the village.

Site 59806 is a proposed vast development approximately one mile north of East Peckham.

This is not a suitable site for development BECAUSE:

The sheer size and extent of site 59806 deeply concerns East Peckham Parish Council. It overwhelms important heritage assets in the north and reaches down to the tiny Hamlet of Peckham Bush in the south. The sits upon the catchment area of two watercourses that regularly flood East Peckham and its development can only increase that flood risk.

The Three A26 sites (59747, 59806 and 59846) would create a new settlement of over 3000 homes, without an existing identity. The parish of East Peckham consists of 1300 homes spread over nine hamlets each with its own character and identity. Established anti-coalescence policy dictates those hamlets must stay separate. To create a new settlement of that size, within a small, historic parish would dwarf the existing village and destroy its character. Unlike the creation of Kings Hill, which was originally built on brownfield sites, the creation of a new settlement within the parish of East Peckham would destroy hundreds of acres of grade 1 and 2 agricultural land, as well as green belt. The greatest concern over site 59806 is flooding. The Coult Stream and Boroughs Oak Stream run through site 59806. Both these water courses regularly flood roads and properties in East Peckham, which lies directly downstream. To develop site 59806 will place East Peckham under significantly increased flood risk.

Paragraph 155 of the NPPF sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.

Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

Photos of flooding from the location of site 59806 and of nearby lanes to the south if the site: Site 59806 is green belt and also consists of grade 1 and 2 agricultural land.

Comments related to site 59806 noted. Comments relating to cumulative impacts of this site and 59747 and 59846 also noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.

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East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved.

The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt. This is not a suitable site for development because: The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm.

Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Ground water tables are very high in this area. A recent development application (ref 21/03353/FL) within 100 metres of site 59813 highlighted the unsuitability of SuDS as there is not enough clearance between maximum groundwater levels and the underside of soakaways. Site 59813 will likely need considerable ground build up (500mm) to achieve the minimum clearances as stated in the SuDS Manual. This will have the knock on effect of displacing surface and flood water into existing properties adjacent to site 59813.

Any discharge of surface water from this site into surrounding watercourses will create extra flooding downstream. The Coult Stream regularly floods Hale St, Smithers Lane and further into the Clubbs Quarry. The Coult blocking access to quarry and Medway View Quarry and public footpath Hale St and Smithers Lane As can be evidenced by photos above, during times of flooding there is no access to the site except from narrow lanes to the west. This leaves much of the village and its resources inaccessible from the site.

Table 9 - List of Sites - Hadlow and East Peckham

Wedged vehicle in the narrow Stanford Lane, westerly access to site 59813 Church Lane, upon which site 59813 is accessed, also regularly floods, according to reports within planning application 21/ 03353/ FL by as much as 900mm. [includes flood map]

Comments related to flooding and surface water issues at site 59813 noted. Comments relating to agricultural land also noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

38330913

East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt. This is not a suitable site for development because:

Objective 9 states the site is greenfield. It is green belt. The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm. Objective 2 states good accessibility. This is incorrect. Accessibility is poor. The only access roads are narrow and regularly flood from the Bourne and Medway and flash flood from run off from hills to the north and east. Snoll Hatch Rd, junction with the Pound. Other end of Snoll Hatch area.

Tonbridge Rd route to Snoll Hatch Addlested Rd by Snoll Hatch

Snoll Hatch Hatches Lane

All the above roads are the only access to the area that contains site 59837. All are unsuitable for extra traffic. All will leave the site isolated and inaccessible during the regular flooding. Flooding occurs on this site from both the River Bourne and River Medway. Also from run off from surrounding higher land. The Leigh Barrier does not protect this area nor will any works to raise the height of the barrier. The majority of flooding of this area is travelling downhill on its way to the Medway. Much does not reach the Medway and therefore sits in Snoll Hatch for days. The site falls within flood zones 2 and 3. Policy CP10 states within the floodplain, development should first seek to make use of areas of no or low risk to flooding before areas of higher risk. Similarly, paragraph 167 of the NPPF sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Ground water tables are very high in this

Table 9 - List
of Sites -
Hadlow and
O East Peckham

area. A recent application for a major development in the village (ref 21/03353/FL highlighted the unsuitability of SuDS as there is not enough clearance between maximum groundwater levels and the underside of soakaways. Site 59837 will need considerable ground build up (over 500mm) to achieve the minimum clearances as stated in the SuDS Manual. This will have the knock on effect of displacing surface and flood

Comments related to flooding and surface water issues at site 59837 noted. Comments relating to traffic, access and the Green Belt also noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

38330913

East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt.

This is not a suitable site for development because:

Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.

The sheer size and extent of site 59846 deeply concerns East Peckham Parish Council. The site sits upon the catchment area of two watercourses that regularly flood parts of East Peckham and its development can only increase that flood risk.

The Three A26 sites (59747, 59806 and 59846) would create a new settlement of over 3000 homes, without an existing identity. The parish of East Peckham consists of 1300 homes spread over nine hamlets each with its own character and identity. Established anti-coalescence policy dictates those hamlets must stay separate. To create a new settlement of that size, within a small, historic parish would dwarf the existing village and destroy its character. Unlike the creation of Kings Hill, which was originally built on brownfield sites, the creation of a new settlement within the parish of East Peckham would destroy hundreds of acres of grade 1 and 2 agricultural land, as well as green belt. Below are photos caused by flooding from the location of site 59846 and of nearby lanes to the south of the site.

Site 59846 contains area which are within flood zone 3. Policy CPIO states within the floodplain development should first seek to make use of areas of no or low risk to flooding before areas of higher risk.

Site 59846 is green belt. The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that

Table 9 - List
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Hadlow and
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Comments related to site 59753 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

38330913

East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt. This is not a suitable site for development because:

The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm. Ground water tables are high in this area. A recent development application (ref 21/03353/FL) close to site 59855 highlighted the unsuitability of SuDS as there is not enough clearance between maximum groundwater levels and the underside of soakaways. Site 59855 may need ground build up to achieve the minimum clearances as stated in the SuDS Manual. This may have the knock on effect of displacing surface into nearby existing properties, most of which already sit lower than site 59855. Some of these properties are already needing to pay a heavy premium for insurance due to flooding. Any discharge of surface water from this site into surrounding watercourses could create extra flooding downstream. The Coult Stream and Boroughs Oaks Stream regularly flood Hale St, Smithers Lane and further into the Clubbs Quarry.

