

Interim Duty to Cooperate Statement

For the Tonbridge and Malling Regulation 18 Stage 2
Local Plan 2024-2042

October 2025

Contents

Section	Page
1. Introduction	1
2. Strategic Context	2
3. Strategic Planning Priorities	7
4. Meeting the Duty to Cooperate	14
5. Cross Boundary Issues	19
6. Next Steps	22
Annex 1. Duty to Cooperate Record of Engagement	23
Annex 2. Other Organisations Engaged	39
Annex 3. Strategic Planning Issues Proforma	41

1. Introduction

- 1.1. The purpose of this Interim Duty to Cooperate Statement is to explain how Tonbridge and Malling Borough Council has engaged and cooperated with neighbouring authorities, prescribed and other public bodies, and partners in meeting Duty to Cooperate (DtC) requirements to support the preparation of the new Local Plan. It is a live document which will be updated to demonstrate that the Duty has been met at Regulation 19 stage, to make clear that engagement and cooperation has been ongoing and effective throughout the preparation of the Plan. Engagement will continue once the Local Plan has been adopted.
- 1.2. The National Planning Policy Framework (NPPF) 2024 states that *“Local planning authorities and county councils (in two-tier areas) continue to be under a Duty to Cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries”* (paragraph 24). As such local planning authorities should collaborate to identify the relevant strategic matters which they need to address in their Local Plans.
- 1.3. The Government consider that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified Local Plan spatial strategy. It is intended that joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 1.4. The DtC is a legal test that is considered at the initial stage of Local Plan Examination (legal compliance). It can't be retrofitted should the appointed Inspector(s) consider that based upon the evidence submitted, the local planning authority has failed to demonstrate that it has met the Duty. A failure to meet the Duty would put at risk the progression of the Local Plan through the Examination process.
- 1.5. To further support effective and on-going joint working, Statements of Common Ground (SoCGs) are to be prepared with neighbouring authorities and prescribed bodies (as considered necessary). These will outline the cross-boundary matters that have been identified and where possible the actions that have been agreed to address these. SoCGs will be published alongside the Regulation 19 Local Plan in 2026.
- 1.6. The Planning Advisory Service has prepared a simple guide to strategic planning and the DtC, this can be found on the [Local Government Association website](#). The guidance has been used to inform the structure and content of this statement.
- 1.7. The Levelling Up and Regeneration Act will facilitate the ending of the Duty, to be replaced with a new alignment policy which is subject to further detail to be made available through secondary legislation and guidance. At this time no further detail has been published regarding this, until this legislation gains royal ascent the Duty will remain.

2. Strategic Context

Spatial Characteristics

- 2.1 Tonbridge and Malling share a boundary with the neighbouring districts of Gravesham, Sevenoaks, Tunbridge Wells, and Maidstone, in addition to the Medway Unitary Authority. Immediately to the east of the borough lies the County town of Maidstone. Sevenoaks lies some 10km to the west and Tunbridge Wells is located to the south, close to Tonbridge.
- 2.2 The borough is mainly rural in character, set within a context of a variety of beautiful landscapes and townscapes. The attractiveness of these areas includes a rich historic heritage, a working countryside that includes small villages and hamlets supported by agriculture, horticulture and forestry. The countryside includes some of the very best productive agricultural land in the country and other notable features such as the upper reaches of the River Medway, and areas with rich and diverse wildlife habitats.
- 2.3 The borough stretches to the north to include areas of Walderslade and the Kent Downs National Landscape, to Tonbridge in the south which also includes areas of the High Weald National Landscape. The borough also extends from the historic village of Ightham in the west, to settlements in the Medway Valley in the east, including Aylesford.



Figure 1 – Tonbridge and Malling and adjacent neighbouring authorities

Draft Spatial Strategy

- 2.4 The spatial strategy sets out the overarching framework for the distribution of development for the Local Plan period between 2024 to 2042. It takes into account national planning policy, supporting the delivery of sustainable growth and seeks to deliver the Local Plan vision and objectives, meet local needs and priorities as well as deliver the quantum of growth, as set by the Government's standard method for calculating housing need.
- 2.5 Tonbridge and Malling borough includes a diverse range of settlements over a varied geography, and our spatial strategy seeks to deliver patterns of sustainable growth, in a way that supports climate resilience, protects natural and historic assets, provides opportunities for regeneration and promotes inclusive and prosperous communities.
- 2.6 The spatial strategy also looks to protect the national landscape and its setting and protect the Metropolitan Green Belt, taking into account that we are unable to deliver our housing need without releasing some sites within the Green Belt. Key to the spatial strategy is ensuring that development is directed to the right places and at the right time, to ensure that the necessary infrastructure is in place to support both new and existing communities.
- 2.7 The draft spatial strategy seeks to allocate growth in and around our most sustainable towns and villages, where communities will have access to a wide range of services and facilities and sustainable transport options to larger settlements. Growth in these areas will also support existing communities by bringing forward new or improved infrastructure and community services and facilities. In addition, our spatial strategy will also support smaller villages by providing some limited housing and employment growth. Policy SP1: Spatial Strategy sets this out in further detail, see pages 38-39 of the Local Plan.

Duty to Cooperate History

- 2.8 The preparation of this Local Plan follows the withdrawal of the Council's previous Local Plan from Examination. The resolution to withdraw the Local Plan 2019 was made at a Full Council meeting held on 13 July 2021. This was taken in accordance with the provisions of Section 22 of the Planning and Compulsory Purchase Act 2004, which provides for a local planning authority to withdraw a local development document at any time up to its adoption.
- 2.9 This decision followed the receipt of a report from the appointed Inspectors Louise Crosby and Luke Fleming in May 2021, regarding the Examination of the Plan. This concluded that the Duty to cooperate in Section 33A of the 2004 Act had not been met for reasons relating to unmet housing need in the previous Sevenoaks Local Plan, the timing of when this became known and the Council's lack of response to this prior to submitting the withdrawn Plan for Examination in January 2019.
- 2.10 The Inspectors concluded that whilst resolution to the problem of unmet housing needs was not a prerequisite to the Council being able to demonstrate compliance with the DtC, earlier, constructive, active and ongoing engagement, would have been much more likely to result in an effective strategy for meeting Sevenoaks District Council's (SDC) need, whether within their district or elsewhere. The Inspectors suggested future cooperation on the preparation of Green Belt and housing capacity evidence, to better understand the comparative quality and any potential to amend Green Belt boundaries across both districts, as well as how to maximise the capacity of suitable sites identified.
- 2.11 Both SDC and TMBC recommenced Plan making following the withdrawal of their previous Plans, and remain at a similar stage of preparation, both seeking to submit Plans for Examination by 12th December 2026. The Council has learnt from previous experience and taken the following steps to ensure compliance with the Duty.

- **Preparation of evidence** – Whilst Sevenoaks and Tonbridge and Malling have not commissioned joint evidence in preparing the new Local Plans there has been the following collaboration on key pieces of evidence to ensure that approaches and methodologies are aligned.
 - Green Belt Assessment – Both Councils have used consultants Arup to prepare their evidence, and collaboration took place between officers and the consultants to ensure that methodologies used are consistent. Both authorities also undertook engagement with all neighbouring authorities regarding methodologies used, which were amended following feedback received.
 - Transport Modelling – Both Councils have used the Kent Model to prepare VISUM modelling which is provided by consultants Jacobs in accordance with a KCC contract. Model validation work was informed by cross-boundary discussions and the provision of data provided by both authorities.

The Council recognises that there is further evidence to prepare in progressing its Local Plan towards Regulation 19 stage, in terms of preparing aligned urban capacity and density evidence. This will ensure that the best possible use is being made of site allocations identified as well as density optimisation given housing need and Green Belt release.

- **Duty to Cooperate meetings** – These have been ongoing with all neighbouring authority partners to support the plan making process since July 2021, including Members where this is considered helpful to support a shared understanding of key issues. Notes of all meetings are taken and agreed between officers.
- **Early and ongoing engagement** - The circumstances of adopted and emerging Local Plans amongst neighbouring authorities have progressed in recent years. Whilst SDC wrote to the Council in May 2024 seeking assistance with unmet need, to which the Council responded, it is understood that SDC are currently seeking to meet their objectively assessed needs in full over their new Plan period 2027-2042, including a housing target of 17,175 homes. The Council will respond to their latest Regulation 18 Local Plan consultation which is currently being consulted upon between 23 October and 11 December 2025.

Similarly, and ahead of a Member decision to progress the Tonbridge and Malling Local Regulation 18 consultation on 21 October 2025, the Council wrote to neighbouring authorities seeking assistance with unmet need in compliance with the NPPF and Planning Practice Guidance on 14 October 2025. Notwithstanding that the Council intends to meet its needs in full as outlined in the draft Plan, this step is a prerequisite in subsequently confirming the exceptional circumstances case for the release of Green Belt sites identified as allocations.

