

Respondent ID	Agent ID	Document Part Name	Comment (plain text)	TMBC Responses									
			<p>4.0 Site-Specific Representations</p> <p>4.1 This section of Rydon's Representations deals with its promotion sites and should be read in conjunction with the duly completed Call-for-Sites Proformas and the suite of technical reports appended to these Representations.</p> <p>4.2 Rydon's promotion sites comprise the following:</p> <p>Table 2 – Rydon's Promotion Sites</p> <table border="1"> <thead> <tr> <th>Site Location</th> <th>SA Site Reference</th> <th>Indicative Nos</th> </tr> </thead> <tbody> <tr> <td>Clare Lane, East Malling</td> <td>59698</td> <td>111 no. dwellings</td> </tr> <tr> <td>Maidstone Road, St Marys Platt</td> <td>59632</td> <td>21 no. dwellings</td> </tr> </tbody> </table>	Site Location	SA Site Reference	Indicative Nos	Clare Lane, East Malling	59698	111 no. dwellings	Maidstone Road, St Marys Platt	59632	21 no. dwellings	Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
Site Location	SA Site Reference	Indicative Nos											
Clare Lane, East Malling	59698	111 no. dwellings											
Maidstone Road, St Marys Platt	59632	21 no. dwellings											
43619329	43619297	Any other comments											
42166241		Any other 0 comments	looks like tonbridge being favoured again ..lack of sites for this area	Comment noted.									
42180641		Any other 0 comments	The consultation is too long and complicated for the usual member of the public.	Comment noted. The consultation was for a standard 6 week period and designed to reach out to all communities and organisations within the borough and for both professionals and none-professionals. A variety of different methods of engagement were provided.									
			<p>In regards to your consultation as a resident of Kings Hill and West Malling there has already been a number of new housing estates. I have lived in this area for 30 years. In that time I have seen in the last 10 years:</p> <ul style="list-style-type: none"> * Loss of Dr surgery in West Malling itself. * No other surgeries to serve new estates. Eg Leybourne Grange * Increase of traffic and poorer air quality. * Loss of bus services. * Increase in primary schools but unaware of developing further secondary schools. * Loss of green spaces that make this a semi rural area. A20 from West Malling to Maidstone has become a linear of housing where once it was broken by green spaces. <p>I would hope future planning will look at:</p> <ul style="list-style-type: none"> * use of brown development areas * Keep a green belt around towns and villages * Guarantee that infrastructure such as NHS services, local buses are developed * Developments have parks and wooded areas. * Affordable housing <p>Sadly I see West Kent becoming one huge housing estate!!!</p>	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.									
40366817		Any other 0 comments											
			<p>This consultation document is ridiculously long and demanding and could have been made a lot simpler to allow everyone to have their say. You are not encouraging feedback.</p> <p>Why was the residents of TMB not contacted before the Local plan was written? Surely a simple questionnaire to the residents before composing the Local Plan would have judged your residents feelings?</p> <p>What guarantee that our comments will be taken into consideration?</p>	Comment noted.									
42350689		Any other 0 comments											

42447265	Any other 0 comments	Please reject the governments 15,941 number	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42107937	Any other 0 comments	No further comments.	Comment noted.
42495297	Any other 0 comments	<p>stop chasing economic growth.....</p> <p>this country has an aging population, not young turks.</p> <p>shift focus away from ethic of wasteful (made in china) consumerism, towards ethic of quality.</p> <p>no more large (low price) stores with big car parks</p> <p>more compact food retail stores- to enable reduction in car journeys</p> <p>enforce speed limits</p> <p>invest in proper cycle lanes not the joke ones in place</p> <p>no more horrible junk food and take out food dives which are fuelling obesity and costing the society heavily.</p> <p>Tonbridge- could be much better than it is - too much litter, too many cars, too many low price shops, no town hall, lack of local engagement,go to france to see how they do it</p> <p>The call for sites is insane. Hildenborough looks like a kid had new red crayons and decided to fill in the squares!!..Utter stupidity. We live in the countryside...The green countryside..The Green Belt....If I wanted a concrete jungle I would of moved to London...</p> <p>Some sites are needed..brown and infill...Not fields and countryside....Think about our future.</p>	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42540737	Any other 0 comments	<p>Just as suspected. The usual green field spaces that were presented before in 2019. Most of them we know in Aylesford are owned by the same company (big surprise).</p> <p>No concept of protecting the natural habitat. No concept of protecting villages and small towns identities. No concept of using renewable energy when any of these houses actually get built.</p> <p>The idea that traffic and living conditions won't be negatively impacted by any of this is absurd.</p> <p>Living in Aylesford village has become a literal hell. And I don't say that lightly. Traffic is a standstill during the morning and evening. People leave their cars running while waiting in traffic so goodness knows what people are inhaling that have to live on the main roads. Parking is a nightmare on Rochester Road with all sorts of lazy people parking there instead of the free car parks leaving residents to park elsewhere.</p> <p>The natural habitat has been slowly destroyed first by a company that bought the Aylesford quarry, gutted it without any notice leaving bats and owls (which we no longer have thank you) homeless. Then by removing even more trees both near the Parish Council offices and the land between the Waitrose site which makes so much noise now one cannot even sleep.</p> <p>Just drive around the Tonbridge and Malling areas and everywhere you look there is already a housing estate being built. I'm not sure how much more the borough can actually hold.</p> <p>This Local Plan has nothing to do with affordable housing which so little actually gets built thanks to deregulation. But hey, the Conservative government needs us to build 15k more houses for landlord firms to purchase and rent out to the poor souls who cannot afford the £400k required to purchase a family home.</p>	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42607681	Any other 0 comments	Absolute disaster.	
42616033	Any other 0 comments	My comments relate specifically to 59800 and 59797 but apply to all sites	Comment noted.

42635873	Any other 0 comments	I haven't answered everything on here as I just don't have the time, but the main concern for me is housing and green space. I strongly object to further development in the Hildenborough area for the reasons outlined in response to those particular questions.	Comment noted.
42646849	Any other 0 comments	Please ensure we are contacted directly should there be any further development with regard to these proposals as we received no notification of this from the council.	Comment noted.
42672513	Any other 0 comments	I believe the local plan is now open for responses with a deadline set of the first week of November. Why has this not been directly communicated in writing to all the potential residents that may be directly affected ? How on earth can responses be sent to the council when hardly anyone who will potentially impacted by the local plan knows anything about it ? Again I have to raise the question regarding the legality of this.	Comment noted. 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.
42675553	Any other 0 comments	Why has this not been communicated to the local residents so that responses can be sent to the council?	Comment noted. 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.
42674753	Any other 0 comments	Responses to be to individual areas in the proposed plans listing residents concerns and exceptional circumstances.	Comment noted.
42687265	Any other 0 comments	Please listen to concerns and not make this just a tick box exercise. Thank you	Comment noted.
42442241	Any other 0 comments	Ultimately, this plan is unsustainable and unwise. It doesn't take into account that the new dwellings will put too much pressure on an already overwhelmed tiny infrastructure. It will drive out the wealthy residents who the local economy was built around and relies on. It will create a rise in mental health problems, at a time when the mental health statistics are the worst they've ever been. It is short-sighted and lazy, in that it is picking the easy option of piggy-backing off an existing success story instead of developing areas in other growing parts of the country. Granted, there may be a demand down here. But people move where there's opportunity. It's human nature. If the opportunity is created in another area, people will live there. You don't have to completely destroy the south of England. That is not the answer.	Comment noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.

		<p>need for housing. The site adjacent remains partially unoccupied showing the need for this type of development is surplus to need.</p> <p>59707. Site is agricultural, green belt and ANOB. A change of planning policy from the government would be required.</p> <p>59371. A replica application. The same comment applies</p> <p>59881. The same comment applies with the addition of the proximity to a busy road rendering the site unsuitable due to exhaust dangers etc.</p> <p>59751. Same point applies as 59881</p> <p>59611. I believe this is the site of an old night club. Permission would be required to alter to domestic. The existing site has a culvert running through it from Wrotham Water. The clearing of the site caused the main road to flood and freeze in the winter. For this reason I consider it unsuitable for development.</p> <p>59611. This site appears to be the existing old Marley site. I understand plans are awaited by the council. Any increase in traffic movement for anything such as a distribution centre will need major infrastructure changes to be made to assist with the road interchanges which are already in need of modernisation to assist with the constant flow of traffic on the major routes, rendering Wrotham and Borough Green egress difficult.</p> <p>59681. As 59611. If a new application as 59707</p> <p>59705. As 59707</p> <p>59643. As 59707</p> <p>59665. As 59707. This has already been rejected as the site of a Motorway service station. What part of, its a field on the Green Belt dont they understand.</p> <p>59706. As 59707</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42388225	Any other 0 comments		<p>Comment noted. This will be noted for future consultations.</p>
42708097	Any other 0 comments	<p>Thank you for your email below regarding the Local Plan Regulation 18 Consultation.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>As you are aware, Tonbridge and Malling Borough Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on any stages of your Local Plan; SPDs etc.</p> <p>In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>
42709057	Any other 0 comments	<p>Local Plan meeting last night in Wrotham, Matt Boughton, Leader TMBC, pledged that if enough responses were received protecting Greenbelt it would sway the decision. So even if you just email " Stop Borough Green Garden City and Save Our Greenbelt" to localplan@tmbc.gov.uk we could avalanche a win.</p>	

		<p>Wrotham and surrounding areas are a Greenbelt area, an area of Outstanding natural Beauty and a conservation area.</p> <p>It will totally destroy THE SETTING OF THE AONB</p> <p>I cannot change the colour of the paint on my doors and windows with out permission because it will change the intrinsic look of the village. I most certainly cannot put in double glazing for that very same reason, I cannot cut down a tree in my own garden without permission from the council as the trees are protected. The villages also hold conservation statuses which means that they are supposed to be protected so they keep their beauty and character for ever.</p> <p>The history in the village of Wrotham where King Henry the 8th awaited news of Ann Boleyns execution,also where Ann Bolelyn played bowls on the beautiful 500 year old bowling green (which is also under threat of being turned into a wedding venue !) when she stayed at the Archbishops Palace in Bull lane. Placed on the Pilgrims Way our beautiful Church paid host to pilgrims making their pilgrimage to Canterbury. Wrotham is a tiny village with one tiny Church of England primary school the narrowest High street and one village shop. There is no Drs surgery or Dentist our Bus service has been cut in half. We certainly cannot sustain 400+ houses with upwards of 1200+ People. And that doesn't include the houses in the surrounding area such as Borough Green which could potentially bring in 10,000 + extra people.</p> <p>The areas you wish to build all these properties on is untouched beautiful Greenbelt, AONB country side the damage to the environment and wildlife will be irreversible.</p> <p>I understand the need for housing why not build some homes on the old Marley Tile site instead of a 24 hour DHL hub that's a brownfield site that could be more sensibly used for housing instead of vehicle's.</p> <p>Please I beg you to protect our beautiful villages and country side it's taken hundreds of years to evolve into what is a beautiful part of the Kent Downs. Please don't destroy it, it will never come back if you do it will be gone for ever.</p> <p>Objection</p> <p>Do not destroy the green belt with building</p> <p>Stop Borough Green Garden City and Save our Greenbelt</p> <p>Site 59850 - East Street Addington is totally unsuitable and should be withdrawn and not considered it is unsuitable at just about every level .</p> <p>It is very important to get the balance between infrastructure (rail and road transportation, medical units, utilities etc.), facilities for health, sports and leisure and housing right. Otherwise, if houses are built without these adjacent services being expanded enough, this will cause a lot of tension and turn the bourough into an unpleasant, rather than pleasant, place to live.</p>	<p>Comment Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p> <p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p> <p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p> <p>Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.</p>
42710209	Any other 0 comments		
42711521	Any other 0 comments		
42716289	Any other 0 comments		
42716641	Any other 0 comments		

38332545	Any other 0 comments	<p>Hadlow is situated on the A26 linking Maidstone and Tonbridge and adjacent motorways. It often takes heavy lorries through the centre of the village where several listed buildings are located. These often speed through the village especially at night despite the 30 MPH limit. They cause noise, pollution and for heavier lorries vibration, causing damage and harm to buildings immediately adjacent to the highway. Any new development in the area will cause more noise, congestion and pollution. The current roadworks have closed the road to through traffic over three weekends making it a much more pleasant environment. A village bypass would be a good solution. New houses in the area would exacerbate the noise and pollution. They should be located where there are direct links to areas which are near rail stations such as Hildenborough and West Malling.</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42585729	Any other 0 comments	<p>I understand that Southern Gas Network mentioned earlier this year that the gas network in Wateringbury needs major repair and replacement and that it is on their 'to do list'. I believe that this would leave the Red Hill / Tonbridge Road / Bow Road areas very vulnerable if new homes are added in these areas.</p> <p>The Jacobs report, which is part of the Transport Annex, has identified a significant gap in accessibility and road transport infrastructure up to 2040. I understand that the borough has higher than the Kent and England average for car ownership, as well as a lack of public transport utilisation, and already has many 'red zones' for congestion. This will only be exacerbated with more housing in the local area.</p> <p>Whilst I do not believe that there are any reasonable grounds to build on any greenbelt, this area of the borough (i.e. east TM) has plenty of non-greenbelt sites, therefore use of greenbelt sites is even more unacceptable than in the west of the borough (where it might be harder to avoid).</p> <p>Wateringbury is located between the boundaries for the borough of Maidstone and Tunbridge Wells, both of which have built or are planning to build extra houses near their borders (e.g. Paddock Wood / Capel). The proximity of these other boroughs' development sites means there will already be an extra strain on the road network in and around Wateringbury, especially with Wateringbury being on the route between Tunbridge Wells and Maidstone hospitals. Any development local to, or within, Wateringbury would therefore only increase the pressure on local infrastructure.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.</p>
42719585	Any other 0 comments	<p>The already strained services, lack of infrastructure (doctors and schools capacity severely lacking and already stretched) suggest that TMBC are clearly doing their best to antagonise Kings Hill residents and bait them with ridiculous proposals that are extreme to say the least. The scale and complexity of the Local Plan, the complex method of residents process to give feedback as well as the short deadlines for this to be completed clearly illustrate the contempt TMBC has for its residents.</p>	<p>Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.</p>
42718497	Any other 0 comments	<p>The Plan needs to reflect the local peoples views and not be a housebuilders charter. Green space needs protection.</p>	<p>Comment noted.</p>
42722849	Any other 0 comments	<p>the green belt and AONB are the important thing for me.</p>	<p>Comment noted.</p>

42727201	Any other 0 comments	<p>site number 59707/59731</p> <p>Strongly oppose this development. This site is within green belt and north downs AONB and as such is heavily constrained against development in planning terms. Concern regarding increased traffic: pollution and safety aspects, increased pressure on primary schools and secondary school and GP practice. Building on natural environment.</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42727201	Any other 0 comments	<p>site number 59880</p> <p>Strongly oppose this development. This site is within the green belt and north downs AONB and as such is heavily constrained against development in planning terms. Strain on local services: schools and GP practice. Heavy traffic congestion around Wrotham causing pollution, noise, safety issues and detrimental to quality of life. Impact on nature.</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42727841	Any other 0 comments	<p>Many thanks for the email.</p> <p>National Grid Electricity Transmission have overhead lines routed through your area of interest displayed on the below map [map image attached]</p> <p>From our perspective we need to maintain access to the towers along the TP route (we ordinarily ask for a 15m stand-off) at all times and would also request that no permanent structures are built underneath the conductors.</p> <p>We do have safety guidance and detailed drawings showing the safe clearances that need to be maintained from the conductors which we can provide should any of the proposed developments be close to the lines. I hope the above information is useful but please let me know if there is anything else you require at this stage.</p> <p>Best regards,</p>	<p>Comments noted however, this is primarily a Development Management matter whereby National Grid are consulted regarding developments in proximity to National Grid plant and structures.</p>
24990817	Any other 24986113 comments	<p>Please see the statement submitted with regard to Site 59660. This page does not allow me to submit the statement.</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
38539137	Any other 0 comments	<p>I would say that the sites listed for employment or that are mixed use do not make up enough for the ambitious level of house building. Kent will further be dominated by commuters, which will still leave those working locally no chance to get on the property ladder (because commuters earn more and keep house prices artificially high).</p> <p>You will need to address the lack of cycling infrastructure if this amount of new homes are built, because many sites are far from railway stations, and a bicycle is cheaper to run than having a bus pass. And you need to put the cycling, wheeling and walking routes where they are convenient for active travel users, which will mean taking out parking spaces and introducing 20mph speed limits in all villages and towns across the borough. You will also need to build cycle storage at new housing developments and not plan for car parking spaces.</p>	<p>Comment noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>

42751809	Any other 0 comments	<p>I have been notified of the TMBC Local Plan concerning further proposed development on Kings Hill. This has been brought to our attention by a local resident.</p> <p>It is my opinion that you should have engaged with residents affected by your proposals rather than trying to hide this from residents. This is disingenuous to say the least and we are very angry that this proposal has been buried in order to push this through.</p> <p>We strongly object to this proposal which deprives residents of a say in the environment in which we live and the amenity of open spaces that are crucial to our well-being.</p> <p>I am quite frankly disgusted and dismayed at your attempt to hide the proposal from residents and register our strong objections.</p> <p>I await your response as speedily as you collect my Council Tax.</p>	<p>Comment noted. 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.</p>
42752193	Any other 0 comments	<p>I applaud that you are undertaking this consultation. A lot of people don't know about it and so I wonder if you should provide some further consultation - perhaps not as detailed. I think that you would have been better served to weight the answers to these questions in some way as surely different people have a great depth of feelings about the issues raised and your responses are just going to be binary based on a choice. For example, I may have chosen 5 things I liked but you have no idea (unless I've written to say so) what I find negative or dislike. I feel that the consultation may be somewhat limited as you've only applied one set of metrics to the answers given.</p> <p>I think you need to concentrate on local issues, not world matters - I care what happens to my council tax £s and what you do with them and in return I expect you to be considerate in planning and looking after the area on my (and my fellow council tax payers) behalf. I do not expect you to go solving problems on a global level when it is our local area problems you need to be looking at in the most appropriate way for all of us. Personally, I care a lot about our area, our green spaces and our countryside. After all, I actually live here. It is important that we recognise the need for affordable housing and address the problems we have in the South East, especially for young people trying to get onto the property ladder. Help for local youngsters to get onto the housing ladder would be great.</p> <p>I wish you well in your plan and if I can expand further on any points please ask.</p>	<p>Comment noted. 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. Concerning your other points these will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>
42760225	Any other 0 comments	<p>Site 59800 is part of the current golf course. Many residents have paid a premium to purchase their homes to back onto this and now the proposal is to build yet more dwellings when the current of infrastructure is struggling to cope with the current massing of properties. Its totally ridiculous to propose this when the current road system, doctors, schools etc are already overstretched with very little green space left.</p> <p>It will be a travesty if this proposal goes ahead</p>	<p>Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
42616641	Any other 0 comments	<p>A very good job done in this initial phase</p>	<p>Comment noted.</p>
42772033	Any other 0 comments	<p>I understand that Southern Gas Network mentioned earlier this year that the gas network in Wateringbury needs major repair and replacement and that it is on their 'to do list'. I believe that this would leave the Red Hill / Tonbridge Road / Bow Road areas very vulnerable if new homes are added in these areas</p>	<p>Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.</p>

42772033	Any other 0 comments	The Jacobs report, which is part of the Transport Annex, has identified a significant gap in accessibility and road transport infrastructure up to 2040. I understand that the borough has higher than the Kent and England average for car ownership, as well as a lack of public transport utilisation, and already has many 'red zones' for congestion. This will only be exacerbated with more housing in the local area.	Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.
42772033	Any other 0 comments	Whilst I do not believe that there are any reasonable grounds to build on any greenbelt, this area of the borough (i.e. east TM) has plenty of non-greenbelt sites, therefore use of greenbelt sites is even more unacceptable than in the west of the borough (where it might be harder to avoid).	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42772033	Any other 0 comments	Wateringbury is located between the boundaries for the borough of Maidstone and Tunbridge Wells, both of which have built or are planning to build extra houses near their borders (e.g. Paddock Wood / Capel). The proximity of these other boroughs' development sites means there will already be an extra strain on the road network in and around Wateringbury, especially with Wateringbury being on the route between Tunbridge Wells and Maidstone hospitals. Any development local to, or within, Wateringbury would therefore only increase the pressure on local infrastructure.	The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.
42443361	Any other 0 comments	We support local planning policy requirements that are aimed at regeneration of existing urban areas (such as Tonbridge Town Centre & other conurbations through bringing together affordable housing/occupants with good transport link, retail & local amenities to limit pollution, costs & not remove green belt thereby helping with sustainability & protect against climate change. Smaller adjacent villages should not be subject to anti-convalescence maintaining identity between settlements.	Comments noted.
42799649	Any other 0 comments	Please protect the Garden of England. I feel very happy that I live in such a beautiful place, however, not all of Kent is like that. TMBC have successfully protected this area, please continue to do so.	Comment noted.
25400737	Any other 0 comments	None	Comment noted
42666881	Any other 0 comments	I understand the need for the Council to have a local plan, and that due process (including calling for sites) needs to be followed. However, I wish local authorities were able to penalise greedy landowners putting forward multiple sites that are clearly unsuitable for large-scale residential development (such as many of those around Mereworth and Wateringbury) given the amount of work - and consequent cost - incurred by TMBC and its consultants in evaluating all the sites. For my part, as a personal protest I intend to cease patronising any companies owned by, or linked to, Tregothnan Estate due to their blatant contempt for those of us affected by their evident desire to profit from selling-off as much of their land in the area as possible.	Comment noted.