Smithers Lane

Quarry and public footpath

The Coult blocking access to quarry and

Medway View

Hale St and Smithers Lane

As can be evidenced by photos above, during times of flooding there is no access to the site except from the north. This leaves the village and its resources inaccessible from the site. Site 59855 is within an area of high and medium flood risk [includes flood map]

Policy CPIO states within the floodplain development should first seek to make use of areas of no or low risk to flooding before areas of higher risk. Similarly, paragraph 167 of the NPPF sets out that inappropriate

Comments related to flooding and surface water issues at site 59855 noted. Comments relating to access and facilities also noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

38330913

Table 9 - List of Sites - Hadlow and 0 East Peckham

East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt. This is not a suitable site for development because:

The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm. Objective 9 states the site is brownfield. It is green belt, not brownfield.

Objective 2 states fair accessibility. This is incorrect. Accessibility is poor. The only access roads are narrow and regularly flood from the Bourne and Medway and flash flood

from run off from hills to the north and east. Other end of Sno/1 Hatch area. Sno/1 Hatch Rd, junction with the Pound. Tonbridge Rd route to Sno/1 Hatch

Addlested Rd by Snail Hatch Sno/1 Hatch, Hatches Lane, All the above roads are the only access to the area that contains site 59876. All are unsuitable for extra traffic. All will leave the site isolated and inaccessible during the regular flooding.

Flooding occurs on this site from both the River Bourne and River Medway. Also from run off from surrounding higher land. The Leigh Barrier does not protect this area nor will any works to raise the height of the barrier.

The majority of flooding of this area is travelling downhill on its way to the Medway. Much does not reach the Medway and therefore sits in Snoll Hatch for days. The site falls within flood zones 2 and 3. Policy CPI0 states within the floodplain development should first seek to make use of areas of no or low risk to flooding before areas of higher risk. Paragraph 167 of the Revised NPPF (2021) advise that when determining planning

applications, local planning authorities should ensure that flood risk is not increased elsewhere.

Similarly, paragraph 167 of the NPPF sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Ground water tables are very high in this area. A recent application for a major development in the village (ref 21/03353/FL) highlighted the unsuitability

Comments related to flooding and surface water issues at site 59876 .

Comments relating to flooding, green belt at 59878 also noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Table 9 - List
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38330913

operated by Go Coach, provides access to Pembury Hospital and the time table below gives the departure and arrival times from the village centre (KCC came close to cancelling this service through their recent cuts, so could happen next year). Arrivals to the Village Centre in East Peckham from Pembury. 07.32 09.33 10.33 11.33 12.33 13.33 15.03 16.32 17.32 Departures from the Village Centre in East Peckham to Pembury. 08.29 10.22 11.22 12.22 13.22 14.22 15.46 17.19 The No. 6 bus operated by Arriva, provides access to Tunbridge Wells and Maidstone and the following timetable gives arrival and departure details. Times from the Village Centre on the Tunbridge Wells to Maidstone Route 07.27 07.37 09.16 10.13 11.13 12.13 13.13 14.13 15.17 17.06 17.26 18.26 Times from the Village Centre on the Maidstone to Tunbridge

Wells Route co 07.03 07.55 08.02 09.03 09.38 10.38 11.38 12.38 13.38 14.38 15.01 15.09 15.38 16.31 16.59 17.19 Overall, the village is served by an hourly service upto 18.30 and this hinders connection with nearby Towns and villages for a range of work

and social activities - hardly adequate for a Rural Service Centre. The closest train station to East Peckham is Beltring (not a mainline service) which is 2,250 Metres from the Village Centre and would be a 30-minute walk along an unlit road without a footpath, a 9-minute cycle ride or a 4-minute car ride. Beltring Railway Station is unable to provide any car parking facility.

Medical Facilities- East Peckham has never had any Dentist with in its boundary, the closest Dental practices can be found in Hadlow, Paddock Wood or Tonbridge. East Peckham campaigned for 2 years to save the village doctors surgery

without success, the surgery which was a satellite of the Woodlands Surgery based in Paddock Wood. Since the surgery closed on 31st March 2018, residents have had to travel to Woodlands in Paddock Wood, Hadlow Medical Surgery or Yalding Medical Surgery. Access to Paddock Wood Surgery and the Dental Surgery could be made by using bus No. 6, access to Hadlow Surgery and Dental Surgery can be

Table 9 - List of Sites - Hadlow and 0 East Peckham achieved by catching the No. 6 to Watlingtonbury or the No. 208 to Tonbridge and catch another bus to Hadlow. It is currently not possible to travel to the Yalding Surgery by bus. pg. 2 --- Den,entia Friendly Village Facilities. East Peckham is fortunate to have several facilities with in its Village Centre, we have: 1 CO-OP shop approximately 200 Metres from the Village Centre. *Irelands Bakery. Pam's Pantry sandwich bar

Comments relating to transport, facilities and shops noted.

42104961

[INCLUDES REPRESENTATION MADE ON LOCAL PLAN (WITHDRAWN) REGULATION 19 PRE-SUBMISSION PUBLICATION (APPENDIX 1) & EXAMINATION MATTERS 2 AND 3 REPRESENTATIONS (OCTOBER 2020) (APPENDIX 2)]

Our client's land comprises a circa 5.6 ha parcel of land in East Peckham. The southern and eastern part is flat field with pasture uses and divided into paddocks, and the north-western part contains a small orchard. It is situated to the west of

East Peckham and is approximately 2 miles from Paddock Wood and 5 miles from Tonbridge.

image

The southern boundary is defined by Snoll Hatch Road, to the west is Addlestead Road, with properties backing the western boundary of the site. To the north and east of the site existing residential areas are located. There are some hedgerows and trees along parts of the site boundary. There are no public rights of way within the site and no trees are currently subjects of Tree Preservation Orders. The two points of access are: Point 1 off Snoll Hatch Road and Point 2 off Addlestead Road. On the concept plan there are two proposed pedestrian links to East Peckham via the eastern border of the site. In terms of public transport, at the junction of Tonbridge Road and Addlestead Road to the north-west of the site are two bus stops, with a few more located along Pound Road to the east of the site. These bus services run between East Peckham, Tunbridge Wells, Maidstone and Henwood Green with stops along the way. To the east of the site is the A228. The nearest train station is Beltring, a short 5-minute drive, 20-minute bus journey using the 6 service or a 30-minute walk. Trains from Beltring station run from Strood to Tonbridge with Maidstone West and Paddock Wood on the service line. These trains on the Southeastern service provide a transfer to train stations that runs service to and from London. The journey time from Beltring train station to London Bridge is approximately 50-minutes. East Peckham is identified as a 'Rural Service Centre' meaning that the settlement provides a good range of local services and facilities for residents and surrounding area.

Table 9 - List of Sites - Hadlow and East Peckham
 Within East Peckham the following services are available: {Primary School, Library, Post Office, Village Hall, and a range of shops including convenience stores and medical facilities. The area also has an established employment area. Given the range of services and facilities available in East Peckham, the site is demonstrably in a sustainable location for residential development.

