

Respondent ID	Agent ID	Document Part Name	Comment (plain text)	TMBC Response
24922977	0	5.3.39 - 5.3.45	<p>First of all I do understand more homes are required across the country/county to allow for the ever growing population.</p> <p>However, I do not agree with enormous developments currently (or proposed) being built ruining the Kent landscape. The reason being; the materials used rarely blend in with the existing building architecture and surroundings, minimal parking facilities, vast areas of ONB used, infrastructure that cannot cope.</p> <p>If more homes are required, then use derelict buildings already available (for instance, there are homes in Wrotham, Clarion Estate, that can be used) or develop smaller estates pocketed around the county. I certainly do not agree with proposed housing estates such as Borough Green Garden City, where there is a request to join the beautiful villages of Wrotham, Ightham and BG as one. I hate the thought that this area would start looking like Milton Keynes!</p> <p>One area of new builds that I think does work is near Moat Park (see photo), at least they are in-keeping with their surroundings:</p>	Comment noted. This matter will be reflected within the next Regulation 18 document
24922977	0	5.3.39 - 5.3.45	<p>Sorry. It's Russet Homes, St George's Court and not Clarion Estate, as I previously mentioned</p>	Comment noted. This matter will be reflected within the next Regulation 18 document
25296065	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>* Strategic Matters</p> <p>5.3 Housing – what are the issues?</p> <p>We note with strong approval in the Housing Needs Survey (Final Report dated July 2022) the statement that there is an annual need for 283 affordable homes in the borough, and that this justifies the need for robust affordable housing policy and delivery with the affordable housing policy to maximise delivery on market sites (subject to viability) and to consider new ways of delivering affordable housing, particularly homes for social rent, through more direct council involvement/intervention with the aim of bringing about an affordable tenure mix of 63% rented and 37% affordable home ownership including First Homes. We recognise that prices are so high in Tonbridge and Malling that it is mostly impossible for young key workers to buy or rent dwellings, producing a skills shortage in many areas. We are therefore very pleased to read in the HNS the council's acknowledgement that it may need to seek alternative methods to maximise delivery of affordable housing for rent, for instance through direct council house building. We think that direct council house building should be a declared aim of the Local Plan rather than left only as a possibility. We seek to minimise pollution (air water and noise) and improve people's mental and physical health by making providing as best possible access to green spaces for relaxation and recreation. We need homes to have access to parks and playgrounds nearby.</p> <p>We know that flooding will become an ever increasing risk with climate change, and so we would strongly suggest avoiding building on areas at flood level 3 risk.</p> <p>We would suggest that developments should be within walking or cycling distance of a train station and school. If they are too far from a town centre then this will increase traffic congestion and thus pollution. It is not sufficient for them to simply be within walking or cycling distance, the developments must connect to safe and pleasant walking and cycling routes to make active travel the preferred choice, plus bus services for those unable to walk or cycle far.</p> <p>Homes should be high density so as to minimise the land used, and built with the best possible insulation for both heat saving and noise prevention. All windows must be double or triple glazed. Buildings should be orientated to make best use of the sun. All roofs should have solar panels. Water conservation devices such as low flow shower heads and water butts should come as standard. Where possible, building materials should be sourced as locally as possible.</p> <p><u>Development should be built to last and be resilient to changes lasting way beyond the 15 year plan period.</u></p>	Comment noted. This matter will be reflected within the next Regulation 18 document
25349153	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>The underlying assumption of the Local Plan is that building more houses will make them more affordable. However, our proximity to London means that many new houses will be bought by people moving out of London and their salaries being able to afford the high cost of houses locally. Others will want to live here and keep their London employment. Para 5.4.7 even says that "house prices [in TMBC] are amongst the highest in Kent, reflecting easy access to London, but many younger and lower wage local employees are priced out of the market".</p>	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
25349153	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>'Affordable' housing only means 80% of market rent. This is totally unaffordable for the local population, what is needed is a dramatic increase in social housing.</p>	Comment noted. This matter will be reflected within the next Regulation 18 document
25378817	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q12. With reference to your answers to questions 3 and 4, do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?</p> <p>The local plan should meet housing needs in full. As set out above the Council has under delivered in the past and has seen affordability worsen rapidly in recent years and anything below minimum needs will see this trend continue. In addition, the Council will need to consider whether there are any unmet needs from other areas that need to be taken into account. Any discussion between Council's will need to be evidenced and properly tested through the SA.</p> <p>What is also clearly apparent from the Council's evidence is that housing needs cannot be met from the development of previously developed sites in the urban area. The Council's urban capacity study shows that there is potential to bring forward just 1,946 new homes from 75 sites in the urban area, therefore, in order to meet housing needs the Council will have to bring forward green field sites. Given the Council's assessment of a spatial strategy that excludes sites in the Green Belt or AONB (option 1) is that this would be unlikely to meet housing and employment needs in full it is evident is that the Council will need to amend Green belt boundaries if its to meet development needs in full. As set out in our response to questions 40 and 41 the HBF would agree with the Council's assessment that there are exceptional circumstances present to amend Green Belt boundaries.</p>	Comment noted. This matter will be considered and reflected within the evidence being prepared to support plan preparation.

25378817	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period?</p> <p>As set out in our comments on the spatial strategy it is essential that the Council ensures a wide variety of sites comes forward. This is not just in terms of size but also in terms of their location. By increasing variety of sites allocated the Council will be able to ensure a consistent supply of homes across the plan period as well as increase the choice of housing being offered in Tonbridge and Malling. In particular we would encourage the Council to allocate more smaller sites. Whilst we acknowledge that the NPPF requires at least 10% of homes to be on sites of less than one hectare this should be seen as a minimum not a maximum. Up until the 1980s, small developers accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80% following the introduction of the plan-led system in 1990.</p> <p>The HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure with a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or else the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have.</p> <p>If the Council are to ensure there is a wide variety of SME house builders operating in its administrative area, and the benefits it brings to the speed of delivery and variety of homes, it must ensure that more homes are delivered on smaller sites. We would suggest that the Council actively works with smaller developers to ensure such sites are allocated recognising the importance of this element of the house building industry.</p> <p>Q14. Do you agree that the Local Plan should require a specified mix of dwelling types (e.g., flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs?</p> <p>The HBF does not consider it appropriate to require developments to achieve a specific mix that is set out in policy as this lacks the necessary flexibility to respond to changing circumstances and viability matters. The Council should set out in policy a more general requirement provides a range of homes, both in terms of size, type and tenure that support the creation and maintenance of balanced communities. In establishing the mix of homes applicants and decision makers can therefore have regard to the most up to date evidence such as the housing needs assessment, monitoring data on the homes delivered, and any specific needs in the local housing market within which a site is located without having to slavishly follow what is a snap shot in time.</p> <p>Q15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building?</p> <p>Before seeking to require large developments to provide a proportion of the homes delivered as self-build plots the Council will need to examine other opportunities for meeting the needs of those</p>	<p>Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement</p>
25378817	0	5.3.37 - 5.3.38	<p>Q.17. Do you agree with the windfall allowance methodology?</p> <p>The Council expect 3,102 units to come from both large and small windfall sites –a little over 19% of housing needs over the plan period. However, whilst it is evident that windfalls have formed a significant part of housing in supply in Tonbridge and Malling over the last decade there can be no certainty that this will continue in future at the same rate. It is also the case that windfall sites have formed a large part of the Borough's housing supply for many years and in area where housing needs are high it is inevitable that this will be a diminishing land supply in future and certainly one that cannot be relied on to be this high in ten-year time. Indeed, the Council note in paragraph 4.19 of the Sustainability Appraisal that as the Council has endeavoured to make best use of previously developed land in built up areas these types of sites are, as a consequence, becoming less common. The HBF therefore does not consider past delivery rates to be robust justification as to future supply.</p> <p>Whilst we agree with the decision to not include any small site windfalls prior to 2025/25 and any large sites prior to 2027/28 to avoid double counting with existing permission and allocations further discounts are necessary to ensure the Council does not overestimate windfalls in future given that it is inevitably a diminishing source of supply. The HBF would therefore suggest that in addition to the discounts to avoid double counting the Council must apply a significant discount to the average rates of delivery both small and large sites. This approach recognises that windfalls will come forward but also that it is a diminishing supply and cannot be relied on to deliver 19% of the areas housing needs.</p> <p>However, Hildenborough Parish Council have a number of points it wishes to emphasize:</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses</p>
38330977	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>[Points 1-3 added to GB section]</p> <p>[Points 4 & 7 added to infrastructure section]</p> <p>[Point 5 added elsewhere in the housing section]</p> <p>6. Currently, large expensive housing seems to be the choice of developers, the Parish Council would like to see more affordable homes for young people and also rented accommodation included as a priority. Recently funding has been made available to the Borough Council through developers with the resulting affordable/rental housing built elsewhere in the borough. The Council is looking for an all age balance of residents.</p>	<p>Comment noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.</p>

38330977	0	5.3.39 - 5.3.45	<p>However, Hildenborough Parish Council have a number of points it wishes to emphasis:</p> <p>[Points 1-3 added to GB section]</p> <p>[Point 4 & 7 added to infrastructure section]</p> <p>5. The Council believe it is important that when planning housing adequate parking and charging points are provided close to the residential home.</p> <p>[Point 6 covered elsewhere on housing section]</p>	<p>Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.</p>
38523009	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>5.3.7. "[...]The garden communities programme is focussed on supporting the development</p> <p>page 27 of new settlements, or large extensions to existing settlements, that provide a mix of homes, job opportunities, community facilities connected with safe walking, cycling and public transport routes with attractive, generous and accessible green space and public realm areas" This also needs to include equestrians. Open space and non-motorised routes should be accessible to all unless there are evidence based reasons to exclude them.</p> <p>5.3.38 page 37 "For places to function properly, it is critical that new homes are served by supporting infrastructure such as schools, health care centres, open spaces, and opportunities for active travel such as walking and cycling. This is important for the health and well-being of the new residents. We understand the importance of not just the amount of supporting infrastructure but also when it is delivered to meet the needs of the new communities. Health and wellbeing is increased where equestrians are included.</p> <p>5.5.3 page 45 • provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans - LCWIP) We have previously met with TMBC and discussed the inclusion of equestrians within the LCWIP. Where equestrian use is likely to be low, this does not mean they should be excluded but surfacing most suited to cyclists might be used. Where bridleways and byways are proposed to form part of a route these must be maintained as suitable for the primary intended users, namely horse riders and carriage drivers.</p> <p>5.5.8. page 46 KCC is the Local Highway Authority for Kent and is responsible for the management and maintenance of all adopted roads in the County, other than motorways which are the responsibility of National Highways (formerly Highways England). KCC is the Local Transport Authority for Kent and therefore has responsibility for procuring some public and school bus services. KCC also has a role in maintaining cycle routes, promoting cycling and maintaining public rights of way. Please see reference to KCC ROWIP above.</p> <p>5.5.14. page 47 A new Active Travel Strategy (LCWIP) is being prepared to support existing and new communities. This will identify cycling and walking infrastructure priorities to support existing and new communities. This is essential to help tackle congestion, respond to climate change and to provide local people with transport mode choice. We have responded to this and liaised with TMBC over their AT plans</p>	<p>Comments noted. Consultation outcomes and responses will be used to support drafting of the local plan and reported through the consultation statement.</p>
38523009	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>5.5.25. page 49 Not addressing known transport challenges could lead to a worsening of congestion and air quality, which has implications for local economic growth and quality of life including public health. A failure to shift towards sustainable transport modes also presents challenges for the design of new developments, where car use and inappropriate parking can dominate and lead to highway safety issues. Furthermore, not planning adequately for safe and attractive active travel opportunities, such as walking and cycling, horse-riding and carriage driving will mean that opportunities to help benefit the health and well-being of residents will be lost.</p> <p>5.5.26. Page 49 Climate change ambitions could also not be achieved if low carbon transport options are not rapidly adopted in both existing and new communities. Key transport issues which the Local Plan can help to address [...]</p> <ul style="list-style-type: none"> • Cycling - Improve the availability of dedicated and segregated cycle routes across the borough. Segregation should not be required. • Walking – Improve the footpath RIGHTS OF WAY network especially in rural locations where pavements may be inadequate and provide safe crossings for all Non-Motorised/Vulnerable Road Users (NNU/VRU). 	<p>Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan</p>
38779009	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>I question the assumption that everyone wants to get on the housing ladder. If there were a stock of good quality, reasonably priced social housing and private rents were capped at a sensible level for tenants, surely an appreciable number of residents would be content to rent? Also, I understand that the government's definition of 'affordable' is 80% of market price or rent, which would mean that even an 'affordable' property to buy in T&M would cost about 10.5 times annual earnings, and to rent a house or flat would still eat a huge chunk of income.</p>	<p>Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.</p>

39011745	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>This reminds me of the adage: Lies, damn lies and statistics!</p> <p>From the documents provided by TMBC, it is evident that the borough is building more houses already than most areas around, in percentage terms. The demand is probably significantly driven by the availability of new houses. (Rail links from Kings Hill are poor, when compared to neighbouring locations such as Tonbridge or even Longfield! The golden goose has probably already been killed!) It is pointless building houses in Kings Hill in the range £500,000 plus if the intention is to bring down the house price / earnings ratio; with average earnings being around £38,000, more houses are required at the £300,000 mark and below, but those only seem to be static caravan sites at present. I.e. the problems are not being addressed. Developers only seem to want to build high margin offerings, and a strategy is required to ensure that appropriately priced houses are built. Note that there is no point building low cost housing in areas where there is no access to a wide range of jobs, as there would then not be the appropriate market for them, and the house price / earnings ratio issue will never be resolved.</p>	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.
42004961	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Building houses in the local area won't necessarily benefit the residents of Tonbridge but benefit those from further afield. It would be interesting to see how many people live in Tonbridge that grew up here. Many people are moving from the city in to the area because it is cheaper to live than it is in the city. There is a significant number of rental properties and agents who buy the new builds and rent them out immediately. This then prevents those from the area buying the properties. I can't understand why there is not a limit on landlord portfolios. This is the reason there is a shortage of housing to purchase. This is the reason the house prices go up and there is no housing available. The council need to approach the empty housing units and prioritise lower income families to help them afford to buy. One in three of the housing going towards this demographic is not enough especially when this third will be flats and not suitable housing for the families that require it. The council simply do not help with the provisions. Meaning more families have to be dependent on the state and the council housing list. Blame landlords and non-local people for the cost of housing not simply the residents of Tonbridge. Any response would be appreciated.</p>	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42006241	42006241	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q.12. With reference to your answers to questions 3 and 4, do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full as a minimum? Yes/No Please explain.</p> <p>Yes. We support the identification at paragraph 5.3.6 of the needs of different groups, including small house builders in providing homes locally. Paragraph 5.3.6 acknowledges that this is best achieved by ensuring an adequate supply of small and medium sized sites, which can help with the supply of new homes in the short-medium term. We are supportive of this recognition for small-medium sites which are provided by SME developers such as Esquire. We consider that this should go further and ensure that the Local Plan identifies and allocates housing specific to these needs. Where it is acknowledged that small sites can provide a high-quality product in the short term, this should be made clear with a specific policy that captures small-sites and SME developers and recognises the contribution.</p> <p>In order to help meet these needs as well as support SMEs and Self and Custom Builders, we consider it appropriate to include a small sites policy or a policy which recognises the role of rural communities and supports windfall developments.</p> <p>The Kent SME network is championing a small sites policy, which is being endorsed by a number of LPAs including Swale (See appendix 4) and Medway Council.</p> <p>The suggested wording of the policy is as follows but can be tailored to suite each LPA.</p> <p>Policy [insert Policy Number] Small Sites In order to recognise the value of SMEs and small-scale sites, the Council will support development of unallocated or windfall small scale housing (C3) and approve applications providing the harm does not demonstrably outweigh the benefits; and where:</p> <p>I. The site does not exceed 60 dwellings (net) and is of an appropriate scale to its location; II. The site is being brought forward by a recognised SME Developer and is not part of a larger site; III. The proposed development delivers; a. A bespoke design approach; b. A high-quality design that is locally distinctive; c. Is sympathetic to the character of its location; IV. All dwellings meet National Design Standards and endeavor to deliver a range of Carbon reduction build techniques; V. The proposed development preserves residential amenity, designated heritage assets and core environmental assets and increase net biodiversity.</p>	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.