		<p>roads are connected via The Street to the south (north of St. Lawrence's church) and to the north by Beech Road. All of these roads have significant problems caused by traffic and in their present conditions are not fit to cope with an increase in traffic volume.</p> <p>MPC are awaiting dates for the work already agreed on the B2016. This work to be undertaken by the KCC is an attempt to make the road safer for all users, including the Primary School which is at present not identified as a hazard at the crossroads with West Peckham.</p> <p>The speed limit reduction either side of the same crossing to 40 mph: MPC is waiting to hear when the work will be carried out and how it is to be enforced.</p> <p>Improvements to A228. This is currently stalled because of finances. Over 4,000 vehicles an hour pass through a 21ft wide crossroads during rush hours. Every month the daily traffic count increases. MPC have been assured that in the event of three death accidents or three deaths in one accident the matter will be given an elevated status. 18 years ago we asked for sensor operated traffic lights to be installed at the Kent Street junction; in view of the financial constraints it is now a possibility that this option is being considered.</p> <p>Any developments which increase the burden placed on these roads will seriously exacerbate congestion to a busy and dangerously narrow road, the main north/south road for mid Kent, which is not fit for purpose or the very large lorries for which it is designated.</p> <p>The infrastructure supporting the existing settlements in this area is woefully inadequate and over-stretched. During 2022 there were water shortages and drainage problems in Mereworth and the surrounding area. There is a serious problem with the existing medical practice, covering Kings Hill, West Malling, Offham, West Peckham, Mereworth, Leybourne and the scattered dwellings in between. Dentistry is no better served.</p>	<p>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.</p>
42330721	Any other 0 comments	<p>There are no secondary schools in the area which are accessible on foot. They all require transport links.</p>	<p>Comment noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.</p>
42812833	Any other 0 comments	<p>I am concerned the over development in an area of farmed green belt will not be supported by adequate infrastructure in an area of former water meadows already subject to flooding. The development of site 59692 and adjacent sites will be far too much and lack infrastructure to support the community.</p> <p>59761 not enough infrastructure, roads can't cope doctors can't cope, schools can't cope, more loss of green belt and woodland traffic in and out of Kings Hill already at breaking point, parking is already difficult, losing this green belt land destroys homes for animals and birds</p>	<p>Comment noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.</p>
42820737	Any other 0 comments	<p>This public consultation is very complex and I think it will deter people from completing it. How was it announced? I only heard about very recently in conversation with a neighbour! Why was the consultation period so short?!</p> <p>As I said in my opening comment I would like to enjoy living in T&M as I used to. With the new mast in the centre of the conservation area, battling authorities to limit traffic and traffic speed, suffering traffic pollution, and fighting to improve amenity I do not value living in the Borough even as recently as I did 3 year's ago</p>	<p>Comment noted. The Consultation ran for the standard 6 weeks.</p>
42745121	Any other 0 comments		
42833153	Any other 0 comments	<p>No further comment</p>	<p>Comment noted.</p>
42801665	Any other 0 comments	<p>Please take notice of public opinion</p>	<p>Comment noted.</p>

42830913	Any other 0 comments	There is no justification for any new houses to be built. East Malling, West Malling and surrounding areas including King's Hill are already ruined by too many houses, cars and people creating pollution, crime and a ridiculous amount of rubbish. The wildlife and natural environment is being ruined and eradicated. You are custodians of the land and should be preserving it for future generations.	Comment noted.
42835041	Any other 0 comments	Too long...not very easy to read from a laymans perspective...not publicised very well...the council holds our email addresses and emails when it is looking for miney..ie parking permits, garden waste etc, so why not email an invite to review? 6 weeks is not long enough considering the importance and time scale of rhe plan. It should have been split up and delivered in easier to read and understand modules.	Comment noted.
43309729	Any other 25240577 comments	<p>1.1.1 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.</p> <p>1.1.2 Our client controls land at Allingham Close (Millbourne Place), Borough Green (TMBC Site 59767), which we believe represents a suitable and sustainable location to provide a small number of new homes. Accordingly, within the sections below we provide a detailed response to the questions being posed by the Council before outline further how we consider our site fits within the spatial options being considered.</p>	Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
43311521	Any other 25240577 comments	<p>1.1 Introduction</p> <p>1.1.1 This representation is prepared on behalf of Portman Homes Group LLP in response to the Tonbridge and Malling Borough Council (TMBC) Local Plan (Regulation 18) consultation which closes 3rd November 2022.</p> <p>1.1.2 We understand that TMBC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040, and that the Council is asking for views on principles that should determine where these homes should be built, and how it can deliver infrastructure improvements across Tonbridge and Malling.</p> <p>1.1.3 Our client controls 'Land at Riding Farm' (Site 59775) which we believe represents a suitable and sustainable future housing location with capacity of up to 10 dwellings.</p> <p>1.1.4 Within the sections below we provide a detailed response to the questions being posed by the Council within the consultation document before outlining further how we consider our site fits within the spatial options being considered.</p>	Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.
43312385	Any other 0 comments	<p>I am sending this email to raise my concerns about the proposed development of land around Kings Hill.</p> <p>There is not the infrastructure on KH to support this development. I have lived here for 10 years and am now finding it impossible to book an appointment at the drs. I have been waiting to see a nurse since the start of September and there are constantly no appointments. How on earth are they to cope with more patients?! This is not the surgery's fault, but more the sheer number of people who need their service!</p> <p>The roads on and around KH are so busy already and our daughter often has to either sit on the floor or stand all the way to school in Tonbridge! More houses will make this situation worse!</p> <p>One of the reasons we chose to live on KH was the beautiful surroundings. This is now being threatened with more housing.</p> <p>Please consider this carefully before making an decisions.</p>	Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.

43313313	Any other 0 comments	<p>I am resident on Kings Hill (address details at foot of email. I moved her five (nearly six) years ago having joined the golf course some five/six years previously.</p> <p>I am very involved in my golf and am lady captain this year. For me the friends I have made at the club and the regular social events held there have enhanced my life immeasurably. The idea that this amenity may be lost for development came as a great shock to me. I had always understood it was an integral part of the development at Kings Hill and was safe from such threats. I am given to understand that it is not the current landowner who has proposed use of these two sites and so it seems to be speculation by some external firm without consideration of the impact on current residents.</p>	Comment noted.
43313441	Any other 0 comments	<p>My reflections on the proposed development of every piece of available and also unavailable land in Kings Hill for housing.</p> <p>I understand the need for more housing but can't help but feel that travelling to the north of Kings Hill is preferable for housing whereas to the South there are many areas which is green belt. There are many areas which already have planning and we should get on and build here now.</p> <p>Specifically Sites in Kings Hill put forward to planning:</p>	Comment noted.
43313473	Any other 0 comments	" Stop Borough Green Garden City, Protect Greenbelt and AONB, once it has gone, it is gone forever	Comment noted.
43356321	Any other 0 comments	<p>I would like to complain about the amount of notice afforded to this objection survey , forms were only delivered at the weekend with a deadline of 4 days later , if people are away on half term holidays there is no chance to lodge a formal significant response</p> <p>I have completed the form as per my objections and would like confirmation that these have been accepted and lodged</p> <p>Some of these planning ideas are quite frankly ridiculous in their asks and I am appalled at the thought of squeezing houses onto any small piece of grassland , who and how are these ideas passed ?</p>	Comment noted. The consultation period ran for the standard 6 weeks.
43356769	Any other 0 comments	<p>I would like to add that currently, Kings Hill simply does not have the infrastructure to accommodate further development, nor does it have the resources of Doctors, Dentists or Schools to accommodate the enormous influx of people such developments would attract. I can see that there has been a "provision" for such facilities being provided, but they need to be in place prior to any further development. Building further supermarkets is not the answer.</p> <p>Additionally, the roads in and around Kings Hill are already congested every day and West Malling station does not have enough services to cope.</p> <p>I trust that the above will be taken into consideration before any approval is given to any further development</p>	Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.
43395937	Any other 25240577 comments	<p>1.1 Introduction</p> <p>1.1.1 This representation is prepared on behalf of Balfour Ltd in response to the Tonbridge and Malling Borough Council 'TMBC' Local Plan (Regulation 18) consultation which closes 3rd November 2022.</p> <p>1.1.2 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.</p> <p>1.1.3 Our client controls 'Land East of Red Hill, Wateringbury' (TMBC Site 59654) which we believe represents a suitable and sustainable future housing location.</p> <p>Accordingly, as part of our response we provide a detailed response to the questions being posed by the Council before outlining further</p>	Comment noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

43397313	Any other 25240577 comments	<p>1.1 Introduction</p> <p>1.1.1 This representation is prepared on behalf of Leander Homes Ltd in response to the Tonbridge and Malling Borough Council (TMBC) Local Plan (Regulation 18) consultation which runs until 3rd November 2022.</p> <p>1.1.2 We understand from the document that TMBC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040, and that the Council is asking for views on principles that should determine where these homes should be built and how it can deliver infrastructure improvements across Tonbridge and Malling.</p> <p>1.1.3 Our client controls 'Land south of Lower Haysden Lane, Tonbridge (Site 59641)' which we believe represents a suitable and sustainable future housing location with capacity of circa 120 dwellings.</p> <p>1.1.4 Within the sections below we provide a detailed response to the questions posed by the Council within the consultation document before outlining further how we consider our site fits within the spatial options being considered.</p> <p>1.1.5 We also flag that the Sustainability Appraisal has not considered the full extent of the site and has only included the upper quarter of what is available. This response provides a detailed overview of the full extent of the site and for completeness the whole site has been submitted again via the Council's consultation portal.</p>	<p>Comment noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
43417665	Any other 0 comments	<p>I have just looked at the local plan consultation, and it certainly isn't the easiest thing to navigate. What I really wanted to see was sites that were in Tonbridge, but they were all mixed up together! However what I do want to say and feel strongly about is the places such as Tonbridge Farm Sportsground and the area at Hayesden which has sports pitches definitely should not be in the local plan. It is after all very important for people's mental and physical health that there are both green spaces to walk and exercise, and places that can be used for sports. Once these are gone they can never be replaced. Tonbridge Farm Sportsground in particular is used by such a wide range of people in the community which is a deprived area, and it really should stay as it is serving people of absolutely all ages. It's recently been improved as a destination to go by the UPZ AND Downz Cafe that had opened there.</p>	<p>Comment noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
43418465	Any other 0 comments	<p>The Housing Plans for TMBC are understandably complicated and contentious. I am quite sure that many of my points below have been considered and/or suggested already, but my civic duty calls me to offer these.</p> <p>1) By far the majority of land now used for housing in TMBC was, 200 years ago, agricultural land. Borough Green consisted of 3 farms, 2 pubs, a chapel and a post office.</p> <p>2) Since then the railway, quarrying, transport links and commerce have attracted 1000s to the area, all needing homes to live in. The pastures and orchards have gone.</p> <p>3) The concept of capacity in town planning is crucial: how many can an designated area hold, provide for, cater for and give benefit to?</p>	<p>Comment noted.</p>
43418913	Any other 0 comments	<p>never thought I would hear myself saying this, but the mass proposal of supposed viable areas to build, is quite frankly a load of bull!!!</p> <p>Did someone get a map and then drop pins (blindfolded) on said map! The roads are already filled to capacity, and there has been no new infrastructure to cope with anymore people living down here!</p> <p>The builders are certainly not building for local people when they do build, and very badly built they are too!! All you are doing by approving any of these 'plans' is extending Mr Khan's vision of London!</p> <p>Because of all the building going on in Kent as a whole, it is leading to mass destruction of precious places to visit and see wildlife. A massive drop in birds and butterflies.</p> <p>I'm afraid you can no longer call yourself the 'garden of England'.</p>	<p>Comment noted.</p>

43422689	Any other 42768769 comments	<p>Local Plan Regulation 18 Consultation response Sites 59515 and 59516 Please find our consultation response attached which has been prepared on behalf of our clients Mr and Mrs N Butler ([redacted], Tonbridge) and Mr P Lawrence ([redacted], Tonbridge) in response to sites 59515 and 59516. I would be grateful if you could confirm receipt.</p>	<p>Comment noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
43422689	Any other 42768769 comments	<p>2 Site references 59515 and 59516 Local Plan Regulation 18 Consultation Response Contents 1. Introduction 3 2. Summary of objections to sites 59515 and 59516 4 3. Conclusion 10 List of Figures Figure 1 – street scene image of site 59516 from Salisbury Road taken from Google Streetview Figure 2 – extract of TMBC’s interactive Policy Map showing open space outlined in green Figure 3 - street scene image of open space from Rochester Road taken from Google Streetview Figure 4 - Extract from MAGIC Map showing priority woodland habitats Figure 5 - street scene image of open space from Royal West Kent Avenue taken from Google Streetview Site references 59515 and 59516 Local Plan Regulation 18 Consultation Response 1. Introduction These representations have been made on behalf of Mr and Mrs N Butler (13 Rochester Road, Tonbridge) and Mr P Lawrence (15 Rochester Road, Tonbridge). Our clients wish these representations to form a formal objection to the Councils Regulation 18 Local Plan consultation. They have been prepared to specifically raise objections to two prospective site allocations that have been identified as sites 59515 and 59516 both within the Cage Green and Angel Ward. It is understood that these sites were sourced via the Urban Capacity Study and that both parcels are owned by Tonbridge and Malling Borough Council. These representations have been submitted to Tonbridge and Malling Borough Council via email as the online consultation response system does not allow for the submission of photographs and illustrations which we consider necessary to illustrate the objections we wish to raise. Consultation Process In addition to the objections to the above site allocations, our clients also wish to comment on the lack of consultation process that has been carried out by TMBC. Our clients were only notified about the prospective sites a few days prior to the consultation period closing and by chance. It is understood, following a conversation between our client and a planning policy officer at TMBC that the Council have relied upon social media to spread the word about the Local Plan consultation, which we believe to be insufficient. Our clients therefore wish to seek reassurance that the Council will pursue a more appropriate consultation strategy in the future. Furthermore, whilst there is a list of prospective sites, these do not appear to have been laid out on an interactive map to aid residents in identifying what sites have been put forward. If there is an interactive map, this does not readily appear on the consultation page. The sites have been listed by postcode without also including a street address which would have aided in the identification of the sites. We consider that this would have made the consultation process more transparent and easier for residents to decipher the relevant information.</p>	<p>Comment noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
43422689	Any other 42768769 comments	<p>Site references 59515 and 59516 Local Plan Regulation 18 Consultation Response 1. Introduction These representations have been made on behalf of Mr and Mrs N Butler (13 Rochester Road, Tonbridge) and Mr P Lawrence (15 Rochester Road, Tonbridge). Our clients wish these representations to form a formal objection to the Councils Regulation 18 Local Plan consultation. They have been prepared to specifically raise objections to two prospective site allocations that have been identified as sites 59515 and 59516 both within the Cage Green and Angel Ward. It is understood that these sites were sourced via the Urban Capacity Study and that both parcels are owned by Tonbridge and Malling Borough Council. These representations have been submitted to Tonbridge and Malling Borough Council via email as the online consultation response system does not allow for the submission of photographs and illustrations which we consider necessary to illustrate the objections we wish to raise. Consultation Process In addition to the objections to the above site allocations, our clients also wish to comment on the lack of consultation process that has been carried out by TMBC. Our clients were only notified about the prospective sites a few days prior to the consultation period closing and by chance. It is understood, following a conversation between our client and a planning policy officer at TMBC that the Council have relied upon social media to spread the word about the Local Plan consultation, which we believe to be insufficient. Our clients therefore wish to seek reassurance that the Council will pursue a more appropriate consultation strategy in the future. Furthermore, whilst there is a list of prospective sites, these do not appear to have been laid out on an interactive map to aid residents in identifying what sites have been put forward. If there is an interactive map, this does not readily appear on the consultation page. The sites have been listed by postcode without also including a street address which would have aided in the identification of the sites. We consider that this would have made the consultation process more transparent and easier for residents to decipher the relevant information.</p>	<p>Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. A comprehensive consultation undertaken whereby 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.</p>

In this submission we ask that Warren Woods Nature Park as shown edged red on attached plan be shown as a Local Green Space on the new draft Local Plan.

This site was previously part of Heath Farm, East Malling which is now largely land out for Sports Facilities to serve the community of Kings Hill to the south.

The bulk of the remainder is now the much used Warren Woods Nature Reserve which is used as an informal recreation area by both residents of Kings Hill and of this Parish.

The site is accessed from this Parish by public footpath MR114 and MR115 from Well Street and The Heath. Within the Nature Park connecting paths have been laid out between these two rights of way giving public access to the whole site.

It should also be mentioned for completeness an application is pending with the County Council to upgrade MR114 to a restricted byway based on historical evidence.

We believe some of the site is classified as ancient woodland and indeed was once part of East Malling being common land enclosed in the early 19th century.

We consider the site is a valuable green space for local people and also has landscape value too plus providing a refuge for wildlife.

Please acknowledge safe receipt of this email.

I have copied this to Kings Hill Parish Council.

I have been asked to enquire if a reference can be made in the draft Local Plan to the system of Quiet Lanes south of East Malling. There was a policy mentioning such lanes in a previous Structure Plan but was not carried forward into the Local Plans.

These lanes were designated in a process involving the Borough Council and are a statutory designation. When the Parish Council raised this previously it appeared the Kent County Council had not correctly registered them and after this was raised by this Council and local councillors, this was rectified. Hopefully the Borough Council is aware of the position but if necessary we can resubmit the documentation.

This has been copied to [Councillor] who was involved previously and out Parish Councillor [redacted].

The Parish Council would also like to request that Larkfield Playing Fields as shown on the attached plan edged in red be considered as an important green space.

The land includes the sports pitches, ball park, children's play area, and ball park all within a centrally placed site within Larkfield. There is also the remnants of a former sand pit with some small oaks which provides an informal play area.

The site is in an elevated spot so there are good views of the Medway Gap Valley and North Downs.

It is the biggest green space within the now built up area of Larkfield.

There is access to the site from the built up area South of the M20 by the Redwing Close footbridge; from Chaucer Way via the public path and cycleway; from New Hythe Lane; and from the Larkfield Leisure Centre to the north.

It is site well used by dog walkers and informal ball games. In snowy weather it is used for sledging. It was much used during the recent COVID period for just walking.

In conclusion we feel it is the most important green space within built up Larkfield.

Comments noted. These matters will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The Council is commissioning a Open Space, Indoor and Outdoor Sport and Recreation study to help inform the Local Plan.

Comment noted. The Council acknowledges the reference to quiet lanes within the borough which will be considered further within the transport evidence that is being prepared.

Comment noted. The Council is commissioning a Open Space, Indoor and Outdoor Sport and Recreation study to help inform the Local Plan.

43463745

Any other
0 comments

43463745

Any other
0 comments

43463745

Any other
0 comments

Conclusion

1.3.1 For the reasons set out in this Statement, we support full development needs being met via disbursed growth option. In this regard, our client's site in Wrotham is considered suitable for a proportionate scale commercial led development given it is adjacent to the established employment hub of Wrotham and would form a natural and logical expansion.

1.3.2 Commercial development would contribute to the economic needs of the borough, which is tantamount to the exceptional circumstances needed to justify the proposal site being developed within the Metropolitan Green Belt.

1.3.3 In respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution, or contamination. There are no known financial restrictions that would impact upon the viability of

Page 12 of 12

a future commercial scheme nor that would prohibit development coming forward within the early stages of the Plan period. To the contrary, we consider there to be an opportunity to deliver a high-quality scheme in a timely manner.

1.3.4 The site is in single ownership and there are no complicated legal agreements or covenants that would prohibit the ability to bring them forward early in the Plan period. The site is therefore considered available and achievable for the purposes of the tests of deliverability.

1.3.1 Taking all the above into consideration, we consider that land south of Invicta Business Park (Site 59705) represents a suitable, sustainable and logical future locations for employment led development as a natural extension to the existing business park.

Thank you for the opportunity to comment on the above consultation.

We attach comments on behalf of our client, Taylor Wimpey Strategic, who have land interests in the former Reg. 19 allocation LP25 (x) at Stocks Green Road, Hildenborough (Site 59692).

We trust these are useful and duly made, and we look forward to receiving an acknowledgement of these in due course.

Our client would welcome the opportunity to meet with Officers to discuss and share the emerging updates to assessments and masterplan work for this site at the appropriate time.

In the interim, if you need any further information please do not hesitate to ask.

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

43485985 Any other
25240577 comments

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

43544961 Any other
25377633 comments

Further to recent discussion with [TMBC officers] , please find attached the consultation response on behalf of Terance Butler Holdings (and associated companies) in respect of land parcels at Aylesford Lakes, Aylesford, Kent.

I enclose details/comments relating to the following land parcels:

* 59678 – West Lake

* 59676 – East Lake

* 59670 – Area E

* 59674 – Area I

* 59675 – Northern Fields

In addition, please find attached:

* A review of the TMBC Housing Needs Survey 2022 referencing the current proposals for the East Lake under planning application TM/22/01909

* The Economic Benefits Assessment submitted as part of the current proposals for the East Lake under planning application TM/22/01909

As requested at the recent meeting with [officers], we also include programme schedules for the above sites to confirm deliverability.

Also included is detail of the Phase 2 land at Lake Cottage (former 80 Rochester Road, Aylesford) which has been submitted separately to the Call for Sites 2 consultation (reference ID d40cb4).

If you would prefer a word version of the Reg 18 consultation response to assist, then please let me know.

Please can you acknowledge receipt of this email and its contents.

Should you require further assistance, please do not hesitate to contact me.

The following representations are made on behalf of Aylesford Heritage Limited, Terance Butler Ltd and Terance Butler Real Estate Investments Limited. The respective land parcels/landowners are indicated below on the summary tables. The comments are specifically related to questions 7 and 8 of the Regulation 18 Consultation.