At the time of drafting this statement the Council was awaiting news from Gravesham Council regarding their spatial strategy and ability to meet their identified needs ahead of the publication of their Regulation 19 Local Plan.

Key Relationships

- 2.12 The following is a summary of key relationships which includes engagement with neighbouring Councils and other prescribed bodies, whom the Council has and continues to work with on strategic issues, in preparing the Local Plan.
- 2.13 **Kent County Council (upper tier)** – The County Council’s roles include the provision of the following services - education, highways, transport (home to school, concessionary fares and supported bus services), adult and youth social care, libraries, planning for minerals and waste, and managing surface water flooding. KCC Highways have been engaged at all stages in the preparation of transport modelling

evidence that has been published alongside the Local Plan.

- 2.14 Meetings have been held with other KCC teams to seek their views on the Local Plan spatial strategy, draft policies and site allocations, as well as to understand the impacts of the growth proposed upon key services. The feedback received is outlined in the detail provided in the Interim Infrastructure Delivery Plan (IDP) that has been published alongside the Local Plan.
- 2.15 **Gravesham, Sevenoaks, Tunbridge Wells, and Maidstone Councils (lower tier), in addition to Medway Council (unitary)** – Neighbouring local planning authorities also have responsibility for plan making in their areas, they too must comply with the Duty to Cooperate. Meetings continue to be held with neighbouring authorities to support Plan making, these include discussion of evidence preparation, spatial strategies and site allocations once these become known, cross-boundary sites and infrastructure requirements. Further detail regarding engagement with neighbouring and other authorities is provided at section 4.
- 2.16 **National Highways** - An executive non-departmental public body, National Highways operates and maintains England's motorways and major A-roads (the Strategic Road Network) to maintain and improve safety, reliability, and connectivity. Their activities include building and maintaining their road network and managing traffic flow through services including highway patrols and control centres. National Highways have been engaged at all stages in the preparation of transport modelling evidence that has been published alongside the Local Plan.
- 2.17 **Environment Agency** - An executive non-departmental public body. Within England the Environment Agency is responsible for regulating major industry and waste, treatment of contaminated land, water quality and resources fisheries, inland river, estuary and harbour navigations, conservation and ecology. They are also responsible for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea.
- 2.18 The Environment Agency has been engaged in the preparation of the level 1 Strategic Flood Risk Assessment that has been published alongside the Local Plan. This includes a Sequential Test methodology, which has been prepared in consultation with, and agreed by, the Environment Agency, Kent County Council (as Lead Local Flood Authority) and the Council. The Environment Agency were also consulted on the draft Sustainability Appraisal Scoping Report.
- 2.19 **Historic England** - An executive non-departmental public body. Historic England helps people care for, enjoy, and celebrate England's historic environment by championing places, protecting heritage, supporting change, and providing expert advice regarding heritage assets. Historic England have been engaged in the preparation of the Heritage Strategy that has been published alongside the Local Plan, they provided comments on draft which were taken into consideration in finalising the Strategy. Historic England were also consulted on the draft Sustainability Appraisal Scoping Report.
- 2.20 **Natural England** - An executive non-departmental public body. Natural England are the government's advisor for the natural environment in England, their purpose is to help conserve, enhance and manage the natural environment for the benefit of present and future generations, thereby contributing to sustainable development.
- 2.21 Natural England have been consulted by the Council on the draft Sustainability Appraisal Scoping and Habitats Regulations Assessment Scoping Reports. The Council received feedback on both reports and has taken this into consideration in finalising these and progressing related work.
- 2.22 Natural England have also been engaged in the preparation of landscape evidence that has been published alongside the Local Plan. They had opportunity to comment on the methodologies and scope of the following - Landscape Character Assessment, Landscape Sensitivity Assessment and Landscape and Visual Assessment. In addition, they had opportunity to provide initial comments on sites that are

now identified as draft allocations in the Local Plan, and draft policies. Officers have taken the feedback received into consideration in shaping draft allocations and policies in the Plan.

- 2.23 **Homes England** - An executive non-departmental public body. Homes England are the government's housing and regeneration agency. Together with partners, they work to accelerate the pace of house building and regeneration across the country.
- 2.24 The Council has worked with Homes England since October 2020 when Borough Green Gardens was confirmed as a project within the previous Conservative Government's Garden Communities Programme. Homes England has awarded the Council capacity funding to help prepare ambitious development proposals and to bring forward delivery (subject to the progression of the Local Plan). This programme remains active, and officers have continued to engage with Homes England to keep them updated regarding plan making. Subject to Local Plan progress officers will continue to liaise with Homes England to understand what ongoing support they can provide, to support the delivery of this site.
- 2.25 **Kent Nature Partnership** - Local Nature Partnerships (LNPs) are also prescribed in the regulations as bodies which local authorities 'should have regard to' given their role in the management of natural environmental assets, supporting biodiversity and, in identifying Nature Improvement Areas.
- 2.26 The Kent Nature Partnership (KNP) is a strategic body that was awarded Local Nature Partnership (LNP) status by the Government in 2012 to improve the county's natural environment. It works to create a healthy ecosystem that benefits biodiversity, people, and the economy by coordinating efforts across public, private, and voluntary organisations. The KNP's work is guided by its vision, strategy, and the Kent Biodiversity Strategy, which aims to restore habitats, protect species, and increase public engagement with nature.
- 2.27 As outlined in the Interim Infrastructure Delivery Plan, the Kent Local Nature Partnership has identified six Biodiversity Action Areas (BOAs) within Tonbridge and Malling. The BOAs will be replaced by Local Nature Recovery Strategy (LNRS) once this has been adopted by KCC. Officers have engaged with KCC to support the preparation of the LNRS and borough wide Green and Blue Infrastructure Strategy, which has been published as evidence alongside the Local Plan.

3. Strategic Planning Priorities

- 3.1 The Regulation 18 Stage 2 Local Plan includes the following 7 objectives.
- **OBJECTIVE 1** - Ensure development makes a significant contribution towards meeting long term emissions reduction goals of net zero by 2050, utilising land and materials efficiently and mitigating against and improving resilience to climate change in the borough.
 - **OBJECTIVE 2** - Protect and enhance our built and natural environment with new development ensuring high quality design including respecting our valued landscapes and historic environment and delivering net gains in biodiversity
 - **OBJECTIVE 3** - Provide sufficient numbers of homes, of a high quality, range and standard to meet our community's needs.
 - **OBJECTIVE 4** - Sustaining and providing excellent social infrastructure to support community health and well-being and incorporate design principles which will assist in improving access and community safety.
 - **OBJECTIVE 5** - Maintain a thriving economy with an enhanced range of premises in which businesses can grow and invest to support employment opportunities
 - **OBJECTIVE 6** - Support and improve the range of services and facilities within our town and village centres to increase footfall and to meet growing and changing community and visitor needs, keeping valued centres occupied and vibrant.
 - **OBJECTIVE 7** - Prioritise sustainable transport and active travel options alongside the timely delivery of required physical and digital infrastructure to support growth.
- 3.2 The following strategic planning priorities are linked to the above objectives. The summaries provided for each identify the key policy issues that have been addressed to achieve the related objective(s) and any cross-boundary or partnership working that has taken place to support this.
- 3.3 **Climate Change** - Chapter 6 of the draft Local Plan outlines the Council's approach to tackling climate change. The NPPF is clear that the planning system should support the transition to net zero by 2050 and should help to shape places in ways that contribute to radical reductions in greenhouse gases. The council has declared a climate change emergency and is committed to working towards a carbon neutral borough over the lifetime of this Plan. The Council is ambitious in seeking to meet its climate change objective and be a net-zero carbon borough as soon as possible.
- 3.4 To inform the Local Plan, the Council has undertaken a Climate Change Policy Support Review, this has been published as evidence alongside the Local Plan. This includes 32 policy recommendations which cover a broad range of related issues, these were discussed with the Council's climate change officer and incorporated into relevant policies in the climate change chapter of the Local Plan.
- 3.5 These policies are aimed at supporting the national transition to net zero, while also advancing the Council's own local climate objectives, and include.
- Policy CC1: Addressing Climate Change
 - Policy CC2: Circular Economy
 - Policy CC3: Sustainable Design and Construction
 - Policy CC4: Energy & Heating
 - Policy CC5: Renewable and Low Carbon and Heat Projects
 - Policy CC6: Water Efficiency
 - Policy CC7: Managing Development Within Flood Risk Areas

- Policy CC8: Sustainable Drainage Systems (SuDS)