42006241	42006241	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium and large) to help maintain supply throughout the plan period? Yes/No Please explain.</p> <p>Yes. Paragraph 69 of the NPPF requires Local Planning Authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. This is a clear requirement therefore that 1,594 dwellings need to be allocated on sites of this nature.</p> <p>The SHLAA is a critical piece of work in this regard, and it is crucial that sites of this scale are identified and that they are being promoted by SME developers (or capable of being delivered by an SME developer). It is not simply a numbers game but a qualitative exercise to ensure that a sufficient number of these small sites are identified to support the intent of paragraph 69 – which is to support SME developers.</p> <p>We support the recognition at para 5.3.34 that one way of building resilience into the supply of new homes across the whole of the plan period is through diversity, with diversity being in terms of the size of sites, tenure of homes and the types and sizes of homes provided. Recognition of this does not go far enough and TMBC must allocate diverse sites for a deliverable and effective Local Plan.</p> <p>Small sites have a significant advantage as they can deliver quickly. Accordingly, in allocating smaller sites (of 1ha), or indeed supporting SME developers in bringing forward larger ‘small sites’ (there are a number of SME Developers capable of delivering sites in excess of 1ha and up to 100 dwellings or more per site), it will help deliver housing in the short term and firstly seek to rectify the existing housing land supply issue and deliver in early years of the plan period whilst the larger, longer term sites move through the planning and delivery process.</p> <p>It is critical to have a good blend of sites and small site and SME developers are key to the success of delivery. SMEs also seek to deliver good design and set a good standard in the Borough.</p> <p>Q.14 Do you agree that the Local Plan should require a specific mix of dwelling types (e.g.,flatted, terraced, semi-detached, detached) on large development sites to meet the range of households needs? Yes/No Please explain</p> <p>No. We consider a policy of this nature to be too prescriptive and would not allow sites to deliver bespoke schemes reflective of the local character</p> <p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building?</p> <p>Yes and No. We consider it appropriate to have a policy that seek to support and deliver self-build and custom build homes. Whilst including this element in larger development s maybe appropriate, in practice, individual or small-scale plots are considered more desirable for this type of dwelling. Accordingly, we consider that a standalone policy supporting self-build and custom build homes is provided.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. The council acknowledges the need to plan for a diverse supply of housing types and typologies and diversity of sites within the trajectory.
42006241	42006241	5.3.37 - 5.3.38	<p>Q.17. Do you agree with the windfall allowance methodology? Yes/No Please explain</p> <p>We do not disagree with the windfall allowance methodology itself (i.e. large and small windfall and how the numbers have been derived). However, we do consider that this results in a significant proportion of the total number of dwellings required to be delivered in the plan period to be reliant on windfall source. Accordingly, the application of Windfall development to meet the housing numbers needs careful consideration.</p> <p>The windfall allowance should be used as a buffer to provide additional development rather than relied upon to make up a large percentage of the housing numbers. We consider that windfall allowance should be given greater flexibility and not relied upon to the extent that these housing numbers suggest.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
42107681	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	Looking at the graph, the England increase is very much the same. One issue not addressed is the pressure on house prices due to people moving here from Greater London rather than actual local need.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42107681	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	The graph shows that the same or very similar increase in house prices exists across the country. Here our house prices started high and continue to be so due to pressure from people moving into the area from Greater London, not local at all. We need to build affordable local housing and social housing.	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.
42224609	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Quality place-making sounds like a nightmare and is against our borough's character. Lumping a disproportionate amount of development in one area is deeply unfair and ruinous to the local environment. Also an excellent way of losing votes!</p> <p>Modern methods of construction have advantages but tend to produce lower quality build which is bad for the new homeowner as well as their future buyers. Hopefully, the council has enough qualified, honest and confident staff in their Building Control Department to professionally meet the requirement. Builders like Persimmon etc. would tend to suggest councils are damagingly lacking in this area.</p> <p>The affordability ratio suggests we will have a preponderance of lower-end housing. First-time buyers are in desperate straights and rightly need help but this should be given within a cocktail of new housing.</p>	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.
42260545	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	Any new housing needs to be delivered with solar power and green roofing. Tonbridge could lead the way in green infrastructure if it made sure all new homes had community garden spaces and living roofs where possible. Building on and covering land with non-permeable products drastically increases the instances of flash flooding which are going to increase as climate change brings us heavier downpours. Using the right permeable products for pavements and drives, and slowing down rain by having green roofs will make a massive difference.	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.

42330785	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	every housing development should have to provide affordable homes for first time buyers and homes to rent at affordable rents. Under no circumstances should permission be granted to avoid such obligations. It appears to me that Kings hill does not have such houses in appropriate proportion to homes being built.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42345281	0	5.3.39 - 5.3.45	There is a lack of detail of infrastructure of plans throughout this plan.	Noted. The local plan development strategy and associated infrastructure demands will be reflected within the Infrastructure Delivery Plan
42368129	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	Again I question these figures do not need this level of houses in TMBC	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.
42386433	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	This is a very partial comparison and all to areas that have more affordability ratios. How do we compare to Sevenoaks, to Orpington, to Central London for example. I would expect us to have better affordability ratios than most/all of these areas. Plus I would expect the trend in those areas to also show affordability ratios to have declined.	Comment noted.
42443361	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	If the Council adopt this position & support continuous building at what point does building cease - consider that the borough will eventually get swallowed up by London - at great expense to the Green Belt, mental well being & climate/global warming. The Borough Council should challenge government policy & allocated given the strategic loss being accommodated. If it does progress as outlined above then higher density housing should be adopted, ensuring Green belt is protected & creating affordable homes (rather than lots of expensive executive homes) . Consider models in China & Europe regarding population adjacent work places saving land & transport.	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42443361	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	Modern Methods of Construction (MMC) - are NOT proven in terms of longevity of construction details or materials. - the design life of a house/dwelling constructed using Modern Methods of Construction (MMC) may not be sustainable given the embodied carbon within those materials (plasterboard, steel, tin, plastics (roofing) which if demolished early may not be recyclable - there is also the hidden transport material costs to the factory then to site & to disposal - if factories/facilities not located in Kent.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42443361	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	The National Planning Policy Framework (NPPF) expects planning policies and decisions to promote an effective use of land in meeting the need for homes, therefore to maintain quality of life, physical & mental health of borough residents in Tonbridge & Malling, across Kent & save areas currently in decline such as Tonbridge - urban areas need to be the focus to get people to help with regeneration rather than adding to transport quadmire & causing gridlock. Best use of finite brown field land for denser affordable dwellings should be promoted by the Council, as oppose to wide spread executive housing (that benefits developers profits & NOT individuals climbing the property ladder?).	Comment Noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.
42445953	0	5.3.39 - 5.3.45	It is a wrong assumption to say that local communities need to grow in order to support the long-term future of local facilities and services. Whilst it is correct to say that schools, shops and pubs can only be sustained if enough people use them - the solution to that issue is not, however, simply to bring more people into an area... If a pub, school or other service is poor and does not offer what people want then simply increasing the size of the population does not address those issues and the services/facilities will continue to decline anyway...	Comment noted.
42471041	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	The housing affordability ratio fails to take into account basic economic pricing principles of supply and demand. Higher salaries are available in London, therefore areas from which it is possible to commute to London become less affordable. The graph does not provide useful comparators such as the affordability ratio in Sevenoaks, Tunbridge Wells or London over time.	Comment noted.
42483905	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	The house price to earnings ratio has been rising since the 80s. I don't think this can be used an exclusive argument to say prices are too high. A long period of low interest rates (now about to end) has made the ratios what they are	Comment noted.
42520801	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	I do not wish to encourage the gypsy traveler communities into the surrounding village areas. I do not support this.	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.
42520801	0	5.3.39 - 5.3.45	Please please leave villages alone. I cannot stress this enough. People have paid a lot of money to live in the villages - there is low noise pollution, minimal light pollution and great air quality alongside being in a diverse environment with wildlife. Huge housing developments will ruin the natural environment we have chosen to live in. Will TMBC compensate home owners for the reduction in value to their properties?	Noted. The council is required to reflect the approach of the National Planning policy Framework and associated planning practice guidance

42556065	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	The mere fact that T&M might have a higher affordability ratio is not sufficient reason for the planning proposals. You have to look at the impact on the environment and the residents of this green and historic landscape.	Comment noted. This matter will be reflected within the next Regulation 18 document.
42556065	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	There are insufficient bus services to support the elderly and disabled in this area.	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
42556065	0	5.3.37 - 5.3.38	I have no objection to disused and decaying commercial buildings being developed into housing provided the transport network is not adversely affected and there is the infrastructure in place to support such development.	Comment noted.
42584513	0	5.3.39 - 5.3.45	While it is excellent that the council plans to ensure the provision of adequate supporting infrastructure such as healthcare, schools etc., how are the council going to ensure that there is an adequate supply of professional staff for them	Comment noted.
42587681	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	To talk of "affordable homes" is useless, since the term is not defined and developers exploit that loophole.	Noted. The council is required to reflect the approach of the National Planning policy Framework and associated planning practice guidance
42588737	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>These arguments are badly flawed.</p> <p>They completely ignore the impact of the cost of borrowing on affordability. Bank rate in Feb 2000 was 6.0%, in Feb 2022 it was 0.5%. so a mortgage has become more affordable. As a result lenders are prepared to lend more cash. This is bound to push up house prices. We can expect a significant downturn in house prices as interest rates now start to rise.</p> <p>Inter regional comparisons simply confirm that we live in a nice area and that people are prepared to pay a premium to live here. We should not seek to level down; it is the Government's role to level up in areas that are not so fortunate.</p> <p>There is certainly a problem for first time buyers getting on the property ladder but this can only be addressed by providing more starter homes, it is not a justification for building more homes of all sizes.</p> <p>The only argument for an overall increase in the housing stock is the forecast change in T&M's population during the plan period.</p>	Comment noted. This matter will be reflected within the next Regulation 18 document.
42590145	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8	The house prices in Tonbridge and Hildenborough in particular have risen disproportionately primarily because of their location. People are moving out of London to areas where commuting is cost effective. This is exacerbated by the trend to work from home for some periods of time. Add to this, the excellent local schools, both public and private means that the area is more and more desirable. It is not a failure of the Council but a success of community. But, the infrastructure, particularly in Hildenborough, cannot sustain further growth. It may be possible to see a few houses but significant developments will crush the village.	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.
42613729	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	There are two variables here - incomes and house prices. Incomes have been depressed but house prices have continued to rise which suggests that they have remained affordable for some. It is quite possible that a rise in incomes but a fall in the housing market may alter this ratio. It will not be the same for the whole country.	Comment noted.
42613729	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	What is happening in neighbouring boroughs is key (hence my comments around where people live / work. In addition, there should be some analysis about why people live where they do. e.g family, schools work etc	Comment Noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.
42614913	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	No reference is made to the pull affect on affordability of the borough being so close to London.	Comment noted.
42614913	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	The development of category C3 properties seems counter to the Kent Strategy that care for the elderly should be provided to them within their home and not through care homes.	Comment Noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.
42614913	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	Affordability for housing is one thing but it also needs to apply to purpose built infrastructure such as doctor surgeries.	Comment noted.
42616033	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	the area has contributed more than any other area and further development is not sustainable due to the lack of infrastructure	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.

42641505	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>5.3.3 It is not possible to build enough houses to crash or substantially affect house prices, therefore "affordability" cannot be part of the process for assessing need.</p> <p>5.3.4 The plan should include for social housing allowances to help home those unable or unwilling to buy based on mortgage availability or repayment amounts. Home Ownership should not be the only housing consideration in the plan.</p> <p>5.3.9 House prices are defined by market rates and asking prices depending on size, not related to build cost which completely negates the consideration of MMC as a driver for "affordable housing" all MMC does is reduce costs and increase profit margins for the developer.</p> <p>Also no house builder will choose to sell houses at below the market value as this would disbenefit their shareholders and profit margins.</p> <p>5.3.13 As above affordability is dictated by markets not by how many houses are built. Developers will not reduce the unit cost compared to regional averages therefore TMBC is not the place to build if you want affordable.</p> <p>5.3.15 Housing affordability is not affected by building new houses for sale, see kings hill for an example.</p>	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42641505	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>5.3.24, 5.3.26 - implies that the HMAs give sevenoaks and tunbridge wells councils the right to impact and implement changes to our council policy, potentially to their benefit and TMBC disbenefit.</p> <p>As they do not exist to benefit TMBC or local residents it needs clarifying to what extent they can input/affect into this plan.</p> <p>5.3.33 - have the numbers of vacant or unsold residential and commercial units available for use been assessed?</p> <p>5.3.34, 5.3.35, 5.3.40, - limitations of certain hosing stock sizes should be considered, also social housing in the primary instance to really impact on the affordability aspect. Houses and plot over a certain size should be excluded from consideration as they do not affect the "need" or "affordability aspects for example 5+ bedroom houses or plots with gardens over a certain size that could be used for additional housing. smaller plots are cheaper and therefore more affordable.</p> <p>Private rented accomodation is ususally as expensive as ownership in terms of monthly rates and should be explicitly excluded from reference to affordability.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
42646849	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	I think the key is in improving transport links, people will be happy to travel to the major towns for work if the roads and public transport is better.	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.
42682465	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	I believe the baseline figures are out of date as there has been considerable development and housing provision across the borough over the past two years. The borough has lost access to the Eurostar stations. Housing prices are currently falling due to the economic situation and high interest rates and mortgage restrictions.	Comment noted.
42684641	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>5.3.17 Comment</p> <p>Affordability in the TMBC area will always be a problem as there is the London Effect. London money comes and buys in this area because the train service is excellent and so are the schools. Private Grammar and Non Grammar- all good reputations. Councils should look to protect some homes for locals whose salary is not so high.</p>	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42684641	0	5.3.39 - 5.3.45	<p>5.3.44</p> <p>Housing should not be packed together</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
42687265	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	Good housing is being used for people with mental health issues which the Government are housing down here making our areas less safe. These houses should be for people on low incomes to help them get on the housing ladder	Comment noted.
42687265	0	5.3.39 - 5.3.45	You really need to open your eyes. Local shops and pubs have closed. There are no doctors or dentists without waiting lists. We have one very overcrowded hospital and long waiting lists for secondary care. Aylesford is overcrowded and not a good place to live anymore. You have spoilt it	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.

42690369	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	Until significant infrastructure improvements are made to all major urban centres in Kent and surrounding towns and villages as part of a well considered unified plan between local authorities and Kent Council collectively, no new housing developments at all should be allowed. What are needed instead are whole new villages and towns well away from existing towns with major new roads, and even rail connections, serving the whole county. Local, regional and national authorities and the government need to see the bigger picture and work together. Until this happens, existing urban areas will become increasingly overdeveloped, strained and valuable open spaces destroyed and the effect of this will create more disharmony and negative well-being for citizens as they become more and more dissatisfied with their environment.	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
42690369	0	5.3.37 - 5.3.38	You need to explain what a windfall allowance is.	Comment noted.
42715009	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	The "call for sites" makes no sense. We have 5 sites on our door step. All on green belt and overlapping. One even includes a private road and private housing within the boundaries. Surely, before sites get to this stage, the council should filter out the ones that they would not support. To generate a list of almost 300 sites, many of which have no merit and will negatively impact the local environment, is counterproductive.	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.
42716705	0	5.3.39 - 5.3.45	Key to us is our quality of life. We wish to live in a rural environment. The Malling/Kings Hill area has been, and still is, awash with new developments. The calm atmosphere of our surroundings (we have lived here for nearly 30 years) is being eroded day by day. New developments create more pressure on local services and infrastructure as well as increasingly persistent background noise (roads and sports fields). Priorities for us are retaining what is left of the rural environment, particularly the local orchards, and keeping individual settlements separate. In specific answer to your question: * Continuation of a rural environment * Preservation of local productive farmland * No further increase in noise levels (playing fields and roads, in particular) * No further expansion of the boundaries of local villages * Extension of the green belt to help to achieve the above four points	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
42729281	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	Whether people can 'get their foot on the first step of the property ladder' should not in any way influence housing policy. There is no absolute right for anyone to regularly upgrade their property as this will inevitably create unnecessary demand and further inflate prices. If buying property is unaffordable then people have to 'cut their cloth' accordingly	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42729313	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	Site 59424 (woodland behind Clearheart Lane) - DEFRA Forest inventory, ancient woodland, TPO protected trees, inadequate resources within Kings Hill, harm to protected species (including adders, slow worm, and bats), outside of the confines of existing developments, impacts on Clearheart Lane residents due to access on insufficiently wide road, crossing bridal path creating danger to walkers (inc school children), impact on wildlife corridor. Sites 59531, 59534 - change of character of area, traffic impact to and from centre of Kings Hill, loss of public space. Site 59544 - harm to conservation areas or harm to significance of conservation areas, harm to non listed heritage assets, preservation order. Site 59547 - loss of green open space, harm to conservation areas or harm to significance of conservation areas Site 59630 - proposed green belt, countryside, harm to the aquifer for streams, outside of the confines of existing developments, traffic restricted on local roads, visual impact from AONB. Site 59631 - existing public open space for Kings Hill, countryside, harm to quiet lane and rural road networks, outside of the confines of existing developments, loss of agricultural land, traffic restricted on local roads Site 59634 - harm to conservation areas or harm to significance of conservation areas, ancient woodland and TPOs (most of site), countryside, harm to quiet Lane and rural road networks, outside of the confines of existing developments, loss of agricultural land, traffic restricted on local roads, visual impact from AONB Site 59655 - green belt, countryside, harm to quiet Lane and rural road networks, outside of the confines of existing developments, loss of agricultural land, traffic restricted on local roads Site 59740 - harm to conservation areas or harm to significance of conservation areas, proposed green belt, countryside, harm to the aquifer for streams, harm to non listed heritage assets, harm to quiet Lane and rural road networks, outside of the confines of existing developments, loss of agricultural land, traffic restricted on local roads, inadequate resources Site 59761 - ancient woodland (part of site), green belt, countryside, access issues to local roads Site 59797 - harm to conservation areas or harm to significance of conservation areas, green belt, countryside, harm to the aquifer for streams, harm to the quiet Lane and rural road networks, outside of the confines of existing developments, loss of agricultural land, traffic restricted on local roads Site 59800 - green belt, countryside, harm to the aquifer for streams, harm to quiet Lane and rural road networks, outside the confines of existing developments, loss of agricultural land, traffic restricted on local roads Site 59802 - green belt, countryside, harm to the aquifer for streams, harm to non listed heritage assets, harm to quiet Lane and rural road networks, outside of the confines of existing developments, loss of agricultural land, traffic restricted on local roads Site 59844 - change of character of the area, traffic impact to / from Kings Hill centre, loss of public open space	Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes
42755105	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	I feel there is a lack of truly affordable, secure property for renting. Plus I am not aware of Developers really designing homes for the elderly or disabled. Too many detached spacious homes take up space needed for the average person/family. Any plan needs to address these issues. Choice of Developers needs to be scrutinised as I feel the type of buildings often depends on what makes the Developer the most money.	Comment noted. This matter will be reflected within the next Regulation 18 document.