[Representation accompanied by Aylesford East Lake Economics Benefits Assessment Report, Housing needs survey review letter and programme PDF]

[site submitted to call for sites]

Call for Sites - Lake Cottage Phase 2 (former 80 Rochester Road, Aylesford)

Site to be submitted to Call for Sites 2 using the template provided by TMBC

Site ReferenceNo current site referenceSubmitted to Call for Sites 2 consultation ref ID – d40cb4

LandownerTerance Butler Limited

Deliverable (0 to 5 years)Deliverable

Submit Planning Application 2023

Delivery 2024

Developable (6 to 10 years)

Capacity9 dwellings

Proposed Use(s)Residential – an extension accessed through the current River Reach scheme where 10 houses are currently under construction (approved under Planning Permissions 19/01979/FL and 20/01916/FL)

Delivery AgentTerance Butler Limited

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

43545921 Any other
0 comments

Comment noted.

43545921 Any other
0 comments

Comment noted.

43545921 Any other
0 comments

Comment noted.

Tonbridge and Malling Borough Council, Emerging Local Plan, Regulation 18 Version, September 2022, Consultation Response and Formal Representations from Millwood Designer Homes.

I write on behalf of our client, Millwood Designer Homes Limited and we write to provide a formal consultation response and our Representations relating to the Regulation 18 version of the emerging Tonbridge and Malling Borough Council Local Plan (the 'Local Plan').

Millwood Designer Homes Limited ('Millwood') who are part of Places for People are an award-winning developer with an established reputation throughout the South-East for its masterful interpretation of local vernacular architecture, especially their Wealden Hall House styles.

Millwood build a broad range of individually designed homes from contemporary style apartments, to more traditional two and three-storey homes. MDH are renowned for high-quality, their attention to detail and for producing new homes that sit very comfortably in their surroundings, complementing and enhancing the area. Millwood are supportive of the Government's desire to see a step change and a significant boost in the delivery of much needed new homes in the Borough, and we support the Government's aims to build at least 300,000 per year, every year across the UK.

Accordingly, Millwood have appointed Gillings Planning to review the emerging Local Plan in order to ensure that the proposed approach is being prepared positively and accords with the National Planning Policy Framework (the Framework) so that the plan can be found sound, as this is in everyone's interests.

43548193 Any other 38432225 comments

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

Millwood Designer Homes' Interests

We can confirm that these Representations relate to Millwood's interests in three sites in the Tonbridge area of the Borough, all submitted to the Council for consideration via the Call for Sites exercise carried out earlier this year. The locations of the three sites, and their TMBC reference numbers are provided below:

- Site c115c | Land south of Lower Haysden Lane, Tonbridge, TN9 2QN
- Site 110864 | Land south of Vauxhall Gardens, Tonbridge, TN11 0NA
- Site 599290 | Land off Vauxhall Lane, Tonbridge, TN11 0NA.

Format of These Representations

We understand that our responses at this 'Regulation 18' stage must focus on the 50 questions set out in the Regulation 18 publication. Therefore, and to assist the Council in reviewing these representations, we have listed the 50 questions below and provided our considered responses to each, where applicable.

43548193 Any other 38432225 comments

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

The above link does not show any potential sites in the Trottiscliffe area!! The only plots which affect Trottiscliffe are 59730 & 59736 which is a repeat of the same site! The comments below are particularly relevant regarding access onto a bend, which is a 50mph limit and drivers all appear to push the limit between Trottiscliffe and Addington; with no infrastructure and amenities available to the site.

As discussed at the meeting on Tuesday, the questionnaire/consultation document is very difficult to negotiate ones way through; although, we have respoded as a Parish Council body seperately; below are my primary comments.

42804769 Any other 0 comments

38430273 Any other 0 comments

I would like to add my name to all these objections by Cllr Garry Bridge. I have his permission to do so.

Comment noted.

1.0 Instructions and Introduction

1.1 Neame Sutton Limited, Chartered Town Planners, is instructed by Rydon Homes Limited (“Rydon”) to prepare and submit representations in relation to the current Regulation 18 Local Plan (“the Draft Plan”) consultation for Tonbridge and Malling Borough Council (“TMBC”).

1.2 This document sets out Rydon’s Representations and should be read in conjunction with the duly completed consultation response proforma and accompanying suite of appendices.

1.3 In terms of format this document deals with the following matters:

- Section 2 Representations on Strategic Issues and Spatial Strategy
- Section 3 Representations on the Evidence Base
- Section 4 Site-Specific Representations
- Section 5 Key Changes Required to make a Sound Plan

1.4 As an overriding point Rydon is concerned by the lack of evidence underpinning the draft Plan particularly in relation to key matters of legal compliance such at the Duty to Cooperate (“DtC”) specifically regarding unmet housing need and also matters such as land availability and Green Belt Assessment. These are all fundamental flaws that need to be rectified as a priority and before the Council proceeds to the next consultation stage.

1.5 This overriding point is addressed in further detail in Sections 2 and 3 of these Representations.

3.0 Representations on the Evidence Base

3.1 In this Section Rydon identifies its headline concerns with the Evidence Base presented by the Council to underpin the Draft Plan. Further detail in relation to the adequacy of the SA in particular relation to Rydon’s promotion sites is set out in Section 4.

3.2 As a starting point it is clear that the Evidence Base underpinning the Draft Plan is limited both in the subject matter covered and the level of detail provided. A key example of this is the Stage 2 Green Belt Assessment (Exceptional Circumstances (Strategic) Note). Whilst that document confirms that, at the strategic level, exceptional circumstances do exist for altering the Green Belt boundaries to help meet the assessed development needs there is no further evidence produced by the Council to assess the Green Belt itself and the areas within it that would be most suitable for removal for development. That is a fundamental flaw in the evidence base at this stage, particularly as the Council has identified a schedule of sites, which have then been assessed through the SA along with asking for feedback on various spatial strategy options. None of the spatial strategy options can be properly considered without this key evidence.

3.3 The Council has amassed information on some 291 sites following its call for sites exercise in December 2021-February 2022. Those sites have been considered through the SA but there is no Land Availability Assessment produced to consider the sites on their merits before assessing them against the SA objectives. This is a fundamental flaw in the evidence base.

3.4 In fact the Council confirms in the Draft Plan¹³ that the Strategic Land Availability Assessment (“SLAA”) will not be published until after the Regulation 18 consultation has concluded. This cannot be the right way to proceed.

3.5 As has already been highlighted earlier in these representations there is no evidence relating to the DtC discussions the Council has had with its neighbours and no evidence of any agreements reached or progress made in that regard. Not only is that a failure in terms of the Evidence Base but it goes to the heart of the legal compliance of the Draft Plan.

3.6 The remaining evidence is extremely limited and it is clear that much more work is to be done before the Council can present a credible plan underpinned by sound evidence.

Comment noted.

Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. The Council has commissioned an independent green belt study to inform the Local Plan development strategy and possible options. The Council continues to engage with its neighbours on strategic cross boundary matters through the Duty to Cooperate forums and evidence on this will be made available in the future as the Local Plan progresses.

43619329 Any other
43619297 comments

43619329 Any other
43619297 comments

5.1 As currently presented and, recognising that this is only the Regulation 18 consultation stage, the Draft Plan is not sound nor is it legally compliant.

5.2 Significant work is required by the Council to rectify the deficiencies identified through these representations. In summary the key changes required before the Council will be able to present a Sound Plan are:

1. Revisit the LHN calculation having regard to the factors identified in Section 2 above to establish an appropriate minimum Housing Requirement Figure, which in Rydon's view should be at least 20% above the LHN;
2. Properly address the DtC particularly in relation to unmet need and document that constructive and ongoing engagement with neighbouring authorities (particularly those that share a HMA with Tonbridge and Malling);
3. Calculate the minimum housing requirement by reference to the factors that point to an uplift to meet the needs of the Borough's residents and then accommodating any unmet need arising from neighbouring authorities;
4. Select an appropriate spatial strategy to enable early delivery of sustainable sites across the Borough that will help to rectify the significant housing crisis that exists as soon as practicable;
5. Revisit the SA to correct the clear flaws in the assessment work undertaken, particularly those instances where the conclusions drawn are wrong when having regard to the available evidence;
6. Revisit the SA assessment of sites, particularly the 3 promotion sites put forward by Rydon to address the inaccuracies in the scoring given;
7. Update the evidence base to rectify the current shortcomings in the existing documents/studies prepared and commission the necessary technical work to complete the evidence base. Then apply that evidence to the selection of an appropriate spatial strategy and site selection (this includes publishing the SLAA and taking on board its findings in the next iteration of the Regulation 18 Draft

Comments noted. The Council is required to reflect the approach of the National Planning Policy Framework and Associated Planning Practice Guidance. These matters will be considered alongside national planning policy requirements and practice guidance, evidence base documents and other consultation responses.

43619329 43619297 Any other comments

Comment noted.

1 INTRODUCTION

Context

Gladman welcome the opportunity to comment on the Tonbridge and Malling Regulation 19 consultation and request to be updated on future consultations and the progress of the Local Plan. Gladman Developments Ltd specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public. Gladman have concerns regarding the Council's Interim Sustainability Appraisal. It does not currently appropriately assess the sustainability of sites and is flawed in its current iteration. This should be thoroughly reviewed prior to the next consultation.

43629217 Any other 0 comments

Comment noted.

CONCLUSIONS

Summary

Gladman welcomes the opportunity to comment on the Tonbridge and Malling Regulation 18 Local Plan Consultation. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2021) and the associated updates that were made to Planning Practice Guidance.

Gladman have provided comments on the Council’s considered approaches to Green Belt and note that the Council will need to give due consideration to Green Belt release sites owing to the heavily constrained nature of the authority.

In this regard, Gladman do not agree with the approach taken in assessing Site 59688- Hilden Golf Course in the Interim Sustainability Appraisal and consider that this needs to be thoroughly reviewed.

We hope you have found these representations informative and useful towards the preparation of the TMBC Local Plan and Gladman welcome any future engagement with the Council to discuss the considerations within forwarded documents.

43629217

Any other
0 comments

Comment Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan. The council will continue to engage with service providers through the preparation of this evidence.

On 1 July 2022 NHS Kent and Medway Clinical Commissioning Group was replaced by the NHS Kent and Medway Integrated Care Board. NHS Kent and Medway is the NHS organisation that plans and buys healthcare services to meet the needs of 1.9 million people living in Kent and Medway. It is our responsibility to ensure health services and all future proposed developments are sustainable from a revenue affordability, capital investment and workforce perspective. We must also ensure that, wherever possible, we maximise the delivery of care closer to where people live.

NHS Kent and Medway will continue to engage with Tonbridge and Malling Borough Council as part of the Local Plan development and consultation process to understand the impacts associated with housing developments, including the likely health needs and the future provision of health services. Through this process and as part of the wider healthcare infrastructure strategy, we will continue to identify infrastructure development requirements, including contributions through S106, that support the provision of additional healthcare services and healthcare facilities (including plans associated with maximising utilisation and potential development of existing facilities) for the local population.

We are pleased to see that the plan includes intentions to provide healthy living and leisure facilities, to provide public green spaces and to promote active travel. All these factors are important determinants of health and well-being and are fundamental aspects that positively influence population health.

We look forward to working with Tonbridge and Malling Borough Council as you develop the Local Plan.

43652001

Any other
0 comments

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

Whilst our clients support the principle of bringing forward a Local Plan, in the line with the NPPF, it is vital that the Council allocates specific, deliverable sites to boost significantly the supply of housing (both market and affordable). In turn, this will assist in reducing the affordability issues and certainly if small and medium size sites are included as part of the spatial strategy. In terms of the Site and as set out above, if independently assessed in Green Belt terms, it would perform weakly. Further, the Site is deliverable in accordance with the definition at Annex 2 of the NPPF. It is therefore proposed that the Site should be released from the Green Belt and allocated for residential development in the emerging Local Plan. Finally, we look forward to working with the Council over the coming months to evolve the current iteration of the Local Plan and we would be grateful if you could confirm receipt of these epresentations, keeping us informed of progress.

42832833

42826433
Any other
comments

42832833	Any other 42826433 comments	<p>TONBRIDGE & MALLING BOROUGH COUNCIL – LOCAL PLAN (REGULATION 18) CONSULTATION (NOVEMBER 2022) – LAND AT BASTED LANE, CROUCH</p> <p>On behalf of our clients, the Packham family, please find enclosed representations to Tonbridge & Malling Borough Council’s (hereafter referred to as ‘the Council’) Regulation 18 Local Plan (the ‘Local Plan’). Our clients support the decision to bring forward a new Local Plan as the importance of creating a Plan-led approach to planning for development cannot be understated given the Council’s adopted Local Plan predates the National Planning Policy Framework (‘NPPF’). A new Local Plan is therefore required to ensure the future needs of residents and businesses across the Borough can be met through the sustainable development of sites.</p> <p>As part of the initial stage of the emerging Local Plan, our client’s Site at Basted Lane, Crouch, was submitted to the Council’s first Call for Sites exercise in February 2022.</p> <p>These representations provide:</p> <ol style="list-style-type: none"> 1. An introduction to the Site and confirms previous promotion; 2. Summarises the development potential of the Site; 3. Identifies the key strategic matters; and 4. Responses to the relevant questions set out in the Local Plan and reassesses the Site (as necessary). 	<p>Comment noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
43676929	Any other 43676897 comments	<p>Please find attached a formal consultation response on the Regulation 18 Draft Local Plan, submitted on behalf of Mirambeau Properties in relation to land at Hale Street, East Peckham (Site 59855).</p> <p>The response is provided in report form with additional supporting reports appended, but is set out as answers to the relevant consultation questions to allow for ease of processing.</p> <p>I trust the attached is satisfactory but please let me know if anything else is required or if you have any queries. I would be grateful if you could also please acknowledge receipt by reply.</p>	<p>Comment noted.</p>
43676929	Any other 43676897 comments	<p>1.1.1 This representation is prepared on behalf of Mirambeau Properties in response to the Tonbridge and Malling Borough Council’s (TMBC) Local Plan (Regulation 18) consultation, which closes 3rd November 2022.</p> <p>1.1.2 We understand that TMBC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040, and that the Council is asking for views on principles that should determine where development should be located, and how it can deliver infrastructure improvements across Tonbridge and Malling.</p> <p>1.1.3 Our client controls ‘has an interest in ‘Land East of Hale Street, East Peckham’, which we believe represents a suitable and sustainable future employment location with an indicative capacity of up to c. 21,000sqm of B2, B8 and Class E (g) floorspace.</p> <p>1.1.4 Within the sections below we provide a detailed response to the questions being posed by the Council within the consultation document before outlining further how we consider our site fits within the spatial options being considered. In this respect, this consultation response is provided in the context of this site and therefore answers those questions relevant to it, principally regarding employment and economic development strategy; the wider spatial strategy and the Green Belt.</p> <p>1.1.5 This representation is supported by technical notes addressing highways and transportation issues (Appendix 1), Drainage (Appendix 2) and Agricultural Land Quality (Appendix 3) and should be read in conjunction with these.</p>	<p>Comment noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
43485921	Any other 0 comments	<p>Please find attached Broadwater Action Group's Q8 response to the Regulation 18 Local Plan Consultation for Site 59740. To support our submission we have referenced various Annex documents, however, due to their size we have not been able to deliver these additional documents via email. Instead, please find below a link via which the Annex documents can be examined and downloaded. Should you have any issues accessing these supporting documents, please do get in touch as they form a critical part of our submission.</p>	<p>Comment noted.</p>

43485921	Any other 0 comments	<p>Introduction</p> <p>This paper forms one of two main responses Broadwater Action Group (BAG) is submitting to TMBC as part of our response to the Regulation 18 Local Plan Consultation. The first paper, which has already been submitted, focusses on an assessment of policy related issues relevant to our objective of preventing inappropriate development of land between West Malling, East Malling and Kings Hill. This second paper focuses on a critique of the Interim Sustainability Assessment of Site 59740 Broadwater Farm.</p>	Comment noted.
43485921	Any other 0 comments	<p>Annex List</p> <p>Annex A* Assessment of the Origin of Water Supporting Cwylla Pond Within the New Barns and Broadwater Farm Conservation Area by GWP Associates</p> <p>Annex B Agricultural Land Classification, Medway Gap and Vicinity Local Plan- Land at Eden Farm/ Broadwater Farm West Malling 1991</p> <p>Annex C Map of potential and ongoing development sites in and around Broadwater and surrounding settlements.</p> <p>Annex D (1,2 & 3)* Highways Technical Appraisal & Appendices by Les Henry Associates.</p> <p>Annex E* BAG Wildlife Subcommittee Report</p> <p>Annex F* West Kent Badger Group</p> <p>Appendix G* BAG Heritage Subcommittee Report</p> <p>*The documents associated with these Annex were originally submitted to TMBC as response to the consultation regarding Planning Application TM/21/02719 for the development of Broadwater Farm.</p>	Comment noted
43781249	Any other 0 comments	<p>1.1 Introduction</p> <p>1.1.1 This representation is prepared on behalf of Gallagher Properties in response to the Tonbridge and Malling Borough Council 'TMBC' Local Plan (Regulation 18) consultation which closes on 3rd November 2022.</p> <p>1.1.2 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 the Council can deliver infrastructure improvements across Tonbridge and Malling.</p> <p>1.1.3 Our client controls various sites which have been promoted through the Call for Sites. These include:</p> <ul style="list-style-type: none"> • Land south of Hermitage Court, Barming1 which represents a suitable and sustainable future employment location with capacity for approximately 7,000m² of additional employment floorspace, deliverable early within the emerging Plan period. • Land west of Chapel Street, Ryarsh2 which represents a suitable and sustainable future housing location for approximately 20 units deliverable early within the emerging Plan period. • North Pole Road3 which represents a suitable future housing location for approximately 10 units. <p>1.1.4 As part of this response, we first introduce Gallagher Properties before providing a detailed response to relevant questions being posed by the Council in the consultation document. Thereafter, we outline how we consider our client's sites fit within the spatial options being considered.</p>	Comment noted.

Comment noted.

1.2 Gallagher Properties Ltd

1.2.1 Gallagher Properties was established 45 years ago and has since grown and developed into one of South East’s most successful privately owned businesses. Gallagher is strategically located in the heart of Kent with easy access to the rest of the county, London and the south east of England. They specialise in developing offices, industrial/warehouses, and residential development. Their developments always benefit from high levels of investment and design in external and landscaped areas. Location is key, with their developments being located close to major roads and the national motorway network.

1.2.2 The business was founded upon strong values; customer focused, passion and confidence, teamwork, character, solution driven and eager to learn. Over the years through the many developments completed, the business has grown to become renowned for its strong track record and market leading reputation for delivery of high-quality developments. The nature of The Gallagher Group's business model means that either part or all of the services can be combined to provide the best solution for each individual project. These services include; aggregates, building, civil engineering, masonry, property and plant and machinery.

43781249

Any other
0 comments

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

SUMMARY AND CONCLUSION

Whilst our clients support the principle of bringing forward a Local Plan, in the line with the NPPF, it is vital that the Council allocates specific, deliverable sites to boost significantly the supply of housing (both market and affordable). In turn, this will assist in reducing the affordability issues and certainly if small and medium size sites are included as part of the spatial strategy.

In terms of the Site and as set out above, if independently assessed in Green Belt terms, it would perform weakly. Further, the Site is deliverable in accordance with the definition at Annex 2 of the NPPF.

It is therefore proposed that the Site should be released from the Green Belt and allocated for residential development in the emerging Local Plan.

Finally, we look forward to working with the Council over the coming months to evolve the current iteration of the Local Plan and we would be grateful if you could confirm receipt of these representations, keeping us informed of progress.

42832833

Any other
42826433 comments

Comment noted.

NHSPS thanks the Council for the opportunity to comment on the Tonbridge and Malling Local Plan and look forward to working with you to ensure that the needs of the health service are taken into consideration.

We would request that NHSPS be added to the consultation database, and we be notified on the progression of all planning policy consultations relating to the Local Plan.

43799937

Any other
0 comments

Tonbridge and Malling Friends of the Earth welcomes the Regulation 18 consultation on the Local Plan. We fully understand that it has to incorporate the requirement for new dwellings imposed by the government and that this is a very difficult problem to solve with approximately 71% of the borough covered by the Metropolitan Green Belt, the combined Kent Downs Area of Outstanding National Beauty and the High Weald AONB constituting approximately 26% of the borough and approximately 11% of the borough covered by Ancient Woodland. These are very significant physical constraints on building development clearly meaning that the Local Plan has to be a compromise document that attempts to meet and merge several distinct and different points of view, including, understandably, the strong opposition to development of different parts of the borough by their residents. The complexity of preparing the balanced response required to meet the twelve key challenges specified by Tonbridge and Malling is a hugely demanding and unenviable task. Although the Council prioritises, correctly we believe, using brownfield sites over greenfield sites the limited number of sites on the Tonbridge and Malling Brownfield register – the 2019 Brownfield Register includes just 13 sites covering only 8.74 hectares out of the total 24,013 hectares of land within the boundaries of the borough. The need to look to the neighbouring authorities to seek assistance in meeting its housing need is clearly identified in the Stage 2 Green Belt Assessment by Arup, dated 27th July 2022. These two factors on their own demonstrate the scale of the task facing Tonbridge and Malling Borough Council in preparing a deliverable Local Plan.

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

25296065

Any other
0 comments

Our comments on specific aspects of the Local Plan are as follows:

ADDITIONAL SECTIONS NEEDED

Separate sections in the plan should address sustainable construction and renewable energy. There are many examples of the level of detail acceptable in a Local Plan to reflect the requirement of Local Planning Authorities to plan for climate change mitigation and adaptation. Although this is a complex issue, it is, however, one which should not be ducked by TMBC. As part of the evidence base for the 'Managing Development and the Environment DPD' (July 2009) TMBC's 'Evidence Base for Carbon Emissions Reduction Policies' – Creative Environmental Networks (2008) indicated that even in 2008 addressing climate change was imperative in Tonbridge and Malling and could be done without challenging the viability of the Local Development Framework.