- 3.6 Outcomes relating to these policies will be monitored through the Authority Monitoring Report (AMR) and will also be monitored through the related review of the Council's Climate Change Strategy and Action Plan. Achieving net zero is a cross-boundary matter the pursuit of which is overseen by the Council's Climate Change Forum. This is attended by representatives from a wide variety of organisations which include, public, private, voluntary sectors as well as faith, community and other groups. Further details about the Forum can be found on the [Council's website](#).
- 3.7 **Natural Environment** – Chapter 7 of the Local Plan identifies that Tonbridge and Malling has a predominantly rural character. With a diverse natural environment including internationally, nationally and locally protected wildlife sites, areas of rare habitats that support protected and priority species, swathes of woodland including ancient woodlands and veteran trees, as well as the River Medway, the River Bourne and their tributaries that support fresh and intertidal habitats.
- 3.8 Furthermore, the borough's natural environment provides a diverse range of benefits to people, nature and the economy. It supports the health and wellbeing of residents and visitors, biodiversity, food and energy production, flood control, climate change mitigation and adaptation, pollution and much more.
- 3.9 The natural environment chapter of the Plan covers a range of issues including landscape and biodiversity. A range of evidence has been prepared to inform the policies in this chapter; this includes the following.
- Green Belt Assessment (2025)
 - Landscape Character Assessment (2025)
 - Landscape Sensitivity Assessment (2025)
 - Landscape Visual Appraisal (2025)
 - Green Gap Study (2025)
 - Green and Blue Infrastructure Study (2024)
- 3.10 The preparation of this evidence has required engagement with a range of stakeholders including Natural England and the National Landscape units. The evidence has informed policies in chapter 7 of the Local Plan which include.
- Policy NE3: Landscape Character
 - Policy NE4: Designated Sites, Irreplaceable Habitat and Priority Habitat and Species
 - Policy NE5: Biodiversity Net Gain (BNG)
 - Policy NE6: Green and Blue Infrastructure
 - Policy NE7: Woodland, Trees and Hedgerows
 - Policy NE8: Best and Most Versatile Agricultural Land
 - Policy NE9: Noise, Vibration and Odour
 - Policy NE10: Air Quality
 - Policy NE11: Ground Contamination
 - Policy NE12: Light Pollution

Outcomes relating to these policies will be monitored through the Authority Monitoring Report (AMR).

- 3.11 **Historic Environment** – Chapter 8 of the Local Plan confirms that Tonbridge and Malling boasts a rich and varied historic environment, offering a unique sense of place and a distinctive character shaped by its diverse heritage. Heritage assets (whether designated or non-designated) are an irreplaceable resource, providing a valuable contribution to the social and economic wellbeing of residents and visitors. Furthermore, all heritage assets, whether designated or not, form a material consideration in the planning process.
- 3.12 The NPPF advises that heritage assets should be conserved in a manner appropriate to their significance so that they can be enjoyed by both existing and future generations. Significance is defined as an asset's

heritage interest, whether archaeological, architectural, artistic or historic, and may be derived from both the asset and its setting.

3.13 The Council has prepared a Heritage Strategy (2024), which provides an evidence-based vision that informs and supports the Local Plan, and which sets out in detail the heritage assets within the borough. Designated heritage assets include Listed Buildings, Scheduled Ancient Monuments, Registered Parks and Gardens and Conservation Areas. The borough also has a significant number of non-designated heritage assets.

3.14 The evidence prepared has informed the following policies.

- Policy HE1: The Historic Environment
- Policy HE2: Listed Buildings
- Policy HE3: Conservation Areas
- Policy HE5: Archaeology
- Policy HE6:
- Enabling Development for Heritage Assets

Outcomes relating to these policies will be monitored through the Authority Monitoring Report (AMR).

3.15 **High Quality Design** - Chapter 9 of the Local Plan identifies that good design is essential to delivering sustainable development. It enhances quality of life, improves perceptions of place, and supports environmental and economic benefits.

3.16 The NPPF attaches great importance to creating better places in which to live and work by achieving inclusive and beautiful design and sets out how this can be achieved through both plan-making as well as through the evolution and assessment of individual proposals. This Plan provides draft site allocations, the design of which will be critical in creating vibrant, safe and functional communities with a distinctive sense of place that respect their local context. A key objective of the Plan therefore is to ensure that all future development is designed with quality at its heart. The borough also has a rich and diverse urban and rural environment, containing many established and attractive places and buildings with distinctive architecture worthy of protection and enhancement.

3.17 The Plan seeks to ensure that new buildings and spaces complement the rich character of the borough and create inclusive, attractive and healthy places which reinforce local distinctiveness. Furthermore, well-designed places can promote economic benefits including reduced heating bills, and in environmental terms, the use of sustainable materials can reduce the effects of climate change, with appropriate planting increasing biodiversity levels on site and in the surroundings.

3.18 The Council has not yet prepared specific design evidence but has sought to take a good practice approach in drafting the following policies.

- Policy D1: Achieving High Quality Design
- Policy D2: Design Codes and Masterplans

3.19 Outcomes relating to these policies will be monitored through the Authority Monitoring Report (AMR). In progressing towards Regulation 19 stage, the Council intends to prepare a Character and Density Study, the outcomes of which will be used to inform a further review of these and other related policies and assumptions in the Local Plan e.g. the capacity of identified site allocations.

3.20 **Housing Provision** - Housing is identified at chapter 10 as being central to the Local Plan's vision to ensure that the borough is a place where all residents can access good quality, affordable homes that meet their needs, whether renting or buying. The Local Plan plays a vital role in delivering this vision by setting out a framework for sustainable housing growth and in doing so it is important that the development that comes forward responds to local needs, supports community wellbeing, and aligns with national planning policy.

- 3.21 The Council has prepared a range of evidence to inform the housing policies in the Local Plan including.
- Strategic Housing Market Assessment
 - Interim Land Availability Assessment Conclusions
 - Housing Market Delivery Study
- 3.22 There are a range of housing challenges within the borough, including affordability pressures, an ageing population, and the need to improve the condition and energy efficiency of existing homes. The Council's Housing Strategy identifies four key priorities that underpin the approach to housing. These include - Making best use of existing homes, improving housing quality and sustainability - Improving housing options and opportunities to prevent homelessness - Delivering the homes our residents need in the places they are needed, and - Working in partnership to achieve shared housing goals.
- 3.23 Chapter 6 supports the delivery of these priorities by setting out policies to guide the location, type, tenure, and design of new homes, ensuring development contributes to inclusive, resilient, and environmentally sustainable communities. It also promotes housing that supports independent living, meets the needs of vulnerable groups, and contributes to the borough's wider strategic objectives, including those in the Council's Corporate Strategy. These policies include.
- Policy H1: Housing to Address Needs
 - Policy H2: Affordable Housing
 - Policy H3: Build-to-Rent
 - Policy H4: Gypsy, Traveller and Travelling Showpeople – Safeguarding Sites
 - Policy H5: Gypsy, Traveller and Travelling Showpeople – Site Criteria
 - Policy H6: Specialist Housing to Meet the Needs of Older and Vulnerable People
 - Policy H7: Accessible and Adaptable Homes
 - Policy H8: Self and Custom Build Housing
 - Policy H9: Houses in Multiple Occupation
 - Policy H10: Residential Extensions, Alterations, Annexes and Ancillary Accommodation
- 3.24 Outcomes relating to these policies will be monitored through the Authority Monitoring Report (AMR). Housing supply and delivery is a strategic issue of cross-boundary significance in terms of the DtC and is a standing matter of discussion with neighbouring authorities with whom the Council shares housing market areas, as defined in the evidence.
- 3.25 **Employment Provision** – Chapter 11 of the Local Plan sets out the strategy for supporting economic development and employment growth in the borough. This supports sustainable economic growth that meets the needs of local businesses, residents and future generations. This includes ensuring a sufficient supply of employment land, supporting town centre vitality, enabling rural enterprise, and responding to the challenges and opportunities presented by technological change, climate adaptation, and the transition to a low-carbon economy.
- 3.26 The economy policies within this chapter have been informed by the Tonbridge and Malling Economy Study (2025), which provides a comprehensive assessment of employment land supply and demand, commercial property market signals, and sector growth opportunities. The Study updates the 2022 Economic Development Needs Study and forms part of the Local Plan evidence base.
- 3.27 The economy policies in the chapter include.
- Policy E1: Supporting a Prosperous, Inclusive and Sustainable Economic Future
 - Policy E2: Strategic Employment Areas
 - Policy E3: Other Employment Sites, Premises and Floorspace
 - Policy E4: Employment and Skills
- 3.28 Outcomes relating to these policies will be monitored through the Authority Monitoring Report (AMR). Employment land supply and delivery is a strategic issue of cross-boundary significance in terms of the

DtC and is a standing matter of discussion with neighbouring authorities with whom the Council shares functional economic market areas, as defined in the evidence.