42764129	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Representation to the Tonbridge and Malling Borough Council (TMBC) Regulation 18 Local Plan and Interim 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)[1] (#_ftn1) 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"> * 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; * 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 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>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 growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.</p> <p>The Regulation 18 Local Plan sets out how the hierarchy of settlements should be used to guide decisions on where development should be focussed. It acknowledges that settlements at the top of the hierarchy (Urban Areas), are most likely to provide opportunities for sustainable development because they contain a variety of services, are well connected by public transport and offer opportunities for active travel. They also contain opportunities for making use of previously developed land. Beyond the Urban Areas are Rural Service Centres and Other Rural Settlements. At the bottom of the hierarchy are Rural Areas within the open countryside and where development should be restricted.</p>	Noted. The site specific matters raised will be taken into consideration within the site analysis and site selection processes
42766209	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>These are my submissions for the Council's Reg 18 Local Plan consultation. They are necessarily truncated due to Covid illness and are not as site specifically focused as I might have liked; however, further representations (either personally or as part of an organized constituents' group backed by specialist public law advice) will be made to the Council in due course, depending on how the Council takes matters forward.</p> <p>I am a former planning solicitor who acted on behalf of both major house builders and local planning authorities on both development management and strategic planning issues. I have also provided statutory consultee responses on behalf of Natural England on the effects of major development proposals on the natural environment, specifically landscape and biodiversity.</p> <p>Of direct relevance to this consultation, I was the lead officer for Natural England at the Kent International Gateway (KIG) called-in public inquiry, a proposal rejected by the Secretary of State in main part due to potential effects related to harm to the setting of the Kent Downs AONB. The KIG site and its relation to the AONB has striking parallels to some of the Reg 18 sites, in particular the site termed Borough Green Garden City (BGGC).</p> <p>The target housing number, present government direction and out of date baseline</p> <p>Before dealing with the detailed Reg 18 representations, the following question has to be asked: why has the Council not announced – like an increasing number of Local Planning Authorities are now doing – that the local plan procedure is to be delayed pending clarification from central government on housing prescriptions and the relevance of the green belt to housing provision and development generally?</p> <p>The leader of the Council asked the now Prime Minister at a hustings meeting in the borough that I also attended, how he saw the importance of the green belt, considering housing targets.</p> <p>The Prime Minister was immediate and unequivocally firm in his response: that the green belt needed to be protected. The Prime Minister has also made clear that housing targets need revisiting. (It is also to be expected that the 2014 baseline and appropriate locations nationally for major strategic development, will be under consideration by the Leveling UP Secretary of State.)</p> <p>I understand the Council may be worried that development proposals may come forward that they may not be able to resist as much as they might like but this doesn't seem a valid argument in terms of the likely short period of delay compared to the potentially huge impact of the current housing target on the borough, if the present number is pushed through by the Council.</p> <p>Any proposals that might be more difficult to resist (as far as there were any of significance in a short, well advised delay) would not be able to be forced through in areas of environmental constraint like the green belt and the AONB, precisely the areas the Council should be seeking to protect through the Local Plan process in any event.</p>	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.

42766209	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>ideal world scenarios such as distributing housing to best fit perceived optimal provision in terms of location, are not considerations that can be used to override environmental constraints like the green belt. Housing Market Areas cannot be used by the Council as justification for allowing the destruction of the Green Belt. Distributing housing to reflect housing market area split does not count as exceptional circumstances; optimal is not exceptional.</p>	<p>Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement</p>
42778945	42778497	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8	<p>Question.12. With reference to your answers to questions 5 and 6, do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum? Yes/No Please explain.</p> <p>Yes, the Local Plan should look to meet the housing requirement in full, however the council should also be aiming for meeting the assessed housing need plus 20%. This would be in line with NPPF para 74 'maintaining supply and delivery of housing'. The councils housing Land supply position statement 2021 identifies at para 4.1 that the council currently has a 3.17 year supply of housing and at 2.4 that 'As a consequence of this HDT measurement, a 20% buffer must be applied to the housing need for the five-year period 2021-2026. This means the need against which the projected supply is assessed increases from 4,195 dwellings to 5,034 dwellings'.</p> <p>It is likely that the council's low housing land supply position will continue for the next few years until the new Local Plan is adopted. There will then be a time lag between the approval of the plan and delivery so this must be planned for and including a buffer of plus 20% would help in this regard.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>
42778945	42778497	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period? Yes/No Please explain.</p> <p>The plan should look to small, medium and large sites given the timescales it can take to get housing completions from larger sites and urban extensions and the deficit in housing delivery.</p> <p>In addition, the plan should look to plan positively towards meeting the needs of specialist groups such as meeting the housing needs of older people. Given the level of need identified for this group (see our answer to question 18), evidence and the guidance of the PPG, we consider that the best approach towards meeting the diverse housing needs of older people is for the plan to ensure it allocate specific sites to meet the needs of older people that are in the most sustainable locations close to key services as well as including a standalone policy that actively supports the delivery of specialist older people's housing in the urban areas and large rural settlements and other locations with good access to services and facilities for older people.</p> <p>Developers should not be required to demonstrate need given the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments "help reduce costs to the social care and health systems" (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.</p> <p>While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:</p> <p>"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.</p> <p>The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."</p> <p>We would respectfully remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the Council's planning obligations and building requirements should therefore be robust</p> <p>We would also like to remind the Council that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that these housing</p>	<p>Comment noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation. The council acknowledges the need to plan for a diverse supply of housing types and typologies.</p>

42778945	42778497	5.3.39 - 5.3.45	<p>Q18. Specialist housing for older people and meeting their needs is of most importance for the following reasons.</p> <p>National Policy Context Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads:</p> <p>"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."</p> <p>The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.</p> <p>In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 states:</p> <p>"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million (https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections) . Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking" (emphasis added).</p> <p>Paragraph 003 Reference ID: 63-003-20190626 recognises that: "the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support."</p> <p>Thus, a range of provision needs to be planned for. Paragraph 006 Reference ID: 63-006-20190626 sets out; "plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require."</p>	<p>Comment noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation. The council acknowledges the need to plan for a diverse supply of housing types and typologies.</p>
42778945	42778497	5.3.39 - 5.3.45	<p>Q.19. What are your reasons for selecting these particular housing matters as priorities for the Local Plan (outline briefly)?</p> <p>Providing specialist housing for older people is important because the housing needs of the increasing number and proportion of older people should be met for the plan to be positively prepared, effective and justified in line with the NPPF and PPG for Housing for older and disabled people. By meeting these needs the Borough will then experience a number of benefits including economic, social and environmental and ensure that older people can live healthier lives as detailed in our answer to question 18.</p>	<p>Comment noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.</p>
42795361	0	5.3.39 - 5.3.45	<p>Potential to impact on Hildenborough Residents by increasing the strain on our infrastructure and amenities, by:</p> <ul style="list-style-type: none"> * Roads * pose additional danger to regular walkers, cyclists and horse riders. * further damaging our poorly maintained and pot-hole prone roads. * increasing traffic volume, not only residents cars but regular delivery vehicles and construction traffic. Any increase in traffic on these rural roads will be detrimental. * Medical amenities – healthcare facilities could not cope with a huge increase in local numbers – as it is, the Hildenborough Medical Group is stretched, and its satellite surgery in Leigh is only open for a short time during the week. * Schools * In the 2022 academic year, Stocks Green School has only 1 space available and 14 children on its waiting list. Hildenborough CE has 22 spaces available. NB this is before any families have moved into the family focused Oakhill development due to open Spring 2023 * Those who could not find places at local schools are offered alternative placements further afield at schools in Tonbridge, thus exacerbating traffic problems. 	<p>Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement</p>
42798817	0	5.3.39 - 5.3.45	<p>Prioritising sustainable housing materials and ensuring that these are built to high specifications to minimise heat leakage and maximise insulation to reduce the need to consume energy for heating purposes.</p>	<p>Comment noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.</p>
42799617	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>The assumption that building more housing prevents houses prices rising is flawed as developers will not build houses for sale unless they see that the market will deliver the highest profit level. This is borne out by the total reliance on pushing prices as high as possible, seen as a good thing by the 'market' and yet reducing the ability of 1st time buyers to afford anything more and more. Control of house building is more achievable if the Local Authority can build homes for local people, which I understand has been happening in other Conservative Boroughs.</p> <p>Therefore I support providing such sites for Local need as a priority.</p>	<p>Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.</p>

42806945	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	Building more and more houses in the borough is not the answer to the difficulty young and first time buyers have in buying houses near by. Fiscal and monetary policy changes should be the way forward	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42806945	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	There are not enough and, as far as I am aware, there are not enough properties suitable for anyone - elderly or disabled - with mobility problems. For example houses designed with spaces and doors designed for wheelchairs.	Comment noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.
42819617	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q.12. With reference to your answers to questions 3 and 4, do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum? Yes/No Please explain</p> <p>3.40 TMBC has confirmed that the new Local Plan will be working towards a new housing need based on the Standard Method. Using the Government's standard method formula, the identified need is currently 839 new dwellings per annum (dpa) for Tonbridge and Malling, which compares to 696 dpa in the previous Plan. This equates to a total of 15,941 dwellings over the plan period (19 years).</p> <p>3.41 We fully support the approach of using the Standard Method approach, which is a requirement set out in the NPPF. As set out in paragraph 61 of the NPPF "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach."</p> <p>3.42 First, it is important to recognise that Standard Method approach sets the minimum requirement for housing need. As demonstrated in the Housing Market Delivery Study and the Housing Needs Survey 2022 both identified a demand for market homes and affordable homes within TMBC. The Borough is a desirable place to live with a strong housing market. The demand for housing is high and growing, it is also geographically spread across the Borough. There is currently a significant undersupply of homes in the Borough, and this appears to be worsening. Therefore, aiming to deliver greater levels of sustainable growth should be encouraged.</p> <p>3.43 Second, local authorities are required to meet housing figures identified using the Standard Method unless exceptional circumstances justify an alternative approach. As it stands, there is no set definition of what constitutes exceptional circumstances. While we are aware of the significant constraints impacting the Borough, namely the Green Belt, we are not of the view that this alone would constitute exceptional circumstances. Therefore, TMBC should seek to deliver the identified housing need as a minimum.</p> <p>3.44 The only outstanding point to consider in terms of housing need is whether any additional housing is required through the Duty to Co-Operate, but we understand this process is currently underway and we shall comment further once discussions are more advanced.</p>	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42819617	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q.12. With reference to your answers to questions 3 and 4, do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum? Yes/No Please explain</p> <p>3.52 TMBC has confirmed that the new Local Plan will be working towards a new housing need based on the Standard Method. Using the Government's Standard Method formula, the identified need is currently 839 new dwellings per annum (dpa) for Tonbridge and Malling, which compares to 696 dpa in the previous Plan. This equates to a total of 15,941 dwellings over the plan period (19 years).</p> <p>3.53 We fully support the approach of using the Standard Method approach, which is a requirement set out in the NPPF. As set out in paragraph 61 of the NPPF "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach."</p> <p>3.54 First, it is important to recognise that Standard Method approach sets the minimum requirement for housing need. As demonstrated in the Housing Market Delivery Study and the Housing Needs Survey 2022 both identified a demand for market homes and affordable homes within TMBC. The Borough is a desirable place to live with a strong housing market. The demand for housing is high and growing, it is also geographically spread across the Borough. There is currently a significant undersupply of homes in the Borough, and this appears to be worsening. Therefore, aiming to deliver greater levels of sustainable growth should be encouraged.</p> <p>3.55 Second, local authorities are required to meet housing figures identified using the Standard Method unless exceptional circumstances justify an alternative approach. As it stands, there is no set definition of what constitutes exceptional circumstances. While we are aware of the significant constraints impacting the Borough, namely the Green Belt, we are not of the view that this alone would constitute exceptional circumstances. Therefore, TMBC should seek to deliver the identified housing need as a minimum.</p> <p>3.56 The only outstanding point to consider in terms of housing need is whether any additional housing is required through the Duty to Co-Operate, but we understand this process is currently underway and we shall comment further once discussions are more advanced.</p>	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.

42819617	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period? Yes/No Please explain.</p> <p>3.45 We fully support a development approach that seeks to allocate a mix of small, medium and large sites. Section 5 of the NPPF sets out the framework for delivering a sufficient supply of homes and paragraph 69 highlights the importance of small and medium sites make in contributing to housing need.</p> <p>3.46 As set out above, there are increased risks associated with delivering large scale new settlements which are more complex and often subject to delays. Small and medium size sites, such as the Land off Crouch Lane, are vital in ensuring a steady and consistent delivery less vulnerable to major delays and should be incorporated into the growth strategy.</p> <p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (eg flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain</p> <p>3.47 Policy should seek to ensure the delivery of a range of house types in order to meet housing need. However, we are of the view that to support flexibility in delivery, dwelling type and mix by tenure should presented as a broad range.</p> <p>3.48 The Housing Needs Survey sets the overall annual dwelling type/size recommendation by different tenures. This is set out below:</p> <p>3.49 We fully support planning policy providing a clear steer on recommended housing mix. This will provide clarity for developers at an early stage which is particularly important when considering viability. However, it is also important to ensure that there is a level of flexibility here. Housing requirements will vary depending on the location and the development type. Therefore, policy should provide a general steer based on the latest supporting evidence. Specifying the broad size of units (in terms of bedrooms) is acceptable and helpful to deliver policy, requiring specific types (e.g. terraced or semi-detached) is overly prescriptive and will depend on the site and the local market. Local authorities do not have the evidence base or expertise to set this level of prescription in to policy effectively.</p> <p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>3.50 We fully support policy that encourages the provision of self and custom build plots. However, it is important that any requirements is evidenced and fully justified to ensure that the Local Plan meets the NPPF test of soundness.</p> <p>Q.16. Do you agree that the Local Plan should require a proportion of homes on large development sites to be Build-to-Rent products? Yes/No Please explain</p>	<p>Comment noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.</p>
42819617	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period? Yes/No Please explain.</p> <p>3.57 We fully support a development approach that seeks to allocate a mix of small, medium and large sites. Section 5 of the NPPF sets out the framework for delivering a sufficient supply of homes and paragraph 69 highlights the importance of small and medium sites make in contributing to housing need.</p> <p>3.58 As set out above, there are increased risks associated with delivering large scale new settlements which are more complex and often subject to delays. Small and medium size sites, such as the Land off Tonbridge Road, are vital in ensuring a steady and consistent delivery less vulnerable to major delays.</p> <p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (eg flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain</p> <p>3.59 Policy should seek to ensure the delivery of a range of house types in order to meet housing need. However, we are of the view that to support flexibility in delivery, dwelling type and mix by tenure should presented as a broad range.</p> <p>3.60 The Housing Needs Survey sets the overall annual dwelling type/size recommendation by different tenures. This is set out below: Table 3.4 Summary of overall dwelling mix by tenure</p> <p>3.61 We fully support planning policy providing a clear steer on recommended housing mix. This will provide clarity for developers at an early stage which is particularly important when considering viability. However, it is also important to ensure that there is a level of flexibility here. Housing requirements will vary depending on the location and the development type. Therefore, policy should provide a general steer based on the latest supporting evidence. Specifying the broad size of units (in terms of bedrooms) is acceptable and helpful to deliver policy, requiring specific types (e.g. terraced or semi-detached) is overly prescriptive and will depend on the site and the local market. Local authorities do not have the evidence base or expertise to set this level of prescription in to policy effectively.</p> <p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>3.62 We fully support policy that encourages the provision of self and custom build plots. However, it is important that any requirements is evidenced and fully justified to ensure that the Local Plan meets the NPPF test of soundness.</p>	<p>Comment noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.</p>

42819617	0	5.3.39 - 5.3.45	<p>Q.18. Which housing matters are most important to you?</p> <p>3.53 The Housing Act 1982 Section 8 refers to a periodical review of housing needs and that 'every local housing authority shall consider housing conditions in their district and the needs of the district with respect to the provision of further accommodation'. Therefore, it is important that Council considers a range of matters when considering housing need and in particular the provision of affordable housing.</p> <p>3.54 The median affordability price ratio for Tonbridge and Malling was 13.39 in 2021 compared to 11.93 in 2020. As shown in the table below, Tonbridge and Malling has a significantly larger median affordability ratio compared to Kent, South East England and England, as well as its neighbouring districts of Maidstone and Medway. Table 3.4 Affordability Ratio 2021</p> <p>3.55 Evidentially, affordability in TMBC is a worsening issue. The Housing Needs Assessment (HNA) (2022) identifies an affordable housing need of 753 and after taking into account affordable lettings and newbuild the net shortfall is 283 each year. As a result, the Local Plan needs to develop a robust affordable housing to support the ongoing delivery of affordable housing and diversify the affordable products available to local residents to reflect identified needs.</p> <p>3.56 The HNA evidences a tenure split of 63% affordable/social rented and 37% affordable home ownership including First Homes. Policy should support this. The HNA also sets out that the current target of 40% of new dwellings to be affordable remains appropriate. Affordable housing target should be fully evidenced with a supporting Viability Report demonstrating the deliverability of this requirement.</p> <p>3.57 It is important to note that setting the requirement too high may act as a barrier to sites coming forward and ultimately slow or reduce the affordable housing delivery rate. The NPPF and Planning Guidance determines that policies should seek to ensure development is viable at the plan making stage. Policies should be achievable and not negotiated on a site by site basis.</p> <p>3.58 While Croudace strongly support pursuing policies that deliver the highest levels of affordable housing on site and indeed they are pursuing levels of affordable housing on site that achieve the 40% figure set out in the plan. However, it can be counter-productive to set figures that are not achievable, which it appears these targets may be. Furthermore, such an approach may not withstand developer and Inspector scrutiny and we would recommend that the Council seeks to further supplement its evidence base or reducing the affordable housing provision to allow sites to come forward without delay.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>
42819617	0	5.3.39 - 5.3.45	<p>Q.18. Which housing matters are most important to you?</p> <p>3.65 The Housing Act 1982 Section 8 refers to a periodical review of housing needs and that 'every local housing authority shall consider housing conditions in their district and the needs of the district with respect to the provision of further accommodation'. Therefore, it is important that Council considers a range of matters when considering housing need and in particular the provision of affordable housing.</p> <p>3.66 The median affordability price ratio for Tonbridge and Malling was 13.39 in 2021 compared to 11.93 in 2020. As shown in the table below, Tonbridge and Malling has a significantly larger median affordability ratio compared to Kent, South East England and England, as well as its neighbouring districts of Maidstone and Medway. Table 3.5 Affordability Ratio 2021</p> <p>3.67 Evidentially, affordability in TMBC is a worsening issue. The Housing Needs Assessment (HNA) (2022) identifies the affordable housing need of 753 and after taking into account affordable lettings and newbuild the net shortfall is 283 each year. As a result, the Local Plan needs to develop a robust affordable housing to support the ongoing delivery of affordable housing and diversify the affordable products available to local residents to reflect identified needs.</p> <p>3.68 The HNA evidences a tenure split of 63% affordable/social rented and 37% affordable home ownership including First Homes. Policy should support this. The HNA also sets out that the current target of 40% of new dwellings to be affordable remains appropriate. Affordable housing target should be fully evidenced with a supporting Viability Report demonstrating the deliverability of this requirement.</p> <p>3.69 It is important to note that setting the requirement too high may act as a barrier to sites coming forward and ultimately slow or reduce the affordable housing delivery rate. The NPPF and Planning Guidance determines that policies should seek to ensure development is viable at the plan making stage. Policies should be achievable and not negotiated on a site by site basis.</p> <p>3.70 While Croudace strongly support pursuing policies that deliver the highest levels of affordable housing on site and indeed they are pursuing levels of affordable housing on site that achieve the 40% figure set out in the plan. However, it can be counter-productive to set figures that are not achievable, which it appears these targets may be. Furthermore, such an approach may not withstand developer and Inspector scrutiny and we would recommend that the Council seeks to further supplement its evidence base or reducing the affordable housing provision to allow sites to come forward without delay.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.</p>