The Town and Country Planning Association and Royal Town Planning Institute report 'A Guide for Local Authorities on Planning for Climate Change' (October 2021). This is the most up to date legal advice to Planners and Local Planning Authorities on the legalities of including policies addressing the mitigation of and adaptation to the impacts of climate change <https://www.local.gov.uk/pas/plan-making/local-plan-review-update/planning-climate-change/guide-local-authorities-planning>.

The UK Green Building Council have made a variety of resources on driving sustainability in new homes available including a policy 'playbook': <https://www.ukgbc.org/ukgbc-work/new-homes-policy-playbook/> (January 2021)

Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The Council has commissioned additional Climate Change evidence to assess the impacts of climate change and how the Local Plan can help secure adaptation measures as part of new developments.

25296065

Any other
0 comments

and Options for local authorities on Driving social value in new developments <https://www.ukgbc.org/ukgbc-work/driving-social-value-in-new-development-options-for-local-authorities/> (March 2019).

The Local Plan has many positive aspects to it in terms of its vision and what it recognises as necessary for sustainable development. The key element in every aspect of development and in the protection and enhancement of the environment is the quality of monitoring to ensure that the policies established in the final draft of the Local Plan are followed so as to fulfil the greatest extent of its ambition, to turn that ambition into the reality that comes into being in the borough.

A clear example of the need for clear, measurable and published monitoring is provided by the issue of air quality in relation to one specific potential site: 59764 in Judd Ward, with its potential yield of 265 new dwellings. The NPPF states that local planning authorities should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.

Objective 12 of the Interim Sustainability Appraisal Report Final report dated August 2022 is 'To protect and improve air quality'. and the cumulative impact of the Local Plan is outlined as the following: The air quality assessment has demonstrated that none of the strategic sites in the Local Plan are predicted to exceed the relevant air quality objectives in any scenario, indicating that the sites are suitable for the introduction of new receptors, i.e. people. The Local Plan requires development to mitigate/offset impacts on air quality. During the plan period, air quality will benefit from reductions in vehicle emissions as vehicles become more efficient and cleaner, with an expected significant growth in electric cars on the roads.

The following three targets are included in Chapter 6, Monitoring, of that report:

- * Maintain and improve local air quality.
- * Promote measures that will remove the occurrence of AQMAs.
- * Reduce the impacts on air quality from transport. Mitigate against the uses that generate NO2 or other

Comment noted. The Council has commissioned additional air quality evidence to assess the impacts of the development strategy on air quality in the borough.

25296065

Any other
0 comments

After many attempts through every possible method, I was unable to upload this onto the online consultation questionnaire or the full Local Plan and SA consultation documents due to the inability of either method to:

- * Accept cut and pasted text reliably in every box.
- * Accept more than 6000 characters. I trust that you will upload and report my comments in full and correctly so that they are available for public perusal.

Past consultations in all authorities I have responded to have listed and displayed submitted consultation responses as soon as they are uploaded, and these were publicly immediately available. I cannot understand why this software was not used to enable public access and scrutiny immediately after data protection screening. The final FULL consultation responses must be available for public perusal from the beginning (comments on Reg18 must be publicly available well in advance of consultation on Reg19) and ultimately both Reg18 and Reg19 full responses must be available for the public and Inspector at the time of submission of the Reg 19 plan in advance of the future Examination in public. This held up the timing of the last Examination as it was not undertaken properly.

There is a lot wrong with this consultation questionnaire and it is difficult for those not versed in planning to really understand the implications of the answers. This is due to the wrong questions being asked and the wrong issues being grouped together. I have pointed this out in the enclosed response. Interpretation of the consultation responses will not give any clear steer to the development of the LP Reg. 19 document which is of concern.

It is important that this LP gets through the Examination this time, and I recognise the real difficulties which the Borough has in accommodating the housing numbers required whilst conserving and enhancing the Borough and ensuring the infrastructure can cope. My comments may appear negative, but they are provided from a spirit of concern. A lot of procedural mistakes were made at the last Examination. They must be

This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.

24986657

Any other
0 comments

Why isn't climate change –meeting the challenges of climate change- on this 'infographic'. It should be one of the main drivers to the strategic and development management policies of the local plan. The choice of option should be driven by its sustainability and contribution to reaching carbon neutrality by 2030 in accordance with the Borough's own Climate Change Strategy.

2. Comments on the Foreword

There is not one word about how the choices impact on the Borough's carbon footprint. Not one word of the context of how the provision of affordable homes, safeguarding green spaces and delivering local jobs in our towns and villages impacts on the carbon footprint.

There is not one word of improving the green infrastructure, providing sustainable infrastructure and making allocations in places which will have the lowest carbon impact. This should have been a main driver for this plan. However there is no climate change evidence base or topic paper. This would have indicated the patterns of growth that would be most efficient in reducing the existing carbon footprint and providing the lowest impact for the future. The Sustainability Appraisal (SA) (Appendix C) is not detailed enough for this to be reliably accurate. Without a climate evidence base the Sustainability Appraisal scores on the impact of each option on the carbon footprint is meaningless and based on guess work. Therefore this consultation does not give consultees the opportunity to choose an option which demonstrates the lowest carbon footprint, except in a very superficial way.

The requirement from Government to allocate sites for 15,941 new homes is only one of the Government's requirements. There are also other requirements set out in the NPPF, Planning Acts and other legislation and Acts which, amongst other issues, relate to addressing climate change as a priority. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008, and co-operate to deliver strategic priorities which include climate change.

'In addition to supporting the delivery of appropriately sited green energy, effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases. Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan making and decision taking. To be found sound, Local Plans

Draft for consideration by SPC

General comments on the Reg.18 LP

Before this consultation on Reg. 18 closes this should be made clear that the process at Reg. 18 takes consultations into account to choose a preferred option and strategy. It is much more about the WHERE than the HOW. The 'how' is addressed more in the Reg.19 plan. Some of the questions raised in the Reg.18 do indirectly address the 'how' but only in a way that is mixed up with questions relating to the 'where' or the 'what'. There is no further opportunity for the public to comment until after the Reg.19 plan has been adopted by the Borough. Only then is there the opportunity for public consultation. Any public consultation responses then go with the plan to the Inspector for the Examination. Currently this statement in para 1.8.2 'There will be an opportunity to comment on the Plan as it progresses to the more detailed stage.' is very misleading. Shipbourne Parish Council will call for consultation on any new allocations and the emerging development management policies before the Reg19. Plan is finalised for consideration by the Borough for adoption. SPC would appreciate conversations with the Officers on emerging development management policies, particularly those which cover: AONB, Green Belt, Rural Areas and rural issues, Conservation Areas and Shipbourne's Design Statement, design and historic environment, and Climate change.

Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The Council will be undertaking further evidence on Green Infrastructure and climate change to inform the Local Plan.

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

24986657

Any other
0 comments

42380353

Any other
0 comments

		Tonbridge and Malling Borough Council must ensure that Brownfield sites are built on first and any abandoned/derelict housing within the borough should be brought back into active housing stock.	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42439841	Any other 0 comments	Some of the sites that have been allocated for development throughout Kent are currently car parks. Building on these sites would seriously impact local shopping areas and the businesses that rely on the footfall. I refer to your communications dated 22nd September 2022 in respect of the current Regulation 18 Consultation for the Tonbridge & Malling Local Plan (Regulation 18 Plan).	Comments noted.
43884609	Any other 0 comments	Tunbridge Wells Borough Council (TWBC) welcomes the opportunity to engage with Tonbridge & Malling Borough Council (TMBC) as part of this process and has several comments to make. regular liaison and meetings to discuss housing, employment and other needs under the Duty to Cooperate and it is noted that the TMBC consultation document makes no specific reference to the Duty to Cooperate. TWBC will continue to work with TMBC on evidence base studies and input to partnerships to address cross boundary issues through consultations on methodologies and where appropriate and practical joint working including participation in partnerships for Ashdown Forest and liaison over Green Belt and landscape studies. As you will be aware from our regular liaison and Duty to Cooperate meetings, TWBC is now at a very advance stage in the preparation of a new Local Plan, which covers a period of 2020-2038. The plan was submitted to the Secretary of State on 1st November 2021 and has been through a number of Hearings between March – July 2022. We are currently awaiting the Inspectors post hearing letter in order to decide how to take the TWBC Submission Local Plan forward to adoption. Now that the TWBC Local Plan is at an advanced stage it is important that the following are taken into account as TMBC move forward with evidence gathering, the drafting of policies, and the allocation of land for potential development. <ul style="list-style-type: none"> • Strategic site delivery identified for the expansion of Paddock Wood and East Capel for 3,490-3,590 dwellings and associated infrastructure and complementary development (Policy STR/SS 1), including Land to the north of Paddock Wood with resolution to grant consent for 18,000sqm of employment floorspace (Planning Ref: 22/01929/OUT). • A new garden village including 2,800 dwellings associated infrastructure and complementary development at Tudeley (Policy STR/SS 3) • Development of Land at Mabledon House for a hotel and leisure uses which could include a spa and other ancillary facilities on the boundary of TMBC (Policy AL/SO 2), particularly in regards to infrastructure needs, and highways impacts. • Land east of Kingstanding Way which has outline consent for 74,000sqm of employment floorspace (planning Ref: 19/02267/OUT). The Regulation 18 Plan does not make any comment on the possibility of TWBC being asked to meet need from any adjoining authority area or vice versa and this approach is not identified as one of the growth scenarios. Given the close alignment in the stage of plan production with SDC continued engagement with	Comments noted. TMBC will continue to work closely with TWBC on cross boundary matters through the duty to co-operate forum.
43884609	Any other 0 comments		

I have read the questions posed in the draft plan but have chosen not to give my views within the suggested Q&A framework as it is cumbersome and, in my view at least, un-user friendly. Likewise trying to access the various maps. It would have been helpful if they could have been listed numerically as well as alphabetically.

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

The 'mood music' reported from Westminster on Government housing targets appears to indicate that the rigid top-down numerical targets are not necessarily going to be imposed so I would urge TMBC to work hard in getting the unrealistic number set for the borough reduced.

I am fortunate enough to live in the middle of Wrotham village so benefit from the surrounding Green Belt and AONB designations.

I'm probably not alone in wishing we didn't have to build any more new homes or commercial premises on Green Belt and AONB land but accept that the need for more housing will result in these protections being over-ridden.

43897729

Any other
0 comments

Green and open spaces which are used by local people are tremendously important and must be respected

Comment noted.

Comments on the plan generally

* The plan and the consultation should be postponed until

(a) A proper detailed assessment of housing need in the district has been carried out in Tonbridge and Malling and adjoining districts.

(b) HMG has decided whether the determination of needs should be carried out by central government alone or by local assessment in consultation with central government

Many districts in Kent have delayed submitting their local plan until the situation is clarified. T & M BC should do the same.

The current central government algorithm of housing needs is unsatisfactory as it pays no attention to real need, and fails e.g. to determine for whom the houses are to be built, or whether they can be afforded by the people they are being built for. Yet the algorithm is imposed on an unwilling local authority without regard to the nature of the district upon which it is being imposed.

42758337

Any other
0 comments

I am writing in response to the above consultation as the Member of Parliament for Chatham & Aylesford. I appreciate developing a Local Plan is a challenging and complex task for local authorities. In the case of TMBC, I acknowledge the task is made more difficult following the withdrawal of the previous draft Local Plan in 2021 and the impact this has had on the level of housebuilding expected across the borough. However, as I have set out in each of my responses to the consultation exercises regarding the previous draft Local Plan, I do share local residents' concern about how TMBC intend to meet its housing need and specifically the impact on my constituency in the north of the borough.

In the previous draft Local Plan, several sites within my constituency were earmarked for development. These included the two large strategic sites in Aylesford and Bushey Wood, in addition to the site referred to as Ditton Edge. As TMBC will be aware, two of these sites have been granted permission despite widespread concerns, with a planning application for development at Bushey Wood currently under consideration. This is in addition to the ongoing building out of the Peters Village development.

I therefore share residents' concern at any scenario where the north of the borough is expected to bear the majority of housebuilding in the new Local Plan, given the number and scale of applications that have already been granted. I appreciate that this is a document setting out potential strategic approaches TMBC could take and that no sites have been allocated. However, the Council will already be aware from the various submissions to consultations on individual planning applications and the previous draft Local Plan, there are significant concerns about local infrastructure, whether that be the local road network, capacity at GP surgeries and loss of green space.

Much of the local road infrastructure across my constituency suffers from congestion at peak times, including the A20, Hermitage Lane, M20 J4 & 5, M2 J3, the A229 and the A228. The suggestion of further development adding additional pressure on these areas of the local road network is obviously concerning. While this is a

Comments noted. These matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. With regard to the development strategy and in particularly development within the north of the borough, no decisions have been made at this stage on the strategy and site locations which will be informed by further evidence to deliver sustainable patterns of development. The site specific matters of individual sites will be taken into consideration within the site analysis and site selection processes and associated infrastructure demands including health care will be reflected within the Infrastructure Delivery Plan. Concerning transport issues, the highways impacts will be modelled through the Kent Model to ensure an acceptable impact upon the highway network inconjunction with KCC and National Highways. The possibility of coalescence between villages and loss of green space will be strongly considered as part of the spatial strategy.

25407105

Any other
0 comments

1.1.1 This representation is prepared on behalf of Heart of Kent Hospice in response to the Tonbridge and Malling Borough Council (TMBC) Local Plan (Regulation 18) consultation which runs until 3rd November 2022.

1.1.2 We understand from the document that TMBC is in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040, and that the Council is asking for views on principles that should determine where development should be directed and how it can deliver infrastructure improvements across Tonbridge and Malling.

1.1.3 Heart of Kent Hospice was founded 31 years ago with a determination to improve end-of-life care for terminally ill adults. To date, over 17,000 people living with a terminal illness from within a 210 square mile of Maidstone area have received the specialist, compassionate palliative and end of life care they needed, free of charge. This care and support also embraces those who are important to them: their partners, children, grandchildren and other family members, carers and friends, estimated at over 68,000

1.1.4 Despite the outstanding achievements of the charity, the existing facility at Preston Hall, Aylesford is aging and subject to a number of ongoing concerns. Accordingly, we respectfully request the Council's intervention and assistance in two forms;

- (a) Policy support for the provision of charitable palliative and end of life care facilities, including the potential for a new purpose built facility if a suitable site can be found; and
- (b) Identification of such a new facility as essential social infrastructure and inclusion within the Infrastructure Delivery Plan

1.2 Why the need for a new facility

1.2.1 The fabric of the established building is failing, and the heating, plumbing and electrical systems are

Introduction

This representation is prepared on behalf of FGS Agri 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 'Island Site – Land North of Aylesford, Burham' (TMBC Site Ref: 59851) which we believe represents a suitable and sustainable future strategic housing location. Accordingly, as part of our response 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.

Comments noted. The Local Plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan. The need for a hospice in the borough will be taken into account as part of the health care needs whereby the Council is happy to advise further through pre application advice.

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

44191169 25240577 Any other comments

44200193 44200161 Any other comments

25378817	Any other 0 comments	<p>Response by the Home Builders Federation to the consultation on the Tonbridge and Malling Local Plan.</p> <p>[INCLUDES SUBMISSION OF A VIABILITY REPORT]</p> <p>Thank you for consulting the Home Builders Federation (HBF) on the Tonbridge and Malling Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.</p>	<p>Comment noted and the accompanying viability report is acknowledged. The Council is preparing its own viability evidence base work which will take this report into consideration.</p>
38330625	Any other 0 comments	<p>West Malling Parish Council made a comprehensive contribution to the Regulation 18 consultation of the previous draft Local Plan and have once again sought to express the views of our local residents.</p>	<p>Comment noted.</p>
44236769	Any other 0 comments	<p>This document offers a “bullet point” overview of our response to the above consultation</p> <p>Introduction</p> <p>Section A of this response gives an overview of our areas of concern regarding the Regulation 18 Local Plan.</p> <p>Executive Summary</p> <p>Detailed below are our responses to the call for sites identified as part of the urban capacity study for potential housing.</p> <p>Our main comments are:</p> <p>* Creation of new Local Green Spaces to retain recreational areas and “green lung” for health purposes: The Carnation Green area should be preserved as a Local Green Space as well as East Malling Playing Fields and Warren Woods Nature Reserve.</p> <p>* Requesting that the Green Belt is extended eastwards from West Malling By Pass. This will protect the character of East Malling and West Malling and prevent its coalescence. It would protect the countryside between the three communities including the network of quiet lanes and rural public paths, the conservations areas within it, and continue to provide a “green” area appreciated by the residents of the adjoining built up area.</p> <p>Our countryside is precious and intrinsic part of the character of our villages. It provides a physical separation between villages so that each retains its own identity. It provides leisure opportunities which is vital for health and wellbeing.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>

		<p>-----</p> <p>This is the Parish Council's formal response to the Borough Council's Regulation 18 Local Plan. The document is in four sections:</p> <ul style="list-style-type: none"> ☑ Introduction and Overview ☑ Appendix 1 Responses to the 50 questions in the Regulation 18 Local Plan ☑ Appendix 2. Sustainability Appraisals and additional information on sites relevant to Kings Hill ☑ Appendix 3 Traffic report sponsored by Mereworth PC, published in 2019 <p>The Parish Council recognises that for the New Local Plan TMBC has adopted a new approach to The Local Plan Regulation 18 and we appreciate the involvement of the Parish Council and the public at this stage of the process. We hope that the Green Belt will be extended between Kings Hill and East Malling and West Malling.</p> <p>Kings Hill Parish Council found the questions within the Regulation 18 Local Plan document extremely difficult to answer in a helpful way. The Parish Council has received much feedback from residents that the process is difficult, and the Parish Council is concerned that this will impact on the number of submissions.</p> <p>Over the last few years, residents have fought hard to protect the countryside around Kings Hill from excessive development. The inclusion of these sites in the Regulation 18 Local Plan has created mental anguish and depression for residents, and there are frequent comments along the line of 'Maybe it's time to leave Kings Hill'.</p> <p>We call for a rebalancing of the housing figures for Kings Hill by reducing the number of proposed homes in the area outside the Green Belt and a reassessment of Brownfield sites.</p> <p>We recognise that many of the issues are the result of national planning regulation and process. We urge the Borough Council to use every opportunity to lobby government and our MPs to recognise that the special difficulties experienced by authorities on the fringes of the Green Belt.</p> <p>In addition, Kings Hill has serious concerns about the enforcement of Local Plans; for example, Kings Hill Phase 3 (635 dwellings) was agreed by TMBC Planning, even though it was not included in the agreed Local Development Framework that existed at the time of the agreement. There are concerns</p> <p>Conclusions</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>
44309601	Any other 0 comments		<p>Comment noted.</p>
25378817	Any other 0 comments	<p>We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in our comments please contact me.</p> <p>I want to register my concern that you have given me Less than 2 days to review and comment on a detailed document of well over 100 hundred pages on a plan which will Shape 20 year period. This is both unfair and ridiculous</p> <p>Why has this not been planned to allow all residents a reasonable time in which to study and provide informed comments and observations , concerns etc ?</p> <p>I work full time during the week which effectively means I have no chance of giving this complex document the attention it deserves</p>	<p>Comment noted. The public consultation took place over a standard 6 week period.</p>
44407489	Any other 0 comments	<p>I look forward to hearing from you</p>	

Introduction

1. These representations to the Tonbridge and Malling Local Plan Regulation 18 consultation have been prepared by Vincent and Gorbing on behalf of Trenport Investments Limited (“Trenport”).
2. Trenport welcomes this first step by Tonbridge and Malling Borough Council (“TMBC”) in advancing a new Local Plan for the Borough and the opportunity to make comment on its contents. Following the withdrawal of the previous Local Plan in July 2021, Trenport has been seeking to work with TMBC to bring forward planning applications on sites previously allocated in the withdrawn draft Local Plan to assist the Council in delivering much needed housing for the area. These sites (Land at Bell Lane, Burham and Land at Eccles [formerly Bushey Wood]) are located on the East Bank of the River Medway, an area that remains one of the only parts of the Borough that is not constrained by Green Belt or Area of Outstanding Natural Beauty (AONB) designations.
3. Trenport has supported the Council’s plan-making process for over 20 years and remain of the view that a flexible, adaptable and dynamic Local Plan will assist the planning of the Borough in the future.

About Trenport

4. Trenport is a development company with a portfolio of sites in the residential and commercial sectors throughout the UK. It acquired Blue Circle’s extensive land interests in the Medway Valley in 2001. Trenport has a history of close collaboration with the Council, having delivered two strategic sites (Holborough Valley and PetersVillage) and other smaller developments amounting to over 2000 new homes. Trenport remains the owner of much of the undeveloped land on the east bank of the River Medway including land previously allocated at “Bushey Wood” for 900 units in the withdrawn Local Plan that is now the subject of a planning application that is with TMBC for determination following its submission in February 2021.
5. Trenport act as both a “master developer” securing planning permission, implementing all necessary strategic infrastructure and disposing of serviced land to housebuilders. Trenport also has its own housebuilding subsidiary, Rosechurch Homes, such that it can directly deliver high quality new homes. It’s first development in TMBC is currently on-site to the south of Peters Village at a development known as St Mary’s View.

I am pleased to submit a response to the Regulation 18 consultation on behalf of Coblands Nursery, landowners of the site at Trench Road, Tonbridge, TN11 9NG.