- 3.29 **Town Centres** – Chapter 11 of the Local Plan also covers town centre issues. It sets out the strategy for how our town, district and local centres can develop, as well as where new town centre uses should be brought forward. High streets are the beating hearts of our towns and villages, and maintaining and enhancing the vibrancy and vitality of our centres will be important to ensure that they continue to play a positive and important role in our local economy as well as ensuring that our centres meet the needs of local residents.
- 3.30 The town centres policies within this chapter have been informed by the Tonbridge and Malling Retail and Town Centres Needs Study (2025), which provides a comprehensive assessment of existing retail centres, market signals, and sector growth opportunities.
- 3.31 The town centres policies in the chapter include the following, outcomes relating to these will be monitored through the Authority Monitoring Report (AMR).
- Policy E5: Supporting the Vitality of Town, Service and Local Centres
 - Policy E6: Primary Shopping Areas
 - Policy E7: Above Ground Floorspace
 - Policy E8: Sequential and Local Impact Tests
- 3.32 **Infrastructure Delivery** – The Local Plan acknowledges at chapter 13 the importance of growth and development being accompanied by required transport and other infrastructure, to ensure that new communities become thriving places that are well integrated with existing settlements. The provision of infrastructure in the right location, at the right scale and at the right time, is therefore essential and includes both physical infrastructure and well as social and community facilities.
- 3.33 The infrastructure policies include in the chapter include the following.
- Policy INF1: Provision of Infrastructure and Services
 - Policy INF2: Sustainable Transport and Active Travel
 - Policy INF3: Parking
 - Policy INF4: Community Facilities
 - Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision
- 3.34 Topic specific evidence has been prepared to inform the infrastructure policies; this includes the following which have been published alongside the Local Plan.
- Active Travel Strategy
 - Indoor Sports Facilities Strategy
 - Open Space Study
 - Playing Pitch and Outdoor Sports Facilities Strategy
- 3.35 The Interim Infrastructure Delivery Plan has been prepared to accompany the Regulation 18 Stage 2 Local Plan, to support the achievement of the above policies. It provides an overview of the type, location and scale of new infrastructure that has currently been identified to support the new development proposed. The review of existing, proposed and additional infrastructure is ongoing, and further updates will be included in the IDP at Regulation 19 stage. Where additional infrastructure is required to support developments, the objective is to secure this as part of or alongside the delivery of sites, and phase this in such a way that provision meets expected growth in a timely manner.
- 3.36 Once the new Local Plan has been adopted, the IDP will be reviewed annually and as new or updated evidence and requirements become known. In accordance with the DtC, the Council will continue to have discussions with infrastructure and service providers as the Local Plan progresses through Regulation 19 and Examination stages, and beyond. The delivery of required transport infrastructure will be kept under review through a 'monitor and manage' approach, involving

stakeholders including Kent County Council and National Highways.

3.37 **Strategic Sites** – Draft housing and employment site allocations are identified in the Local Plan, the delivery of which is crucial to the achievement of related objectives. Strategic sites in particular require ongoing partnership work due to their complexity, to demonstrate deliverability. So far, the progression of several sites has required engagement with Kent County Council, National Highways, Homes England and other partners. The following is a summary of the current position in relation to the most prominent of these, which are at various stages in terms of promotion through the Local Plan and development management processes.

- **Ref AY1 - Land at Aylesford Lakes, Aylesford (800 dwellings)** – Pre-application discussions have progressed regarding this site which have included KCC. To support the delivery of this site a proposed link road between Bull Lane, Eccles and Rochester Road, Aylesford has been identified in the Interim IDP, the design of which will be subject to detailed masterplanning.
- **Ref MG3 - Land at Bunyards, Beaver Road, Allington (435 dwellings)** – This site is currently the subject of a live planning application (22/00409/OAEA). Due to the location of the site, its boundary crosses the borough boundary with Maidstone in the vicinity of the proposed site access. As such specific development management led consultation has been undertaken with Maidstone Borough Council as well as KCC, National Highways, Network Rail, the Kent and Medway ICB, and other partners in progressing the outline application.
- **Ref MG 4 - Land East of Kiln Barn Road and West of Hermitage Lane, Aylesford (1300 dwellings)** - This site is currently the subject of a live planning application (24/00372/PA). Specific development management led consultation has been undertaken with KCC, National Highways, Network Rail, the Kent and Medway ICB, and other partners in progressing the outline application.
- **Ref BG1 - Land North of Borough Green, Sevenoaks (3000 dwellings)** – As explained at paragraph 2.23, the Council has worked with Homes England since October 2020 when Borough Green Gardens was confirmed as a project within the previous Conservative Government’s Garden Communities Programme. Homes England has awarded the Council capacity funding to help prepare ambitious development proposals and to bring forward delivery (subject to the progression of the Local Plan).

Previously governance arrangements were established to co-ordinate activity between the landowners, appointed consultants, Homes England, KCC Highways, KCC Minerals and Waste, Natural England, the Kent and Medway ICB and other partners, these were paused following the withdrawal of the previous Local Plan in 2021. Subject to Local Plan progress officers will resume project governance arrangements to complete work to demonstrate deliverability of this site, which includes the preparation of a development brief and relief road feasibility. Homes England remain engaged with this work.

- **Ref KH1 - Land at Broadwater Farm, Kings Hill, West Malling (900 dwellings)** – This site is the subject of a previously withdrawn planning application (21/02719/OAEA). The application was withdrawn for reasons including impact upon the New Barns and Broadwater Farm conservation area and the lack of a secondary vehicular access from Kings Hill. Prescribed bodies and partners were engaged in the application process including KCC, Historic England and the Kent and Medway ICB. It is expected that the issues identified previously are addressed to the satisfaction of the Council in any future planning application(s) for the site.
- **Ref SN1 - Land North of Holborough Lakes, Snodland (1300 dwellings)** – The northern boundary of this site abuts the borough boundary with Medway. Landowners are also promoting an adjacent parcel of land to the north of the site through the Medway Local Plan 2041. Medway Council have assessed this site identified as (CHR4 North of Snodland and West of Halling) in their Land

Availability Assessment and Sustainability Appraisal as unsuitable, due to factors including the potential coalescence between settlements. The delivery of development north of Holborough Lakes is subject to ongoing DtC discussion with Medway Council in terms of understanding potential impacts.

- **Ref E9 - Land West of Rochester Airport, Rochester (14,000sqm floorspace)** – This site comprises part of Innovation Park Medway, a strategic employment site which spans the borough boundary with Medway. Both Medway Council and [TMBC have adopted a Local Development Order \(LDO\)](#) to support the delivery of this site. Officers understand following DtC discussions, that the LDO has been too inflexible in supporting development on the site, as such Medway Council are seeking to revoke this, the new Medway Local Plan being an appropriate alternative policy vehicle given the timing of this.
- Medway Council recently consulted on their Reg 19 Local Plan and are aiming to submit this to the Secretary of State (SofS) in November 2025 for Examination. The draft Plan includes the allocation of IPM under policy SA14: Employment Sites, identifying this to deliver B2 - 11,248 sqm and EG(iii) - 21,000 sqm, between years 1-10 of the plan period. In preparation for the anticipated revocation of the LDO which is being led by Medway Council, TMBC has agreed to include an allocation for the part of Innovation Park Medway that falls within the borough as identified above.

3.38 In progressing discussions regarding the above and other site allocations identified in the Local Plan, officers will continue to engage with neighbouring Councils, prescribed bodies, landowners, agents and other partners as necessary to progress related work and activity to support these.

4. Meeting the Duty to Cooperate

- 4.1. To demonstrate effective and on-going joint working, it is good practice for local authorities to keep an accurate record of meetings undertaken with neighbouring authorities and other bodies. These will inform the preparation of statements of common ground that will be published at Regulation 19 stage, which will document the cross-boundary matters identified and progress made in cooperating to address these. It should be noted that the Duty to Cooperate is not a Duty to agree. Should there be differences of opinion or position between parties, these will also be recorded in the statements of common ground.
- 4.2. A DtC record of engagement is included at Annex 1, this provides a summary of contact between TMBC, neighbouring authorities and other prescribed bodies from July 2021, the point at which the Council recommenced plan making. It is not intended to be an exhaustive list of all engagement and partnership work that has been undertaken. Annex 2 sets out a full list of organisations which have and will play a role in informing the policies and other content in the Local Plan and related documents, including the Infrastructure Delivery Plan.

Cooperation Between Adjacent Authorities

- 4.3. The tables below provide a summary of the current strategic planning position regarding each adjacent local authorities and other authorities. These provide a summary of engagement and any known cross-boundary matters. All neighbouring and other authorities prescribed, and other public bodies will be invited to respond to the TMBC Local Plan Regulation 18 Stage 2 consultation. Further DtC meetings will be arranged by officers as required.

Planning Authority	Current Local Plan Status	Comments
Kent County Council	The Kent Minerals and Waste Local Plan 2024 to 2039 was adopted on 13 March 2025.	TMBC engaged in the preparation of the Kent Minerals and Waste Local Plan, providing comments in response to published consultations. The Council also engaged in discussions and provided a response to consultation on the Kent Local Transport Plan 5, which was adopted by KCC in December 2024. Regular DtC meetings have been held with KCC throughout the preparation of the Tonbridge and Malling Local Plan. These have included half yearly district liaison meetings to which service leads across KCC attend, as well as additional meetings scheduled to support Local Plan progress and to consider related infrastructure and service delivery implications. In addition, - Fortnightly meetings are scheduled with lead highways officers to support the preparation of transport modelling and other transport evidence. - Monthly meetings of the Kent Planning Policy Forum as chaired by KCC and are attended by planning policy managers and other team leaders/principal officers representing Kent districts and boroughs, to discuss planning policy, plan making and other related issues. - Quarterly meetings are scheduled with highways major projects, active travel and other officer leads to discuss progress regarding the funding and delivery of highways and active travel schemes.