42821345	42821281	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Housing Market Areas</p> <p>The Plan Making section of Planning Practice Guidance defines a Housing Market Area as: A geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. These can be broadly defined by analysing:</p> <ul style="list-style-type: none"> • The relationship between housing demand and supply across different locations, using house prices and rates of change in house prices. This should identify areas which have clearly different price levels compared to surrounding areas. • Migration flow and housing search patterns. This can help identify the extent to which people move house within an area, in particular where a relatively high proportion of short household moves are contained, (due to connections to families, jobs, and schools). • Contextual data such as travel to work areas, retail and school catchment areas. These can provide information about the areas within which people move without changing other aspects of their lives (e.g. work or service use). Paragraph: 018 Reference ID: 61-018-20190315 <p>The Regulation 18 consultation is supported by a Housing Market Delivery Study (July 2022) which seeks to, at Section 4, identify and understand the Housing Market Areas within which the Borough falls.</p> <p>This work revisits the conclusions arrived at in the Strategic Housing Market Assessment 2014 (SHMA 2014), with significant variation between the Housing Market Areas (HMAs) identified at that time and now. As noted in Section 2, clarity is need as to whether the changes to HMAs have been done in cooperation with other authorities in the HMAs or if this is completed unilaterally by TMBC.</p> <p>For reference, the SHMA 2014, prepared by GL Hearn, undertook an approach to defining the housing market area in accordance with national guidance which used three primary information sources:</p> <ul style="list-style-type: none"> • Patterns of house prices and rates of change in house prices; • Population and household migration flows; and • Contextual data, such as travel to work areas. <p>Para 2.4 of the SHMA 2014 reflected that there is no 'right or wrong' way to identify housing markets, recognising sources of information can reflect different aspects of household behaviour, instead it is important to consider what is appropriate in a local context.</p> <p>In concluding on the local Housing Market Areas in the Borough, the SHMA 2014 found there to be 2no. distinct HMAs operating, one focussed on Maidstone and the other focussed on Sevenoaks, with some overlap between these (para 2.43), as shown in Figure 3.1.</p>	Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42824065	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	The Nppf is flawed in terms of generating additional housing in the absence of significant population growth, but it is particularly noisome where related to the south east including T&M. Maintenance of high housing affordability ratio is a good thing as it will encourage outward migration to more economically needy areas.	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
42824065	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	There is no real increasing shortage of housing unless there is an increase in population - the existing stock remains available either as for rent or for sale. If renting is priced at a level which people will not pay then the landlords will sell (as is currently happening) thereby producing stock for first time buyers etc. The 'given' need is based on a false premise that it is a requirement to concrete over the entire south east to pack in more people. The objective should be to stabilise the population and planning policy should support and encourage this through rationing/price.	Comment Noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42832833	42826433	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q.12. With reference to your answers to questions 3 and 4, do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum? Yes/No Please explain.</p> <p>As set out above, given the poor recent performance of housing delivery and the current affordability issues that exist in the Borough, we must emphasise in the strongest terms the need for the Council to address, as a minimum, the identified OAHN in full whilst also exploring options to go above this. As set out above, this will then ensure the Local Plan accords with the NPPF (paragraph 61). Further, with small and medium sized sites making an important contribution to meeting the housing requirement of an area given they can be built out relatively quickly, it will assist the Council in its deliverable supply (NPPF, paragraph 69).</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
42832833	42826433	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period? Yes/No Please explain.</p> <p>Yes – in accordance with the NPPF (paragraph 68), it is vital that the Council brings forward policies that allow “a sufficient supply and mix of sites” to be allocated in the Plan. In so doing, the Council will then be able to identify “a supply of:</p> <p>a) specific, deliverable sites for years one to five of the plan period; and b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan”.</p> <p>Allocating a mix of sites will ensure the supply of housing is robust and avoids the difficulties of delivering a new settlement (Option 5) that are often associated with long-lead in times owing to the number of parties involved and the significant costs in delivering infrastructure which can often be to the detriment to rates of supply and the resultant provision of affordable housing. The Council therefore needs to ensure a mix of sites are allocated in sustainable locations – and which, in the majority of cases, are those that are located adjacent to, or easily accessible from, existing settlements to ensure the costs of delivering new infrastructure do not impact deliverability.</p>	Comment Noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42832833	42826433	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (e.g. flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain</p> <p>Yes – the mix, type and tenure of housing to be delivered needs to be considered to ensure development meets the requirements of the community and ensure sustainable development.</p>	Comment Noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.

42832833	42826433	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>No – whilst the concept is supported in-principle, self-build/custom house building on large developments are difficult to deliver as there are few self-build providers wanting to develop (such plots) on large housing schemes. We therefore suggest a specific policy is incorporated that provides the flexibility for developers to deliver infill/exception sites (such as this Site) as these are more likely to address the local need in the locations that are more suited to such developments. This approach will not only support the Government’s drive to deliver a sufficient supply of homes quickly but it will encourage such developers to bring forward development on smaller, individual sites rather than part of large schemes. To support the government’s objectives of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is development without unnecessary delay (NPPF paragraph 60). Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including (but not limited to), people wishing to commission or build their own homes (NPPF paragraph 62).</p>	Comment Noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses.
42832833	42826433	5.3.37 - 5.3.38	<p>Q.17. Do you agree with the windfall allowance methodology? Yes/No Please explain</p> <p>Whilst we support the intention, we consider that including approximately 20% of the overall supply of housing is optimistic.</p>	Comment noted. This matter will be reflected within the next Regulation 18 document
42832833	42826433	5.3.39 - 5.3.45	<p>Q.19. What are your reasons for selecting these particular housing matters as priorities for the Local Plan (outline briefly)?</p> <p>Whilst we have not selected any particular housing matter (in response to Q.18), it is vital that the Council brings forward a Local Plan that includes a range and mix of sites (including sizes) that will allow each of the matters (and types/tenures of housing) to be delivered.</p>	Comment noted. This matter will be reflected within the next Regulation 18 document
42832929	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Don't measure the construction cost alone but the life-time financial and environmental cost of utilities and maintenance involved in the use of the constructed facility. Make it affordable to live in for it's whole life - subsidise building costs if needed to make them affordable.</p>	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.
43309729	25240577	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q.12. Do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?</p> <p>1.2.46 In addition to the spatial distribution of development across the borough, the Council is seeking input on the quantum of development that is accommodated, namely whether to plan for the full housing need of the area, or to plan for full need plus 10% for flexibility to be built into the strategy.</p> <p>1.2.47 By way of simple response, there is a clear need to ensure development requirements are met in full and that any future plan is sufficiently flexible in the face of what could be a difficult economic period.</p> <p>1.2.48 As emphasised within the plan, one of the Government’s key objectives for planning is to significantly boost the supply of homes. This includes not just market housing but also housing to meet the needs of different groups in society. The gross need for housing (2021-2040) is stated to be 9,245 dwellings based on an annual delivery rate of 839 pa.</p> <p>1.2.49 Such delivery requires a step change in how the borough is planning for housing.</p> <p>1.2.50 In addition to the overall housing need, the plan also acknowledges that housing affordability is a significant issue that is worsening beyond that of the county, region and national level. Accordingly affordable housing provision must be a strategic priority with the need for close to 300 affordable dwellings per annum.</p> <p>1.2.51 In our view, the delivery of a higher number of homes will have the greatest impact on combatting the affordability constraints.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43309729	25240577	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period?</p> <p>1.2.52 Yes. Paragraph 69 of the NPPF explicitly acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-up relatively quickly. To promote the development of a good mix of sites local planning authorities should accommodate at least 10% of their housing requirement on sites no larger than one hectare and support the development of windfall sites through their policies and decisions.</p> <p>1.2.53 We also consider the need to recognise the importance of SME developers. The support for SMEs is recognised within Central Government and significant weight and reliance is being placed upon them to help deliver and achieve the 300,000 dwellings per annum housing target. In particular SMEs think differently and act differently to volume housebuilders, including the ability to deliver bespoke designs reflecting the local area and deliver quickly. do not also land bank and deliver quickly and so it is important that this is fully understood when selecting sites.</p> <p>1.2.54 Our client’s site is wholly deliverable and in the control of a reputable SME developer with a track record of quality delivery.</p> <p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (eg flatted, terraced, semi-detached, detached) on large development sites to meet the range of households’ needs? Yes/No Please explain</p> <p>1.2.55 Yes. There is great emphasis on the need to deliver mixed and balanced communities throughout the framework.</p> <p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>1.2.56 No. The Council should address self build need within the plan and potentially allocate suitable sites for self build development. However, the practicalities of delivering self builds as part of a larger scheme is complex and faces a number of design and infrastructure constraints.</p> <p>Q17 Do you agree with the windfall allowance methodology?</p> <p>1.2.57 We support a modest windfall allowance to reflect that some unplanned sites will continue to be delivered. However, as part of the plan making process there is a requirement to consider, identify and maximise a range of sites before proceeding to any greenfield or Green Belt land releases.</p> <p>1.2.58 Owing to the onerous nature of these tests, it is likely that more sites will be identified and more land exhausted than has previously been the case. Accordingly, we question the extent to which past trends will represent a sound basis for future expectations.</p> <p>1.2.59 The above in mind, any windfall allowance should be conservative rather than overly optimistic.</p> <p>Q.18. Which housing matters are most important to you?</p> <p>1.2.60 As outlined above, there is a need to plan for full housing needs. Given there is clarity on these matters we question the benefit in implying that there is an element of choice of which types of housing take priority.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.

43311521	25240577	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q.12. Do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?</p> <p>1.2.43 In addition to the spatial distribution of development across the borough, the Council is seeking input on the quantum of development that is accommodated, namely whether to plan for the full housing need of the area, or to plan for full need plus 10% for flexibility to be built into the strategy.</p> <p>1.2.44 By way of simple response, there is a clear need to ensure development requirements are met in full and that any future plan is sufficiently flexible in the face of what could be a difficult economic period.</p> <p>1.2.45 As emphasised within the plan, one of the Government's key objectives for planning is to significantly boost the supply of homes. This includes not just market housing but also housing to meet the needs of different groups in society. The gross need for housing (2021-2040) is stated to be 9,245 dwellings based on an annual delivery rate of 839 pa.</p> <p>1.2.46 Such delivery requires a step change in how the borough is planning for housing.</p> <p>1.2.47 In addition to the overall housing need, the plan also acknowledges that housing affordability is a significant issue that is worsening beyond that of the county, region and national level. Accordingly affordable housing provision must be a strategic priority with the need for close to 300 affordable dwellings per annum.</p> <p>1.2.48 In our view, the delivery of a higher number of homes will have the greatest impact on combatting the affordability constraints.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43311521	25240577	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period?</p> <p>1.2.49 Yes. Paragraph 69 of the NPPF explicitly acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.</p> <p>1.2.50 We also consider the need to recognise the importance of SME developers. The support for SMEs is recognised within Central Government and significant weight and reliance is being placed upon them to help deliver and achieve the 300,000 dwellings per annum housing target. In particular SMEs think differently and act differently to volume housebuilders, including the ability to deliver bespoke designs reflecting the local area and deliver quickly, do not also land bank and deliver quickly and so it is important that this is fully understood when selecting sites.</p> <p>1.2.51 Our client's site is wholly deliverable and in the control of a reputable SME developer with a track record of quality delivery.</p> <p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (eg flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain</p> <p>1.2.52 Yes. There is great emphasis on the need to deliver mixed and balanced communities throughout the framework. Our client's land is of a size and scale that it can be delivered swiftly.</p> <p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>1.2.53 No. The Council should address self build need within the plan and potentially allocate suitable sites for self build development. However, the practicalities of delivering self builds as part of a larger scheme is complex and faces a number of design and infrastructure constraints. These should therefore only be pursued where there is a willingness on the part of the developer.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. No decisions have yet been made on sites for identification or allocation within the plan, but the council acknowledges the need for a diverse supply.
43311521	25240577	5.3.37 - 5.3.38	<p>Q17 Do you agree with the windfall allowance methodology?</p> <p>1.2.54 We support a modest windfall allowance to reflect that some unplanned sites will continue to be delivered. However, as part of the plan making process there is a requirement to consider, identify and maximise a range of sites before proceeding to any greenfield or Green Belt land releases.</p> <p>1.2.55 Owing to the onerous nature of these tests, it is likely that more sites will be identified and more land exhausted than has previously been the case.</p> <p>Accordingly, we question the extent to which past trends will represent a sound basis for future expectations.</p> <p>1.2.56 The above in mind, any windfall allowance should be conservative rather than overly optimistic.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43311521	25240577	5.3.39 - 5.3.45	<p>Q.18. Which housing matters are most important to you?</p> <p>1.2.57 As outlined above, there is a need to plan for full housing needs. Given there is clarity on these matters we question the benefit in implying that there is an element of choice of which types of housing take priority.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43395937	25240577	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q.12. Do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?</p> <p>1.2.43 In addition to the spatial distribution of development across the borough, the Council is seeking input on the quantum of development that is accommodated, namely whether to plan for the full housing need of the area, or to plan for full need plus 10% for flexibility to be built into the strategy.</p> <p>1.2.44 By way of simple response, there is a clear need to ensure development requirements are met in full and that any future plan is sufficiently flexible in the face of what could be a difficult economic period.</p> <p>1.2.45 As emphasised within the plan, one of the Government's key objectives for planning is to significantly boost the supply of homes. This includes not just market housing but also housing to meet the needs of different groups in society. The gross need for housing (2021-2040) is stated to be 9,245 dwellings based on an annual delivery rate of 839 pa.</p> <p>1.2.46 Such delivery requires a step change in how the borough is planning for housing.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.

43395937	25240577	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period?</p> <p>1.2.49 Yes. Paragraph 69 of the NPPF explicitly acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should accommodate at least 10% of their housing requirement on sites no larger than one hectare and support the development of windfall sites through their policies and decisions.</p> <p>1.2.50 We also consider the need to recognise the importance of SME developers. The support for SMEs is recognised within Central Government and significant weight and reliance is being placed upon them to help deliver and achieve the 300,000 dwellings per annum housing target. In particular SMEs think differently and act differently to volume housebuilders, including the ability to deliver bespoke designs reflecting the local area and deliver quickly. do not also land bank and deliver quickly and so it is important that this is fully understood when selecting sites.</p> <p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (e.g. flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain</p> <p>1.2.51 Yes. There is great emphasis on the need to deliver mixed and balanced communities throughout the framework. Our client's land is of a size and scale that it can be delivered swiftly.</p> <p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>1.2.52 No. The Council should address self-build need within the plan and potentially allocate suitable sites for self-build development. However, the practicalities of delivering self builds as part of a larger scheme is complex and faces several design and infrastructure constraints.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. No decisions have yet been made on sites for identification or allocation within the plan, but the council acknowledges the need for a diverse supply.</p>
43395937	25240577	5.3.37 - 5.3.38	<p>Q17 Do you agree with the windfall allowance methodology?</p> <p>1.2.53 We support a modest windfall allowance to reflect that some unplanned sites will continue to be delivered. However, as part of the plan making process there is a requirement to consider, identify and maximise a range of sites before proceeding to any greenfield or Green Belt land releases.</p> <p>1.2.54 Owing to the onerous nature of these tests, it is likely that more sites will be identified and more land exhausted than has previously been the case. Accordingly, we question the extent to which past trends will represent a sound basis for future expectations.</p> <p>1.2.55 The above in mind, any windfall allowance should be conservative rather than overly optimistic.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.</p>
43395937	25240577	5.3.39 - 5.3.45	<p>Q.18. Which housing matters are most important to you?</p> <p>1.2.56 As outlined above, there is a need to plan for full housing needs. Given there is clarity on these matters we question the benefit in implying that there is an element of choice of which types of housing take priority.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.</p>
43397313	25240577	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8	<p>Q.12. Do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?</p> <p>1.2.45 In addition to the spatial distribution of development across the borough, the Council is seeking input on the quantum of development that is accommodated, namely whether to plan for the full housing need of the area, or to plan for full need plus 10% for flexibility to be built into the strategy. 1.2.46 By way of simple response, there is a clear need to ensure development requirements are met in full and that any future plan is sufficiently flexible in the face of what could be a difficult economic period.</p> <p>1.2.47 As emphasised within the plan, one of the Government's key objectives for planning is to significantly boost the supply of homes. This includes not just market housing but also housing to meet the needs of different groups in society. The gross need for housing (2021-2040) is stated to be 9,245 dwellings based on an annual delivery rate of 839 pa.</p> <p>1.2.48 Such delivery requires a step change in how the borough is planning for housing.</p> <p>1.2.49 In addition to the overall housing need, the plan also acknowledges that housing affordability is a significant issue that is worsening beyond that of the county, region and national level. Accordingly affordable housing provision must be a strategic priority with the need for close to 300 affordable dwellings per annum.</p> <p>1.2.50 In our view, the delivery of a higher number of homes will have the greatest impact on combatting the affordability constraints.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.</p>
43397313	25240577	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period?</p> <p>1.2.51 Yes. Paragraph 69 of the NPPF explicitly acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. However, it is also undeniable that larger sites can often deliver additional infrastructure that small sites cannot. Accordingly, a mix of sites is needed.</p> <p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (e.g. flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain</p> <p>1.2.52 Yes. There is great emphasis on the need to deliver mixed and balanced communities throughout the framework. Our client's land is of a size and scale that it can be delivered swiftly.</p> <p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>1.2.53 No. The Council should address self build need within the plan and potentially allocate suitable sites for self build development. However, the practicalities of delivering self builds as part of a larger scheme is complex and faces a number of design and infrastructure constraints. These should therefore only be pursued where there is a willingness on the part of the developer or on sites specifically capable of delivering self build units.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. The council has duties in relation to self build/custom build which need reflecting appropriately within the local plan.</p>