The submission (which has also been completed online) is contained within four parts:

1. Response to Reg 18 consultation (Response #1123046)
2. Response to Interim SA (annex 1) for Site ref 59746 – reference Comment #31
3. Interim Sustainability Appraisal report review for site 59746
4. Vision for Coblands Nursery, Trench Road, Tonbridge – site ref 59746

We look forward to working with the Council on the Local Plan process.

[INCLUDES VISION DOCUMENT FOR COBLANDS NURSERY, TONBRIDGE].

Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Comments noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

24927329

Any other
0 comments

42452545

Any other
42452353 comments

.....
i) About the Kent SME Developers Network

These representations have been prepared by the Kent SME Developer Network (the Network)

- a consortium of Small and Medium (SME) Developers who are located in or operate within Kent and Medway. The Group is currently chaired by Paul Henry, Managing Director of Esquire Developments, an SME Housebuilder based in Longfield near Dartford, Kent.

The Network was formed in November 2019 and presently comprises approximately 30 participants including SME Housebuilders and Developers (of varying size and scale) and Registered Providers. In addition, the Network includes representatives of Local Planning Authorities including Medway Council, Swale Borough Council, Tonbridge and Malling Borough Council, Tunbridge Wells Borough Council and Maidstone Borough Council. It is the intention that the Network grows over time to cover all of Kent including additional SME Developers and Local Planning Authorities.

The Network was set up to provide a platform for SMEs to discuss relevant planning and delivery issues associated with bringing forward smaller developments and to positively and proactively engage with Local Planning Authorities at the plan making and decision taking stages.

The Government has recognised the need to support existing SMEs and encourage more into the market in order to diversify the housing market from the volume housebuilders and generate choice and improve quality of homes being built. The Government has described SMEs as being of 'National Importance'. Appendix 1 sets out the narrative behind the support and role for SME Housebuilders.

The Network meets on a quarterly basis to discuss and explore relevant SME related issues, including working through planning related matters. Notable attendees at past meetings including Steve Quartermain (prior to

Comments noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.

44415649 Any other
42006241 comments

APPENDIX 1

The Role of SMEs

THE ROLE OF SMEs

This statement set out the importance currently being placed by Central Government on the role of Small to Medium Enterprises (SMEs) in the housebuilding Industry and demonstrates the vital role SME Housebuilders will play in complementing volume housebuilders to deliver the Council's housing requirements and in turn the national housing target.

A. The Government's Position on SME'S

i) Building More Homes – July 2016

The Government has made it clear that it is committed to increase housebuilding to deliver 300,000 homes per year by the mid 2020's. The target figure of 300,000 homes per year comes from a recommendation in the House of Lords Economic Affairs Committee report, 'Building More Homes', published in July 2016. The figure takes into account estimated population change but also to address the backlog created by the failure to build enough homes over many years. All the main political parties have accepted the 300,000 dwelling per annum figure.

Statistics monitoring completions across the UK (gov.uk) confirm Housebuilding has not achieved this level of growth since 1977-78 (314,090 dwellings – Live_Table 109) and in 2017-18 only 222,194 dwellings (Live_Table 122) were completed. Whilst this is an increase since 2012-13 (124,722 completed dwellings), this is still well short of the 300,000 dwelling target.

ii) Home Builders Federation – January 2017

This representation is prepared on behalf of Persimmon Homes in response to the Tonbridge and Malling Borough Council 'TMBC' Local Plan (Regulation 18) consultation which closes 3rd November 2022.

Tonbridge and Malling Borough Council is in the process of preparing a new Local Plan to set out a strategy for development across the Borough for the period to 2040 and is seeking views on key principles that should determine the spatial strategy for the Borough over the Plan period, including where additional homes should be built, and how infrastructure improvements can be delivered.

Our client, Persimmon Homes, have a promotional interest in land at Snoll Hatch, East Peckham (Site [59613]), which we believe represents a suitable and sustainable future housing location. Accordingly, our client is promoting the site for residential allocation with capacity for approximately 105 units, deliverable within the emerging Plan period.

As part of this promotion, we provide a detailed response to the questions being posed by the Council before outlining further how we consider our client's site fits within the spatial options being considered.

Comment noted. The role of SMEs will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The Council recognises the important role SMEs and custom house building can play in helping to meet the boroughs housing needs in a challenging market which will be considered and appropriately reflected in the emerging Local Plan and other evidence base documents as required. The Local Plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan for all developers including SMEs and custom house builders.

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

44415649 Any other
42006241 comments

44426049 Any other
25240577 comments

xii) The Bacon Review (August 2021)

1.37 In August 2021, the Prime Ministers Independent Review into scaling up self build and custom housebuilding was published¹⁴. Led by Richard Bacon MP. Whilst primarily dealing with recommendations to government on how to support growth in all parts of the custom

¹² <https://lichfields.uk/media/1728/start-to-finish.pdf>

¹³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

¹⁴ <https://www.gov.uk/government/publications/independent-review-into-scaling-up-self-build-and-customhousebuilding-report>

and self build market, helping to boost capacity and overall housing supply in our housing market, the review touched on the plight of smaller building firms.

The report outlined how smaller firms now account for only 12% of new housing stock and 'have been largely squeezed out by very big companies who can afford the time and cost involved in negotiating a path through the complex thickets of the planning system'.

The review continues that the SME sector has nearly been destroyed as a direct consequence of a regulatory environment which is both exceptionally complex and fraught with risk, so that the gaining of planning consents requires both very deep pockets and the ability to bear significant risks over very long periods of time.

xiii) Meeting Housing Demand, House of Lords Select Committee (January 2022)

In January 2022, the House of Lords Select Committee released its report 'Meeting Housing Demand¹⁵. A

Comments noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance and will be considered alongside other evidence base documents and consultation responses. The Council recognises the role of SMEs and custom house building in meeting the boroughs housing need which will be reflected in the emerging Local Plan as it develops.

Any other

44415649 42006241 comments

.....

These representations have been prepared by Esquire Developments Ltd, a multi-award-winning SME developer based in Longfield, Kent.
Esquire Development has a number of land interests in the Borough, including pending applications at Hermitage Lane, Aylesford (ref 22/00907/FL) (Appendix 1) and Ivy Farm, East Malling (ref 22/01570/OA) Appendix 2.

In addition, as a local SME Housebuilder, Esquire Developments will have ongoing land interest in the Borough on smaller scale, windfall development.

We recognise the early stages of the Regulation 18 Local Plan which is providing for a high-level option for a future spatial strategy. Therefore, these representations have been prepared in objective terms with reference to the relevant questions where appropriate.

In summary, the representations consider:

- The Settlement Hierarchy should be reviewed with the addition of a new tier of settlement - recognising larger villages and the role they play in meeting sustainable development.
- Our preferred strategy is Option 4, which we consider strikes the right balance to meet housing and employment needs across the Borough.
- Support for the recognition of SME Housebuilders and the need to deliver at least 10% of housing on sites of 1ha or less.
- The identification that SME housebuilders can play an even greater role, and that the Local Plan should be prepared in a way that supports SME's working within policy on windfall or edge of rural settlements. This can be achieved through a specific SME policy or a wider rural villages type policy.
- That any future housing allocations should be qualitative in its assessment (including SHLAA assessment), including ensuring that sites being promoted by SME developers should be recognised and that is built into the

Comments noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The Council recognises the role of SMEs and custom house building in meeting the boroughs housing need which will be reflected in the emerging Local Plan as it develops.

42006241 Any other
42006241 comments

1997 and has a strong track record of delivering high quality residential and mixed use developments in Kent over the last 25 years. This has been acknowledged through the receipt of nationally recognised awards, including the gold Evening Standard Awards best family home 2022 and 2019 bronze WhatHouse Best Small Housebuilder.

Comments noted.

SME housebuilders are recognised in the National Planning Policy Framework (NPPF) at paragraph 69 as making an important contribution to meeting the housing requirements of an area, and being able to build out relatively quickly, and by the Planning Inspectorate². This is particularly the case with Fernham Homes, which is privately owned with access to significant resources. This provides significantly more flexibility than national and other regional housebuilders, and allows Fernham Homes to deliver housing rapidly and to a high quality, beautiful and sustainable standard (para 126 of the NPPF).

Fernham Homes has embarked on a sustained period of growth, with a clear adopted business plan to deliver around 300 houses per year in five years time.

A key element of Fernham Homes' operations is to take a very diligent approach to site selection: a huge amount of due diligence is undertaken as part of this, and therefore Fernham Homes only invests in those sites which meet the NPPF requirements of being available, suitable, and deliverable. As set out in Section 25 of these Representations, Land at Maidstone Road, Hadlow is considered to be such a site.

Similarly, a key feature of Fernham Homes' approach is work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Fernham Homes are fully committed to engaging with TMBC in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led" and should be shaped by early, proportionate and effective engagement between LPAs and others, including businesses and developers. Accordingly, Fernham Homes would welcome the opportunity to discuss the matters contained in this representation, including the availability, suitability, and

44459553

Any other
0 comments

Appendix 5 - Emerging Policy SP4 - Residential Windfall Development

image

Appendix 5
Ashford Borough Council Adopted Local Plan Policy HOU5

image

image

Appendix 6
Dover District Local Plan (Emerging Policy SP4)

SP4 - Residential Windfall Development

1 Residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within or immediately adjoining the settlement boundaries, as shown on the Policies Map, of the following settlements:

Ash, Alkham, Aylesham, Capel-le-Ferne, Deal, Dover, East Langdon, Eastry, Elvington, Eythorne, Guston, Goodnestone, Kingsdown, Lydden, Northbourne, Preston, Ripple, Sandwich, Shepherdswell, St Margarets at Cliffe, Wingham, and Worth.

2 Minor residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within the settlement boundaries, as shown on the Policies Map, of the following settlements:

Ashley, Barnsole, Betteshanger, Chillenden, Coldred, Denton, East Studdal, Finglesham, Great Mongeham, Martin, Martin Mill, Nonington, Ringwould, Staple, East Stourmouth, Sutton,

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

42006241 Any other
42006241 comments

i) National Policy & Plan Making

2.1 The NPPF (July 2021) places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF. These include:

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and improved productivity; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental role – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy.

(Paragraph 8)

2.2 Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- Local Plans should meet objectively assessed needs, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed

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

44460673

Any other
0 comments

Consultation (“the Consultation”) being progressed by Tonbridge and Malling Borough Council (“the Council”).

1.2 The Consultation is seeking views on the Council’s new emerging Local Plan following its withdrawal of its previous emerging Local Plan for reasons of legal compliance following Examination. The Consultation covers a range of issues and options, including different spatial approaches as to where development / growth (needed to sustain prosperity and local communities) should be located, along with environmental matters and how infrastructure improvements should be planned for.

1.3 Ramac Holdings interest in the Consultation is that it owns land to the north of Pratling Street, Aylesford (“the Site”) on which it has submitted a planning application for up to 20,000sqm of employment development (reference 21/03066/OA), as a logical expansion of the adjacent Forstal Business Park. The illustrative layout of that development is at Appendix A.

1.4 As well as through the planning application, the development opportunity on the Site is known to the Council through Ramac Holdings call for sites submission in February 2022 and as previously considered as part of the plan-making process of the withdrawn Local Plan.

1.5 The Consultation includes various evidence base documents. In particular, regard is had to the ‘Economic Development Needs Study – Part 1’ (August 2022) (“the EDNS”), which highlights the lack of supply and unmet demand for employment, and to the ‘Interim Sustainability Appraisal Report’ (August 2022) (“the Interim SA”) which considers the merits of specific sites (including the Site) against its objectives of sustainable development.

1.6 Against this background, these representations are structured to:

- ☑ highlight the need for significant employment development / growth with regard to the EDNS as the Council’s latest evidence base;
- ☑ comment on options for the spatial distribution of development, including that options for sustainable development beyond the Green Belt must be exhausted before ‘exceptional circumstances’ to justify changes to existing boundaries can exist; and
- ☑ demonstrate that the approach of the Interim SA does not accurately reflect the Site’s overall sustainability for employment development with regard to the information submitted with the

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

44462081 Any other
44462081 comments

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

[59828]

5.1 These representations identify the opportunity for sustainable employment growth on land adjacent to Forstal Business Park, adjacent to the Medway Gap urban area / Aylesford that would make a significant contribution towards levels of economic growth needed across Tonbridge and Malling Borough.

5.2 As to how much employment development should be provided, the Council's preferred 'labour demand scenario' in the EDNS would continue to impede economic growth, compounding periods of unprecedented turbulence into the future. Instead the EDNS's 'labour supply scenario' should be used, to maximise local job creation, reduce the need for out-commuting and to most effectively support local employment needs. Any approach other than a 'labour supply scenario' would suppress the opportunity for growth and productivity contrary to national policy.

5.3 To contribute towards the employment development required, consistent with an appropriate spatial strategy of exhausting sustainable options for growth beyond the Green Belt, the Council should allocate the Site for development. As seen in the review and comparative scoring of the Site against the Council's sustainability objectives, development on it would be sustainable, with the environmental context understood and impacts minimised, delivering a range of important benefits. This is an opportunity that should not be overlooked.

44462081 Any other
0 comments

Comment noted.

28.1 Berkeley is pleased to be able to comment on the new emerging Local Plan 2040; the themes identified are generally supported. There are, however, some detailed elements of the Plan – as explained through this submission – that Berkeley believes should be investigated further, justified, and explained. This will ensure that the objectives of the Plan can be delivered in a comprehensive and effective way.

28.2 Berkeley trusts that these comments are helpful to the Council and looks forward to further positive joint working as the Local Plan progresses.

Please find attached a copy of my reps on the TMBC LP – Reg 18 Consultation Document (Sept 2022) submitted on behalf of Redrow Homes Southern in respect of their interest at Land east of Carpenters Lane/ north of The Paddock, Hadlow. Said reps consist of a detailed letter addressing all relevant questions asked in the Reg 18 Plan, a Vision Document for the Land east of Carpenters Lane/ north of The Paddock, Hadlow, and a Site Layout Plan

As set out in my letter we would be happy to meet with officers to discuss our representations further if this would be of helpful.

Please confirm safe receipt

Hildenborough Parish Council has completed the consultation paper on the Section 18 Local Plan and would also like their attached comments to be taken into account when considering future development proposals concerning the village and surrounding area. There did not seem to be a suitable place to include this in the consultation document.

44463361 Any other
25366913 comments

Comment noted.

44417409 Any other
25392865 comments

Comment noted.

38330977 Any other
0 comments

established in 1997 and has a strong track record of delivering high quality residential and mixed use developments in Kent over the last 25 years. This has been acknowledged through the receipt of nationally recognised awards, including the gold Evening Standard Awards best family home 2022 and 2019 bronze WhatHouse Best Small Housebuilder.

SME housebuilders are recognised in the National Planning Policy Framework (NPPF) at paragraph 69 as making an important contribution to meeting the housing requirements of an area, and being able to build out relatively quickly, and by the Planning Inspectorate¹. This is particularly the case with Fernham Homes, which is privately owned with access to significant resources. This provides significantly more flexibility than national and other regional housebuilders, and allows Fernham Homes to deliver housing rapidly and to a high quality, beautiful and sustainable standard (para 126 of the NPPF).

Fernham Homes has embarked on a sustained period of growth, with a clear adopted business plan to deliver around 300 houses per year in five years time.

A key element of Fernham Homes' operations is to take a very diligent approach to site selection: a huge amount of due diligence is undertaken as part of this, and therefore Fernham Homes only invests in those sites which meet the NPPF requirements of being available, suitable, and deliverable. As set out in Section 25 of these Representations, Goldings Yard, Stocks Green Road is considered to be such a site.

Similarly, a key feature of Fernham Homes' approach is to work positively and proactively with local planning authorities (LPAs), both during the preparation of local plans and at planning application stage. Fernham are fully committed to engaging with TMBC in the preparation of its Local Plan, and firmly subscribe to the national policy approach set out in paragraphs 15 and 16 c) of the NPPF that "the planning system should be genuinely plan-led"

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

44459553

Any other
0 comments

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

These representations have been prepared on behalf of Vistry, in response to the current Tonbridge & Malling Borough Council Local Plan 2040 Regulation 18 consultation. Therefore, in preparing these representations, we have responded to those consultation questions which are pertinent to our client's interests.

We have raised concerns regarding the proposal to progress from the current consultation, (which concerns a high-level 'Issues and Options' paper) directly to a Regulation 19 Pre-Submission consultation, without any intervening steps. The spatial options presented do not clearly flow from the evidence base. Nor is the Consultation Document supported by a HELAA or any Green Belt evidence, beyond the overarching Exceptional Circumstances (Strategic) Note.

It is concerning that both the Consultation Document and evidence base, are effectively silent on the Duty-to-Cooperate. This is noting that the failure to properly engage and plan strategically (on a cross-boundary basis) for growth within the West Kent HMA was instrumental in the failure of the previously submitted Local Plan, as it was in Sevenoaks and as may soon be the case in Tunbridge Wells.

Whilst it is welcomed that the TMBC now proposes to meet its minimum (Standard Method) housing need, there are strong justifications for the housing requirement being increased further. This is needed to address severe housing affordability issues and to ensure a consistent supply of new homes. Further options for achieving higher levels of growth must be tested fully, both as a matter of soundness and legal compliance.

Significant housing growth must be provided for within the Sevenoaks and Tunbridge Wells (West Kent) HMA, in order to respond to clear cross-boundary market dynamics and to ensure that new homes are provided where they are needed. This requires significant new development at sustainable locations within the south / south west of the Plan-area. Hildenborough is one such location, which is well-connected to the key settlements within the HMA, including those in adjoining local authority areas.

42271969 Any other
42271649 comments

Vistry are concerned that TMBC intends to progress from the current Regulation 18 consultation directly to a Regulation 19 Pre-Submission consultation, without any intervening steps. This approach is set out in the most recent Local Development Scheme (LDS) and has been recently confirmed by the Planning Policy Team.

The current consultation concerns what is essentially a high-level 'Issues and Options' paper. It does not identify preferred options, nor does it specify areas where future housing growth might be focused. Certainly, the consultation document does not identify potential allocations. This scope of consultation is very limited, when it is considered that it is to be followed by a Regulation 19 Draft Local Plan, which TMBC would (assumedly) intend to submit for Examination without substantive alteration.

The evidence base that is presented in support of the consultation is lacking in detail. There is no Housing and Economic Land Availability Assessment ('HELAA') to comment on. This is despite a Call for Sites exercise taking place in December 2021 to February 2022. This is surprising, given that the Urban Capacity Study (July 2022) and Interim Sustainability Appraisal (SA) (August 2022), suggest that submitted sites have already been subject to assessment.

Beyond the Exceptional Circumstances (Strategic) Note (July 2022), there is no supporting Green Belt evidence which might have been used to inform an emerging strategy for Green Belt release. Similarly, the spatial options being explored in the consultation document and Interim SA, do not appear to be clearly grounded in supporting technical evidence. Likewise, the 'testing' of options for the overall housing requirement appears artificially limited to meeting the minimum Standard Method figure or exceeding it by 10%. No justification is provided for not testing options for uplifts exceeding the '+10%' scenario.

Vistry accept that Regulation 18-stage Issues and Options consultations are often conceptual and high-level. However, it is not certain that TMBC will be able to progress the new Local Plan on a legally justified and sound basis, if the scope of consultation is restricted in the way set out in the LDS, particularly noting the limitations

Comments noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance and is planning to undertake a Green Belt study to inform the next stage of the Local Plan drafting.

Any other
42271969 42271649 comments

i) Duty to Cooperate

Section 33A of the Planning and Compulsory Purchase Act 2004 imposes a duty on authority to cooperate with other planning authorities, the County Council and prescribed bodies or other persons by engaging constructively, actively and on an ongoing basis in relation to the preparation of a development plan document so far as relating to a strategic matter to maximise the effectiveness of the activity of plan preparation.

This "Duty to Cooperate" (DtC) is further emphasised through the National Planning Policy Framework (NPPF) which states, at Paragraph 26:

Effective and on-going joint working between strategic policymaking authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
[emphasis added]

Further, paragraph 27 of the NPPF identifies this should be demonstrated through the preparation and maintenance of one or more Statements of Common Ground, documenting the cross-boundary matters being addressed and progress in co-operating to address these.

The Plan-making section of National Planning Guidance provides further clarification on Statements of Common Ground:

What is a statement of common ground?

A statement of common ground is a written record of the progress made

Re: Local Plan Regulation 18 Comment

At the meeting of the Planning Committee on Tuesday 18 October 2022 the Council Agreed the following

TMBC Local plan consultation observations.

The Government Policy and NPPF's 14 objectives, are broadly achieved within the outline local plan.

I am totally against any further house building within the Tonbridge & Malling BC. To lose car parking spaces would impact heavily on business and visitors for starters. The roads are already far too busy (air pollution) and as for Doctors surgeries, schools etc. that's another subject.

WE DO NOT WANT TO BE SWAMPED WITH MORE HOUSE BUILDING.

Comments noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. Regarding Duty to Cooperate, the council has continued to engage with neighbouring authorities on cross boundary matters with positive outcomes which is an on going process.

42821345 Any other
42821281 comments

Comment noted.

36594049 Any other
0 comments

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

44629185 Any other
0 comments

response

Sevenoaks District Council (SDC) welcomes the opportunity to comment on Tonbridge and Malling Borough Council's (TMBC) Regulation 18 Plan.

Through our duty to co-operate discussions and regular meetings, it is clear that SDC and TMBC share similar issues including:

- * Large areas of constrained land (including Green Belt, AONB and areas subject to flooding)
- * The requirement to meet housing need
- * Providing health and education facilities and other strategic infrastructure and services
- * Protecting the natural environment and countryside (and prioritising brownfield)
- * Supporting active travel and public transport, to address climate change and support health and well-being
- * Backing local business and the economy

With this in mind, SDC would like to make the following comments at an officer level:

1. Duty to Co-operate

As an adjoining Local Planning Authority, it is important that SDC works closely with TMBC to address strategic, cross boundary issues such as housing and infrastructure to ensure that co-ordinated development can be enabled over the plan period.