		• A TMBC officer engages in the quarterly Kent Bus Services Improvement Plan Enhanced Partnership meetings for West Kent, which are led by KCC. Meetings were held with KCC during August and September 2025 specifically to discuss the emerging Local Plan spatial strategy, site allocations, draft Local Plan policies and infrastructure requirements with KCC service leads. Feedback received was taken into consideration in the drafting of the Interim IDP.
Gravesham Borough Council	Preparing a Local Plan review. The Regulation 18 stage 2 consultation closed in December 2020. The Regulation 19 consultation is awaited before the end of 2025.	TMBC responded to the Gravesham Regulation 18 stage 2 consultation in December 2020. Based on the development needs as well as the location and distribution of potential development set out in the consultation, it was not considered that there would be significant cross-boundary impacts upon Tonbridge and Malling. Concern was however expressed regarding the potential expansion and infilling of villages including Meopham, which could contribute towards growth in traffic on local roads, particularly the A227. In addition to potential impacts upon the Kent Downs National Landscape and North Downs Woodland SAC. Tonbridge and Malling do not share a housing market area with Gravesham, as such it is less likely to be asked to assist Gravesham should it be unable to fully meet its housing need. Detail of Gravesham Borough Council's Local Plan spatial strategy and site allocations was awaited at the time of drafting this statement. The most recent DTC meeting with Gravesham BC was held on 19th September, to discuss the Tonbridge and Malling Local Plan spatial strategy and site allocations. TMBC wrote to Gravesham Borough Council in October 2025 seeking assistance with unmet needs, a response is due in November 2025.
Maidstone Borough Council	The appointed Inspector's Final Report on the new Maidstone Local Plan was delivered to the Council on 8 March 2024; this signified the formal closure of their Examination. The Maidstone Borough Local Plan Review 2021-2038 was adopted on 20 March 2024.	TMBC responded to the Inspector's consultation in February 2024 on some additional technical documents, including an M2 Junction 3 Transport Assessment. In doing so the Council expressed concern regarding the scheme of mitigation proposed by MBC for the junction, requesting that officers be included in further discussions by MBC regarding this matter. There are known junction capacity issues at these linked junctions which have cross-boundary significance. TMBC is supporting a more substantial scheme for Blue Bell Hill, including M2 junction upgrades that is being pursued by KCC. This is identified in the Interim IDP and is subject to a 'Large Local Major Schemes' funding bid to the DfT. Both Councils continue to liaise on cross-boundary matters relating to the progression of respective Local Plans, these matters include. • Delivery of strategic and other cross-boundary sites. • Infrastructure delivery matters which include junction improvement schemes and primary care facilities that have cross-boundary relevance as identified in the Interim IDP.

		Gypsy and traveller need relating to the ongoing preparation of the Maidstone Gypsy and traveller Supplementary Planning Document. The most recent DtC meeting with Maidstone BC was held on 8th September to discuss the Tonbridge and Malling Local Plan spatial strategy and site allocations. Known issues were discussed including the improvement of junctions including Fountain Lane/A26 and Mills Road/Hall Road/A20, further details are included in the Interim Infrastructure Delivery Plan regarding these. TMBC wrote to Maidstone Borough Council in October 2025 seeking assistance with unmet needs, a response is due in November 2025.
Medway Council	Preparing a new Local Plan, the Regulation 19 consultation for which closed on 11 August 2025. Submission of the Medway Local Plan to SofS is expected before the end of 2025.	Given the timing of Local Plan preparation, officers have previously agreed to collaborate once respective details regarding draft site allocations and evidence base documents are published. Medway Council are using the Kent VISUM transport model to undertake scenario and sensitivity testing. TMBC responded to Medway Council's Regulation 19 Local Plan consultation making representations which are summarised as follows. - Spatial Strategy – Support was expressed for the strategy proposed which is considered sound and legally compliant. - Employment Sites – Support was expressed for Policy SA14 Employment Sites including the allocation of Innovation Park Medway, which is considered sound and legally compliant. - Transport mitigation – Support was expressed for the monitor and manage approach towards transport mitigation identified at policy DM15. However, concern was expressed regarding the integration of active travel schemes in the Council's published Local Cycling and Walking Infrastructure Plan which were not identified in the Local Plan and IDP. This should be addressed to make to policy sound and to support delivery for related infrastructure. - M2 Jn3 and Blue Bell Hill – Concern was expressed that the Local Plan does not make Medway Council's position clear regarding support for the improvement of this junction, and related Local Plan impacts. This should be addressed to make to Plan sound and to support delivery of this critical infrastructure. The most recent DtC meeting was held with Medway Council on 18th September to discuss the Council's response to the Medway Local Plan consultation, and the Tonbridge and Malling Local Plan spatial strategy and site allocations. Medway officers expressed concern regarding draft allocation SN1 - Land North of Holborough Lakes, Snodland for 1300 dwellings, in terms of the scale and location of development. The position regarding this is to be established in a Statement of Common Ground. TMBC wrote to Medway Council in October 2025 seeking assistance with unmet needs, a response is due in November 2025.

Tunbridge Wells Borough Council	Public consultation on Tunbridge Wells Borough Council's response to the Inspector's initial findings letter on the Examination of their new Local Plan was extended to 12 April 2024. Examination ongoing, Inspector's final report and adoption anticipated before end of 2025.	TMBC responded to the most recent Local Plan consultation in February 2024, supporting the reduction in the scale of proposed growth east of Paddock Wood by 1000 dwellings, and the deletion of the Tudeley Village allocation from the submitted Plan. Notwithstanding TMBC's support for the proposed policy changes, the Council remains concerned about the cross-boundary traffic impacts of growth upon the A228 north of Paddock Wood and the B2017 west of Paddock Wood, which links with the A26 at Woodgate Way, Tonbridge. Additional growth places further pressure upon the local road network which has been taken into consideration by officers and consultants, in preparing transport evidence to support the new Tonbridge and Malling Local Plan. The most recent DtC meeting with Tunbridge Wells BC was held on 11th September to discuss the Tonbridge and Malling Local Plan spatial strategy and site allocations, no specific concerns were raised by Tunbridge Wells officers. It is understood that once adopted an early review of the Tunbridge Wells Local Plan will be undertaken. Additional sites are likely to be required to meet updated housing and employment needs. TMBC wrote to Tunbridge Wells Borough Council in October 2025 seeking assistance with unmet needs. TWBC responded on 7th November confirming that the Tunbridge Wells Local Plan is due to be adopted in December 2025. It now has a reduced housing supply of approximately 10 years, due to the deletion of the Tudeley Garden Village allocation, and reduced growth at Paddock Wood and East Capel. TWBC has not therefore been able to meet its own housing need in full, and by implication is not able to assist TMBC is meeting any potential unmet needs.
Sevenoaks District Council	Preparing a new Local Plan. The Regulation 18 consultation closed in January 2024. The Regulation 18 Stage 2 consultation is due to commence on 23 October 2025.	Sevenoaks District Council (SDC) wrote to TMBC in May 2024 requesting assistance with unmet housing need of 3792 homes over their plan period to 2040. TMBC responded confirming that it was unlikely that the Council would be able to assist in accommodating some of this shortfall, due to constraints including Green Belt and National Landscapes. TMBC wrote to SDC in October 2025 seeking assistance with unmet needs a response is due in November 2025. TMBC responded to the Sevenoaks Local Plan Regulation 18 (part 2) consultation in December 2023. Support was expressed for development strategy options 2 and 3 as these either meet or exceed the projected need over the Local Plan period. Further clarity was requested regarding the spatial distribution of growth so that consideration could be given to any cross-boundary implications. Given the landscape constraints within Tonbridge and Malling especially within the west of the borough that is within the West Kent HMA (shared with Sevenoaks and Tunbridge Wells), it was expressed that TMBC was unlikely to be able to assist with any unmet need should this arise.