43397313	25240577	5.3.37 - 5.3.38	<p>Q17 Do you agree with the windfall allowance methodology?</p> <p>1.2.54 We support a modest windfall allowance to reflect that some unplanned sites will continue to be delivered. However, as part of the plan making process there is a Page 13 of 20 requirement to consider, identify and maximise a range of sites before proceeding to any greenfield or Green Belt land releases.</p> <p>1.2.55 Owing to the onerous nature of these tests, it is likely that more sites will be identified and more land exhausted than has previously been the case. Accordingly, we question the extent to which past trends will represent a sound basis for future expectations.</p> <p>1.2.56 The above in mind, any windfall allowance should be conservative rather than overly optimistic.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.</p>
43397313	25240577	5.3.39 - 5.3.45	<p>Q.18. Which housing matters are most important to you?</p> <p>1.2.57 As outlined above, there is a need to plan for full housing needs. Given there is clarity on these matters we question the benefit in implying that there is an element of choice of which types of housing take priority.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.</p>
43412865	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Housing Mix</p> <p>Q 13. Whilst some development is essential, it is absurd to consider large sites that impact massively on local infrastructure which already cannot cope with the volume of traffic and people in the area.</p> <p>Q 14. A mixture of housing is needed but AVOID LARGE SITES that impact massively on local infrastructure which already cannot cope with the volume of traffic and people in the area.</p> <p>Q.15 On all smaller sites, some should be available for self build and custom build housing. I do not agree with any large sites being made available that impact massively on local infrastructure which already cannot cope with the volume of traffic and people in the area.</p> <p>Q16. On smaller sites there should be an allowance for build to rent. I do not agree with any large sites being made available that impact massively on local infrastructure which already cannot cope with the volume of traffic and people in the area.</p>	<p>Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement</p>
43412865	0	5.3.37 - 5.3.38	<p>17. The windfall methodology is not applicable.</p>	<p>Comment noted.</p>
43412865	0	5.3.39 - 5.3.45	<p>Housing Type.</p> <p>My choices are and in this order:</p> <ul style="list-style-type: none"> * SMALL ONLY * DISTRIBUTION ACROSS THE BOROUGH WHERE NEEDED * ACCESSIBLE <p>2/3. AFFORDABLE TO BUY/RENT</p> <ul style="list-style-type: none"> * FIRST TIME BUYERS <p>* 19 Housing is a priority for local people, it is not a priority to attract incomers to an already overcrowded area.</p>	<p>Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement</p>
43417889	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Housing Type.</p> <p>My choices are and in this order:</p> <ul style="list-style-type: none"> * SMALL ONLY * DISTRIBUTION ACROSS THE BOROUGH WHERE NEEDED * ACCESSIBLE <p>2/3. AFFORDABLE TO BUY/RENT</p> <ul style="list-style-type: none"> * FIRST TIME BUYERS <p>* 19 Housing is a priority for local people, it is not a priority to attract incomers to an already overcrowded area.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.</p>

43417889	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Housing Mix</p> <p>Q.13. Whilst some development is essential, it is absurd to consider large sites that impact massively on local infrastructure which already cannot cope with the volume of traffic and people in the area.</p> <p>Q.14. A mixture of housing is needed but AVOID LARGE SITES that impact massively on local infrastructure which already cannot cope with the volume of traffic and people in the area.</p> <p>Q.15 On all smaller sites, some should be available for self build and custom build housing. I do not agree with any large sites being made available that impact massively on local infrastructure which already cannot cope with the volume of traffic and people in the area.</p> <p>Q.16. On smaller sites there should be an allowance for build to rent. I do not agree with any large sites being made available that impact massively on local infrastructure which already cannot cope with the volume of traffic and people in the area.</p>	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement
43417889	0	5.3.37 - 5.3.38	* 17. The windfall methodology is not applicable.	Comment noted.
43463745	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>The Parish Council is keen to see a range of properties on new development sites within the Borough or indeed where existing sites are redeveloped on a mix of sites.</p> <p>Question 14 refers to flatted, terraced, semi-detached and detached needed to meet a range of household needs. We also think that bungalows should be considered too as there is an aging population and we think there is a demand for people as they get older to downsize to smaller properties with downstairs toilets and bathrooms all on one level. We are aware there is a view bungalows take up more room but this does not have to be the case as the square of bungalows at Raven Close and Magpie Close adjoining Martin Square demonstrates and these are close to shops and medical facilities.</p> <p>We also think a range of properties should mean that in appropriate locations higher densities should be encouraged so as to reduce the need to build in the countryside.</p> <p>We have recently been consulted by Churchill about redeveloping the site south of Church Farm, New Hythe Lane, Larkfield for apartments for the elderly and this, if passed will help meet housing numbers as well as providing accommodation of older residents. We are also aware that KCC are wishing to dispose of the former Family Centre in Martin Square and this could provide a similar development on a well located urban site. Such sites would avoid the idea of building on local greens which the Parish Council strongly opposes.</p> <p>In respect of apartments, these should fit in with the existing local environment especially as to heights and design and also any nearby listed buildings.</p> <p>In respect of Question 16 we do think there is a need for properties to rent and as to Question 15 we think there may be a need for land to building self build properties.</p> <p>In conclusion, we do think that if a range of smaller properties were provided it would allow people who live locally to downsize and release bigger properties for families.</p>	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement
43487649	25240577	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q.12. Do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?</p> <p>1.2.42 In addition to the spatial distribution of development across the borough, the Council is seeking input on the quantum of development that is accommodated, namely whether to plan for the full housing need of the area, or to plan for full need plus 10% for flexibility to be built into the strategy.</p> <p>1.2.43 By way of simple response, there is a clear need to ensure development requirements are met in full and that any future plan is sufficiently flexible in the face of what could be a difficult economic period.</p> <p>1.2.44 As emphasised within the plan, one of the Government's key objectives for planning is to significantly boost the supply of homes. This includes not just market housing but also housing to meet the needs of different groups in society. The gross need for housing (2021-2040) is stated to be 9,245 dwellings based on an annual delivery rate of 839 pa.</p> <p>1.2.45 Such delivery requires a step change in how the borough is planning for housing.</p> <p>1.2.46 In addition to the overall housing need, the plan also acknowledges that housing affordability is a significant issue that is worsening beyond that of the county, region and national level. Accordingly affordable housing provision must be a strategic priority with the need for close to 300 affordable dwellings per annum.</p> <p>1.2.47 In our view, the delivery of a higher number of homes will have the greatest impact on combatting the affordability constraints.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43487649	25240577	5.3.37 - 5.3.38	<p>1.2.53 We support a modest windfall allowance to reflect that some unplanned sites will continue to be delivered. However, as part of the plan making process there is a requirement to consider, identify and maximise a range of sites before proceeding to any greenfield or Green Belt land releases.</p> <p>1.2.54 Owing to the onerous nature of these tests, it is likely that more sites will be identified and more land exhausted than has previously been the case. Accordingly, we question the extent to which past trends will represent a sound basis for future expectations.</p> <p>1.2.55 The above in mind, any windfall allowance should be conservative rather than overly optimistic.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43487649	25240577	5.3.39 - 5.3.45	There is a need to plan for full housing needs. Given there is clarity on these matters we question the benefit in implying that there is an element of choice of which types of housing take priority.	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.

43548193	38432225	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q.12. With reference to your answers to questions 3 and 4, do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum? Yes/No Please explain</p> <p>It is frankly unacceptable that the Council, like so many other Council's in the locality always strive to deliver the absolute minimum number of homes required. A 'do minimum' is not proactive and will not influence the affordability of new homes. A 'do minimum' is not in the spirit of the step change and significant boost to housing supply that the Government requires, and frankly is contrary to the provisions of the Framework which require a local plan to be prepared positively. Paragraph 74 of the Framework is clear, and we would expect the Council to apply a 20% buffer due to the significant under delivery of housing in the borough over the last three years to improve the prospects of achieving the required supply of sites.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43548193	38432225	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period? Yes/No Please explain.</p> <p>Yes. The Framework is clear that choice is necessary to deliver the right number of homes in the right places.</p> <p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (eg flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain</p> <p>We consider that new development should rightly strive to meet the identified range of household needs in the locality. There must be caution however, because the required mix may not always be suitable, viable or deliverable on some sites. For example, in a suburban location on the edge of a settlement, a high rise (flatted) or high-density (terraced) scheme may appear incongruous and out of character. Design criteria for development must not therefore be overly prescriptive in this regard.</p> <p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>No. We believe that self-build and custom housing is a specialist form of housing and cannot be delivered easily on large developments without causing impacts to the desirability, viability and delivery of the sites overall.</p> <p>Q.16. Do you agree that the Local Plan should require a proportion of homes on large development sites to be Build-to-Rent products? Yes/No Please explain</p> <p>No comment.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. The council has duties in relation to self build/custom build which need reflecting appropriately within the local plan.
43548193	38432225	5.3.37 - 5.3.38	<p>Q.17. Do you agree with the windfall allowance methodology? Yes/No Please explain</p> <p>No. In our experience, the windfall allowance is flawed and cannot be relied upon. The Framework requires any windfall allowances to be based on robust evidence, and we conclude that the evidence suggests that a lower windfall allowance should be set.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43548193	38432225	5.3.39 - 5.3.45	<p>Q.18. Which housing matters are most important to you?</p> <p>In our opinion, the most important housing matter is the "Distribution of housing across the borough (taking account of where the needs are generated)".</p> <p>Q.19. What are your reasons for selecting these particular housing matters as priorities for the Local Plan (outline briefly)?</p> <p>In our opinion, the Framework is clear, new homes should be built where they are needed. it is not right that a Council should seek to locate new development artificially based purely on a Green Belt avoidance strategy.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.

43619329	43619297	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>2.0 Representations on Strategic Issues/Spatial Strategy</p> <p>(i) Local Housing Need and the Minimum Housing Requirement</p> <p>2.1 As the Council has correctly identified in the draft Plan the starting point for determining the Local Housing Need (“LHN”) is the Government’s Standard Method, which for TMBC currently equates to 839 dpa¹.</p> <p>2.2 The Standard Method calculation is however just the starting point. The PPG2 is clear that the Standard Method identifies the minimum annual housing need figure. It does not produce a housing requirement figure³.</p> <p>2.3 The PPG4 goes on to consider the circumstances where it might be appropriate to plan for a higher housing need figure than the Standard Method indicates. Such circumstances can include:</p> <ul style="list-style-type: none"> • Instances where housing need is likely to exceed past trends; and, • Where the authority agrees to address unmet need arising from neighbouring authorities. <p>2.4 The PPG is not exhaustive in its examples and matters such as a high affordability ratio that is following a rising trend along with significant affordable housing need and of course the importance of ensuring an adequate buffer to cater for under supply or instances where the Plan strategy fails to deliver as expected are all sound reasons for considering an uplift.</p> <p>2.5 In the case of TMBC no consideration has been given to the potential reasons for an uplift to the LHN. The Council has argued that the Draft Plan makes provision for a 10% uplift beyond the LHN in terms of its supply. This is a different issue entirely, which is returned to below and does not address the importance of planning positively by setting an appropriate Local Plan Housing Requirement.</p> <p>2.6 In fact the Draft Plan and its Evidence Base are not only silent on the consideration of reasons for an uplift to the LHN there is also no indication that they have been considered and then dismissed. This is a serious oversight on the part of the Council</p> <p>[Footnotes 1 The Forward to the Draft Plan and Paragraph 5.3.2 on Page 26 of the Draft Plan 2 Housing and Economic Needs Assessment chapter of the PPG – Paragraph: 002 Reference ID: 2a-002-20190220 Revision date: 20 02 2019 3 Underlining is our emphasis.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43619329	43619297	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>(iii) Housing Supply</p> <p>2.45 The Council has undertaken a headline review of its supply sources as documented in Paragraphs 5.3.27-5.3.33 in the Draft Plan and also Appendix B. The sites identified in Appendix B have also been considered through the Sustainability Appraisal (“SA”). The SA methodology, accuracy of the assessment undertaken by the Council and, consideration of the correct assessment for each of Rydon’s promotion sites is set out in Section 4 of these Representations.</p> <p>2.46 The Council has a poor track record in terms of housing land supply, which is reflected by the most recent HDT result that has led to the automatic application of the ‘tilted balance’ set out in Paragraph 11 d) of the Framework 2021.</p> <p>2.47 The Council’s most recently published housing land supply position statement (to the based date of 31 March 2021) confirms a supply of only 3.17 years with the application of a 20% buffer. That equates to a shortfall of some -1,840 dwellings. That is significant.</p> <p>2.48 The Council must therefore ensure that the Draft Plan rectifies this shortfall and maintains a robust and rolling 5-year supply going forward. This will necessitate a front loading of delivery focussed on sites that are able to come forward early and deliver quickly. Equally the Council must ensure that it has the required clear evidence to demonstrate that completions will be delivered when it expects.</p> <p>Sources of Supply:</p> <p>2.49 The Draft Plan includes a table of supply (Table 2 on Page 28) that the Council intends to rely upon to meet the minimum LHN over the Plan period.</p> <p>2.50 The information within the table is limited and the evidence that underpins the various supply sources identified is sparse. The Council indicates in Paragraphs 5.3.10 – 5.3.12 (Pages 27-28 of the Draft Plan) that the supply sources set out in Table 2 are the basis upon which the net housing need for the period 2021-2040 is derived i.e. the figure that the Council says will need to be met via new housing allocations.</p> <p>2.51 For the net housing need figure to be robust there must be a sound evidence base underpinning it. At present the following headline flaws exist in the evidence base:</p> <p>2.51.1 Extant Planning Permissions: The Council has presented no evidence to confirm what the figure of 3,594 dwellings comprises of. This raises many questions that go to the robustness of this supply source. How many permissions are in full detailed or outline form? How many permissions have been implemented and therefore how many completions have arisen since 2021? Does the figure take account of dwelling losses? If these permissions are relied upon for the first 5-years of the Plan period where is the ‘clear evidence’ of delivery required by Annex 2 of the Framework 2021?</p> <p>2.51.2 In short this supply source is currently without foundation and therefore unreliable.</p> <p>2.51.3 Windfalls: There are two categories of windfalls relied upon by the Council (Small Site and Large Sites). The test for including windfalls as part of anticipated supply is set out in Paragraph 71 of the Framework 2021, which requires ‘compelling evidence that they will provide a reliable source of supply.’ The Framework goes on to advise that any allowance should be realistic having regard not only to historic rates but expected future trends. The Council is currently relying on delivery of some 3,102 dwellings (20% of the total LHN figure) to come from this supply source without any credible evidence base.</p> <p>2.51.4 The Council has produced some evidence in an attempt to justify its approach to windfalls¹¹. However, the Council’s evidence is solely reliant upon a headline review of past windfall delivery rates i.e. historic trends. There is no analysis of current supply evidence in the form of a land availability assessment (see Section 3 below) and no analysis of expected future trends other than a</p>	Comment noted. This matter will be reflected within the next Regulation 18 document

43745089	25240577	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q.12. Do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?</p> <p>In addition to the spatial distribution of development across the borough, the Council is seeking input on the quantum of development that is accommodated, namely whether to plan for the full housing need of the area, or to plan for full need plus 10% for flexibility to be built into the strategy.</p> <p>By way of simple response, there is a clear need to ensure development requirements are met in full and that any future plan is sufficiently flexible in the face of what could be a difficult economic period.</p> <p>As emphasised within the plan, one of the Government's key objectives for planning is to significantly boost the supply of homes. This includes not just market housing but also housing to meet the needs of different groups in society. The gross need for housing (2021-2040) is stated to be 9,245 dwellings based on an annual delivery rate of 839 pa.</p> <p>Such delivery requires a step change in how the borough is planning for housing.</p> <p>In addition to the overall housing need, the plan also acknowledges that housing affordability is a significant issue that is worsening beyond that of the county, region and national level. Accordingly affordable housing provision must be a strategic priority with the need for close to 300 affordable dwellings per annum.</p> <p>In our view, the delivery of a higher number of homes will have the greatest impact on combatting the affordability constraints.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43745089	25240577	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Question 13</p> <p>Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period?</p> <p>Yes. Paragraph 69 of the NPPF explicitly acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. However, it is also undeniable that larger sites can often deliver additional infrastructure that small sites cannot. Accordingly, a mix of sites is needed.</p> <p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (eg flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain</p> <p>Yes. There is great emphasis on the need to deliver mixed and balanced communities throughout the framework. Our client's land is of a size and scale that it can be delivered swiftly.</p> <p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>No. The Council should address self build need within the plan and potentially allocate suitable sites for self build development. However, the practicalities of delivering self builds as part of a larger scheme is complex and faces a number of design and infrastructure constraints. These should therefore only be pursued where there is a willingness on the part of the developer.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. No decisions have yet been made on sites for identification or allocation within the plan, but the council acknowledges the need for a diverse supply.
43745089	25240577	5.3.37 - 5.3.38	<p>Q17 Do you agree with the windfall allowance methodology?</p> <p>We support a modest windfall allowance to reflect that some unplanned sites will continue to be delivered. However, as part of the plan making process there is a requirement to consider, identify and maximise a range of sites before proceeding to any greenfield or Green Belt land releases.</p> <p>Owing to the onerous nature of these tests, it is likely that more sites will be identified and more land exhausted than has previously been the case. Accordingly, we question the extent to which past trends will represent a sound basis for future expectations.</p> <p>The above in mind, any windfall allowance should be conservative rather than overly optimistic.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43745089	25240577	5.3.39 - 5.3.45	<p>Q.18. Which housing matters are most important to you?</p> <p>As outlined above, there is a need to plan for full housing needs. Given there is clarity on these matters we question the benefit in implying that there is an element of choice of which types of housing take priority.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.