Officers at SDC and TMBC meet regularly as part of the West Kent grouping, together with Tunbridge Wells Borough Council (TWBC) to discuss local plan progress and strategic cross-boundary issues. This includes discussion on evidence base documents and we have recently procured joint studies with TMBC, including Strategic Transport Assessment and Green Belt Review. Co-ordinated evidence production is fully

4. Conclusion

In summary, SDC will continue to positively engage with TMBC under the Duty to Cooperate, as both authorities progress their Local Plans and try to meet their requirements over the aligned Plan period, particularly through the development of a joint evidence base. In particular, SDC would ask TMBC to assist in providing for our identified unmet housing need, and we would welcome a response on this issue as part of our forthcoming Regulation 18 consultation.

In summary the section identifies:

- The only reasonable approach would be to meet assessed housing needs in full, but this should be the 'minimum' position;
- We support the testing of a housing requirement figure in excess of the 'minimum' housing needs figure, but recommend a +20% scenario also be tested to provide flexibility for resilience, assist in addressing housing affordability and, if required, address unmet need from neighbouring authorities and London;
- There may be unmet need arising from adjoining authorities and London which should be explored in detail through the Plan-making process;
- The Urban Capacity Study is not considered robust or justified in its approach but it does indicate limited opportunities existing within the urban area and rural service centres;
- The principle of a windfall allowance is not disputed however we do not believe the level of windfall proposed is justified;
- Exceptional circumstances could exist to allow development in the AONB, this should be tested through the Plan-making process; and
- Exceptional circumstances do exist to allow Green Belt release to be completed across the Borough.

Comments noted. TMBC will continue to proactively engage with SDC on cross boundary matters through the duty to cooperate forum.

44635745 Any other
0 comments

44635745 Any other
0 comments

42821345 42821281 Any other
comments

Comments noted. TMBC has responded directly to SDC regarding the request for unmet need and will continue to work with SDC on cross boundary matters through the duty to cooperate forum.

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

*

General points

* Green field sites should not be used for housing. Britain desperately need to become self sufficient in farming and cannot afford to waste good arable land.

* There are plenty of brown field sites available, but it seems the preference is to use these for warehousing/industry rather than to fulfill the need for housing. There is plenty of room to extend the Aylesford Print site, and Peters Pit Wouldham, & Borough Green quarries for instance. And the 'Yalding Enterprise Site' by Yalding station has lain derelict for years!

* The land between East and West Malling was earmarked to become official Green Belt, until incompetence by TMBC regarding land banks allowed open season for builders.

* The builders do not want to concrete over this land to satisfy a housing need, they are big business doing it for profit!

* Each new house will have at least two cars; this is a huge number of traffic movements. Kent is already grid locked!

* Many of the proposed sites are around East Malling village. The only access for cars will be into narrow village streets that cannot cope even now.

* Some of the proposed sites are recreational land that have been used for years for the well-being of the residents. They also support a wild variety of wildlife. These should be designated Local Green Spaces urgently.

* This TMBC Consultation asks for our comments. Will anybody read this? Will anyone take any notice? Allay my cynicism by replying please.

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

42144033

Any other
0 comments

Do you really think residents of T&MBC are going to read all these documents by 3/11/22 and understand.

My initial view is the housing - 16,000 new homes by 2040. What size housing + how many added to population in the area? Some of the sites are just ridiculous to even put into the plan. If implemented some small green areas in housing estates will be lost for children to play on. Why are there for example places not being built on that have been knocked down in Shipborne Road? Why is the toilet block that T&MBC sold off, a number of years ago, not been knocked down and built on?

The key points should have been raised that any resident would understand and be able to make comments on. To request comments on this extensive, over worded document is expecting too much and very few replies.

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

44809441

Any other
0 comments

Hopefully the meeting on Monday evening will simplify what comments from residents that T&MBC council could consider going forward to plan 19.

image

[personal information omitted]

image

image

Comments noted.

44811297

Any other
0 comments

...
terms and assessed against the prevailing planning policy and guidance framework.

Comments noted.

This Regulation 18 consultation is the first stage in the engagement process seeking to understand the views of stakeholders. Alongside the Regulation 18 Local Plan (Reg 18 LP) , the consultation is accompanied by a range of evidence including:

- Interim Sustainability Appraisal Scoping Report ;
- Green Belt 'Stage 2' Exceptional Circumstances Note;
- Housing Needs Study;
- Urban Capacity Study;
- Housing Market Delivery Area Study;
- Transport Initial Baseline Assessment; and
- Windfall Allowance Methodology Paper.

It is important at this early stage all parties reflect and learn from the lessons from the previous withdrawn Local Plan process, including:

- The need for a robust and up-to-date evidence base; and
- The importance of the "Duty to Cooperate" and the need for effective and ongoing engagement with neighbouring authorities and prescribed bodies.

Our response is prepared in this context, seeking to provide a "critical friend" role to enable the production of a "sound" Local Plan which delivers growth needs in full.

These representations respond directly to the content of this Regulation 18 consultation with reference where applicable to relevant consultation and evidence base documents. These are structured as follows:

Any other
44819617 42821281 comments

		<p>* B) Every day I meet residents of Tonbridge and Malling that are totally unaware of this Section 18 Consultation and feel, as I do, that a simple mail shot to all homes in the borough would have elicited a much bigger response ... your excuses for not doing this, especially that it would have been too expensive are unacceptable. There is no doubt in my mind that a wider response would have produced a lot more objections.</p> <p>* C) we desperately need to get an approved new Local Plan in place to help ward off the opportunistic applications that are now being lodged with TMBC and I do hope that at a later stage this Section 18 consultation is not found to be inadequate because of A) and B) above.</p> <p>* D) I'm a member of Broadwater Action Group (BAG) and I've read and agreed all of the general comments it has lodged and also it's specific comments for Site # 59740.</p> <p>* E) I live in East Malling and we feel that we are hugely disadvantaged because TMBC has failed over the years to put in place an extension of the Green Belt to cover our corner of the borough. In the last 20 years our corner has endured a disproportionate amount of the new housebuilding in the borough and the prospects for the future are not looking good !! We ask that you require other parts of the borough to take their fair share of future developments notwithstanding that this may necessitate the use of Green Belt land.</p> <p>* F) we urge you to use all available Brown Field sites such as the Quarry in Borough Green ahead of Green Field sites on prime Grade 1 & 2 farmland.</p> <p>* G) please consider making representations directly to Central Government explaining that residents of Tonbridge and Malling are very angry that it continues to impose unrealistic house building targets upon us which are not driven by local needs. For example if people decide to move out of central London down into Kent because we have kept some of our Grammar Schools then they simply go to an estate agent and buy a I fortunately, due to lateness of the council meeting to explain the plan and the length and complications of following the 1000page document online, have not seen how this plan will impact me locally. So I would vote for all developments to be added to exciting large areas.</p>	<p>Comments noted. 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. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.</p>
44891009	Any other 0 comments		Comments noted.
44894689	Any other 0 comments		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.
		<p>This has been brought to our attention today by one of the London Road residents.</p> <p>We are all very concerned with this and would object please could someone get back to us today with an update on this and also with the ongoing issue of the site opposite our houses.</p>	
44897057	Any other 0 comments	This area is being turned into a concrete jungle, the traffic, the noise the environment. Why have we not been informed of the below proposed development and what can we do to get our voices heard?	noted.
44951137	Any other 0 comments	*image*	Comment noted.
44953217	Any other 0 comments	No to more houses.	

44976097	Any other 0 comments	<p>I would like to add to this list my objections the last time I asked at kings hill Dr surgery how many people are on your list they said 26,000 so how do you think they can possibly cope also the NHS in general together with the loss of green spaces wildlife fresh air places to go for a walk for mental health more pollution more sewage not healthy by latest reports flooding! Nowhere for rainwater to soak away this amount of proposed building is ludicrous for the planet and our future grandchildren consider.</p>	<p>Comment noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.</p>
45009345	Any other 0 comments	<p>We are writing in response to the Local Plan Consultation which our neighbour recently informed us was taking place. Firstly, we would like to address the fact that we have had no notification from the Council relating to the possible major changes to our residential area. Since this will impact on many residents it is poor on the Council's part not to highlight this consultation to local residents and the wider community.</p> <p>Having quickly read over some of the lengthy documentation, the below are our comments which mainly concern our local area of Kings Hill:</p> <p>LP Infographic : Releasing 'greenbelt land' for development contradicts statements - 'Protecting Countryside' & 'Supporting Active Travel'.</p> <p>Developments will have a huge impact on local infrastructure which already struggle to cope with existing overstretched resources.</p> <p>Sustainability Appraisal</p> <p>Please find below our representation to the TMBC Regulation 18 Local Plan consultation. This representation objects to the proposed allocation of Land to east of Ismays Road, Ivy Hatch (Site 59608) for residential development.</p> <p>Context</p> <p>The National Planning Policy Framework (NPPF) provides the overarching framework used for preparing Local Plans based on the Government's aims for the planning system, the purpose of which is to contribute to the achievement of sustainable development. It sets out in paragraph 8 that sustainable development has three interdependent objectives that need to be pursued in mutually supportive ways:</p> <ul style="list-style-type: none"> * a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; * b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and * c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. 	<p>Comments noted. 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. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.</p>
44719265	Any other 0 comments	<p>So that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 states that for plan-making this means that all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>

Comments noted.

Please find below Tonbridge Historical Society's [THS] response to Tonbridge & Malling Borough Council's [TMBC] Local Plan consultation which have been reserved to those key issues relating to Tonbridge.

Firstly, we would like to bring to your attention the historical error in relation to the date [1871] that the Railway came to Tonbridge, [in 47 page Local Plan], this error is also repeated within the Mace Documentation.

The railway line Redhill to Tonbridge opened in Tonbridge on the 26th May 1842 and over the next 26 years the line was expanded until the London Bridge to Tonbridge Line via Sevenoaks opened in 1868. By 1871 the railway was the largest employer in the town

25406881

Any other
0 comments

Comment noted.

45091969

Any other
0 comments

Also lack of Doctors, Dentists and other infrastructure

This letter is a formal objection to TMBC's Local Plan proposals, put forward for consultation under Regulation 18. I shall expand in the ensuing paragraphs on the precise nature of my objections, but I make here the central criticism that these proposals are very largely a mere rehashing and restatement of the previously dismissed and discredited Local Plan and should be seen in that light.

Comment noted.

TMBC's latest proposals are again characterised by a failure to recognise and address the real issues. Above all, they totally fail to recognise the intense opposition of local residents. The Council needs to be reminded that it exists to represent the interests of local people and not to serve its own intrinsic purposes or those of commercial consortia.

I shall summarise my objections briefly, under various headings. I do not intend to cover all of the failings of these proposals. Those failings have been well articulated by many others whose criticisms I support wholeheartedly. I do, however, propose to cover at greater length the environmental impacts which I foresee and which have been very largely ignored by TMBC. To that end I shall comment in due course specifically on the question of the local wildlife.

45110625

Any other
0 comments

Dear Sir/Madam,

I wish to put on record my belief that the Local Plan must now, under all circumstances, be based upon a firm policy of responding to actual local need: truly affordable homes for local citizens, rather than the excessive construction of estates of five-bedroom houses for incomers - a policy which perpetuates social division across the Borough and which excludes our citizens, particularly younger people.

Our Borough is not an urban area, yet is being mistakenly treated as such by planners and policy-makers who see valuable farmland, orchards and ancient fields and lanes as areas simply for the building of houses, instead of valuable community and landscape characteristics (and resources for food self-sufficiency and security) which give the district its unique identity.

The Local Plan of the future must respect accepted Village Design Statements, Quiet Lanes (a policy once inaugurated by TMBC) and all conservation areas - and their green hinterlands. The conservation areas and village greens must "make sense" and continue to connect to the existing natural or built environment, rather than just being surrounded by new roads and housing.

Pathways, woodland, orchards - our precious countryside - provides for fresh air and all the environmental qualities which make for better mental and physical health; attributes which have been researched and advocated by many bodies, including the London Greenbelt Council, whose recent landmark report has been presented to HM Government.

Tonbridge and Malling is being made to take a disproportionate amount of the South-East's housing needs. The Local Plan must redress this lack of balance, which for local communities, worried about congestion and pressure on social services, is fast turning into an urgent crisis.

Development threat to Local Greens and car Parks

The local plan to develop on these green spaces and car parks is preposterous, in no way should this happen.

* We are already living in a densely

populated area in the southeast.

* We need these open spaces for children and everyone's wellbeing.

* The area we live in is already highly polluted, building is not going to help, this could have a knock on effect on the already stretched NHS.

* There is already a water shortage, more homes are not going to help and will make the water situation worse. The government need to do something about reservoirs before anything else.

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

Comment noted.

45121665

Any other
0 comments

45144513

Any other
0 comments

			In response to the first draft of the new Local Plan, I wish to raise some concerns I have as a resident of the local area. I would like to note that this consultation is not fairly accessible- it is very difficult to respond to questions online (therefore I am emailing as an alternative) and the questions frequently require specialist planning knowledge which is clearly not something that most residents will benefit from.	Comment noted.
45174209	Any other 0 comments		I hope that my responses can be registered. I wish to note that I am in full agreement with the responses sent on behalf of Broadwater Action Group. Accessibility of the Main Consultation Document "TMBC's Regulation 18 Local Plan"	Comment noted.
			* The documents are aimed at those with professional planning knowledge and experience outside of the layperson's easy comprehension * Responding to the consultation is not straightforward hence why a written reply rather than completing the questionnaire.	
			The Wording of the Consultation Questions	
			* Many questions can be interpreted in more than one way and respondents are concerned that answers may be misinterpreted e.g. Q42 concerning Green Belt options * Lack of Pre-Publication Scrutiny * It was disappointing that certain land parcels including those with Village Green status were included as potential sites and should not have been.	
45217569	Any other 0 comments		This is a beautiful part of Kent and, as I understand it, green belt, which means residential development is not allowed. Already the roads, schools and doctors surgeries are under immense pressure from the enormous influx of people and lorries - the roads, particularly the country lanes are in a terrible state with increasing potholes and ever increasing traffic.	Comment noted.
			In Hadlow we are lucky with our surgery in that we are able to speak to someone, if not get a physical appointment, but we know of many local people who do not have access to anyone at all with only A&E as their back up.	
42819233	Any other 0 comments		Please reconsider these plans for huge development, particularly on green belt areas.	Comment noted.
			To surmise and to add to the numerous comments, things which matter to me the most are:	
			- diverse housing proposals (including affordable) both through tenure, price and design.	
			- transport strategies with emphasis on active travel and choice meeting the needs of a wider range of people. This might mean affecting some existing roads, but this has worked well in the Netherlands which used to suffer from car dependency and unsafe streets but is now a precedent for planning. This will initially involve up front investment and upsetting the 4x4 brigade, but we'll see the benefits in the long term and wonder why we didn't change sooner! I'm encouraged to see this put in the local plan, but wish to add to the tally of people who see this as important and a good avenue (literally) to better equality as well as economic growth.	
42820673	Any other 0 comments		- implementation of wildlife corridors around strategic areas in conjunction with rewilding schemes.	

Thank you for inviting National Highways to comment on the Tonbridge and Malling Borough Local Plan Review Regulation 18 consultation, seeking a response no later than 3 November 2022.

We observe that the consultation seeks initial views on the new Local Plan which will shape the community until 2040 identifying how the council can provide affordable homes, safeguard green spaces and deliver local jobs in the borough's towns and villages.

We have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN. The M20 (J2- J6), M26 (J2a) and the A21 runs through the boundary of the authority area of Tonbridge and Malling Borough and we have particular interest in any sites or infrastructure proposals which could have implications on these routes and the wider SRN network.

Future Year Modelling Assessments (2040)

By Regulation 19 Consultation there will be a need for 2040 future year modelling assessments covering the targeted site allocations as well as an agreement with neighbouring local authorities as to how to correctly reflect their Local Plans. It will be essential to check on the assumptions applied in the Kent Transport Model to ensure a consistent approach is applied.

Given that we are responsible for the operation and maintenance of the SRN, any such proposals for development sites and infrastructure proposals identified through the Local Plan process would need to be developed in consultation and conjunction with us. Scheme development would need to be combined with strategic modelling to understand the impact of traffic displacement following implementation of both the targeted levels of development as well as any identified highway network changes to understand the implications of operation and capacity of the SRN.

Conclusion

We conclude that whilst the overarching principles of encouraging sustainable development are welcomed, further evidence will be required to understand the direct and wider impacts to the SRN as part of the site selection process and identification of infrastructure to support the targeted level of growth in the Local Plan.

Therefore, we request further details regarding the selection of sites for development and wish to be informed of future development of the Tonbridge and Malling Borough Local Plan.

Comments noted. TMBC acknowledges the concerns of National Highways regarding the potential implications of growth upon the SRN and are committed to joint working to prepare our Local Plan transport modelling work. We recognise that there are potential implications for junctions on the M20 (J2- J6), M26 (J2a), M2 (J3) and the A21 at Tonbridge. We look forward to continuing partnership work with National Highways and to identifying any appropriate mitigation that many be required to support growth and the incombination impacts of Lower Thames Crossing upon the SRN and local roads.

Comments noted. We will continue to liaise with National Highways via consultants Jacobs, as we progress our Local Plan transport modelling work including scenario testing. Lower Thames Crossing wider network impacts work and the outcome of the A229 Blue Bell Hill Strategic Outline Busines Case should be known in advance of preparing our Regulation 18b Local Plan, and should help to inform any required highways mitigation.

45283457

Any other
0 comments

45283457

Any other
0 comments

4.7 The Urban Capacity Study has been prepared as part of the Local Plan evidence base as TMBC consider potential growth options. The overall approach to the study, as well as the specific decisions taken with regards to the methodology, were guided by national policy, an approach that we support.

4.8 The methodology of this study is split into four key stages:

- Stage 1: Site identification;
- Stage 2: Assessment of site suitability;
- Stage 3: Character assessment; and
- Stage 4: Density optimisation

4.9 We fully support the need to identify and promote development of brownfield land. However, it is important that the deliverability of sites is considered. It is evident in this scenario that availability and deliverability has not been considered at this stage. As set out in paragraph 5 of the NPPF, ensuring plans are 'effective' is key in assessing their soundness. This means ensuring they are deliverable over the plan period. The assessment has identified 75 potential development sites, with an overall optimised capacity of 1,946 residential dwellings. A total of 3 sites were identified in Borough Green with capacity for 23 dwellings in total.

4.10 We fully support the push to maximise brownfield sites. However, it is evident that there are limited brownfield opportunities. Particularly in Borough Green which is a highly sustainable settlement. Even if every site identified came forward for development, this would only deliver 1,946 homes across the borough with only 23 homes in Borough Green. It is evident that the Borough cannot rely solely on brownfield land.

34

CONCLUSION

5.1 These representations are written in support of our client's site – Land off Crouch Lane, Borough Green. The site is in a sustainable location, close to Borough Green town centre, Borough Green and Wrotham Station and a range of services and facilities. These representations are also accompanied by a Vision Document and

Although my address comes under Maidstone council I am obviously very local to tmbc.

[Additional comments entered under relevant section of the Local Plan]

Where are the open spaces that were so essential to people's mental health during the pandemic lockdown?

All in all this local plan would appear to be a recipe for disaster.

Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Comment noted.

42819617 Any other
0 comments

45292513 Any other
0 comments

4.7 The Urban Capacity Study has been prepared as part of the Local Plan evidence base as TMBC consider potential options. The overall approach to the study, as well as the specific decisions taken with regards to the methodology, were guided by national policy. Specifically, Section 11 of the National Planning Policy Framework: Making effective use of land. This is a sensible approach which we support.

4.8 The methodology of this study is split into four key stages:

- Stage 1: Site identification;
- Stage 2: Assessment of site suitability;
- Stage 3: Character assessment; and
- Stage 4: Density optimisation

4.9 We fully support the need to identify and promote development of brownfield land. However, it is important that the deliverability of sites is considered. It is evident in this scenario that availability and deliverability has not been considered at this stage. As set out in paragraph 5 of the NPPF, ensuring plans are 'effective' is key in assessing their soundness. This means ensuring they are deliverable over the plan period. The assessment has identified 75 potential development sites, with an overall optimised capacity of 1,946 residential dwellings. However, whether these sites are likely to come forward is unclear and it is unlikely that all 75 sites will come forward.

4.10 Even if all 75 sites come forward and deliver the potential yield identified, this would only deliver 1,946 homes which is significantly below the identified housing need figure. It is evident that TMBC will be required to identify greenfield sites to come forward to meet the housing need. Highly sustainable sites on the edge of settlements, such as the Land off Tonbridge Road, should be allocated to come forward in order to meet housing need.

Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

42819617

Any other
0 comments

CONCLUSION

5.1 These representations are written in support of our client's site – Land off Tonbridge Road, Wateringbury.

I am responding to this consultation on behalf of The British Horse Society, the UK's largest equestrian charity, representing the country's 3 million horse riders.

The questions contained within the consultation document, in which equestrians are entirely without mention, do not lend themselves to our response and so we are submitting it in this letter.

Key information

- 9190i passported horses are owned by people living in the postcodes contained within Tonbridge & Malling Borough Council area, contributing in excess of £50 million to the economy, much of which is spent locally (feed, bedding, farriers, vets, riding instructors and riding schools, etc.).
- According to the 2011 census, there were 48086 households meaning that almost 1 in 5 households in the TMBC area has a horse owner.
- Horse riders have the right to access just 16.7% of the public rights of way network in Kent, with substantially less for carriage drivers. Many of these routes are inaccessible or disconnected as a result of increased traffic and/or development.
- Research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Society found that
 - o More than two thirds (68%) of respondents participated in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimates that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.
 - o A range of evidence indicates the vast majority (90% plus) of horse riders are female and more than a third (37%) of the female riders of respondents were above 45 years of age. Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages.
 - o Amongst the horse riders who took part in the survey, 39% had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.

Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. Equestrian use and access is likely to be considered as part of the emerging Active Travel Strategy.

38523009

Any other
0 comments

Comment noted.

As a part of the formulation of a new local plan, TMBC issued a series of consultation documents to satisfy the requirements of Regulation 18 which is a statutory stage of the process and invited interested parties and residents of the TM BC area to comment.

The Broadwater Action Group (BAG), was formed in 2021 to campaign against inappropriate development of a major part of the north-eastern area of TMBC's responsibilities, Broadwater Farm. BAG currently has over 380 members and over 700 online followers.

Section A of this response gives an overview of BAG's areas of concern regarding the Regulation 18 Local Plan.

43485921

Any other
0 comments

Section B lists responses to consultation questions relevant to BAG's constitution and objectives.

		<p>1) Accessibility of the Main Consultation Document "TMBC's Regulation 18 Local Plan" The manner in which the above document is written is clearly aimed at those with professional planning knowledge and experience with many cross references to highly specialised planning documents and National/Central Government policies most of which would be outside of the layperson's easy comprehension and certainly incredibly time consuming to attempt to read, let alone understand. This core document is the background to 50 questions that residents and interested parties have been invited to answer. Many of these questions need to be cross referenced to the Reg 18 document which are littered with specialized phrases such as Assessed Housing Needs, Spatial Strategy, Settlement Hierarchies, Sustainability Appraisal Report, Strategic Gap to name a few. This 'jargon' is difficult to navigate. Some BAG members have even reflected that it felt as though the language used in some documents was so purposefully technical that it was beyond what could be readily understood by a lay person and that they would have been appreciative of a document in plain English. Indeed BAG has received many requests from members to help them begin to navigate this paper and others, feeling that they wish to contribute to the process, but not being able to do so. When such requests come from computer literate people who are au-fait with "online life", this indicates that this important document may not have been appropriately trialed before publication.</p>	<p>Comments noted. These matters will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The council designed the consultation to reach out to as many communities and people in the borough as possible for both professional organisations and non-professionals. As part of this, it 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 socia media platforms. Future iterations of the local plan will however take these comments on board and strive for improvements.</p>
43485921	Any other 0 comments	<p>2) The Wording of the Consultation Questions Many of the questions raised, can be interpreted in more than one way. For example, Q42 (which we detail further on) is very difficult to answer as the alternatives given as strategic policy options require the respondent to employ specialist knowledge of Green Belt matters to determine what may be the benefits of preferring a Green Belt policy versus those of preferring an "Anti-coalescence/ strategic gap" policy which is not defined in any detail. For this question, and others, we know some residents are reluctant to register a response as Dear Sirs</p>	<p>Comment noted.</p>
45337601	Any other 0 comments	<p>I am responding to the consultation for the TMBC Local Plan and fully support the objections raised by West Malling Parish Council. I strongly believe that the Grade 1 agricultural land in our Borough is precious and development should not be allowed on it at all. In addition this land should be protected around it's perimeters to ensure it's viability for agriculture. All development should be MMC if possible. Character and diversity can be incorporated into modern design that is equal to more traditional building methods. Renewable energy and efficiency should be incorporated as standard. Smaller building companies and suppliers should be encouraged to participate in this Plan.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>
42682465	Any other 0 comments	<p>I hope you can include these comments in your feedback for the Local Plan</p>	
45357665	Any other 0 comments	<p>This questionnaire has excluded residents like me who do not have a computer or email address - and will continue to exclude me in future for the sake of the council going paperless.</p>	<p>Comment noted. The Consultation allowed for written paper representations to be made.</p>

I am taking my time to provide a written commentary on the generalities of this plan. My time is short as I am about to travel overseas.

My first point concerns your consultation process which I feel is rushed and has been construed to make it difficult for members of the public who are stakeholders to comment upon. I cannot even begin to imagine that written responses to this questionnaire will be sufficient to enable an adequate measure of community opinion.

There are several key factors which are worthwhile mentioning.

Firstly, the priority of new residents will be getting to work. Rural communities, for example Borough Green, Platt, Wrotham, Ightham etc have workers travelling several miles for employment. Offices in London, warehouses in Snodland and Maidstone, industrial units in Sevenoaks and Dartford or Tonbridge. These are destinations for employment and they are not within a cycling range. These destinations are not reachable by public transport with any measure of acceptable convenience either. Unless there is some masterplan I have not heard of, there is no way this situation is likely to change and if it did then it would cost beyond imagination.

The conclusion from this is that a utopian "green" world in which private car usage is removed is unachievable and wasting time and resources to try and achieve this is foolish. A reality check is required!

Secondly, a priority for families is schooling and your plans do not recognise

We are group of small rural villages. This proposal will turn our villages into suburbs of a large town bigger than Tonbridge itself. There are enough areas of London tmbc to build on if you want to without destroying our precious green belt an area of outstanding natural beauty. We accept we need more housing for refugees and getting young people on the property ladder we do not need houses to attract people into this overcrowded area and who are moving out of perfectly good houses elsewhere the whole point of this avalanche of house building is to provide homes for a growing population not just to line developers pockets.

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

Comment noted.

Comment noted.

We are group of small rural villages. This proposal will turn our villages into suburbs of a large town bigger than Tonbridge itself. There are enough areas of London tmbc to build on if you want to without destroying our precious green belt an area of outstanding natural beauty. We accept we need more housing for refugees and getting young people on the property ladder we do not need houses to attract people into this overcrowded area and who are moving out of perfectly good houses elsewhere the whole point of this avalanche of house building is to provide homes for a growing population not just to line developers pockets.

45361985 Any other
0 comments

45388417 Any other
0 comments

42543361 Any other
0 comments

45388897	Any other 0 comments	We are group of small rural villages. This proposal will turn our villages into suburbs of a large town bigger than Tonbridge itself. There are enough areas of London tmhc to build on if you want to without destroying our precious green belt an area of outstanding natural beauty. We accept we need more housing for refugees and getting young people on the property ladder we do not need houses to attract people into this overcrowded area and who are moving out of perfectly good houses elsewhere the whole point of this avalanche of house building is to provide homes for a growing population not just to line developers pockets.	Comment noted.
45389025	Any other 0 comments	We are group of small rural villages. This proposal will turn our villages into suburbs of a large town bigger than Tonbridge itself. There are enough areas of London tmhc to build on if you want to without destroying our precious green belt an area of outstanding natural beauty. We accept we need more housing for refugees and getting young people on the property ladder we do not need houses to attract people into this overcrowded area and who are moving out of perfectly good houses elsewhere the whole point of this avalanche of house building is to provide homes for a growing population not just to line developers pockets.	Comment noted.
45389569	Any other 0 comments	We are group of small rural villages. This proposal will turn our villages into suburbs of a large town bigger than Tonbridge itself. There are enough areas of London tmhc to build on if you want to without destroying our precious green belt an area of outstanding natural beauty. We accept we need more housing for refugees and getting young people on the property ladder we do not need houses to attract people into this overcrowded area and who are moving out of perfectly good houses elsewhere the whole point of this avalanche of house building is to provide homes for a growing population not just to line developers pockets.	Comment noted.
45390113	Any other 0 comments	We are group of small rural villages. This proposal will turn our villages into suburbs of a large town bigger than Tonbridge itself. There are enough areas of London tmhc to build on if you want to without destroying our precious green belt an area of outstanding natural beauty. We accept we need more housing for refugees and getting young people on the property ladder we do not need houses to attract people into this overcrowded area and who are moving out of perfectly good houses elsewhere the whole point of this avalanche of house building is to provide homes for a growing population not just to line developers pockets.	Comment noted.
45390209	Any other 0 comments	We are group of small rural villages. This proposal will turn our villages into suburbs of a large town bigger than Tonbridge itself. There are enough areas of London tmhc to build on if you want to without destroying our precious green belt an area of outstanding natural beauty. We accept we need more housing for refugees and getting young people on the property ladder we do not need houses to attract people into this overcrowded area and who are moving out of perfectly good houses elsewhere the whole point of this avalanche of house building is to provide homes for a growing population not just to line developers pockets.	Comment noted.
45390753	Any other 0 comments	We are group of small rural villages. This proposal will turn our villages into suburbs of a large town bigger than Tonbridge itself. There are enough areas of London tmhc to build on if you want to without destroying our precious green belt an area of outstanding natural beauty. We accept we need more housing for refugees and getting young people on the property ladder we do not need houses to attract people into this overcrowded area and who are moving out of perfectly good houses elsewhere the whole point of this avalanche of house building is to provide homes for a growing population not just to line developers pockets. " Life is easier to destroy, extract and control when you do not feel connected to it.	Comment noted.
25408289	Any other 0 comments	Conversely life is easier to build regrow and regenerate when you know that it is part of you." - The Seeds of Vandana Shiva	

42798881	Any other 0 comments	<p>In conclusion:</p> <p>I strongly object to the proposals. There has been no mention of extended infrastructure, which, as mentioned above, in many cases is not viable in any case.</p> <p>What about improved roads, access to the motorway, not to mention schools, hospitals, doctors surgeries, drainage, water supply, etc etc? The list goes on, but nowhere in the report is any of this mentioned.</p> <p>The whole idea of expansion of anything like this size is totally unsustainable.</p>	<p>Comments Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.</p>
45440929	Any other 45440705 comments	<p>I am writing on behalf of Hallam Land Management Limited (Hallam) and herewith enclose representations on their behalf to the current Regulation 18 Local Plan consultation. You will be aware that Hallam has an interest in land at East Peckham and our representations are therefore focus on the following consultation questions.</p> <p>[See questionnaire answers]</p> <p>We trust that these representations are helpful in progressing the new Local Plan over the coming months. Should you wish to discuss any of the points raised please do not hesitate to contact me.</p>	<p>Comments noted.</p>
45440929	Any other 45440705 comments	<p>1. Introduction</p> <p>1.1 These representations have been prepared on behalf of Hallam Land Management Limited (Hallam). They concern the future role of East Peckham in the new Local Plan's Spatial Strategy and its suitability as a location for new housing, particularly to the north of Church Lane. (See red line plan attached in Appendix 1).</p> <p>1.2 The new Local Plan is to replace that withdrawn in 2021 and is at an early stage of preparation; Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012 invites various bodies and stakeholders to comment about what the new Local Plan ought to contain.</p> <p>1.3 Our response is concerned with the following questions set out in the consultation document:</p> <p>1.4 Question 3 concerning the spatial strategy options (Section 2);</p> <p>1.5 Questions 5 and 6 and 12 concerning the quantum of new development (Section 3);</p> <p>1.6 Question 8 and the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report (Section 4); and</p> <p>1.7 Questions 40 and 41 concerning the Green Belt (Section 5).</p>	<p>Comments noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>

			Comments noted.
		I agree with all the Parish council comments in objection to the sites put forward for possible housing development.	
		The loss of our regularly used car parks can only be detrimental to the businesses that rely on them, especially at a time when these local businesses need our support more than ever.	
		The loss of local green space can only be detrimental to local people who use these recreational areas regularly.	
		The loss of any agricultural land is detrimental to the whole country, we already import too much food and need to be growing more to reduce imports and sustain our population in an environmentally friendly manner.	
45445089	Any other 0 comments	The South East is already overpopulated in relation to the rest of the country and our services are under strain to cope. The government are supposed to be "levelling up" which means providing housing and job opportunities in less populated areas of the country in a sensible and sustainable manner.	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.
		[We redacted] on 3 November 2022 submit our representations and comments in respect of the Draft Tonbridge & Malling Local Plan Regulation 18 public consultation.	
		East Malling & Larkfield Parish Council Position and Representations: We would like to add our support to any representations made by the East Malling & Larkfield Parish Council on behalf of their constituents. In particular we would strongly back: West Malling / East Malling Green Belt Extension Proposal: The continued and renewed support of the Parish Council and others for the proposal of an extension of the Green Belt eastwards from the West Malling By-Pass (Ashton Way) to Watringbury Road. I believe this proposal (which was included in the withdrawn Draft Local Plan and achieved very strong local support) should be maintained and carried forward to the New Draft Local Plan now under discussion. Local Green Spaces Designation: We would also strongly support the use of the Local Green Space designation insofar as this may afford a degree of protection to critically important sites within our area that contribute significantly to the environmental appeal of settlements and provide important functions as open space for recreation supporting well-being of residents and often affording important vestigial habitats for threatened wildlife. We support the East Malling & Larkfield Parish Council in seeking such designation for the East Malling South Ward Playing Fields area, Clare Lake, Warren Wood and other sites as they may consider appropriate within East Malling and Larkfield. In this context it is noted that in a number of cases the sites listed for possible development appear to include (somewhat incredibly) green open space areas in existing residential developments which are actively used by residents and where any proposal for development should be strongly resisted.	
45306113	Any other 0 comments		Comment noted.
		I fully support the WMPC responses to the Local Plan and I wish to endorse the comments therein.	
45184545	Any other 0 comments	Please acknowledge my written comments which I have posted by hand.	

...the documents were a series of points... included bullet points for which we have an insight; others will cover areas relevant to their own concerns and locations.

Introduction

Section A of this response gives an overview of our areas of concern regarding the Regulation 18 Local Plan.

Summary

Detailed below are our responses to the call for sites identified as part of the urban capacity study for potential housing.

Our main comments are:

* Creation of new Local Green Spaces to retain recreational areas and “green lung” for health purposes: The Carnation Green area should be preserved as a Local Green Space as well as East Malling Playing Fields and Warren Woods Nature Reserve.

* Requesting that the Green Belt is extended eastwards from West Malling By Pass. This will protect the character of East Malling and West Malling and prevent its coalescence. It would protect the countryside between the three communities including the network of quiet lanes and rural public paths, the conservations areas within it, and continue to provide a “green” area appreciated by the residents of the adjoining built up area.

Our countryside is precious and intrinsic part of the character of our villages. It provides a physical separation between villages so that each retains its own identity. It provides leisure opportunities which is vital for health and wellbeing.

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

45509121

Any other
0 comments

We refer to the 2022 Tonbridge&Malling Borough Council (TMBC) Regulation 18 Local Plan and to certain sites which are identified for possible development around the area of Wateringbury.

We acknowledge the challenges on the TMBC to meet the Government requirement to identify new sites within its boundaries. We are supportive of its efforts to meet the development targets required of it by Government up to 2040, and applaud the measured approach it is taking to identify and consider key themes and issues in consultation.

This letter falls in to two parts. Firstly, it sets out some general comments on the Local Plan where it has been easier to collate local views on headline issues rather than attempting to answer the detailed questions in the Plan document . Secondly to raise, as invited, both general issues of objection, and some specific site issues of objection, with regard to the possible Plan sites in and around Wateringbury.

At this stage of the consultation process, we have not sought legal or expert planning advice and the views expressed in this letter have been formulated through discussion with other residents and online research.

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

1.0 General Comments on the Local Plan

The issues for consideration are well set out in the Plan document. We appreciate that there are competing imperatives; the provision of more affordable housing, the preservation of green spaces and countryside, the restrictions of the infrastructure, traffic management, and necessary economic stimuli to create more jobs.

The over-arching priority is that the local plan needs to ensure a sustainable future, that the building of additional housing is matched with an increased capacity of all local services and improved infrastructure to service these communities; that our green spaces are both accessible and maintained; and our biodiversity is encouraged to thrive so all communities have the access to the countryside and green spaces that are so vital to physical and mental well- being.

The Key Elements for the core vision of the plan, set out on pages 10 and 11 of the document, are all, in our view, equally important in meeting its delivery.

We have reviewed the five spatial strategy options set out in the plan. We support the existing Settlement Hierarchy, on page 13, as a basis for informing the Plan.

Comment noted.

I am a local resident of West Malling and have been for over 20 years. I write in support of WMPC response on the call for suitable building sites. The most severe negative consequence of this level of building will be to destroy the boundaries between West Malling and its surrounding villages- eg East Malling, Offam and Kings Hill. Permitted development will take away the boundary with Larkfield. As well as destroying high quality rural areas valuable grade 1 agricultural land is lost.

We refer to the 2022 Tonbridge&Malling Borough Council (TMBC) Regulation 18 Local Plan and to certain sites which are identified for possible development around the area of Wateringbury.

Comment noted.

We acknowledge the challenges on the TMBC to meet the Government requirement to identify new sites within its boundaries. We are supportive of its efforts to meet the development targets required of it by Government up to 2040 and applaud the measured approach it is taking to identify and consider key themes and issues in consultation.

This letter falls in to two parts. Firstly, it sets out some general comments on the Local Plan where it has been easier to collate local views on headline issues rather than attempting to answer the detailed questions in the Plan document . Secondly to raise, as invited, both general issues of objection, and some specific site issues of objection, with regard to the possible Plan sites in and around Wateringbury.

At this stage of the consultation process, we have not sought legal or expert planning advice and the views expressed in this letter have been formulated through discussion with other residents and online research .

45512481 Any other
0 comments

45679201 Any other
0 comments

45710145 Any other
42599649 comments

45710145	Any other 42599649 comments	<p>1.0) General Comments on the Local Plan</p> <p>The issues for consideration are well set out in the Plan document. We appreciate that there are competing imperatives; the provision of more affordable housing, the preservation of green spaces and countryside, the restrictions of the infrastructure, traffic management, and necessary economic stimuli to create more jobs.</p> <p>The over-arching priority is that the local plan needs to ensure a sustainable future, that the building of additional housing is matched with an increased capacity of all local services and improved infrastructure to service these communities; that our green spaces are both accessible and maintained; and our biodiversity is encouraged to thrive so all communities have the access to the countryside and green spaces that are so vital to physical and mental well-being.</p> <p>The Key Elements for the core vision of the plan, set out on pages 10 and 11</p> <p>that bothers to keep residents up to date with matters that effect their lives.</p>	<p>Comment noted. Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>
<p>Assuming what they say is true, and I have no doubt to its authenticity, especially as it was delivered personally by David Thornewell it is beyond belief . The thought of a number of places that have been included on the list is quite farcical . Car parks that shops rely on for trade, bearing in mind the ageing local population is quite ridiculous . Are they really serious about building on places like the play area at Leybourne Lakes.</p>	<p>Comments noted.</p>		
<p>I realise that this is a Government requirement but surely the suggested sites on the list are not going to produce many properties , to eat into the shortfall of 9245 homes.</p>			
<p>When I moved to Larkfield in 1966, I worked in London for the majority of the time until I retired. Depending on the Bank Branches I was posted to meant it was either train or car transportation . When returning home , I would get to Swanley and then feel the joy of open spaces. Now with all the building that has gone on, Maidstone, Allington, Ditton, East & West Malling, Larkfield and Leybourne are one continuous conurbation.</p>			
<p>Yes we are very fortunate with the Country Parks locally, but with the sites suggested for the latest list, how long are they safe.</p>			
<p>Always supported the Lib Dems locally and Conservatives Nationally but with the debacle in Westminster at present means I have absolutely no confidence in Tories any longer. This latest draft Borough Local Plan list is the final straw.</p>			
<p>I pray and hope those who make the decisions that effect us all will think very carefully and remove these crazy places from the list.</p>			
45717985	Any other 0 comments	<p>How about building the majority of the homes required by the Government on the site of the London Golf</p>	<p>Comments noted.</p>
<p>I have attempted to complete your online survey regarding the local plan. This survey does not seem to have been written with local residents in mind e.g. question 7 asks whether I agree with a report that is 273 pages long and is not summarised or explained. Question 9 asks whether I agree with a set of strategic matters, which are not explained in plain English. Question 17 asks a technical question about a windfall allowance methodology. I can only think that there is another questionnaire that I have not found the correct link to or this has been designed so that residents give up and do not submit the form?</p>	42504929	Any other 0 comments	

.....
HIGHWAY]

We are in receipt of your letter dated 5th October 2022 inviting everyone who lives in the Tonbridge & Malling borough to have their say on future development within the borough. Before seeking to allocate sites for future development, it would be very much appreciated if the borough council first address current ongoing problems for their residents.

It does strike of double standards that when development is required we are very much in the catchment area for the proposed Borough Green Garden City, but when repairs are required to the roads we are overlooked as we live on the periphery of Tonbridge & Malling and Sevenoaks Councils.

We have approached the Highways department on a number of occasions over the years and have had a representative called Paul from the Highways Department of Tonbridge & Malling Borough Council come and assess our predicament and to give him his due, he has tried on our behalf to get the situation resolved, but he has been given numerous reasons on various occasions as to why there is no money to rectify the problem. He even marked out on the road about 4 years ago where the uneven surfaces need repairing.

We moved to the above address 21 years ago this December, and although on a relatively busy road (A227), there was not a problem. In around 2006, sometime after works were carried out outside our property requiring the road to be dug up, we now have large dips in a number of places in the road which Lorries hit day and night, causing an appallingly loud noise, and more worryingly causing our property and neighbouring properties to shudder excessively, which has resulted in cracking to our properties, it quite honestly feels like an earthquake and is very frightening when this happens, particularly throughout the night and very noticeably around 5.30/6am when the lorries start arriving/leaving local sites, we would add that when lorries are empty the noise is even worse. Besides Long Pond quarry being worked by Robert Body approximately 200 yards down the road from our house, who we might add are very compliant, we are quite horrified that 2 additional companies have now been allowed to operate close by, one of these (Docks to Door/Box Logistics) are being allowed to operate very large curtain sided articulated lorries so close to residential properties and what is

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

45719233

Any other
0 comments

As a part of the formulation of a new local plan, TMBC issued a series of consultation documents to satisfy the requirements of Regulation 18 which is a statutory stage of the process and invited interested parties and residents of the TMBC area to comment.