		TMBC and SDC have commissioned aligned Green Belt and transport evidence to support plan making. Officers most recently met on 29th September to discuss respective draft spatial strategies and site allocations. Both are currently seeking to fully meet objectively assessed housing and employment needs. Cross boundary issues discussed primarily related to traffic impacts upon the A25 and A20. Both authorities are using the Kent VISUM model which takes account of proposed growth in neighbouring authority areas. Further testing will be undertaken at Regulation 19 stage to confirm assumptions in published transport evidence.
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Cooperation Between Other Authorities

Planning Authority	Current Local Plan Status	Comments
Wealden District Council	The Wealden Core Strategy was adopted in 2013; this is being replaced. A Regulation 18 Local Plan Consultation took place between March and May 2024. A further Regulation 18 draft is due to be published late 2025.	Wealden District Council (WDC) wrote to TMBC in April 2024 requesting assistance with unmet housing and employment needs. TMBC responded 10 May 2024, informing that the Council anticipated that it would not be able to assist with the shortfalls identified, given known constraints. TMBC wrote to WDC in November 2025 seeking assistance with unmet needs. A response was awaited at the point of publishing this statement.
Bromley Council	The Bromley Local Plan was adopted in January 2019. This is being reviewed, and the Council's second Regulation 18 consultation took place between July and September 2025.	TMBC wrote to Bromley Council in November 2025 seeking assistance with unmet needs. A response was awaited at the point of publishing this statement.
Ashford Borough Council	The Ashford Local Plan 2030 was adopted in February 2019. The Council held a Regulation 18 consultation between August and October 2025 on their new Local Plan 2042.	TMBC wrote to Ashford Borough Council in November 2025 seeking assistance with unmet needs. A response was awaited at the point of publishing this statement.
Dartford Borough Council	The Dartford Local Plan 2037 was adopted in April 2024.	TMBC wrote to Dartford Borough Council in November 2025 seeking assistance with unmet needs. A response was awaited at the point of publishing this statement.

5. Cross Boundary Issues

- 5.1 The following issues are considered of strategic importance in terms of the Duty to Cooperate, a position on each is provided below. These will be closely monitored in terms of the development and delivery of the Tonbridge and Malling, and neighbouring authority Local Plans.
- 5.2 **Housing** - The Council continues to liaise closely with other authorities in discussions on meeting their objectively assessed housing needs, which may have cross boundary implications. Paragraph 27 of the 2024 NPPF advises in relation to matters which require collaboration, that “*b) unmet development needs from neighbouring areas are provided for in accordance with paragraph 11b*”. The planning practice guidance also advises that identifying housing market areas is appropriate to assist in preparing policies for meeting housing needs across local authority boundaries.
- 5.3 The Council’s Strategic Housing Market Assessment (SHMA) defines the relevant housing market areas. These include the ‘West Kent Housing Market Area’ (HMA), which also includes parts of Sevenoaks district, Tunbridge Wells borough and Maidstone borough, with further sub-areas also identified which include links with the Medway towns in the north of the borough. Given the cross-boundary interactions, ongoing consideration has been given to the housing need and supply situation in all neighbouring local authority areas.
- 5.4 As outlined at section 4, currently Wealden and Sevenoaks District Councils have requested assistance with unmet housing needs in preparing their Local Plans. Our understanding is that all neighbouring authorities who are currently preparing Local Plans, are seeking to meet their needs in full. Tunbridge Wells Borough Council is at a late stage of the examination process and was not able to meet its need in full but has committed to an early review post adoption. Maidstone Borough Council adopted its Local Plan in 2024 and has met its housing need in full.
- 5.5 From the detailed evidence base work we have undertaken to date, we consider that we are able to identify land in ‘non-Green Belt’ locations to deliver 11,910 new homes through allocations in the emerging Plan (4,756) and from existing commitments (5,242) and a windfall development allowance (1,870). Our objectively assessed housing need figure is to deliver 1,097 dwellings per year or 19,746 dwellings in the Plan period. This means that, before considering Green Belt release, we have a potential shortfall in housing supply of around 7,836 dwellings over the Plan period.
- 5.6 As set out in the draft Local Plan the Council is seeking to fully meet its housing need, to do so this will require the release of Green Belt sites. However, the Council is not currently able to identify a 20% buffer. To account for the risk that identified allocations in the draft plan become undeliverable, as a consequence of further testing and feasibility work in preparation for Regulation 19 or the general non-delivery or delayed delivery of sites. The Council will therefore continue to carefully consider the availability, suitability and deliverability of sites as it progresses plan making. The Council’s ‘call for sites’ remains open and we will consider any further sites submitted during the Regulation 18 stage 2 consultation. Given known constraints, it is unlikely that the Council will be able to accommodate any unmet housing needs arising elsewhere, however this will need to be tested further in preparation for Regulation 19.
- 5.7 **Gypsies and Travellers** - In relation to accommodation for Gypsies, Travellers and Travelling Showpeople, a needs assessment has been undertaken, which identifies a pitch need of 33 over the plan period in the borough. The Council expect to be able to meet the need identified through the regularisation of unauthorised pitches and intensification of permanently authorised pitches.
- 5.8 Maidstone Borough Council has identified a need for 529 Gypsy and Traveller pitches and 7 Travelling Showpersons plots over their plan period to 2040. TMBC made representations to MBC during their plan making process expressing concern in terms of the Council being able to meet these needs. Maidstone

Borough Council is preparing a separate Gypsy and Traveller Development Plan Document (DPD). We understand that the Regulation 18 consultation for this will commence shortly.. At the time of drafting this statement the Council had not received any requests from neighbouring authorities for assistance with Gypsy and Traveller needs.

- 5.9 **Economy** – The consideration of employment floorspace and land requirements are also an important cross-boundary matter, especially where unmet needs arise or where strategic sites have cross-boundary implications.
- 5.10 The Council has prepared economy evidence which has informed the Local Plan and related policies. This identifies that the borough is situated predominantly within the West Kent and Maidstone Functional Economic Market Areas. As such the borough shares important economic relationships which extend beyond the borough boundary with neighbouring Tunbridge Wells borough, Sevenoaks district and Maidstone borough. These relationships are reflected in commuting flows and demand for employment investment along key corridors including the M20.
- 5.11 In relation to employment need, our evidence suggests that we require 361,500 sqm of new employment space over the plan period. This includes a requirement to deliver 60,500 sqm of office space. Taking commitments into account, we need to allocate land to deliver 52,644 sqm of office space. Through allocations, we consider we can achieve 46,080 sqm of office space within ‘non green belt’ locations. In relation to B2/B8, our requirement is to deliver a minimum of 301,500 sqm. Taking into account existing commitments, we need to allocate a minimum of 12,467 sqm to achieve the ‘development trend’ employment scenario. However, this scenario is much lower than the labour supply scenario and given our housing need we would need to allocate 250,167 sqm of B2/B8 to achieve this.
- 5.12 In our Regulation 18 consultation, we are proposing to allocate 12,000 sqm in ‘non-Green Belt’ locations. This means that, before considering Green Belt release, we have a potential shortfall in land to meet our employment need over the Plan period. The Council is however seeking to fully meet its identified employment land and retail needs as outlined in the Local Plan, this will require the release of Green Belt sites in some areas as outlined. Given known constraints, it is unlikely that the Council will be able to accommodate any unmet employment needs arising elsewhere. The Council’s ‘call for sites’ however remains open and we will consider any further sites submitted once the Regulation 18 stage 2 consultation has closed.
- 5.13 The Council has worked closely with Medway Council regarding Innovation Park Medway (IPM), an employment site, part of which is situated within Tonbridge and Malling. Medway Council recently consulted on their Regulation 19 Local Plan, this includes the allocation of IPM under policy SA14: Employment Sites, identifying this to deliver B2 - 11,248 sqm and EG(iii) - 21,000 sqm, between years 1-10 of the plan period. We have allocated the part of IPM that falls within the borough in our draft Local Plan. Policy A1: Housing and Employment Allocations identifies the site (reference E9) to deliver B2 - 14,000sqm during our plan period. These allocations are expected to replace an existing Local Development order for the site that has been jointly adopted.
- 5.14 **Infrastructure** - There are known infrastructure issues which require cross boundary cooperation, these include the delivery of new primary and community health care facilities, secondary education provision, local highway and transport improvement schemes.
- 5.15 In preparing the Interim Infrastructure Delivery Plan (IDP), relevant infrastructure and service providers have been engaged through the sharing of information about the draft spatial strategy and strategic sites, with related meetings held to discuss requirements. Full details of this engagement are set out in the IDP and delivery schedules, which provide information regarding currently defined infrastructure requirements across the borough over the plan period.
- 5.16 In recent years there has been a particular focus in progressing high priority requirements with partners,

these include.

- A229 Blue Bell Hill Junction and Road Improvements - Regular and ongoing meetings are held with KCC Highways, National Highways and other neighbouring authorities on this £250m cross-boundary scheme, to support the preparation of the business case and feasibility work.
- Primary and Community Care Provision – Regular and ongoing meetings are held with the Kent and Medway Integrated Care Board, Maidstone and Tunbridge Wells NHS Trust and NHS England to discuss current and future facilities requirements. Partners are seeking to work together to enable the delivery of new facilities across the borough which has proven to be challenging, in terms of coordinating capital funding and site availability.