43781249	43781441	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8	<p>Q.12. Do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?</p> <p>1.3.48 In addition to the spatial distribution of development across the borough, the Council is seeking input on the quantum of development that is accommodated, namely whether to plan for the full housing need of the area, or to plan for full need plus 10% for flexibility to be built into the strategy.</p> <p>1.3.49 By way of simple response, there is a clear need to ensure development requirements are met in full and that any future plan is sufficiently flexible in the face of what could be a difficult economic period.</p> <p>1.3.50 As emphasised within the plan, one of the Government's key objectives for planning is to significantly boost the supply of homes. This includes not just market housing but also housing to meet the needs of different groups in society. The gross need for housing (2021-2040) is stated to be 9,245 dwellings based on an annual delivery rate of 839 pa.</p> <p>1.3.51 Such delivery increase clearly requires a step change in how the borough is planning for housing.</p> <p>1.3.52 In addition to the overall housing need, the plan also acknowledges that housing affordability is a significant issue that is worsening beyond that of the county, region, and national level. Accordingly affordable housing provision must be a strategic priority with the need for close to 300 affordable dwellings per annum.</p> <p>1.3.53 The delivery of a higher number of homes will have the greatest impact on combatting the affordability constraints. Our client's land has the potential to make a contribution towards both market and affordable needs.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43781249	43781441	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period?</p> <p>1.3.54 Yes. Paragraph 69 of the NPPF explicitly acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. Indeed, to promote the development of a good mix of sites local planning authorities should accommodate at least 10% of their housing requirement on sites no larger than one hectare and support the development of windfall sites through their policies and decisions.</p> <p>Page 14 of 25</p> <p>1.3.55 Our client's land, including land west of Chapel Street in Ryarsh (Site 59744), and land south of Hermitage Court in Barming (Site 59738) are clear examples of the type of sites that could be planned, agreed and developed quickly within the immediate five-year period, whilst still of scale that it will contribute towards affordable housing and infrastructure provision.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43781249	43781441	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (e.g. flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain</p> <p>1.3.56 Yes. There is great emphasis on the need to deliver mixed and balanced communities throughout the framework. Our client's land is of a size and scale that a suitable mix can be delivered swiftly.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43781249	43781441	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>1.3.57 No. The Council should address self-build need within the plan and potentially allocate suitable sites for self-build development. However, the practicalities of delivering self builds as part of a larger scheme is complex and faces several design and infrastructure constraints.</p> <p>1.3.58 Dedicated self-build sites should be identified.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43781249	43781441	5.3.37 - 5.3.38	<p>Q.17. Do you agree with the windfall allowance methodology?</p> <p>1.3.59 We support a modest windfall allowance to reflect that some unplanned sites will continue to be delivered. However, as part of the plan making process there is a requirement to consider, identify and maximise a range of sites before proceeding to any greenfield or Green Belt land releases.</p> <p>1.3.60 Owing to the onerous nature of these tests, it is likely that more sites will be identified and more land exhausted than has previously been the case. Accordingly, we question the extent to which past trends will represent a sound basis for future expectations.</p> <p>1.3.61 The above in mind, any windfall allowance should be conservative rather than overly optimistic until a more relevant new trend is identified as reliable.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43781249	43781441	5.3.39 - 5.3.45	<p>Q.18. Which housing matters are most important to you?</p> <p>1.3.62 As outlined above, there is a need to plan for full housing needs. Given there is clarity on these matters we question the benefit in implying that there is an element of choice of which types of housing take priority. Nevertheless, in this instance our client has a desire to genuinely deliver good quality housing and has a string track record of doing so within the borough</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
43884609	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>The headline needs identified in the Regulation 18 Plan are for 15,941 homes (830 dwellings per annum), the need for 25 Gypsy & Traveller pitches, and 69.8 hectares of employment land are all noted. The constraints of Tonbridge & Malling borough at 70% Green Belt and 28% AONB, as well as flood risk issues are also recognised.</p> <p>The Regulation 18 Plan under consultation indicates an increase in housing need of 14.5%, and of employment land of 49% since the last Regulation 19 pre-submission consultation plan stage, to which TWBC commented on 15 November 2018.</p>	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.

43884929	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Tonbridge and Malling Local Plan (2021 to 2040)</p> <p>Submission</p> <p>* The 15,941 house building target for Tonbridge and Malling (839 houses to be built per year for 19 years) - (2021 to 2040) needs to be reduced based on: 1/ Matt Boughton, Head of TMBC has written to No 10 Downing Street, challenging these numbers. The need for homes (ie people on waiting list) as stated by the Head of TMBC is 1500 which is 14,441 less than the out-dated government set target. 2/ The 15,941 housing target was set pre Brexit and pre COVID. Migration and the population has decreased and whilst the waiting list of 1500 does not include the forecasted need, new analysis of the demand is critically needed to be revised, 3/ Due to COVID, more industrial and retail units stand empty which could be regenerated into residential usage, creating a positive impact in towns and industrial (these units and properties need to be counted, recorded and re-purposed, 4/ Following the Bank of England's announcement of higher interest rates (now 3%) and a "looming recession", building too many houses in Tonbridge and Malling could weaken home prices in the future as buyers demand decreases. This impacts local people and the economy as a whole</p>	<p>Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.</p>
43884929	0	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>* Provision for Gypsy Traveller sites is not reflected in the Local Plan and whilst it has been stated that there is not a large demand in TMBC, Unauthorised Encampments need to be stopped and allocated sites included – SUGGESTION – Can Coldharbour be further extended?</p>	<p>Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement. A Call for sites for these purposes is underway.</p>
44200193	44200161	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q.12. Do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?</p> <p>In addition to the spatial distribution of development across the borough, the Council is seeking input on the quantum of development that is accommodated, namely whether to plan for the full housing need of the area, or to plan for full need plus 10% for flexibility to be built into the strategy.</p> <p>By way of simple response, there is a clear need to ensure development requirements are met in full and that any future plan is sufficiently flexible in the face of what could be a difficult economic period.</p> <p>As emphasised within the plan, one of the Government's key objectives for planning is to significantly boost the supply of homes. This includes not just market housing but also housing to meet the needs of different groups in society. The gross need for housing (2021-2040) is stated to be 9,245 dwellings based on an annual delivery rate of 839 pa.</p> <p>Such delivery requires a step change in how the borough is planning for housing. In addition to the overall housing need, the plan also acknowledges that housing affordability is a significant issue that is worsening beyond that of the county, region, and national level. Accordingly affordable housing provision must be a strategic priority with the need for close to 300 affordable dwellings per annum.</p> <p>In our view, the delivery of a higher number of homes will have the greatest impact on combatting the affordability constraints.</p>	<p>Comment noted. This matter will be considered and reflected within the evidence being prepared to support plan preparation.</p>
44200193	44200161	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period?</p> <p>Yes. Paragraph 69 of the NPPF explicitly acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. Larger sites however are capable of providing greater volumes of housing to meet the requirement and provide reliable sources of housing in the latter half the Plan period. Larger sites are also typically capable of providing greater affordable housing, developer contributions and supporting community infrastructure. Accordingly, we support an appropriate mix of small, medium and large scale sites to ensure deliverability across the Plan period.</p> <p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (e.g. flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain</p> <p>Yes. There is great emphasis on the need to deliver mixed and balanced communities throughout the framework. Our client's land is of a size and scale that a significant variety of house types and sizes can be delivered.</p> <p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>No. The Council should address self-build need within the plan and potentially allocate suitable sites for self-build development. However, the practicalities of delivering self builds as part of a larger scheme is complex and faces several design and infrastructure constraints.</p>	<p>Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement. No decisions have yet been made on sites for identification or allocation within the plan, but the council acknowledges the need for a diverse supply.</p>
44200193	44200161	5.3.37 - 5.3.38	<p>Q17. Do you agree with the windfall allowance methodology?</p> <p>We support a modest windfall allowance to reflect that some unplanned sites will continue to be delivered. However, as part of the plan making process there is a requirement to consider, identify and maximise a range of sites before proceeding to any greenfield or Green Belt land releases.</p> <p>Owing to the onerous nature of these tests, it is likely that more sites will be identified and more land exhausted than has previously been the case. Accordingly, we question the extent to which past trends will represent a sound basis for future expectations.</p> <p>The above in mind, any windfall allowance should be conservative rather than overly optimistic.</p>	<p>Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement</p>

44200193	44200161	5.3.39 - 5.3.45	<p>Q.18. Which housing matters are most important to you?</p> <p>As outlined above, there is a need to plan for full housing needs. Given there is clarity on these matters we question the benefit in implying that there is an element of choice of which types of housing take priority.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.</p>
44275681	44277153	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Matters such as a high affordability ratio that is following a rising trend (see below), along with significant affordable housing need, historic under delivery, and the importance of ensuring an adequate buffer to cater for under supply, or instances where the Plan strategy fails to deliver as expected, are all sound reasons for considering an uplift.</p> <p>There are several sound reasons for TMBC to consider an uplift in housing need, including: a high affordability ratio, significant affordable housing need, historic under-delivery, the importance of a suitable buffer to cater for under supply or instances where the Plan strategy fails to deliver as expected.</p> <p>Despite the way in which it is couched, question 5 appears to relate to the issue of housing supply, not the requirement i.e. whether the Draft Plan makes provision for a 10% uplift beyond the LHN in terms of its supply. This is a different issue entirely, to which we will return below, and does not address the importance of planning positively by setting an appropriate Local Plan Housing Requirement. As set out above the PPG is very clear about the obligation to establish the need before looking at it and how it can be met. To this end neither the draft plan nor the evidence base appear to have given any consideration to the issue of the requirement and any potential uplift to address the issues we have outlined in para 5.4 above. This in our opinion is a serious oversight on the part of the Council and goes to the heart of both the Soundness of the approach taken and Legal Compliance particularly in relation to the DtC, which we will return to below.</p> <p>Affordability</p> <p>Paras 5.3.13 – 5.3.16 of the Draft Plan are clear about the significance of the housing affordability issue across the Borough and how it has worsened over time, whilst para 5.3.18 highlights the fact that the plan should as a minimum meet the assessed need for housing in full because ‘anything less would have the effect of worsening housing affordability and run the risk of not delivering key national planning policy objectives’. We note, when looking at the ONS House price to workplace-based earnings ratio – March 2021, that the ratio of median house price to median gross annual workplace-based earnings by local authority district, England and Wales⁴, 1997 to 2021 indicates that the ratio of median house price to median gross annual workplace-based earnings in TMBC has increased significantly over the past 10 years, and that TMBC is now the 3rd least affordable Borough in the county after Tunbridge Wells and Sevenoaks, who, together with the western part of Tonbridge and Malling comprise the West Kent HMA.</p> <p>*image*</p> <p>The rapid increase in the affordability ratio is in our opinion clear evidence of the lack of housing delivery that has taken place over the last 10 year period within the Borough, as demonstrated below. Simply providing for the LHN as calculated through the Standard Method will only slow the rate of decline in affordability no more. For an improvement in the affordability situation to occur positive action is required through the provision of more housing over and above the LHN.</p> <p>Affordable Housing Need</p> <p>Linked to the issue of affordability is the significant need for affordable housing identified in the Borough, as acknowledged at para 5.3.16 of the Draft Plan and in the Housing Needs Survey 2022 (HNS) that forms part of the evidence base.</p> <p>The HNS 2022 confirms a minimum net annual shortfall for affordable homes of 283 dpa. This has been arrived at by calculating the gross need of 753 dpa and then reducing this to take account of expected annual affordable housing supply from various sources (470 dpa)⁵. The figure of 283 dpa must therefore be seen as a minimum because it is dependent on the supply assumptions set out in Appendix C of the HNS 2022.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. The council is preparing a new Housing Constraints Assessment which will be reflected within the Regulation 18b plan.</p>

44275681	44277153	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>In the context of the above we note that according to information produced by KCC6 ,TMBC have over the past 9 years only delivered on average 19.97% affordable housing. Even if one assumes an average of 20%, this suggests that the plan would need to deliver over 1400dpa to meet the identified affordable housing needs of the Borough7.</p> <p>*image*</p> <p>Whilst we are not advocating this level of growth, the above demonstrates the need for an uplift to the LHN figure to boost the supply of open market and affordable homes and thus help address the affordable housing needs of the Borough.</p> <p>Past Under Delivery</p> <p>We note the Councils' Housing Land Supply Position as of 31 March 2021 indicates that based upon the housing need of 839 dpa plus a 20% buffer, and the assumptions made on the supply, the Council is only able to demonstrate 3.17 years of Housing Land Supply between 1 April 2021 and 31 March 2026. We further note that when one reviews the Oct 2017 AMR (the last AMR produced by TMBC) and updates this with information on delivery set out in the HDT and KCC's statistical bulletins, and set this against the Councils position on the housing requirement, it's clear that TMBC have a long history of undersupply.</p> <p>*image*</p> <p>The fact the Council have in 9 out of the past 12 years failed to meet their annual housing requirement and have accumulated a substantial running deficit would suggest to us that there has been a record of persistent under delivery of housing, and that in order to address this there needs for an uplift to the LHN figure.</p> <p>The Council's history of under delivery is further denoted by the latest HDT results which, as set out below, suggest the Council only delivered 63% of the HDT requirement, which was itself adjusted to take on board the possible effects of Covid on housing delivery, and thus set a lower requirement than that associated with the standard methodology.</p> <p>*image*</p> <p>Again, this supports the needs for an uplift to the LHN figure.</p> <p>Unmet Need</p> <p>Nowhere in the Regulation 18 Plan is there any reference to the Duty To Cooperate (DtC) or its potential successor and its implications for the overall housing requirement. This is, in our opinion, a major omission in the light of the reasons behind the withdrawal of the previous Local Plan Review.</p> <p>The R18 Plan acknowledges at para 5.3.24 that two HMA's exert an influence on the Borough, the West Kent HMA which encompasses Sevenoaks/Tonbridge/Tunbridge Wells and falls across the northwestern, south-western and south-eastern parts of the Borough; and the Maidstone HMA which falls across the north-eastern and eastern parts of the Borough. In addition para 4.2.15</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.</p>
44275681	44277153	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>It is in our opinion imperative given the housing needs of the West Kent HMA that the TMBC LPR addresses the issue of the housing needs of the wider HMA, the extent to which any requests to help meet unmet needs has been made and whether TMBC themselves have looked to others to assist them.</p> <p>Only through a rigorous approach to the issue of the DTC will the Council be able to demonstrate that its housing requirement is right, and that the spatial strategy is correct in its approach to growth, including the release of GB sites and land within the AONB. To this end the SA should, in order to justify the Councils end approach, test various reasonable alternatives that consider the issue of unmet need and how this could be addressed through the plan. Likewise it's important that the plan encompasses evidence of effective and on-going joint working with neighbouring authorities on the issue of unmet need, both those within the same HMA, and those beyond who may be less effected by issues associated with the removal of land from the Green Belt and major development in the AONB.</p> <p>As things currently stand and cognisant of the situation in Sevenoaks (whose LPR is due to be published this autumn and whose ability to meet its LHN has yet to be clarified), and Maidstone (who are currently at examination, but struggling to meet their current LHN and have as a result a negative position in terms of their 5 year Housing Land Supply position), and Gravesham (who with the exception of Gravesend are wholly within the Metropolitan Green Belt and will not be able to meet their needs wholly within their urban areas); and not forgetting the continued issue of London's unmet need, we believe there is a clear and justifiable reason for the LHN figure to be increased to address the potential unmet needs of adjacent authorities.</p> <p>A Buffer</p> <p>As set out above it appears that the Council has tested a scenario within its spatial strategy that provides sufficient housing supply to meet the minimum LHN plus up to 10%. As drafted the R18 plan does not provide any detailed information on the makeup of the supply. Table 2 merely sets out the component parts i.e. extant permissions, windfall allowances and scale of allocations to be made. Whilst we will return to the matter of windfalls below, as far as proposed allocations are concerned we are not able to test their deliverability/ the numbers relied upon in the housing trajectory as they are as yet unknown.</p> <p>We do however note that Para 4.2.15 of the R18 Plan acknowledges that given the time horizon of the plan (to 2040), the Council should consider the need for flexibility to be built into the strategy so that it can be resilient to unforeseen changes that may occur during the latter years of the plan period.</p> <p>Given the issues of affordability, affordable housing need, past under delivery and the DTC as identified above, all of which have a material impact on LHN, it is considered that at the very least a buffer should be built into the housing requirement for the Plan. Introducing a buffer into the housing requirement would ensure that the Council plans positively for the future in a manner that not only meets the LHN but also provides an uplift to reflect the acute affordability problem and in turn the rising affordable housing need in the Borough.</p> <p>Conclusions on the Housing Requirement</p> <p>Whilst recognising that the Council has worked from the correct starting point, which is the LHN calculated by reference to the Standard Method i.e. 839 dpa, PPG is clear in that the LHN is only the starting point. There are a range of factors relevant to the calculation of the housing requirement for the Draft Plan that the Council needs to consider when arriving at its overall housing requirement. These include</p> <ul style="list-style-type: none"> • The severe and worsening affordability issue and the increasingly eye-watering affordability ratios; 	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. The council will continue to work with its neighbouring authorities and stakeholders under the duty to cooperate.</p>