Comments highlighting specific factors and background to site 59613 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

44426049

25240577 East Peckham

This representation is provided by Fernham Homes Ltd in response to the Tonbridge and Malling Borough Council (TMBC) Regulation 18 consultation on the emerging Local Plan. Fernham Homes are a local SME housebuilder with a track record for delivering high quality residential development, at pace. Land at Maidstone Road, Hadlow (TMBC references 59637, 59638 and 59686) is located adjacent to Hadlow, a rural service centre. Fernham Homes consider that this site represents a suitable, available and deliverable site for which there are exceptional circumstances for its release from the Green Belt, and should be included as an allocation. This is demonstrated in Section 25 of these representations, with information provided in relation to its (aside from Green Belt designation) relatively unconstrained nature, strong sustainability credentials and pedestrian connectivity, and ability to achieve safe and appropriate vehicular access. An indicative layout is shown that demonstrates the ability to deliver a care home (65 – 85 beds), approximately 100 – 110 dwellings, space for the expansion of the adjacent cemetery and considerable open space, as part of a high quality development. The representations set out: - there is an acute affordability issue in Tonbridge and Malling Borough, and there has been significant under delivery, and there is a significant undersupply, of both market and affordable housing in both the borough and – particularly – the West Kent Housing Market Area. Delivering housing to address these affordability and related issues must be the key priority for the Local Plan; - Fernham Homes' view and reasoning that the Vision, and Local Plan, should cover the period 2021 to 2041; - that there is considerable outstanding evidence that is required, including an updated settlement role and function study; - there is clear justification for TMBC to plan to meet its housing need and more than 10%, related to the fact that the standard method for calculating need is capped for TMBC, the need to provide a buffer, the affordability issues summarised above, and due to ongoing issues in relation to the Duty to Cooperate; - there is very strong justification for the release of Green Belt, particularly in the West Kent Housing Market Area, and particularly at Tonbridge and around the rural service centres such as Hadlow; - 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" represents the most appropriate spatial strategy; - as such there is very strong justification for the release of Land at Maidstone Road from the Green Belt, and its allocation for housing. The representations raised concerns about some of the judgements made in the Interim

44459553
 Table 9 - List of Sites - Hadlow and 0 East Peckham

Comments relating to sites 59637, 59638 and 59686 noted.

Tonbridge and Malling Borough Council (TMBC) is consulting under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on its emerging borough wide Local Plan (hereafter referred to as the Reg 18 LP), and as such is inviting representations “about what a local plan with that subject ought to contain”. It is also consulting on the associated and Interim Sustainability Appraisal (ISA). There is, inevitably, significant overlap between the Reg 18 LP and the ISA. Accordingly, this representation has been submitted to both consultations. The representation is structured as follows:

- Section 2.0 provides background to Fernham Homes Ltd, a local small and medium sized (SME) housebuilder;
- Sections 3.0 – 24 addresses the questions posed in the Reg 18 LP, and where relevant refers to the evidence base and supporting ISA. Where a response is not provided, Fernham Homes does not have a specific comment on that question;
- Section 5.0 provides further detail on the site Land at Maidstone Road, Hadlow (TMBC references 59637 and 59638) which Fernham Homes are promoting through the Local Plan, and again refers to the supporting ISA where relevant.

For the reasons set out in this representation Land at Maidstone Road, Hadlow is considered suitable for residential development. The site has been considered under three parcels of land in the ISA (TMBC references) 59637, 59638 and 59686: however, it comprises a single site and Fernham Homes’ view is that TMBC must assess it as such in both the ISA and forthcoming housing and economic land availability assessment (HELAA). For the avoidance of doubt a fresh submission has been under the TMBC call for sites for this site: previously the three parcels were submitted separately. A site location plan is provided in Section 25 which clearly demarcates the extent of the site. The site is contiguous to the existing boundaries of the rural service centre (RSC) of Hadlow and would form a natural and logical extension to this sustainable settlement. The provision of residential development at this site would make a positive contribution to the housing land supply for the borough – and particularly the West Kent Housing Market Area (HMA), for market, local needs affordable housing and potentially retirement/specialist extra care accommodation, which is tantamount to the exceptional circumstances needed to justify the proposal site being developed within the Metropolitan Green Belt.

The site is suitable: there are no physical limitations or problems such as access, infrastructure, flood risk,

44459553
 Table 9 - List of Sites - Hadlow and 0 East Peckham

Comments relating to sites 59637, 59638 and 59686 noted, including comments that these should be assessed as one site.

Hadlow Introduction The following provides further information on the above, explaining why Fernham Homes considers that the land should be included as a future housing allocation in the Reg 19 LP, or Reg 18 draft Local Plan if TMBC considers that it should have an additional stage. Three parcels of land were submitted to TMBC in the call for sites: together, these comprise the single site Land at Maidstone Road, Hadlow. Figure 1 below shows the site in its entirety, with Figure 2 showing the site with the parcels overlain. As detailed in Section 1.0 of these representations, the site shown in Figure 1 should be considered by TMBC as a single site, and subject to SA and consideration under the HELAA accordingly. A separate submission has been made in the Call for Sites.*image*

Figure 1: Land at Maidstone Road, Hadlow

image

Figure 2: Land at Maidstone Road, Hadlow, with parcels 59638, 59637 and 59686 overlain

The site lies immediately adjacent to the north eastern boundary of the RSC of Hadlow. It comprises two field parcels, with a sizeable frontage (approximately 120 metres long) to Maidstone Road, the principal road which runs through Hadlow to connect to the urban areas of Tonbridge and Kings Hill, as shown on the aerial photograph in Figure 3.

image

Figure 3: Aerial photograph of Land at Maidstone Road, Hadlow

44459553	Table 9 - List of Sites - Hadlow and 0 East Peckham	The site benefits from very good pedestrian connections to Hadlow and its centrally located services (including a primary school, Hadlow college, NHS doctors and dentists' surgeries, shops, and community facilities): the village centre (including the primary school) is c. 400 – 500m from site entrance along well lit walkways	Comments relating to sites 59637, 59638 and 59686 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
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We note that this site is considered as a whole (13.83ha) for its development potential within the Sustainability Assessment (SA) that accompanies the Regulation 18 Consultation. We also note that the stated development yield is significantly higher than that which would be achievable on site. We therefore urge the Council to review the Site Promotion Document which is included as part of this Call for Sites submission.

CESL are aware that the Council have considered other adjacent sites separately within the SA. For example sites 59635 (2.38ha) and 59853 (7.37ha) are adjacent and, together, exceed 10ha in area. Similarly, the Council has considered similar parcels of land more than once, with different potential yields. For example, overlapping parcels 59613 (5.60ha) and 59837 (3.01ha) for 131 and 79 units, respectively.