6. Next Steps

- 6.1 The Council will continue to engage with neighbouring authorities and prescribed bodies as it progresses plan making. A proforma is provided at Annex 3, this will be used to summarise related strategic planning issues that are confirmed and/or newly identified by the Council in reviewing the Regulation 18 Stage 2 Local Plan consultation feedback. This annex will be completed when this statement is updated at Regulation 19 Stage and will be used to inform the preparation of Statements of Common Ground, that will be published at Regulation 19 stage.

Annex 1. Duty to Cooperate Record of Engagement

Duty to Cooperate record of meetings and engagement between Tonbridge and Malling Borough Council, other local authorities, and prescribed bodies regarding Local Plan matters. This record begins from July 2021 when the Council recommenced plan making and is not intended to be an exhaustive list of all of the engagement and partnership work that has been undertaken. Specific Duty to Cooperate meetings are held with neighbouring authorities, these are identified in bold in the schedule below. Where necessary notes of meetings are taken and agreed between attending parties and kept by the Council for future reference.

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
Kent County Council, Maidstone Borough Council and Medway Council	16.10.25	A229 Blue Bell Hill Improvement Scheme – Project Board.	Update provided by KCC officers regarding progress on the preparation of the business case and feasibility work for this project. This scheme remains unfunded and the DfT are only likely to fund up to 85% of the cost if business case is approved. Officers agreed to meet again to discuss potential for any strategic Local Plan sites to contribute towards the funding gap.
Sevenoaks District Council	29.09.25	Meeting to share Local Plan updates and discuss any cross-boundary matters.	The following were discussed regarding the Tonbridge and Malling Local Plan. • Evidence updates shared including Green Belt, Gypsy and Traveller and transport modelling. • Spatial strategy and site allocations • Cross boundary considerations • Traffic, highways and sustainable transport • Other infrastructure and service requirements It was agreed that further transport modelling was required to confirm potential impacts on the A20 and A25 cross-boundary and to identify any mitigation that may be required. East facing slips A21-M26 are identified as a project in LTP5 but are not currently funded. A West Kent SoCG format was agreed as a sensible approach.
Homes England	25.09.25	To provide an update on Local Plan progress in relation to Borough Green Gardens.	Homes England were informed of the timing of the Local Plan committees in October and proposed dates for public consultation on the Local Plan. The ongoing resourcing of Borough Green Gardens was discussed in terms of

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
			capacity funding, governance and ongoing support from Homes England.
Gravesham Borough Council	19.09.25	Meeting to share Local Plan updates and discuss any cross-boundary matters.	The following were discussed regarding the Tonbridge and Malling Local Plan. • Evidence updates • Spatial strategy and site allocations • Cross boundary considerations • Traffic, highways and sustainable transport • Other infrastructure and service requirements Gravesham officers agreed to share details of the Councils spatial strategy and site allocations as soon as this was known, so that any additional transport modelling commissioned can take account of any growth proposed at Meopham and other settlements north of Wrotham.
West Kent DTC meeting with Sevenoaks District Council and Tunbridge Wells Borough Council	10.09.25	Meeting to share Local Plan updates and discuss any cross-boundary matters.	Focus of discussion was on the anticipated Regulation 18 consultations for the Sevenoaks and Tonbridge and Malling Local Plans. SDC confirmed that their housing need was 1145pa or 17,175 over their 15-year plan period to 2042. Their employment need was 40,400sqm. Their proposed growth strategy focused on urban sites, PDL and grey belt in sustainable locations. They had just published their employment evidence and were shortly to publish their GTAA. Both authorities discussed their draft spatial strategies and site allocations, no site specific cross-boundary impacts were identified.
Tunbridge Wells Borough Council	11.09.25	Meeting to share Local Plan updates and discuss any cross-boundary matters.	The following were discussed regarding the Tonbridge and Malling Local Plan. • Evidence updates including Green Belt, Gypsy and Traveller and transport • Spatial strategy and site allocations • Cross boundary considerations • Traffic, highways and sustainable transport • Other infrastructure and service requirements

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
Medway Council	11.09.25	Meeting to share Local Plan updates and discuss any cross-boundary matters.	The following were discussed regarding the Tonbridge and Malling Local Plan. • Evidence updates including Green Belt, Gypsy and Traveller and transport • Spatial strategy and site allocations • Cross boundary considerations • Traffic, highways and sustainable transport • Other infrastructure and service requirements Both authorities agreed to draft an SoCG to for the Medway Local Plan, to cover known cross boundary issues outlined in this statement. In addition, Medway officers expressed concern regarding the allocation of housing north of Holborough in the Tonbridge and Malling Local Plan, due to potential landscape and highway impacts.
Kent County Council	11.09.25	Highway and active travel schemes progress meeting.	A quarterly meeting to discuss the progress of funded and committed projects as well as those which are not yet funded or committed. The latest position regarding highways and active travel schemes is outlined in the Interim Infrastructure Delivery Plan, where these relate to growth proposed in the Local Plan.
Network Rail	09.09.25	Meeting to discuss draft spatial strategy and site allocations, and to consider what additional stations improvements may be required to support this.	The list of station improvements identified in the Interim Infrastructure Delivery Plan were discussed and agreed with Network Rail at this meeting. Further feasibility work is required to confirm details including capital costs.
Maidstone Borough Council	08.09.25	Meeting to share Local Plan updates and discuss any cross-boundary matters.	The following were discussed regarding the Tonbridge and Malling Local Plan. • Evidence updates including Green Belt, Gypsy and Traveller and transport • Spatial strategy and site allocations that are close to our which straddle the borough boundary south of Aylesford. • Cross boundary considerations • Traffic, highways and sustainable transport • Other infrastructure and service requirements in particular the

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
			delivery of junction improvements at Mills Road/Hall Road/ A20 and Fountain Lane/A26. The current position on this is outlined in the Interim IDP.
Kent County Council and Tonbridge and Malling – Strategic Planning and Infrastructure Catch-up	20.08.25	Meeting with service leads to discuss Local Plan progress and related infrastructure and service requirements.	Having shared the draft Tonbridge and Malling spatial strategy and site allocation details in advance, this meeting was to discuss requirements arising. Having taken account of the feedback shared at the meeting and subsequently by email, the current position in terms of KCC infrastructure and service requirements is set out in the Interim IDP and delivery schedules. Draft Local Plan infrastructure policies were shared following the meeting for comment.
Medway Council	11.08.25	Representations submitted in response to the Medway Regulation 19 Local Plan consultation.	Representations submitted covered the following issues. • Support expressed for the Medway Local Plan spatial strategy. • Support expressed for the continued allocation of Innovation Park Medway, with commitment to ongoing partnership working regarding this. • Soundness concern expressed regarding the integration of active travel schemes in the Local Plan and IDP. • Soundness concern expressed regarding the potential impacts of growth upon Blue Bell Hill and its junctions.
Kent County Council and Tonbridge and Malling – Strategic Planning and Infrastructure Catch-up	01.08.25	Meeting with service leads to discuss Local Plan progress and related infrastructure and service requirements.	Having shared the data relating to high, medium and low growth scenarios tested, this meeting sought explore KCC infrastructure and service requirements. draft Tonbridge and Malling spatial strategy and site allocation details in advance, this meeting was to discuss requirements arising. Having taken account of the feedback share at the meeting and subsequently by email, the current position in terms of KCC infrastructure and service requirements is set of in the Interim IDP and delivery schedules.
Medway Council	31.07.25	Meeting to discuss draft Statement of Common Ground in	A meeting to discuss the scope of a combined SoCG with all neighbouring authorities and prescribed bodies.

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
		relation to the Medway Local Plan.	Medway were drafting this for partner review following the close of Medway's Regulation 19 consultation.
Kent County Council, Maidstone Borough Council and Medway Council	17.07.25	A229 Blue Bell Hill Improvement Scheme – Project Board.	Update provided by KCC officers regarding progress on the preparation of the business case and feasibility work for this project. Actions agreed that are relevant to TMBC. • Share data to inform uncertainty log. • Share Local Plan transport modelling scenarios data. Updates on this project and related technical survey work is being published online .
Natural England	23.06.25	Meeting to discuss Local Plan including emerging policies, spatial strategy and evidence.	Officers provided an update on the Local Plan, including increase in objectively assessed needs and a new plan period of 2024-2042. Transport, Green Belt, and landscape evidence was discussed. Sites that are partly within the Kent Downs National Landscape and its setting were discussed. Draft Local Plan Natural Environment policies were shared in advance of the meeting for comment.
Medway Council	11.06.25	Meeting to share Local Plan updates and discuss any cross-boundary matters.	Meeting to discuss progression of Local Plans and related evidence. Preparation of transport modelling work discussed as Medway were now using the Kent Visum model. Impacts upon M2 junctions discussed, including Jn 2 - A228 and Jn3 – A229. Medway to publish modelling evidence once their Regulation 19 consultation goes live.
Kent County Council	15.05.25	Highway and active travel schemes progress meeting.	A quarterly meeting to discuss the progress of funded and committed projects as well as those which are not yet funded or committed. The latest position regarding highways and active travel schemes is outlined in the Interim Infrastructure Delivery Plan, where these relate to growth proposed in the Local Plan.
West Kent DTC meeting with Sevenoaks District Council and Tunbridge Wells Borough Council	14.05.25	Meeting to share Local Plan updates and discuss any cross-boundary matters.	TWBC provided an update on their Local Plan examination having completed consultation on main modifications. Tunbridge Wells town centre plan was progressing towards Regulation 18 consultation. SDC provided an update on their Local Plan having completed a further call for