44275681	44277153	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>We do not believe this measure will be justified based on need, nor effective based on the delivery of high quality development. Thus, we do not agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building. We say this because in the first instance whilst paragraph 57-014-20210508 of PPG identifies a Council's duties with regard self-build registers when preparing planning policies, it also outlines that consideration needs to be given to the disposal of their own assets in order to meet the need for self-build plots or whether selfbuild could support the regeneration of brownfield sites. As such the need for self-build plots should not automatically lead to a policy requiring their provision on larger sites. PPG also notes at paragraph 57- 025-20210508 that local authorities should be encouraging developers and land owners to consider providing plots for self-build and custom house building but makes no reference to requiring their provision</p> <p>In the context of the above, not only do we believe the plan needs to define what it means by large developments, it also needs to provide greater clarity the scale of the self-build requirements in the Borough. Whilst para 4.78 of the HNS suggests that over the period 2016 to 2019/20, a total of 179 individuals and 1 group of households registered interest in a self-/custom built property on the Council's register, it also acknowledges that the Council has yet to apply local qualifying criteria or a charge for people on the register.</p> <p>We understand that the updated Self-Build and Custom Housebuilding Regulations 2016 specify that if a local connections test is implemented, the register must be split into two parts. All those applicants who meet all the eligibility criteria (including a local connections test, financial solvency test and pay the required fee), will be in Part 1 of the register. Those applicants who fail to meet the local connections test, but otherwise meet the eligibility criteria, will be placed into Part 2 of the register. Having found a committee report from November 2019 that looks to address this matter we note that officers indicated that the effect of introducing the local connections eligibility criteria could potentially have the effect of reducing those on Part 1 of the register to 51 (there being 153 expressions of interest on the register at that time)16.. Before the Council start to look to require a proportion of plots on large developments to be made available for self-build and custom house building they must first define the scale of the issue that needs to be addressed and whether it can in the first instance be addressed by encouraging self-build and custom housebuilding schemes on non-allocated windfall developments (subject to compliance with other Policies in the Local Plan), or the development of their own assets. Thereafter rather than require a percentage of plots on all sites we would suggest that a more generic policy supporting the delivery of self build plots is more appropriate, or through discussions with the development industry specific sites are identified in those areas where the defined need is greatest to deliver say five percent (rounded up to the nearest whole number) of dwellings (as serviced plots) of the total TWBC emerging Local Plan17, and not dissimilar that proposed by MBC in the emerging plan which looks to allocate a specific number of self-build plots on a certain site as well as encourage individual self-build development18.</p> <p>In the context of the above, and as highlighted by the HBF in many Local Plan examinations, the Council need to consider whether it is feasible for large sites deliver self-build plots. Often there are multiple contractors and large machinery operating on-site, the development of single plots by individuals operating alongside this construction activity raises both practical and health & safety concerns. Any differential between the lead-in times / build out rates of self & custom build plots and the wider site may lead to construction work outside of specified working hours, building materials stored outside of designated compound areas and unfinished plots next to completed and occupied dwellings resulting in consumer dissatisfaction. Whilst some sites may be able to locate self-build plots in a manner that reduces these potential risks in other this will be impossible with developers unable to co-ordinate the provision of self & custom build plots with the development of the wider site. Such concerns must be given full consideration by the Council when preparing any policies on self-build to be included in the Local Plan.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. The council has duties in relation to self build/custom build which need reflecting appropriately within the local plan.</p>
44275681	44277153	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>No, we do not agree with the windfall allowance methodology. We note that according to table 2 of the R18 Plan windfalls comprise 3,10219 of the supply intended to meet the 15,941 housing requirement i.e. 19.46% of the overall supply/ 25% of the residual requirement having regard to extant permissions. This is a significant figure and whilst we note that the Windfall Allowance, Methodology and Justification and Calculation Paper suggests this figure is taken from annual averages over the past 13 years, and in the case of large windfalls discounted by 50% for years 6 – 10, with no allowance in the first 5 years, we would question how compelling this evidence is, especially when para 4.19 of the SA highlights the fact that as the Council has endeavoured to make best use of previously-developed land in built up areas such as Tonbridge for many years, these types of sites are, as a consequence, becoming less common.</p> <p>Whilst this is we acknowledge part of the rationale behind the need for the development greenfield sites, within and beyond existing built-up areas to meet the housing requirement, it does call into question the extent to which windfall sites are still available. A position that is exacerbated still further by the commentary in section 3.4.2 of the Green Belt Assessment which also highlights the fact "that it is not possible to meet all of the Borough's housing needs within existing built up areas".</p> <p>The above is exacerbated by the fact the last AMR (of 2017) highlighted the fact that many of the unimplemented consents in the Borough where from windfalls20, which at that time were only forecast to deliver an average of 44dpa; the Housing Land Supply Position as at 31 March 2021 suggests that the small sites windfall projection is assumed to be 42dpa based upon records of delivery from this source over the previous five years and discounted by 50% to ensure a cautious approach is taken; and the Urban Capacity Study only identified 75 potential development sites, with an overall optimised capacity of 1,946 residential dwellings within the urban areas. Whilst this could potentially be enhanced through the recent changes to permitted development rights allowing commercial buildings to convert into homes without planning permission, subject to the prior approval process, the implications of this on the economic strategy for the Borough and the suitability of many such buildings for conversion is such that we do not believe they are the panacea they are being made out to be.</p> <p>Given the above, whilst accepting that some element of windfall development will continue over the plan period, we would caution against the scale of windfall suggested in table 2 of the R18 Plan. We also note that table 2 includes within the housing land supply extant planning permissions, for which no evidence of deliverability is provided within the evidence base, and that whilst the plan period runs from 2021/22 to 2040/41 no figure is provided of completions for 2021/22 which should now realistically be available. Such that we assume the extant permissions includes competitions from 2021/22.</p> <p>Whilst the R18 Plan does not ask for comments on the component parts of the housing supply, other than windfalls, given the implications a properly evidenced supply has on the scale and potential nature of the proposed allocations it is in our opinion pertinent that this issue is addressed now. The Council's most recently published Housing Land Supply Position Statement (to the base date of 31 March 2021) confirms a supply of only 3.17 years with the application of a 20% buffer. That equates to a shortfall of some -1,840 dwellings. That is significant and together with the history of under supply (as evidenced above) and the most recent HDT result that has led to the automatic application of the 'tilted balance' set out in Paragraph 11 (d) of the NPPF, highlights the need for the Council to ensure that the Draft Plan rectifies this shortfall and maintains a robust and rolling 5-year supply going forward.</p> <p>With this in mind we note that of the extant permissions identified in the Housing Land Supply Position Statement (31 March 2021), a large number had not started and as outline consents will need to secure reserved matters approval and discharge of pre commencement conditions before works can start on site. Evidence to demonstrate deliverability thus needs to be provided to justify the inclusion of said sites in the housing trajectory, let alone the 5 year housing land supply, which we note we are not able to</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. The Regulation 18 b document will include a housing trajectory which will include some allowance for windfalls, as updated to current evidence.</p>

44345345	44345409	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8	<p>St Clere Estate should be understood as a key actor within the Sevenoaks/Tonbridge/Tunbridge Wells Housing Market Area (HMA), with land straddling the boundary of Tonbridge and Malling and Sevenoaks. As emphasised within the Consultation Document, understanding this HMA and the necessary joined-up approach to housing is key to securing sustainable development. The land ownership pattern of St Clere provides an exciting opportunity for a strategic approach to housing development within the HMA.</p> <p>3.2 For St Clere to contribute to sustainable development patterns within the Sevenoaks/ Tonbridge/Tunbridge Wells HMA, it is important that their combination of smaller sites is considered as a strategic housing opportunity within the Local Plan.</p> <p>3.3 As recognised in paragraphs 4.2.4 and 4.2.5 of the Consultation Document, the majority of previously developed land in built up areas has already been developed for housing, so a mixed portfolio of sites of various sizes will be important to secure opportunities for all types of developers. St Clere is therefore in support of Option 5 for the Local Plan's spatial strategy for housing (Question 3). This approach will seek out housing opportunities across the whole Borough, including in 'other rural settlements'. Option 5 offers the best chance of sustainable and varied housing delivery.</p> <p>3.4 This is essential given the shortage of affordable rural housing for workers to support the landbased and agricultural sector as paragraph 5.4.15 makes clear:</p> <p>3.5 Attracting and retaining staff to support our land based and agricultural businesses is vital. In a borough where the cost of living is relatively high the availability of linked agricultural dwellings and other affordable housing, is essential for those working in the sector.</p> <p>3.6 The St Clere Estate already provides some housing to local families but is keen to expand this provision. The Rural West HMA within which the Estate sits is an attractive area to live and as such, rural housing need is being priced out as the Housing Needs Assessment makes clear. Particularly in respect of the higher rents which are commanded.</p> <p>3.7 The Estate does provide some affordable housing for its workers as Coney Shaw Farm on the Kemsing Road illustrates: an excellent example of affordable, attractive housing which respects the character of the area. However, more is needed.</p> <p>3.8 The Estate has many discrete areas of land to provide small-scale housing opportunities to deliver rural housing. This approach could work with any of the Spatial Distribution Options presented. Irrespective of which spatial distribution option is selected, the new Local Plan should include clear policies setting out how opportunities for rural housing can be brought forward. The current draft is certainly tilting in this direction by stating that smaller housebuilders should be involved in providing homes locally, which requires an adequate supply of small and medium sized sites that can deliver homes in the short-to-medium term (Consultation Document paragraph 5.3.6).</p> <p>3.9 The Local Plan would be strengthened if the Housing Needs Assessment provided a greater insight in to the rural housing market and its specific challenges as this would inform the drafting process and ensure the Plan was meeting the needs of the local area.</p>	<p>Comment noted. This matter will be considered and reflected within the new housing and spatial strategy evidence being prepared to support plan preparation. No decisions have yet been made on sites for identification or allocation within the plan, but the council is aware of a need for a diverse supply of sites to achieve delivery rates required.</p>
44415649	42006241	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8	<p>Q.12. With reference to your answers to questions 3 and 4, do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full as a minimum? Yes/No Please explain.</p> <p>2.28 Yes. We support the identification at paragraph 5.3.6 of the needs of different groups, including small house builders in providing homes locally. Paragraph 5.3.6 acknowledges that this is best achieved by ensuring an adequate supply of small and medium sized sites, which can help with the supply of new homes in the short-medium term. We are supportive of this recognition for small-medium sites which are provided by SME developers. We consider that this should go further and ensure that the Local Plan identifies and allocates housing specific to these needs. Where it is acknowledged that small sites can provide a high-quality product in the short term, this should be made clear with a specific policy that captures small-sites and SME developers and recognises the contribution.</p> <p>2.29 In order to help meet these needs as well as support SMEs and Self and Custom Builders, we consider it appropriate to include a small sites policy or a policy which recognises the role of rural communities and supports windfall developments.</p> <p>2.30 The Network is championing a small sites policy, which is presently being endorsed by a number of LPAs including Swale and Medway Council.</p> <p>2.31 Any future plan should provide for a policy framework to allow SMEs to deliver throughout the lifetime of the plan, particularly in rural areas.</p> <p>2.32 As part of the Network's objective, it has sought to introduce a policy into emerging Local Plans that seeks to support small and medium sized developments that builds on the 1ha site requirement but expands this into a policy framework that can allow SMEs to successfully operate within the policy framework of a Local Plan where there are limited opportunities through the allocations in which the Council has made (i.e. on larger sites).</p> <p>2.33 In this respect, there is often a large windfall figure required to be met, or LPAs find themselves in a position where the presumption in favour of sustainable development is applicable. The SME policy set out below is a policy in which the Network considers would provide the opportunity for SME sites to come forward, whilst offering the LPA an enhanced development coming forward that is typically delivered by an SME – i.e. in respect of design quality or for instance carbon efficiencies.</p> <p>2.34 Whilst the ideal scenario would be for the same policy to be adopted by each Council (and therefore apply a level of consistency in understanding and application of the policy), we also recognise that each LPA has a specific set of circumstances that may require the policy wording to be tweaked. This maybe the case in TMBC and the Network would welcome further discussions as to how such a policy could be introduced into the Plan.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses. No decisions have yet been made on sites for identification or allocation within the plan, but the council is aware of a need for a diverse supply of sites to achieve delivery rates required. The council has duties in relation to self build/custom build which need reflecting appropriately within the local plan.</p>

44415649	42006241	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium and large) to help maintain supply throughout the plan period? Yes/No Please explain</p> <p>2.46 Yes. Paragraph 69 of the NPPF requires Local Planning Authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. This is a clear requirement therefore that 1,594 dwellings need to be allocated on sites of this nature.</p> <p>2.47 Central Government recognises the problem of bringing SMEs into the market and has sought to 'level the playing field' in the context of supporting small and medium sized sites at the plan making stage. Crucially, the NPPF 2019 confirms in paragraph 68 that:</p> <p>68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:</p> <p>a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;</p> <p>b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;</p> <p>c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and</p> <p>d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.</p> <p>2.48 The NPPF provides for a clear direction to LPAs, that it must identify land to accommodate at least 10% of their housing requirement that are 1ha or less.</p> <p>2.49 The SHLAA is a critical piece of work in this regard and it is crucial that sites of this scale are identified and that they are being promoted by SME developers (or capable of being delivered by an SME developer). It is not simply a numbers game but a qualitative exercise to ensure that a sufficient number of these small sites are identified to support the intent of paragraph 69 – which is to support SME developers.</p> <p>2.50 We support the recognition at para 5.3.34 that one way of building resilience into the supply of new homes across the whole of the plan period is through diversity, with diversity being in terms of the size of sites, tenure of homes and they types and sizes of homes provided. Recognition of this does not go far enough and TMBC must allocate diverse sites for a deliverable and effective Local Plan.</p>	<p>Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement. No decisions have yet been made on sites for identification or allocation within the plan, but the council is aware of a need for a diverse supply of sites to achieve delivery rates required.</p>
44415649	42006241	5.3.37 - 5.3.38	<p>Q.17. Do you agree with the windfall allowance methodology? Yes/No Please explain</p> <p>2.54 We do not disagree with the windfall allowance methodology itself (i.e. large and small windfall and how the numbers have been derived). However we do consider that this results in a significant proportion of the total number of dwellings required to be delivered in the plan period to be reliant on windfall source. Accordingly, the application of Windfall development to meet the housing numbers needs careful consideration.</p> <p>2.55 The windfall allowance should be used as a buffer to provide additional development rather than relied upon to make up a large percentage of the housing numbers. We consider that windfall allowance should be given greater flexibility and not relied upon to the extent that these housing numbers suggest.</p>	<p>Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement</p>
44426049	25240577	5.3.39 - 5.3.45	<p>As outlined above, there is a need to plan for full housing needs. Given there is clarity on these matters we question the benefit in implying that there is an element of choice of which types of housing take priority. Nevertheless, in this instance our client has a desire to genuinely deliver good quality housing aimed at local people given the limited growth in East Peckham in recent years.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. The council is preparing a new Housing Constraints Assessment which will be reflected within the Regulation 18b plan.</p>

44463361	25366913	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>13.0 QUESTION 13: DO YOU AGREE THAT THE LOCAL PLAN SHOULD ALLOCATE A MIX OF SITES (SMALL, MEDIUM, AND LARGE) TO HELP MAINTAIN SUPPLY THROUGHOUT THE PLAN PERIOD?13.1 Yes. Having a range of site types and scales is a good way to de-risk housing supply in that different sites can deliver in different ways, and at different times, to support a rolling 5-year supply.</p> <p>13.2 A mix within the strategy will ensure a wide range of sites, both in terms of size and location, delivered to support a vibrant and diverse housing market. There are substantial advantages in identifying strategic development opportunities, especially those (like Broadwater Farm site ID: 59740) that can make an early contribution to housing land supply (in a location where growth is needed). As above, Berkeley expects to be able to deliver 900 homes within the new Local Plan period and deliver through the Plan period.</p> <p>14.0 QUESTION 14: DO YOU AGREE THAT THE LOCAL PLAN SHOULD REQUIRE A SPECIFIED MIX OF DWELLING TYPES (E.G. FLATTED, TERRACED, SEMI-DETACHED, DETACHED) ON LARGE DEVELOPMENT SITES TO MEET THE RANGE OF HOUSEHOLDS' NEEDS?</p> <p>14.1 Berkeley supports, in principle, a vision for mixed communities where a variety of housing types and tenures are available, which also support the delivery of affordable housing. Guidelines which help to deliver this are likely to be the best option so that individual site characteristics and locally specific needs can be assessed on a site-by-site basis.</p> <p>14.2 The Council will need to consider evidence, which examines the current situation regarding housing stock quality, tenure and mix and also the needs, and desires, of the community. Dwelling types for an aging population and for parts of the community with other specific needs, will also need to be fed into the assessment.</p> <p>15.0 QUESTION 15: DO YOU AGREE THAT THE LOCAL PLAN SHOULD REQUIRE A PROPORTION OF PLOTS ON LARGE DEVELOPMENTS TO BE MADE AVAILABLE FOR SELF-BUILD AND CUSTOM HOUSE BUILDING?</p> <p>15.1 Berkeley is not convinced that this is the most appropriate and effective way to meet this type of need.</p> <p>15.2 In the first instance, the Council will need to collect and maintain evidence which demonstrates the level of need for self-build and custom build development. If and when this evidence demonstrates that there is a need, then it might be more appropriate to identify a single location where self-build development is supported and concentrated. The Graven Hill development in Oxfordshire is a good example of where the shared experience of self/custom build has worked and fostered like-minded and supportive community.</p> <p>15.3 The challenge of including self/custom build as a proportion of larger site allocations is that it can be difficult to assimilate designs into a carefully developed master plan, and street scene. Another concern is the effect that self/custom build can have on development delivery and phasing as this will be affected by demand and delivery from individual plot purchasers.</p> <p>16.0 QUESTION 16: DO YOU AGREE THAT THE LOCAL PLAN SHOULD REQUIRE A PROPORTION OF HOMES ON LARGE DEVELOPMENT SITES TO BE BUILD-TO-RENT PRODUCTS?</p> <p>16.1 Berkeley considers that build-to-rent is a market product that will be dictated by market forces, and it should not therefore be a specific requirement of policy.</p> <p>16.2 This is not to say that build-to-rent is not an important part of the housing market, nor that it should be restricted. Build-to-rent, and serviced apartments are a growing trend in the UK and can provide new homes at high density in appropriate locations, such as adjacent to railway stations and in town centres. Berkeley does not however operate a build-to-rent model and does not intend to deliver this tenure on its sites including at Broadwater Farm.</p>	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement
44546305	44546401	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8	<p>[59874]</p> <p>The National Planning Policy Framework emphasises the pressing need for more housing. It is vitally important that all boroughs in the UK play their part in meeting housing needs, as confirmed by the Inspector reviewing the previous draft local plan in Tonbridge and Malling. The whole country is also now in economic decline, with some experts predicting that the recession could last for 10 years; this is a substantial period of the plan and not just a short economic slump. This means that development viability could be challenging for many years. In order to have the best chance of constant housing delivery in these circumstances, it is important that a variety of sites are identified for development (small, medium and large), with the focus not just in one area or on a particular type of site. Over identification of housing sites to meet needs is required in order to ensure that at least minimum needs are met, albeit we consider that more than minimum needs should be sought to be met due to the pressing UK housing need.</p>	Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.
44546305	44546401	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>[59874]</p> <p>As stated already above, we strongly recommend that the new Tonbridge and Malling Local Plan allocates a mix of sites (small, medium and large) to help maintain supply throughout the plan period. This is in order to counter housing viability challenges so that at least minimum housing needs are met over the plan period, albeit we consider that more than minimum needs should be sought to be met due to the pressing UK housing need. We consider that sufficient housing sites should be identified in order to ensure that housing delivery can continue in these challenging times, and that will therefore mean over allocating sites to meet housing needs.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. No decisions have yet been made on sites for identification or allocation within the plan, but the council is aware of a need for a diverse supply of sites to achieve delivery rates required.