Accordingly, a link to download the Site Promotion Document (version 2) is enclosed with this letter https://drive.google.com/file/d/13Q9VEBvIUynQDLP1LX4LBR2T6XWq_hRc/view?usp=share_link and within the covering email. This document covers Phase 1 (6.73ha / 101 units) on a reduced parcel of site 59842.

The CESL site 59842 can be developed in 2 phases, with the first Phase of 101 dwellings being deliverable in the 5 year period. This represents a separate Call for Sites submission to the wider parcel that is already before the Council and should therefore be assessed separately within the SA.

Benefits of an Allocation on Site 59842

Allocation of this site for 101 dwellings would:

- Create a high quality and accessible extension to Hadlow within a contained and logical site;
- Provide a mix of new housing including affordable homes to contribute towards the unmet housing need in the village.
- Support existing local businesses within Hadlow through additional expenditure in the local economy.
- Provide accessible open space and reinforce existing landscape features including ponds, trees and hedgelines
- Provide significant areas of on-site public open space, including extensive landscaping and new planting.
- Locate development on areas of lower flood risk and through the provision and implementation of sustainable urban drainage systems and solutions, provide flood risk improvements to wider Hadlow.
- Provide green, pedestrian and cycle networks through the site and create opportunities to connect with adjacent sites and the wider countryside.
- Provide environmental and visual improvements to the south-eastern corner of the site through the

Table 9 - List of Sites - Hadlow and

25369441 42831745 East Peckham

Comments relating to site 59842 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

include extensive building in East Peckham, where my family have lived for many generations. My grandfather was the village baker and informed me that local bread deliveries in the 1940 to 1960s was reliant on a boat fixed to the top of his van from October to May, this would enable him to reach cottages, such as mine and others in East Peckham. To avoid the flood water, he told me how the occupants of these houses would relocate their living areas from the ground floor to the first floor of their properties during this time too. These facts can be validated now through the evidence of an extremely high water table: our garden well is no more than 6 foot deep, yet has never been dry; the fields around us hold lakes of surface water after rain which slowly drains into the fine soil; our neighbour still mops water that seeps through their floor tiles throughout the winter and no local houses have cellars. Frequent flood warnings by text and voice messages from the Environment Agency all through autumn, winter and spring remind us we are on very low ground and in a floodplain.

Subsequent flooding controls in Tonbridge and the village since the 1970s have meant that we no longer need river transport to move around the village, however, flooding is a threat or disruption we have lived with over the past 25 years in East Peckham, and particularly in the hamlet of Snoll Hatch.

This has included impassable roads due to flooding, where cars and pedestrians are unable to enter the village along Addlestead Road. This can last a few days after the water has subsided, as abandoned cars are left blocking the route. We lost a car whilst driving just along the road from our house when the River Bourne burst it banks sending a metre high wave through the vehicle.

Our home's gas and water pipes have been affected by flood water. A recent Christmas was spent with no heating or cooking for a few days. The storm filters cannot cope with excess water, allowing bacterial worms to enter the water system, meaning we have had to use and wash in bottled water in the past.

We have been told to evacuate our cottage by police officers three times since living here. Once it included using the army and amphibian vehicles to move through flood water, with residents spending the night in community centres on higher ground over 10 miles away.

Local properties, especially those close to the road, have had flood water through their homes. Thankfully, when extending our property the TMBC building inspector recommended constructing our drive like a soak-away with sand and large stones to avoid water entering our cottage. He advised strongly against tarmac. A [Site reference 59646]

44861249
Table 9 - List of Sites - Hadlow and 0 East Peckham

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

44896833
Table 9 - List of Sites - Hadlow and 0 East Peckham

Hi
I wish to strongly object any planning applications put forward for at the hop farm, this is a flood area all they will do is push water in to the neighbourhood. [59789]

Site comments (59646) noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

I object to this site being considered for future housing development:

- This site is Green belt land.
- The site is in flood zones 2 and 3.
- Building on this site goes against established anti coalescence policy and the Hamlet of Hale Street so the site must be kept separate from East Peckham.
- A main river, the Coult Stream, runs through the site and regularly floods. Extra surface water discharge from this site would exacerbate this. All roads to the site flood which can lead to the site being isolated from village services during times of flooding.
- High ground water levels means the use of soakaways is likely unsuitable for this area.
- Church Lane is narrow with poor vehicle access.

42641825
Table 9 - List of Sites - Hadlow and 0 East Peckham

Comments relating to site 59789 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

[59525]

I object to this site being considered for future housing development:

- This site is Green belt land.
- The site is in flood zones 2 and 3.#
- This site is regularly used by the community for singing groups, keep fit sessions, parades, Salvation Army events, football, children playing, a place to sit and be within nature, dog walking, a place to meet and socialise, a place for those with no gardens, a safe place to meet in an emergency and as such should be designated a green space.
- Developing the site would be detrimental to health and well-being of the community.
- Existing roads are narrow, with poor accessibility and limited parking.

[59862]

I object to this site being considered for future housing development:

- This site is Green belt land.
- The site is in flood zones 2 and 3.
- Building on this site goes against established anti coalescence policy and the Hamlet of Hale Street so the site must be kept separate from East Peckham.
- A main river, the Coult Stream, runs through the site and regularly floods. Extra surface water discharge from this site would exacerbate this. All roads to the site flood which can lead to the site being isolated from village services during times of flooding.
- High ground water levels means the use of soakaways is likely unsuitable for this area.
- Church Lane is narrow with poor vehicle access.

[59813]

I object to this site being considered for future housing development:

- This site is Green belt land.
- The site is in flood zones 2 and 3.
- Building on this site goes against established anti coalescence policy and the Hamlet of Hale Street so the site must be kept separate from East Peckham.
- Surface water discharge from this site could flood property downstream and on many occasions Church Lane has flooded when the drainage ditches cannot cope with excess surface water. All roads to the site flood which can lead to the site being isolated from village services during times of flooding.
- High ground water levels means the use of soakaways is likely unsuitable for this area.
- A historic footpath MR534 (Hadlow Village to Yalding) crosses the site.
- Church Lane and Bush Road are narrow with poor vehicle access.
- The CLH fuel pipeline system runs through this site.

This site is a regular nesting area for the Skylark - a Red List species.

Table 9 - List of Sites - Hadlow and 0 East Peckham

42641825

Comments relating to green space at site 59525 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Table 9 - List of Sites - Hadlow and 0 East Peckham

42641825

Comments relating to site 59862 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Table 9 - List of Sites - Hadlow and 0 East Peckham

42641825

Comments relating to site 59813 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

I've been a resident of Westwood Road for a little over a year, previously living in another property in East Peckham and the surrounding areas for over 30 years.

While residing at my present home I've had the pleasure of seeing people running around playing with their dogs. Children are often running around together playing games on the green which is a safe place that can be seen from all angles.