The Broadwater Action Group (BAG), was formed in 2021 to campaign against inappropriate development of a major part of the north-eastern area of TMBC's responsibilities, Broadwater Farm. BAG currently has over 380 members and over 700 online followers.

Section A of this response gives an overview of BAG's areas of concern regarding the Regulation 18 Local Plan. Section B lists responses to consultation questions relevant to BAG's constitution and objectives.

Executive Summary

BAG Executive Committee members have spent a significant amount of time studying TMBC's Regulation 18 Consultation documents (effectively some 45 man hours, so far). It has been a complicated process and we have found it difficult to summarise our response in simple terms.

However in essence, BAG's main comments are:

- The high-grade agricultural land of Broadwater and Eden Farms needs to be preserved
- The hydrogeology of the area should not be ignored
- The Conservation Areas of New Barns and Broadwater Farm and Mill Street must be protected
- Coalescence of communities must be avoided
- Transport infrastructure and the effect of extra traffic on West and East Malling cannot cope with a 30% uplift in population
- The disproportionate development of the north east of the Borough is unfair and unsustainable.
- Central Government's demands for increased housing need to be robustly challenged.

SECTION A - Overview of Areas of Concern

BAG would like to comment as follows:

1) Accessibility of the Main Consultation Document "TMBC's Regulation 18 Local Plan"

The manner in which the above document is written is clearly aimed at those with professional planning

Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.

43485921

Any other
0 comments

Support for extending the Green Belt to the West Malling bypass.

Support for a further extension of the Green Belt to protect the best and most versatile farmland, ensure separation of Kings Hill from East and West Malling, Larkfield and Leybourne, protect Broadwater Farm from encroachment and provide a green lung and beautiful recreation space for the surrounding communities.

Opposition to the full development of the Manor Farm, Offham Road site. Support for a small social housing development site infilling the frontage only of this site, to meet the exceptional local need for affordable housing exempt from Right to Buy.

Support for a new business car park site on the 'Amber' rated site between London Road and the railway line together with housing, including affordable housing required to enable it to meet the exceptional need for business parking to support our market town and remove cars from residential streets.

Opposition to extending Kings Hill beyond the boundary of the RAF Airfield into Broadwater Farm to protect the best and most versatile farmland, preserve separation of Kings Hill from East and West Malling, Larkfield and Leybourne, and help limit the westward expansion of Maidstone in the absence of the strategic gap.

Reluctant support for development of East Malling Research Station only to the extent that the income is required to ensure the continuation of the station in Kent. No decision to build on land with access to Hermitage Lane until the A20 and Hermitage Lane capacity study has been completed with recommended solutions to the severe current and future congestion levels.

We are not familiar with the details of the Borough Green site, but note that in the north eastern Malling Area, quarry land has been successfully developed at Peters Pit and Holborough Quarry, and Aylesford workings are proposed to be used. Traffic and air quality in Borough Green requires addressing, and the provision of east facing slip roads at Junction 5 of M25 needs to be a priority for any development to relieve local traffic and also provide an alternative to vehicles currently travelling to junction 4 of M20

Opposition to any redevelopment of the Martin Square Larkfield Library site unless it provides for a new Library.

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

45739713

Any other
0 comments

These representations have been prepared by Boyer, in response to the current Tonbridge & Malling Borough Council (TMBC) Local Plan 2040 Regulation 18 consultation, which runs until the 3rd November 2022.

Boyer has been appointed by Barratt David Wilson Homes Kent (BDW) to prepare representations and comment on the Local Plan Regulation 18 Document (the Consultation Document), and the associated evidence base. BDW's interest in the emerging Local Plan relates to matters in general and particularly to their site-specific land interest within the Borough pertaining to the Land at Bunyards, Beaver Road, Allington (the site) and its ability to deliver much needed new residential development within the Borough.

The site is a rectangular parcel of land located on the north-western edge of Maidstone and 600m southeast of Aylesford. A Location Plan is provided at Appendix 1. The site is bounded by a railway line to the northwest (beyond which is a large area of land recently granted planning permission to deliver 820 new homes, a new primary school, highway infrastructure improvements, etc.) and to the south east by Beaver Road which has suburban housing development along its southern side. To the northeast and south west the site is bounded by undeveloped grassland upon which separate planning permissions have also recently been granted for the development of 106 and 330 new homes with associated works respectively.

An application for the site's development has already been submitted by BDW proposing the delivery of up to 435 new homes on the site, including realignment of a section of Beaver Road and other associated development works. The application¹ is presently pending determination by the Council.

The extant planning application and its supporting technical reports, surveys and plans demonstrate the site's deliverability. These documents have not all been provided as part of these representations. Nonetheless, all the application's documents are accessible for review on the council's planning applications register webpages associated with the application's specific reference (ref. TM/22/00409/OAEA). We would of course be glad to provide further electronic copies of any of the application's specific documents upon request from Officers

Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The site specific matters raised will be taken into consideration within the site analysis and site selection processes. The Council will continue to proactively engage with neighbouring authorities to address cross boundary issues through the duty to cooperate forum.

45742881

Any other
0 comments

Tonbridge & Malling Borough Council Local Plan 2040 Regulation 18 consultation. Therefore, in preparing these representations, we have responded to those consultation questions which are pertinent to our client's interests.

We have raised concerns regarding the proposal to progress from the current consultation, (which concerns a high-level 'Issues and Options' paper) directly to a Regulation 19 Pre-Submission consultation, without any intervening steps. The spatial options presented do not clearly flow from the evidence base and it is concerning the Consultation Document has not been supported by a HELAA.

It is concerning that both the Consultation Document and evidence base are effectively silent on the Duty-to-Cooperate. This is particularly of note given the very recent past failure to properly engage and plan strategically (on a cross-boundary basis) for growth specifically within the West Kent HMA was instrumental in the failure of the previously submitted Local Plan.

Whilst it is welcomed that the Council now proposes to meet its minimum (Standard Method) housing need, we are of the opinion there are strong justifications for the housing requirement being increased further. This is needed to address severe housing affordability issues and to ensure a consistent supply of new homes in the Borough moving forward. Further options for achieving higher levels of growth must be tested fully, both as a matter of soundness and legal compliance.

Significant housing growth must be provided for within the Sevenoaks and Tunbridge Wells (West Kent) HMA, and the Maidstone HMA, to respond to the clear cross-boundary market dynamics. And to ensure that new homes are provided where they are needed. This requires significant new development at sustainable locations within the Borough.

As evidenced by the already submitted application for the development of the Land at Bunyards, Beaver Road, Allington - for the proposed development of up to 435 new homes – BDW firmly consider the site can come

As a document for public consideration, which it undoubtedly is, I found it full of technical language and references which made it extremely difficult to wade through.

I suggest that future documents for public information and comment are rendered accessible to your Council Tax payers, or you could be accused of wishing to encourage non participation in this very important process.

Would you also be kind enough to place me on whatever list exists that will ensure I receive all public documents relating to this Plan via email?

With regard to your proposed local plan for the period 2025 to 2040 I have a number of concerns regarding the whole plan as well as some specific concerns about some of the development sites.

I would preface my comments by saying that I and my wife are 76 and 74 and have lived on Kings Hill since 2000. We are in good health and hope to remain so for a number of years. I am a member of Kings Hill Golf Club playing twice a week and we both walk our dog in and around Kings Hill and are therefore familiar with many of the proposed development sites.

Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

Comment noted.

Comment noted.

45742881 Any other
0 comments

42224609 Any other
0 comments

45768097 Any other
0 comments

45788993	Any other 0 comments	Firstly, we have chosen not to complete the 50 questions in the TMBC new Local Plan questionnaire as we find them and the consultation process clunky and 'user unfriendly' and which does not promote equality for all residents to respond as it is far too long and too onerous and even too complicated to understand too.	Comment noted.
45801537	Any other 0 comments	Having attended a recent meeting of the new Local Plan proposal at Wateringbury Village Hall hosted by Leader of TMBC – Cllr Matt Broughton and KCC Cllr Sarah Hudson, it was alarming to note the proposed sites for residential development across the Green Belt areas of the borough.	Comment noted
45801537	0 comments	I confirm that I agree with the West Malling Parish Council response to 'The Way Forward'..I Agree	Comments noted
45825729	Any other 0 comments	<p>I am responding to the ask for comments on the Local Plan by email as I could not get the portal to work. I firstly would like to say that there was a mountain of information to go through and it requires quite detailed knowledge of intricate detail to be able to respond effectively and, given that this plan has been in development for so long, I was disappointed to be given such a little amount of time to respond. However, I do have very strong views on this matter, so I will provide an opinion on what I feel are the top priorities as a resident of the Borough for four years and 7 months.</p> <p>[See Questionnaire response]</p> <p>The talk in the plan of improving infrastructure and access to public transport appear good on the surface. However, we are seeing increases of cars on roads that simply cannot cope with more. Just try and get through the High Street and Mill Street in East Malling in rush hour to experience what it is like to live in a "rural community" in the Borough these days., and with another development being proposed at the end of the High Street. In the meantime, Kent County Council are proposing to withdraw funding for the one bus that serves East Malling, threatening those that rely on a bus with the possibility of having no bus service. These things never appear joined up in any way and are a constant worry for working mothers, the elderly and other residents.</p> <p>I hope this consultation exercise will prove fruitful in helping to develop a sustainable future for the area with proper consideration given to the need to preserve our countryside for future generations and will strike the right balance between that and the need to provide homes for them also.</p>	

1.1 Purpose of this Representation

1.1.1 This representation is prepared on behalf of GGT Estates Ltd in response to the Tonbridge and Malling Borough Council 'TMBC' Local Plan (Regulation 18) consultation which closes 3rd November 2022

1.1.2 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.

1.1.3 Our client controls 'Land at former Oast Park Golf Club, Snodland (site 59840), which we believe represents a suitable and sustainable future housing location. Our client is promoting the site for residential allocation with capacity for up to 800no. dwellings deliverable within the emerging Plan period.

1.1.4 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.

1.2 About GGT Estates Ltd

1.2.1 GGT Estates is a privately owned property development and investment company formed in 2010 and part of the 'Obee Group' of property companies owned by brothers Glen and Thomas Obee who have been successfully involved in a number of business activities throughout the UK over the past 30 years. The group currently oversees a property portfolio with assets in excess of £100m comprising of a wide range of uses including motor retail, warehousing, retail and residential. Over the past 30 years they have acquired many redundant brown field sites and identified green field locations and successfully developed them to provide high quality and sustainable developments for both sale or to let.

1.3 Representation Structure

1.3.1 The representation structure is as outlined below:

Chapter 2 (Consultation Background) – Sets out the context of the Tonbridge and Malling Local Plan preparation and relevant national planning requirements.

Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.

45864993 Any other
25240577 comments

		<p>5.1 Site and Surroundings</p> <p>The submission site comprises a circa 40ha former golf course which has since ceased active use. It is situated west of the A228 'Malling Road' and forms a logical extension to the south of Snodland, with an existing pedestrian footway connection from the site access to the settlement edge.</p> <p>5.1.1 Snodland is identified as one of five 'Urban Areas' within the current adopted settlement hierarchy, reflective of its higher order levels of services and facilities including primary schools, secondary school, grocery stores, medical centre, community facilities and a range of independent shops and restaurants and employment opportunities.</p> <p>5.1.2 In terms of accessibility, Snodland benefits from a well-served train station with regular services on the Medway Valley Line between Tonbridge and Medway via Maidstone and frequent bus services to Maidstone 'route 71' and West Malling/King's Hill and Chatham 'route 151'.</p> <p>5.1.3 Considering high level constraints, the site is located within the Metropolitan Green Belt 'MGB' and Kent Downs Area of Outstanding Natural Beauty 'AONB'. Considering wider constraints, there are no known constraints that would adversely impact upon delivery. The site is not subject to any further landscape or ecological designations and is located entirely within Flood Zone 1 (least likely zone to flood). With respect to heritage constraints, no heritage assets are identified within the submission site, although two Grade II Listed properties 'Sandhole Farm Cottages' and 'Sandhole' are located to the north of the site, albeit both assets are spatially and visually unrelated to the submission site and are nevertheless well-screened by intervening boundary vegetation.</p> <p>5.2 Proposed Development</p> <p>Overview</p> <p>5.2.1 Land at Oast Park Golf Club is promoted for residential allocation, comprising up to 800no. residential dwellings in an accessible and logical location to the south of Snodland.</p>	<p>Comment noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes.</p>
45864993	Any other 25240577 comments		Comment noted.
45876769	Any other 0 comments	I have enclosed two photos in the email to support my objections. One is to show the road on Kings Hill flooded a few weeks ago when the torrential rain made all the roads locally come to a standstill (not just on this development but A228, A26, A20, West Malling, Larkfield, Mereworth. Also the traffic on A228.	Comment noted.
45889953	Any other 0 comments	Quite unbelievably wordy and difficult to understand.	Comment noted.
45897441	Any other 0 comments	I attended a presentation by the leader of TMBC yesterday about the local plan formulation, and as a resident of Trottiscliffe I would like to give my views in response for you take into account. As the closing date for responses is tomorrow there is insufficient time for me to properly look through the website, which I understand is a thousand-page document, and comment on specific sites or areas, hence I am sending this general response by email.	Comment noted.
45906401	Any other 0 comments	I would also like to log a complaint in terms of the lack of usability of the Regulation 18 consultation on the TMBC website. The site is not user friendly at all, with the 'List of potential sites by site reference' being cleverly listed to not include the site addresses/names. I imagine this has been done to try and put off local residents in spending time cross referencing the site references to the site addresses, in hope that the number of objections would be limited, and putting an act of discrimination against those residents with little knowledge of the Local Plan processes.	

		In response to the first draft of the new Local Plan, I wish to raise some concerns I have as a resident of the local area. I would like to note that this consultation is not fairly accessible- it is very difficult to respond to questions online (therefore I am emailing as an alternative) and the questions frequently require specialist planning knowledge which is clearly not something that most residents will benefit from.	Comment noted.
45925409	Any other 0 comments	I hope that my responses can be registered. I wish to note that I am in full agreement with the responses sent on behalf of Broadwater Action Group.	
46056769	Any other 0 comments	Thank you for the opportunity to respond to the consultation on TMBC's draft local plan options. I strongly object to the five options as drafted as they will increase development in already constrained areas in terms of local infrastructure. Most notably, this is in the form of already congested roads and lack of access to medical facilities (in particular, GP appointments and access to dentists).	Comment Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.
		I would like to comment on the local plan. (Especially I have so little time to respond and cannot do it on the site. However, I wish this to be included	Comment noted. 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. The consultation ran for a standard 6 week period and allowed for written paper representations to be made with paper copies of the plan available to the public at the Council Offices.
		Firstly before doing this I would like to say how poorly this has been done. This is a 20 year plan for a complete ward not a simple planning request.	
		To start with here are some of the issues with this process	
46061857	Any other 0 comments	<ul style="list-style-type: none"> * Awful communication of the plan * Awful advertising of the whole process * Mind numbingly poor website with incomprehensible links and no easy way to navigate * No provision for non IT literate people * Ridiculous timescales for the responses 	

1) Accessibility of the Main Consultation Document “TMBC’s Regulation 18 Local Plan”

The manner in which the above document is written is clearly aimed at those with professional planning knowledge and experience with many cross references to highly specialised planning documents and National/Central Government policies most of which would be outside of the layperson’s easy comprehension and certainly incredibly time consuming to attempt to read, let alone understand. This core document is the background to 50 questions that residents and interested parties have been invited to answer. Many of these questions need to be cross referenced to the Reg 18 document which are littered with specialized phrases such as Assessed Housing Needs, Spatial Strategy, Settlement Hierarchies, Sustainability Appraisal Report, Strategic Gap to name a few. This ‘jargon’ is difficult to navigate. Some friends and family have even reflected that it felt as though the language used in some documents was so purposefully technical that it was beyond what could be readily understood by a lay person and that they would have been appreciative of a document in plain English . I have received many requests from people to help them understand this paper and others, feeling that they wish to contribute to the process, but not being able to do so. I myself have also asked for advice from others, namely Broadwater Action Group. Much of what is detailed in this email is taken from their response but it is what I and my family and friends whole heartedly agree with now that we have had it explained in a more simplified manner. I have also added my own thoughts so please take the time to read it all. I am also a member of Broadwater Action Group .

* 2) The Wording of the Consultation Questions

Many of the questions raised, can be interpreted in more than one way. For example, Q42 (which I detail further on) is very difficult to answer as the alternatives given as strategic policy options require the respondent to employ specialist knowledge of Green Belt matters to determine what may be the benefits of preferring a Green Belt policy versus those of preferring an “Anti-coalescence/ strategic gap” policy which is not defined in any detail. For this question, and others, we know some residents are reluctant to register a

Comments noted. Comment noted.
Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.

46102273

Any other
0 comments

Land North of Offham Road, West Malling, Tonbridge – Andrew Black Consulting on behalf of Miller Homes

I write in response to the Local Plan (Regulation 18) Consultation on behalf of Miller Homes in relation to their interest in the Land at West Malling (Site Reference 59699).

Paragraph 16 of the framework states that plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

It is with this guidance in mind that the representations as set out in this document are made.

2 Local Plan Regulation 18 Consultation | November 2022

A separate Vision Document is enclosed with these representations which assesses the constraints and opportunities of the site against the objectives as set out in the Sustainability Appraisal.

Paragraph 22 of the framework states that Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

The consultation document seeks to plan development to 2040 and it is considered that the proposed plan complies in this regard

Duty to Co-operate

The National Planning Policy Framework and Planning Practice Guidance is clear on the importance of Maintaining Effective Cooperation throughout the Plan Making process. Given that the previous Local Plan was found unsound due to failings in the Duty to Cooperate (particularly with Sevenoaks), cooperation with adjoining authorities is of particular importance for the Council.

The NPPF sets out the following at paragraph 27:

In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.

It is noted that no evidence on the DTC has been produced to accompany the regulation 18 version of the plan. Given the outcome of the previous local plan examination and the central importance of cooperation in the plan making process, it is considered that the council should update this position and provide robust evidence on DTC ahead of the next stages of the plan making process.

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

Any other

46103169 46103137 comments

The Council will continue to proactively engage with neighbouring authorities to address cross boundary issues through the duty to cooperate forum.

Any other

46103169 46103137 comments

46128161	Any other 0 comments	<p>I would like to make my options known regarding the proposed Local Plan.</p> <p>Firstly I must say that the whole process has been done back to front.</p> <p>In Trottiscliffe we have had just two days to react to the 'information' given to us at a public meeting which took place on 1st Nov 22. Then the relevant sites to our area were not on display. Unbelievable!</p> <p>Why were the meetings not done first and then the consultation period determined?</p> <p>Poor communication, poor promotion, no thought for non IT literate residents.</p> <p>Website not straightforward to navigate. Hours to complete and unreasonable timescale for responses!</p> <p>Thank you for the opportunity to participate in the TMBC Local Plan Regulation 18 Consultation.</p>	<p>Comment noted. 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.</p>
46162977	Any other 0 comments	<p>I have chosen to submit the attached brief document rather than complete the questionnaire because I want to suggest an approach that is informed by my experience of living in the Borough for the last 35 years. I recognise that this does not help you to generate statistics for your analysis and I apologise for that.</p> <p>You have an unenviable task. Good luck!</p> <p>Response to the TMBC Regulation 18 Local Plan Consultation Document and Sustainability Appraisal The Consultation Document asks, "What kind of place do you want Tonbridge & Malling to be in 2040?" I have chosen not to complete the questionnaire. I do not think it is wrong to ask for preferences, but I do think that method risks encouraging people to focus on details in isolation. Everything in the Consultation Document is interconnected and solutions to Local Plan challenges require a holistic approach. My response is in two parts. 1. Comments regarding where I live and the 'call for sites' 2. My vision for sustainable communities</p>	<p>Comment noted.</p>
46162977	Any other 0 comments	<p>*image*</p> <p>1.00 Comments regarding where I live and the 'call for sites' I love where I live. My family and I have no wish to move. However, there are things about where I live that are not effective and can be challenging. I suspect that many people within the Borough, and across the country, face similar challenges. A summary of these challenges follows. I have tried to use them to inform 'My vision for sustainable communities' as illustrated in my diagram above.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>

46162977	Any other 0 comments	<p>Levelling Up. The Consultation Document states :- “Our requirement from Government is to identify sites for 15,941 new homes within the boundaries of Tonbridge and Malling” by 2040. “We will continue making the case to Government that our need ought to be reduced but, in the meantime, we welcome all your thoughts on how we can best overcome these challenges.”</p> <p>Already overcrowded areas with exhausted infrastructure should not be required to accommodate significant growth. Entirely new communities would provide the critical mass for accommodation with the benefits of appropriate infrastructure and employment opportunities. These new communities should not be in the already overcrowded South East and Home Counties.</p> <p>1.07 Thinking about the challenges concerning where I live has encouraged me to address the question “What kind of place do you want Tonbridge & Malling to be in 2040?” and produce ‘My vision for sustainable communities.’ Repairing the damage caused by years of unstructured development will be difficult, but creating new communities in underdeveloped areas could halt that damage.</p>	<p>Comment noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan.</p>
46162977	Any other 0 comments	<p>Scaling Up. Flexibility and future-proofing are essential ingredients for every form of life, including the long term success of sustainable communities. A maximum community size, based on active travel, should determine the ideal infrastructure to be provided. Any attempt to increase the number of dwellings or population beyond that maximum will inevitably degrade the infrastructure and quality of life. Scaling up will therefore require new communities to be created, using the same principles, rather than the detrimental expansion of existing communities.</p> <p>*image*</p>	<p>Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.</p>