44646113	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Please find below and attached a representations by Inspired Villages to the Local Plan Issues and Options consultation ending 3rd November 2022.</p> <p>A copy of accompanying documents which are referenced in our representation is as follows:</p> <ul style="list-style-type: none"> * Local Plan Representations by Inspired Villages * 21st Century Care by Inspired Villages * Benefits Infographic by Inspired Villages * The Mayhew Review November 2022 by The International Longevity Centre <p>Who are Inspired Villages:</p> <p>Inspired Villages is a developer and operator of retirement communities in the UK. We are majority owned and fully funded by Legal & General and NatWest Pension Fund. We currently have seven operating villages, with a further 20 sites legally secured with a number of those under construction, consented or in planning/pre-planning. Our business plan is to have 60 operational villages within the next ten years and we currently provide purpose built housing for over 1000 residents.</p> <p>A retirement community falls under the extra care model and our developments are within the C2 use class. Inspired Villages is a member of Associated Retirement Communities Operators (ARCO) and we encourage Tonbridge and Malling Borough Council to engage with ARCO to assist with your understanding of the Retirement Community Sector, and would recommend you view their website: https://www.arcouk.org/what-retirement-community</p> <p>This representation is made in response to section 5 of the Regulation 18 Draft Local Plan 'Strategic Matters' specifically, section 5.3 'Housing – what are the issues?'</p> <p>Need and Allocations for Older Persons Housing</p> <p>We would encourage Tonbridge and Malling Borough Council (TMBC) to first identify local needs within the Borough with particular reference to older persons housing so that the right homes can be planned for the right places to meet existing and projected housing need. Greater emphasis should be placed upon the provision of housing for older persons, the Local Plan should set out clear and specific policies to address housing needs for older people with a range of tenure types provided to meet these needs. Further, the provision of housing for older people should allocated within the Plan and be located on land in and adjacent to settlement boundaries, and where proposed development provides sustainable transport and communal facilities, and there is an identified need. The provision of specialist housing should be positively planned for and with specific targets set separately to those created for general housing (C3 Use). Please refer to Recommendations Three and Four</p>	<p>Comment noted. This matter will be considered and reflected within the new evidence being prepared to support plan preparation.</p>
44819617	42821281	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Housing Market Area</p> <p>The consultation is supported by a Housing Market Delivery Study (July 2022) which seeks to, at Section 4, identify and understand the Housing Market Areas within which the Borough falls.</p> <p>This work revisits the conclusions arrived at in the Strategic Housing Market Assessment 2014 (SHMA 2014), with significant variation between the Housing Market Areas (HMAs) identified at that time and now. It is not clear whether the changes to HMAs have been done in cooperation with other authorities in the HMAs or if this is completed unilaterally by TMBC.</p> <p>In concluding on the local Housing Market Areas in the Borough, the SHMA 2014 found there to be 2no. distinct HMAs operating, one focussed on Maidstone and the other focussed on Sevenoaks, with some overlap between these (para 2.43), as shown in Figure 2.1.</p> <p>Consistent with the findings of the SHMA 2014 the Housing Market Delivery Study (para 4.75 – 4.79) concludes the Borough falls into 2no. local HMAs. However, through review of home mover data from the Royal Mail and ONS internal migration data amended HMA boundaries within TMBC are identified. This is shown below in Figure 2.2.</p> <p>However, paragraph 4.48 highlights a significant weakness of this, using ward “Borough Green & Platt” (which has moved from the Sevenoaks and Tonbridge and Tunbridge Wells HMA in the SHMA 2014 to the Maidstone HMA in the Housing Market Delivery Study) has a marginal difference in home movers between the HMAs at 15% home movers to Maidstone HMA and 16% to the other.</p> <p>This appears to be the only justification for the divergence from the SHMA 2014 HMAs and therefore we question whether a robust assessment has been undertaken and whether the identified HMAs can be “justified”, especially if these are used to make strategic decisions in respect of the location of development and Green Belt release .</p> <p>If it is the intention of the Plan to adopt a separate housing needs requirement for each HMA, this needs to be accompanied by a robust justification and detailed evidence to demonstrate the suitable locational boundaries between the HMAs in the Borough.</p> <p>It is likely the case, as reflected in the SHMA 2014, there is overlap between the HMAs. We strongly recommend this be clarified and, where there are strong overlaps, those are as be acknowledged as appropriate locations for housing delivery to serve both HMAs.</p> <p>This is likely to be the case for Borough Green and St Mary’s Platt which has ‘changed’ HMA between the SHMA 2014 and latest assessment, and only has a marginal difference in home movers.</p> <p>Figure 2.1: SHMA 2014 Housing Market Areas in Tonbridge and Malling Borough</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements evidence base documents and other consultation responses</p>

45221249	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Over recent years, as local residents we have been required to consider and respond to housing plan after housing plan after housing plan. Suffice to say that planning application fatigue has set in, which I sometime believe is the ultimate aim of planning, as residents eventually just accept whatever is put forward, as "there is nothing you can do about it".</p> <p>It is however extremely well received that this opportunity is being offered to residents to help shape the future of housing stock locally. A big move in the right direction. But, I am of the view that a robust approach along the following steps must be considered before any site applications are considered.</p> <p>* What is the true forecasted demand for housing ? With significant migration after Brexit and a significantly reducing UK fertility rate (2010 = 1.92 births per woman - 2020 = 1.56 births per woman), planning MUST take this into account as opposed to knee jerk response to current housing pressures. Accurate central government forecasting must be able to generate regular updated forecasts that also take into account the Levelling Up agenda and populous migration</p> <p>* No additional houses should be built until empty housing stock is utilised. I understand this can be a costly and lengthy process to free-up these properties. So streamline the process to make it easier and cheaper in the long run.</p> <p>* No additional houses should be built until the majority of empty housing stock has been released and then all Brownfield sites identified and utilised. Again, I am aware that often these can be more expensive to develop compared to Greenfield sites. So establish why this is and mitigate it.</p> <p>* Where new Greenfield sites are required for new housing, far greater emphasis needs placing on designated allocation. By this I mean, 'x thousand houses for this borough and y thousand houses for the next borough'. So for example, a borough of 1.4mile² with 0.7mile² of Greenbelt, shouldn't have to take the same qty of houses as a similar sized borough with no Greenbelt. It should be proportionate to the actual land available. This should apply to Greenbelt, Heritage etc etc.</p> <p>* Once land is identified for consideration, there should be a more joined up approach to planning where ALL 'departments' work in unison. So Highways, Health, Amenities, Education, Environmental, Heritage, Transport, Ecology, Wildlife etc. In parallel to this, all other local developments that have either been recently completed, are under construction, are in the planning stage or being proposed, MUST be considered in full. By way of example, approved or pending developments within a few of miles radius of East Malling (Broadwater Farm (pending) x900, Parkside (EM-New Road) x110, Ditton Edge (Ditton) x300, Forty Acre (Larkfield) x25), which equates to 1,560 new properties, will generate an estimated additional 2.18 million new local traffic movements p.a. Is this really taken into account when considering any of the sites put forward? Without doing so, I fear nothing will change.</p> <p>With almost 300 sites having been denoted as possible development opportunities, some serious modelling needs undertaking before any can be approved.</p>	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.
45283457	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>We observe that in terms of housing, based on standardised government calculations the area is expected to be required to provide 839 new homes a year, equating to a total of almost 16,000 new homes over the plan period. Whilst several sites have been put forward to the council for consideration, we understand that no sites have been committed and instead you are seeking views on where these homes should be built and how they can deliver infrastructure improvements.</p>	Comment noted. Consultation outcomes and responses will be used to support drafting of the local plan, and reported through the consultation statement.
45864993	25240577	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Q.12. Do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?</p> <p>4.1.49 In addition to the spatial distribution of development across the borough, the Council is seeking input on the quantum of development that is accommodated, namely whether to plan for the full housing need of the area, or to plan for full need plus 10% for flexibility to be built into the strategy.</p> <p>4.1.50 By way of simple response, there is a clear need to ensure development requirements are met in full and that any future plan is sufficiently flexible in the face of what could be a difficult economic period.</p> <p>4.1.51 As emphasised within the plan, one of the Government's key objectives for planning is to significantly boost the supply of homes. This includes not just market housing but also housing to meet the needs of different groups in society. The gross need for housing (2021-2040) is stated to be 9,245 dwellings based on an annual delivery rate of 839 pa.</p> <p>4.1.52 Such delivery requires a step change in how the borough is planning for housing.</p> <p>4.1.53 In addition to the overall housing need, the plan also acknowledges that housing affordability is a significant issue that is worsening beyond that of the county, region and national level. Accordingly affordable housing provision must be a strategic priority with the need for close to 300 affordable dwellings per annum.</p> <p>4.1.54 In our view, the delivery of a higher number of homes will have the greatest impact on combatting the affordability constraints.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.
45864993	25240577	5.3.19 - 5.3.36 Table 4,5, & Figure 9	<p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period?</p> <p>4.1.55 Paragraph 69 of the NPPF explicitly acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly and that to promote the development of a good mix of sites local planning authorities should accommodate at least 10% of their housing requirement on sites no larger than one hectare and support the development of windfall sites through their policies and decisions.</p> <p>4.1.56 Nevertheless, an over provision of small sites will not deliver the level of benefits and delivery that a strategic site, such as Oast Park, can achieve. Accordingly, a balanced approach is needed.</p> <p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (eg flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain</p> <p>4.1.57 Yes. There is great emphasis on the need to deliver mixed and balanced communities throughout the framework.</p> <p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>4.1.58 No. The Council should address self build need within the plan and potentially allocate suitable sites for self build development. However, the practicalities of delivering self builds as part of a larger scheme is complex and faces a number of design and infrastructure constraints.</p>	Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan. The council has duties in relation to self build/custom build which need reflecting appropriately within the local plan.

45864993	25240577	5.3.37 - 5.3.38	<p>Q17 Do you agree with the windfall allowance methodology?</p> <p>4.1.59 We support a modest windfall allowance to reflect that some unplanned sites will continue to be delivered. However, as part of the plan making process there is a requirement to consider, identify and maximise a range of sites before proceeding to any greenfield or Green Belt land releases.</p> <p>4.1.60 Owing to the onerous nature of these tests, it is likely that more sites will be identified and more land exhausted than has previously been the case. Accordingly, we question the extent to which past trends will represent a sound basis for future expectations.</p> <p>4.1.61 The above in mind, any windfall allowance should be conservative rather than overly optimistic.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.</p>																		
45864993	25240577	5.3.39 - 5.3.45	<p>Q.18. Which housing matters are most important to you?</p> <p>4.1.62 As outlined above, there is a need to plan for full housing needs. Given there is clarity on these matters we question the benefit in implying that there is an element of choice of which types of housing take priority.</p>	<p>Comments noted. These matters, along with other consultation responses, evidence base documents and national planning policy requirements will be considered during the preparation of the next stage of the Local Plan.</p>																		
45869441	0	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8	<p>I am writing to comment on the local plan. I only have one point to make, and it is this:</p> <p>*** WE DO NOT NEED 16,000 NEW HOMES IN THIS BOROUGH ***</p> <p>The government targets are ridiculous. They are based on out of date projections from the ONS. They bear no relation at all to reality. In fact, we don't need ANY new houses at all - unless they be social housing.</p> <p>Why?</p> <p>Because housing has become an investment opportunity. Incentivised by government, and contributing 20% of all Conservative Party donations, the property industry has convinced many people that if you build enough houses the demand will go down. If we all needed one house, and one house was all we got, then supply and demand would work fine - build more, the price goes down. Simple. But that's not what happens. The more houses we build, the more investors will buy them up. Some of them are unsavoury - money-launderers, overseas entities, Rachman landlords.</p> <p>Some of them supply a need, like AirBnBs, buy-to-lets, and so forth. But *all* of them are taking property off the market. An estimated one in five of all UK homes is sequestered in this way. Whatever the reason, it is true that we have more houses than households: ONS figures prove this - AND show that the gap is widening. The only kinds of homes that are insulated from this are social housing homes - with no right to buy. That's what we should be building - on brownfield sites with good transport links, not on green fields that should be feeding us.</p> <p>So what should TMBC do?</p> <p>We must refuse to accept those government targets. Yes, we are threatened with the loss of our planning powers. Would central government really do that? And would that survive a judicial review? I doubt it. The current regime is in a complete mess on this - as on so much else. If they allow indiscriminate building will they lose so many backbench seats as to outweigh the huge donations to party coffers from property interests?</p> <p>So they say both things: we'll preserve Green Belt, AND we'll allow massive uncontrolled housebuilding wherever. This must be challenged, and TMBC is as good a place as any to challenge it. So I cannot support any of your proposals. I can only support you if you take a stand against this government's crazy targets.</p>	<p>Comment noted. The council is required to reflect the approach of the National Planning Policy Framework and associated planning practice guidance.</p>																		
46103169	46103137	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8	<p>Housing Requirement</p> <p>The council has correctly used the Standard Methodology to calculate the housing requirement of 15,941 dwellings across the plan period which equates to 839 dwellings per annum.</p> <p>Recent delivery in Tonbridge and Malling has been poor with the council only delivering 63% of its housing requirement over the preceding three years as set out in the most recent Housing Delivery Test Results, released in January 2022. The results are summarised in the table below:</p> <table border="1"> <thead> <tr> <th>2018-19</th> <th>2019-20</th> <th>2020-21</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Homes Required</td> <td>854</td> <td>774</td> <td>561</td> <td>2189</td> </tr> <tr> <td>Homes Delivered</td> <td>457</td> <td>471</td> <td>441</td> <td>1360</td> </tr> <tr> <td></td> <td colspan="3">(63%)</td> </tr> </tbody> </table> <p>The most recent housing land supply was recorded at 2.93 years in a recent appeal decision in October 2022 (APP/H2265/W/21/3284350).</p> <p>The affordability ratio for Tonbridge and Malling is 11.07 which is one of the highest of all the Kent councils.</p> <p>Given the historical under delivery, unmet needs in the wider area, the lack of current five year housing land supply and high affordability ratio, it is considered vital that the council allocates a sufficient number of sites which would enable it to deliver against its housing target in the early part of the plan period.</p> <p>It is noted that the council has considered an option to increase the housing requirement from the standard method figure by 10%. However, it is considered that the council should consider a higher uplift in order to address unmet need from other authorities, affordability and historic under delivery in order to ensure that any future adopted plan remains robust against any potential under delivery.</p>	2018-19	2019-20	2020-21	Total	Homes Required	854	774	561	2189	Homes Delivered	457	471	441	1360		(63%)			<p>Comment noted. This matter will be considered alongside national planning policy requirements evidence base documents and other consultation responses</p>
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46103169	46103137	5.3.1 - 5.3.18 & Tables 2-3, & Figure 8.	<p>Affordable Housing Requirement</p> <p>The Regulation 18 version of the plan sets out that there is an affordable housing need of 283 dpa over the plan period which equates to 33% of the total housing requirement.</p> <p>The Planning Practice Guidance sets out the following in regard to affordable housing need:</p> <p>The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.</p> <p>Paragraph: 024 Reference ID: 2a-024-20190220</p> <p>Revision date: 20 02 2019</p> <p>Given the historic undersupply of housing in general within the past number of years, the council should consider a further increase of the housing target to ensure the delivery of much needed affordable housing in the early part of the plan period.</p> <p><u>The Land at West Malling can deliver a policy compliant amount and tenure split of affordable housing across the site.</u></p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements evidence base documents and other consultation responses</p>
46162977	0	5.3.37 - 5.3.38	<p>My vision for sustainable communities</p> <p>I concur strongly with the sentiments expressed in 5.3.38 of the Regulation 18 Local Plan Consultation Document, as stated :-</p> <p>“Delivering homes needs to be done in a way that can achieve quality, well connected places where people are happy and proud to live. For places to function properly, it is critical that new homes are served by supporting infrastructure such as schools, health care centres, open spaces, and opportunities for active travel such as walking and cycling. This is important for the health and well-being of the new residents. We understand the importance of not just the amount of supporting infrastructure but also when it is delivered to meet the needs of the new communities.”</p> <p>As TMBC has identified, simply attempting to meet housing quotas is unacceptable. Adding dwellings where the infrastructure is already exhausted or under pressure benefits no-one and only serves to degrade the quality of life for all concerned. All planning applications for additional dwellings should therefore require the applicant to state how basic health, education and welfare needs will be met. It should also be a requirement to identify where the employment opportunities are, so that there can be a sensible assessment of travel needs and the impact on existing transport options. Not enough consideration is given currently to the impact of additional dwellings on neighbouring communities and transport networks. I was encouraged to see the inclusion of maps in the latest documents illustrating traffic hotspots and congestion across the entire Borough instead of unintelligible tables of figures at individual junctions that are meaningless to most people.</p> <p>It should be incumbent on councils to confirm that basic human needs can be met before even validating applications for additional dwellings.</p> <p>My schematic diagram on the first page assumes a blank canvas, but the principles outlined in the following text could also be applied to existing communities to improve the quality of life for all.</p>	<p>Comment noted. This matter will be considered alongside national planning policy requirements, evidence base documents and other consultation responses</p>