During lockdown and ever since resident can be seen grouping together in support doing aerobics and at Christmas, the Salvation Army put on a free concert on the green, which brought me so much joy as I imagine it did to others.

The parking in the road is terrible at times, sometimes resulting in having to park half on the grass so not to cause the road to be unsafe to drive around. Can we not have a car park built rather than more homes which will generate more traffic and parked cars.

Up until today I was completely unaware of any plans to build on our little green and to say I'm horrified is an understatement.

45360609	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>I truly can't believe it is even being considered.</p> <p>Unfortunately I can't attend the meeting to view my concerns but hope this letter will convey my point with figure.</p>	Comments relating to the greens and car parks noted.
45401633	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>I strongly object to the above site being included in the TMBC Local Plan for the reasons given below:</p> <ul style="list-style-type: none"> * This site sits within established Green Belt Land. Paragraph 140 of the NPPF states: "Once established Green belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified". It goes on to say that "the policy making authority should be able to demonstrate that it has examined fully all other reasonable options" these include: "suitable brownfield sites" and "other locations well served by public transport" etc. This site sits firmly in a rural area, surrounded by country lanes, no public transport and within the Green Belt. There is no such evidence that TMBC has proved exceptional circumstances exist. * Furthermore, the Report on Urban Capacity Study undertaken by Urban Intelligence for TMBC in July 2022 has gone some way in identifying potential sites for TMBC to reach the housing requirement within the borough by 2040. This states that TMBC is 71% covered with Green Belt Land. This study has identified sites within the existing urban areas and rural service centres, most importantly looking at suitability, capacity and density optimisation in the most accessible locations. They have identified 75 potential sites. Page 3 states "No sites were identified in the rural service centres of Hildenborough and Hadlow". Page 29 Summarises findings for Hadlow – Point "7.1 - No sites identified by Hadlow". They did however find other potential sites in the borough. Therefore site 59811 has not been recommended in a hugely detailed study, undertaken by a company paid by TMBC, with the expertise required to advise them on urban capacity and viability analysis. * The 5 purposes of Green Belt designation are: <ul style="list-style-type: none"> * To restrict unrestricted urban sprawl, * Prevent coalescence of neighbouring settlements, * Safeguarding the countryside, * Protect the setting and character of historic towns, * Assist or encourage urban regeneration. As stated above by Urban Intelligence there are far more suitable sites within the TMBC local area requiring urban regeneration and which are far better served by public transport, than site 59811. * Accessibility – this site is served by narrow, winding and at times, single track lanes to all sides. There is no 	Comments related to site 59811 noted, including that relating to the Green Belt, accessibility and the environment. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

[59859]

To whom Concerned,

I am a local resident to the proposed development site 59859 adjacent to Hadlow College.

I strongly object to this land being developed based on the following reasons.

* The proposed site has the river Bourne running down one side of it and a stream down the other side and regularly floods after heavy rains. This would be a disaster for any houses built on the land.

* The strip of land is extremely narrow and runs between Hadlow college and multiple existing housing estates. Acting as a natural barrier between the two. Building on this land would not only encroach on the College but also the existing estates.

* The access would be very difficult and most likely have to come from carpenters lane. This would add more traffic to an already overly busy road.

* Village facilities and services are already stretched and will not cope with more housing developments.

Table 9 - List
of Sites -
Hadlow and

I think this proposed site is an awful choice. If Hadlow has to be developed then far better sites must be found than 59859.

0 East Peckham
Regards,

Comments relating to site 59859 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

45441121

Addendum to previous submission 59789 call for sites by Tonbridge & Malling Borough Council
Previously, site 59789 (CfS 5a815d) was submitted and is listed in the Council's Regulation 18 Local Plan Consultation Document, September 2022. Here follows additional information for consideration by the Council:

image

Notes on the above map:

- Yield: It shows an illustration of the potential development on only part of site 59789, which would yield 110 to 140 dwellings. The development could be extended to include all of site 59789, in which case the yield would increase to about 165 dwellings.
- Site location: The site is shown consisting of two parcels of land (Figure 11 in above map outlined in red) and (Figure 12 in above map outlined in blue). 11 is owned by the Whiteside/Bishop family and 12 is owned by the Lawrence family, both of whom are willing to develop their site.
- Flood zone: The flood warning information service website indicates that the site is mostly in flood zone 2 and a small part in flood zone 3. Indeed, the Flood Risk Assessment regarding mitigation of flooding on the proposed Wealden Homes development (Planning application Reference 21/03353/FL for 69 dwellings and medical centre and Figure 3 in above map) indicated that there was NO risk of flooding. Given that this site 58789 is adjacent to the Wealden Homes development, it is reasonable to assume the same would apply. However, as a further mitigation, it is proposed that the existing Coult's Stream (Figure 10 in above map) be widened to form an attractive attenuation pond. More attenuation basins could be provided if required.
- Existing buildings: The existing house and converted barn would remain (Figure 4 in above map).

Site number - 59616. East Peckham

Reference the above site reference number, I feel I must respond to this proposed development.

East Peckham has over the years suffered many serious flooding issues from the river Medway. The flooding in Medway Meadows however does not always flood directly from the river but from two other sources. Firstly in heavy rain there is always a run off from the higher ground north of Seven Mile Lane along Hale Street to Medway Meadows. Secondly the drains in old Old Road cannot cope and the outpouring adds to the flood. The land drains through out E. Peckham are another concern as they never get cleared. The proposed site (59616) will add another large area to already established businesses and create a vast concrete plateau and when the river does flood, the run off from there, into the river would greatly increase.

Given this evidence, and this is easy to check, it is therefore my respectful submission, that before a decision is made, a diligent and comprehensive, assessment of the site should be made.

The attached photo is from my house [no. redacted]. I was lucky that time!! Others were not. At [address redacted] a 93 yr old lady who has been flooded out 2 times worries constantly each time it rains and this proposal has only increased her anxiety.

Comments relating to site 59759 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Comments relating to site 59616 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

45443105
Table 9 - List of Sites -
Hadlow and
0 East Peckham

45468353
Table 9 - List of Sites -
Hadlow and
0 East Peckham

Reference Local Plan - Westwood Road Green - Site Reference 59525

There are regularly children playing out on Westwood Road Green. When I was young I spent a lot of time on the green playing with my friends.

45468833	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>We have a had parties on the green . During lockdown it meant we could get outside and safely catch up with neighbours.</p> <p>People take their dogs out on to the green to play and exercise. The owners get to meet up and have a chat.</p> <p>The available space of 6000 characters to answer Q8 is insufficient given the number of sites that are to be considered. Please find below my comments for Q8.</p> <p>Q8. Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>Site 59601 - Object</p> <p>Reasons. The site is in the flood plain of the River Bourne and is regularly flooded. Development would restrict the natural capacity of the land to cope with run off and will lead to more serious flooding down stream. The site is beyond the established village boundary and would intrude into a key view of Hadlow Tower and the village from the A26, which is cited as important for the character of the village and would damage the setting of the listed building. The view is cited in the Hadlow Conservation Appraisal. It is important for the character of the village that this hard south west edge remains and is not absorbed by suburban sprawl. The site had ecological significance with habitat for a number of protected species along the river edge, including water voles and dormice.</p> <p>Development of the site would add further traffic to the congested A26 corridor.</p> <p>Site 69859 - Object</p> <p>Reasons. The site is in the flood plain of the River Bourne and is regularly flooded. Development would restrict the natural capacity of the land to cope with run off and will lead to more serious flooding down stream. The site is beyond the established village boundary and would intrude into a key view of the Maltings and the village from the A26, which is cited as important for the character of the village and would damage the setting of the listed building. It is important for the character of the village that this hard south west edge remains and is not absorbed by suburban sprawl.</p> <p>The site had ecological significance with habitat for a number of protected species along the river edge, including water voles and dormice.</p>	Comments relating to green space at site 59525 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
38333377	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>Development of the site would add further traffic to the congested A26 corridor.</p> <p>Site 59776 - Object</p> <p>The site is currently a field utilised in conjunction with the adjacent sports field by the village hall as much</p>	Comments relating to site 59601, 69859, 59776, 59638, 59637, 59686, 59647, 59635, 59853, 59857 and 59605 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Reference Local Plan - Westwood Road Green - Site Reference 59525

Why is Westwood Road Green so important?

It has provided a safe place for children to play for many years and continues to do so.

The green provides a meeting place for residents. Somewhere to sit and have a catch up - often with a mug of tea in hand.

Community parties and events such as Christmas carols with refreshments provided by the local silver band and the salvation Army have been held over many years. Developing this space would take away the ability to hold such community events.

The green is vital for mental health, providing an attractive outlook which is particularly important for residents that find it difficult to get out for health reasons.

During lockdown the green proved to be an amazing asset.

There are a number of established trees on the green. Green space and retention of trees is vital to help maintain air quality which is diminishing with the huge increase in house building.

Issues surrounding building on Westwood Green:

It is not possible to have water meters in Westwood Road. I believe this is now a legal requirement for new builds.

There are already major problems with parking because there are many properties with no off street parking and several vehicle's. I have witnessed an ambulance having to stop in the middle of the road, meaning that nothing could pass in either direction, because there was nowhere for it to park.

45611137	Table 9 - List of Sites - Hadlow and 0 East Peckham	To sum up: The quality of life for Westwood Road residents would be severely affected if the green was developed. Taking away this special green space that enables the community to come together and children to get outside and play would be very mis guided and detrimental to the wellbeing of Westwood Road residents.	Comments relating to green space at site 59525 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
45624097	Table 9 - List of Sites - 0 Hadlow and	question, if I refer to any specific sites. I would say that I do not think Hadlow can sustain any large sites due to pressure of traffic and infrastructure	Comment noted.

to say I found it very useful however the consultation papers and options for comment seem extremely complicated and therefore I wonder if they will elicit the participation you sought, due to the length of time required to make a response, and understand that the complexity will make understanding and managing the responses fairly, will be very difficult, as others have said.

I would like to summarise my views and do so here, so you can consider these when selecting the preferred sites for delivery over the next period.

There is a general tone of anti development expressed through the question and reports. This is wrong and will actually lead to economic decline and decline in the community dealing fairly across the wealth ranges.

Compassionate conservatism should address:

- * the disadvantaged and not just protect the status quo.
- * Encouragement of industry, economic development and small business.
- * Address concerns related to climate change.

The settlement hierarchy is not well constructed currently and does not reflect the connectivity advantages of some communities over others.

Specifically Hadlow and East Peckham are not the same as Hildenborough and Borough Green. Development should go where the communication links are good as a priority. Hadlow and East Peckham should be moved down the hierarchy into a new category.

There is no vision for what future transport systems should be like and without a vision this will drift and be driven by market forces rather than being planned and developed. The policy should encourage greater use of public transport and more flexible responsive service by hired transport options. Car ownership which is currently reducing should be encouraged to do so and internet connected self-driving vehicles should be favoured. Slower speeds will enable carbon saving and greater safety and maximise the use of our existing infrastructure without adding to congestion.

Variable pace maximising road space can be achieved by automated gps related driving to optimise road use at low speeds. This will also help cyclists without requiring infrastructure changes. Delivery vehicles should be optimised for final mile delivery using a licencing system to diminish duplication. This could be operated on a local regional basis influenced by local government in a similar way as taxis. Responsive hire systems such as

Comments relating to the role of Tonbridge as principal town and sites such as 59685 and 59721 before other sites are considered noted. Comments relating to sites 59776, 59637, 59647, 59635, 59638, 5968, 59842, 59605, 59806, 59853, 59857, 59853, 59795, 59811, 59525, 59613, 59837, 59876, 59616, 59789 and 59646 noted. Support for employment off the A20 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

45634817
Table 9 - List of Sites - Hadlow and 0 East Peckham

I hope that it is OK to contact you about this issue in relation to the Local Plan Reg 18 consultation that finishes today. As a councillor for Hadlow Parish, together with my experience in land-based education, I have had a long-standing concern over water quality in Kent from a health and particularly a biodiversity point of view. As you know, the status of water bodies in Kent is adversely affected by a range of pressures on the environmental quality of the water bodies. As of 2015, only one surface waterbody in Kent met overall Good Status as required under the Water Framework Directive. Whilst several measures are proposed to improve the status of many water bodies to Good Status as required by the WFD, the scale of growth proposed across Kent and Medway has the potential to significantly increase the scale and number of pressures on both the natural and infrastructure based water systems in Kent unless sustainable options to mitigate those pressures can be identified. I have therefore made a submission on the TMBC Reg 18 sustainability appraisal consultation (attached) on behalf of all the Volunteer Pond Wardens in Kent and I have asked my Parish Council to note these issues (also attached) when considering future development within the Parish. As a major issue, I do not believe that the adequacy of wastewater treatment has been considered in the sustainability appraisal for individual sites within the TMBC plan, and that this could lead to many future environmental issues over the period of the developing Local Plan.

I would add that not only all of this is an issue for many Parishes with Tonbridge and Malling as far as TMBC's Local Plan is concerned, but it is a particularly important consideration for the scheduling of large scale development such as the Tudeley Garden Village within the TWBC Local plan that rely on the Paddock Wood Wastewater Treatment Plant, already struggling to meet demand. The risk here is that development within TWBC's area will negatively impact on water quality and the natural environment in the Medway Valley to the north of TWBC, including within TMBC's area downstream of Paddock Wood. Also, specifically from the point of view of the sustainability of the water supply, in the 2017 Kent Water for Sustainable Growth report from KCC it was suggested that "LPAs should consider adopting the Building Regulations optional standard for water use (110 l/p/d) as the preferred policy target for new development with respect to water efficiency, [as I would argue we are in a water-stressed area]. Each LPA could consider developing specific guidance on how developers can achieve this standard, and how to consider going further with the introduction of water recycling technologies." Has TMBC planned for this higher standard in its Local Plan or is it sticking to the lower

- This site is Green belt land.
- The site is in flood zones 2 and 3.#
- This site is regularly used by the community for singing groups, keep fit sessions, parades, Salvation Army events, football, children playing, a place to sit and be within nature, dog walking, a place to meet and socialise, a place for those with no gardens, a safe place to meet in an emergency and as such should be designated a green space.

- Developing the site would be detrimental to health and well-being of the community.
- Existing roads are narrow, with poor accessibility and limited parking.
- This site is Green belt land.
- The site is in flood zones 2 and 3.
- Building on this site goes against established anti coalescence policy and the Hamlet of Hale Street so the site must be kept separate from East Peckham.
- Surface water discharge from this site could flood property downstream and on many occasions Church Lane has flooded when the drainage ditches cannot cope with excess surface water. All roads to the site flood which can lead to the site being isolated from village services during times of flooding.

- High ground water levels means the use of soakaways is likely unsuitable for this area.
- A historic footpath MR534 (Had low Village to Yalding) crosses the site.
- Church Lane and Bush Road are narrow with poor vehicle access.
- The CLH fuel pipeline system runs through this site.

42803809
Table 9 - List of Sites - Hadlow and 0 East Peckham

45654113
Table 9 - List of Sites - Hadlow and 0 East Peckham

45654113
Table 9 - List of Sites - Hadlow and 0 East Peckham

Comments relating to water quality within the area noted. This matter will be considered and reflected within the new infrastructure evidence being prepared to support plan preparation.

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

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

59682

- This site is Green belt land.
- The site is in flood zones 2 and 3.
- Building on this site goes against established anti coalescence policy and the Hamlet of Hale Street so the site must be kept separate from East Peckham.
- A main river, the Coult Stream, runs through the site and regularly floods. Extra surface water discharge from this site would exacerbate this. All roads to the site flood which can lead to the site being isolated from village services during times of flooding.
- High ground water levels means the use of soakaways is likely unsuitable for this area.
- Church lane is narrow with poor vehicle access.

Table 9 - List of Sites - Hadlow and 0 East Peckham

45654113

Comments relating to site 59682 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

59789

- This site is Green belt land.
- The site is in flood zones 2 and 3.
- Building on this site goes against established anti coalescence policy and the Hamlet of Hale Street so the site must be kept separate from East Peckham.
- A main river, the Coult Stream, runs through the site and regularly floods. Extra surface water discharge from this site would exacerbate this. All roads to the site flood which can lead to the site being isolated from village services during times of flooding.
- High ground water levels means the use of soakaways is likely unsuitable for this area.
- Church Lane is narrow with poor vehicle access.

Table 9 - List of Sites - Hadlow and 0 East Peckham

45654113

Comments relating to site 59789 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

please see Appendix 1 as below - apologies on the delay of this but we were not made aware of such proposals until a facebook post by a local resident late in October.

Firstly, we find it abhorrent that Tonbridge & Malling Council failed to notify the residents of the villages and towns that the proposal affects. You expect each of us that pay our council tax on time, without a fuss and with regular yearly increases, to continuously monitor your un-user friendly website for any development proposals. You have essentially tried to get this through flying under the radar rather than actually notifying the residents by any form of communication. The forms of communication that would have been acceptable would be; email, post or even posters in the village itself. But we have not been made aware of any such proposed developments by any of these means.

As such, our feedback and rejection of the proposals is delayed, we would like for this to still be considered and added to the other residents feedback. Our concerns and feedback are as follows;

During the Build;

- What are the ingress and egress plans for getting to and from each of the building sites for all vehicle types?

The issue with East Peckham's roads are that they are simply not wide enough for two normal size (non SUV) vehicles to pass each other. Introducing any further vehicle and traffic into the area would cause huge delays, traffic and a likely increase in accidents. Most of the roads are back-lane style and are not suitable to manage HGVs or heavy vehicle usage.

Table 9 - List of Sites - Hadlow and 0 East Peckham

45676033

- Where will all of the vehicles be allowed to park?
- There is already a huge lack of available parking for residents in the area that already live there. Introducing additional vehicles, be that for a temporary time for workers and then the permanent time for further

Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. The Council notified relevant national and local organisations, residents who were registered on the Local Plan database, community groups, businesses, Council's and stakeholders including its youth forum. The Consultation was also advertised via its website and social media platforms.

Introduction This representation is prepared on behalf of Rydon Homes Ltd in response to the Tonbridge and Malling Borough Council (TMBC) Local Plan (Regulation 18) consultation which closes on 3rd November 2022. We understand that Tonbridge and Malling Borough Council 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 these homes should be built, and how it can deliver infrastructure improvements across Tonbridge and Malling.

Our client controls the site known as land to the north of Court Lane, Hadlow (TMBC Site ID 59647), which we believe represents a suitable and sustainable location to provide housing. Accordingly, within the sections below we provide a detailed response to the questions being posed by the Council before outlining further how we consider our site fits within the spatial options being considered.

Response to The Local Plan Core Questions

Q.1. Which elements should feature in the vision for the borough in 2040?

The consultation document asks respondents to comment on the extent to which the following objectives should form part of the strategic vision for the plan:

- (1) A place where the range of housing needs are being met in full and affordability is much improved.
- (2) A place where there are plentiful jobs opportunities, both within the rural and urban economies, to meet the needs of local communities.
- (3) A place with well-designed, accessible, homes and neighbourhoods that are safe, legible, energy efficient and respect the local character.
- (4) A place where people and communities are connected digitally in an effective and reliable way.
- (5) A place where biodiversity thrives alongside communities.
- (6) A place where landscapes and open countryside are respected and can be easily accessed and enjoyed.
- (7) A place where there are plentiful opportunities to enjoy the borough safely and healthily by cycling and walking.

Comments relating to site 59647 noted. Comments relating to the objectives of the plan and the level of detail also noted. Comments acknowledging the role of Hadlow in the settlement hierarchy and the inter-relationships with the housing market areas noted. Objection to option 1 of the spatial strategy options and the role of the Green Belt as well as comments on the other options noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.

Table 9 - List
of Sites -
Hadlow and

43619329 45752033 East Peckham

deliverable within TMBC's 2018 SHLAA. This found the site to be in a sustainable location in terms of access to services, being adjacent to the built-up confines of Hadlow. The assessment also found that the site is not subject to any high-level constraints. It found that access could be provided off Court Lane, but at the time it was unclear as to whether this could serve the entirety of the development. Recent discussions with Kent Highways have confirmed that Court Lane is indeed suitable and capable of accommodating development on the entire site.

Location and surroundings the site occupies 5.58 hectares on the eastern side of Hadlow, behind the residential properties of Tonbridge Road and Court Lane. As confirmed in discussions with Kent County Council, vehicular and pedestrian access can be provided off Court Lane. The site is bounded by the rear gardens of existing residential properties on its western and southern boundaries, and agricultural land to the north, separated by a mature hedgerow, and to the east.

Hadlow is a sustainable settlement, defined within the Core Strategy as a Rural Service Centre. It benefits from Primary and Secondary Schools within the village, and a Medical Centre, along with retail and food and drink provision, community facilities, religious establishments and open spaces. Bus services provide regular connections throughout the day into Tonbridge (14 minutes), Tunbridge Wells (40 minutes), Kings Hill (12 minutes) and Maidstone (35 minutes) as well as other intervening centres.

There are a number of shops along the High Street within easy walking distance, including the Hadlow Grocers & Off Licence as well as a number of local stores, pubs and bars that can service the new residents of the village.

The A26 is close to the site and acts as the primary road through the village. This road gives easy access to Tonbridge to the southwest which would provide further employment opportunities within a short travelling distance for new residents. There is also a number of Public rights of Way close to the site which would help to encourage healthy exercise while enjoying views of the countryside for those who wish to make use of them.

Proposals - Detailed development proposals for the site have not yet been advanced, however a Vision Document and a Framework Plan have been prepared to show how the site could be developed, and its potential capacity. The framework plan has been developed in accordance with the following design principles:

WE OBJECT TO THE FOLLOWING SITES for development as identified in the new Local Plan proposed by TMBC (Regulation 18).

* A26 between Grove Farm Fisheries and the Alder's Roundabout

Site 59806 - East side of the A26 around Killingleave Cottages right over to Seven Mile Lane (south of Alder's roundabout), extending over Seven Mile Lane towards Roydon church and south to Peckham Bush. 150.77ha, 3289 homes.

Site 59747 - ME18 5JF - West side of the A26 between a solitary pair of semi-detached cottages and Forge Farm. Residential, 9.40ha, 210 houses.

Site 59846 - West of A26 between Grove Farm Fisheries to behind the pair of semi-detached cottages mentioned in site 59747. 8.33ha, mixed use.

Site 59811 - the map is out of focus. It is a huge area from the top of Gover Hill in West Peckham, south as far as Steers Place off Carpenters Lane in Hadlow (includes Hamptons?). Residential, 194.46ha, 2362 homes.

Reasons for objection: Change of character of the area. Loss of green belt. Traffic impact on the wider environs of village envelope in relation to neighbouring areas of Kings Hill, Wateringbury, Hadlow, West Peckham. The local road infrastructure is poor and has remained poor for decades without proper investment to ensure fit for purpose for current housing levels. The high volumes of residential proposed above will create the need for thousands of vehicles and increased traffic movements per hour. Taking one site alone (site 59811) proposing 2362 homes will create at least an extra 4724 cars on the road at a minimum. The local road infrastructure cannot cope with such numbers. Then there are local services to consider including schools, GP services.

43619329 45752033 Table 9 - List of Sites - Hadlow and East Peckham

45788993 Table 9 - List of Sites - Hadlow and East Peckham

Comments related to site 59647 noted, including that in relation to the role of the Green Belt. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Comments relating to sites 59747, 59846, 59811 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

RE: SITE 59806

My wife and I are both in our 80's and due to our health we have not managed to attend the local meetings regarding the above proposal.

However, we have lived at the bottom of Stamford Lane for 49 years and would like to add our voices to the objections being outlined and submitted by our fellow neighbours.

Whilst we appreciate the necessity to sometimes infringe onto the greenbelt land in order to provide housing, we do not feel that this site is at all suitable and we object to its allocation. We trust the logistical concerns will be listened to and it will be recognised that any plans to build on site 59806 would in fact be building in the heart of the countryside. Also, St Michael's Church forms a beautiful backdrop to the rural village of East Peckham etc. Any development on this site would ruin that view.

We have particularly noticed how much busier the roads and lanes have become and we have witnessed the village amenities struggling to cope with the current demand on their services. Most notably the Hadlow Village GP Surgery is massively oversubscribed.

42829121	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>Please take account of all the above reasons and we hope you can remove this potential site from the Local Plan to ensure that there will not be any future proposal to develop housing on this site. [59525]</p> <p>Re: Proposed Consideration of Development of Grassland in Westwood Road, East Peckham</p> <p>As I will be away on holiday when the meeting to discuss the above takes place on the 16th October 2022, I am writing this letter to inform you of my opposition to any development of the above-mentioned land. This piece of land is in the front of my property and would severely affect my quality of life as well</p> <p>as:</p> <ul style="list-style-type: none">• Destroy an open space that is used by the community for social gatherings; exercise classes; and a safe playing area for children, to name but a few.• The destruction of mature trees.• Add to the current problem of parking.• Completely change the look and character of this part of the Village.• The reduction of light to existing properties.• Access to new buildings/existing pathways.	Comments related to site 59806 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
46065633	Table 9 - List of Sites - Hadlow and 0 East Peckham	<p>I would request that I am personally informed by post of any meetings or progress regarding this matter in future as, had I not been informed by a neighbour of this planned meeting, I would have missed the opportunity to write this letter and express my opposition.</p>	Comments relating to site 59789 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

[Site 59525]

Reference Local Plan - Westwood Road Green - Site Reference 59525

Westwood Road Green has been used by the community for decades. Children playing, residents parties, BBQs, mini fun days with games and races for the children, discos, carols at Christmas and more.

If this important community space is developed it would have a huge impact on our special community, mental health and wellbeing.

46109249	Table 9 - List of Sites - Hadlow and 0 East Peckham	Lack of parking is already a major problem. The majority of properties in Westwood Road do not have parking and own several vehicles. Emergency services and larger service vehicles such as the refuse lorry, already struggle to get down Westwood because of parked vehicles. [59806]	Comments relating to green space at site 59525 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
42771489	Table 9 - List of Sites - Hadlow and 0 East Peckham	Development on this site would mean loss of good agricultural land, loss of natural habitat, increased traffic on surrounding roads including Seven Mile Lane and the increasingly very busy and dangerous Boroughs Oak roundabout at Hale Street, East Peckham.	Comments related to site 59806 noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.