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
			sites. Depending on options taken forward there may be some unmet housing need. Evidence base preparation was ongoing. TMBC provided a Local Plan update. Call for Sites concluded at end of March and options are being tested. Evidence base preparation was ongoing.
Kent County Council, Maidstone Borough Council and Medway Council	24.04.25	A229 Blue Bell Hill Improvement Scheme – Project Board.	Progress update provided regarding detailed design and feasibility work for this project.
Medway Council, Kent County Council and National Highways	21.03.25	Medway Local Plan Traffic Modelling Update.	A meeting of partners to discuss the progression of transport modelling work to support the Medway Local Plan. Kent model assumptions, scenarios and known key issues discussed.
West Kent DtC meeting with Sevenoaks District Council and Tunbridge Wells Borough Council	26.02.25	Meeting to share Local Plan updates and discuss any cross-boundary matters.	TWBC provided an update on their Local Plan examination, preparing for main modifications consultation. Adoption was anticipated in May 2025. SDC provided an update on their Local Plan having agreed an updated LDS at cabinet on 13 Feb. Further Reg 18 consultation expected in autumn 2025. Evidence base preparation was ongoing. TMBC provided a Local Plan update. Reg 18 consultation was expected in October 2025, Reg 19 in Q2 in 2026 and then to submission in December 2026. Progressing policies currently and engaging with Members. Further call for site commencing 26 th Feb. Evidence base preparation was ongoing. Agreed subject to direction of Local Government reorganisation to include MBC in future meetings.
Kent County Council, Maidstone Borough Council and Medway Council	05.01.25	A229 Blue Bell Hill Improvement Scheme – Project Board.	Progress update provided regarding detailed design and feasibility work for this project.
Kent County Council	06.12.24	Highway and active travel schemes progress meeting.	A quarterly meeting to discuss the progress of funded and committed projects as well as those which are not yet funded or committed. The latest position regarding highways and active travel schemes is outlined in the Interim Infrastructure Delivery Plan,

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
			where these relate to growth proposed in the Local Plan.
West Kent DTC meeting with Sevenoaks District Council and Tunbridge Wells Borough Council	26.11.24	Meeting to share Local Plan updates and discuss any cross-boundary matters.	TWBC explained that they had been at examination since the end of 2021, they were now aiming for adoption before May 2025. TMBC were due to progress a second Regulation 18 consultation in Summer but paused due to new NPPF. New LDS in new year once new NPPF is finalised. SDC were meant to be at Regulation 19 this winter but won't now be the case due to new NPPF. Working on evidence base to move forwards once published.
Sevenoaks District Council	11.09.24	Meeting to share Local Plan updates and discuss any cross-boundary matters.	Both authorities had paused plan making pending publication of the new NPPF. Local Plan evidence base updates shared. • Uplift in housing target from new NPPF of 58% for Sevenoaks, this will require additional sites if need is to be met in full. • Sevenoaks meeting needs in full for G&T. Both authorities are using Arc4 to prepare G&T evidence to approaches are aligned. • Uplift in housing target from NPPF of 23% for Tonbridge and Malling, this will require additional sites if need is to be met in full. Work to progress Green Belt evidence would continue to be aligned.
Kent County Council	06.09.24	Highway and Active Travel schemes progress meeting.	A quarterly meeting to discuss the progress of funded and committed projects as well as those which are not yet funded or committed. The latest position regarding highways and active travel schemes is outlined in the Interim Infrastructure Delivery Plan, where these relate to growth proposed in the Local Plan.
Sevenoaks District Council	13.06.24	Meeting to share Local Plan updates and discuss any cross-boundary matters.	Both authorities shared updates on Local Plan progress covering housing, Gypsy and Traveller, employment, transport and natural environment evidence. Acknowledged that forthcoming general election on 4 July could have implications for Plan making if a change in government follows.

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
Homes England Catch-up	03.06.24	To provide an update on Local Plan progress in relation to Borough Green Gardens.	Local Plan progress discussed. All acknowledged that further partnership work was dependent upon the Local Plan moving forward with an allocation for the site. TMBC officers agreed to keep Homes England updated moving forward.
Sevenoaks District Council	22.05.24	Response to request from Wealden District Council dated 08.05.24 for assistance with unmet housing and need.	Written response submitted advising that TMBC was unlikely to be able to assist with unmet needs.
Wealden District Council	10.05.24	Response to request from Wealden District Council dated 25.04.24 for assistance with unmet housing and employment needs.	Written response submitted advising that TMBC was unlikely to be able to assist with unmet needs.
Medway Council	25.03.24	Meeting to share Local Plan updates and discuss any cross-boundary matters.	TMBC and Medway officers agreed to share and discuss evidence base studies once these were published.
Tunbridge Wells Borough Council	26.02.24	Consultation on proposed changes to the Tunbridge Wells Borough Local Plan (2020 - 2038) response to Examination Inspector's initial findings	Written response submitted. This supported the reduced scale of growth at Paddock Wood and deletion of Tudeley Village allocation from the submitted Plan. Ongoing concerns regarding cross boundary traffic arising from growth at Paddock Wood were outlined.
Maidstone Borough Council	12.02.24	Examination of the Maidstone Local Plan Review – Inspector additional consultation on technical documents 2024.	Written response submitted outlining concerns regarding proposed mitigation for M2 Junction 2.
Kent County Council and JBA consulting	09.01.24	Meeting to discuss TMBC's Strategic Flood Risk Assessment.	To discuss KCC response to the draft SFRA.
Kent County Council	04.01.24	Meeting to discuss SuDS and emerging policy in new Local Plan.	Discussed various aspects of the draft SFRA and surface water flooding, including new draft SuDS policy.

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
Sevenoaks District Council	13.12.23	Meeting (including portfolio holders) - To share Local Plan updates and discuss any cross-boundary matters.	The Sevenoaks Local Plan (Regulation 18) consultation was discussed, including growth options. TMBC agreed to provide a response to the consultation.
Gravesham Borough Council	08.12.23	Meeting to share Local Plan updates and discuss any cross-boundary matters.	Officers agreed to keep each other informed of evidence and cross-boundary matters, including landscape, highways and the impacts of Lower Thames Crossing.
Maidstone Borough Council	16.11.23	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Gypsy and Traveller issues were a focus. Maidstone was progressing separate Gypsy and Traveller DPD. TMBC Gypsy and Traveller Accommodation Assessment preparation was ongoing.
Tunbridge Wells Borough Council	07.11.23	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	TWBC provided an update on revised draft Tudeley and Paddock Wood strategic allocations, and cross-boundary implications upon Tonbridge and other communities.
Medway Council	16.10.23	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Local Plan updates shared, no actions agreed.
Sevenoaks District Council	12.10.23	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Emerging spatial strategies and evidence base work discussed, including Green Belt and transport modelling which were aligned.
Gravesham Borough Council	15.09.23	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Local Plan updates shared, no actions agreed.
Kent County Council	13.09.23	District liaison meeting with various service leads to discuss growth and emerging Local Plan infrastructure requirements.	Local Plan update shared by TMBC officers. Infrastructure and Service capacity issues were discussed covering, highways, education, flood risk and heritage.
Sevenoaks District Council, Tunbridge Wells Borough Council and JBA consulting	06.09.23	Meeting with West Kent districts to discuss TMBC's Strategic Flood Risk	Agreed with JBA to share, flood zone 2 and 3b modelling outputs as these become available.

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
		Assessment modelling.	
Tunbridge Wells Borough Council	24.08.23	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	TWBC officers provided update on work that was ongoing to address their Inspector's concerns re Tudeley and Paddock Wood allocations.
Maidstone Borough Council	02.08.23	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Progress on Local Plans was discussed including preparation of evidence with specific focus upon Gypsy & Traveller accommodation needs, highways and minerals and waste.
Kent County Council	20.07.23	Minerals Site Plan Regulation 18 consultation.	Written response submitted. Concerns outlined regarding the proposed new hard rock site at Oaken Wood and the impact upon the ancient woodland, ecology and biodiversity.
Maidstone Borough Council	17.07.23	To discuss the Kent Minerals Sites Plan Regulation 18 consultation.	A new hard rock site was proposed at Oaken Wood that straddles the borough boundary. Agreed that both authorities had significant concerns over the potential impacts, and their respective responses would reflect this.
Maidstone Borough Council	30.6.23	Meeting to discuss Maidstone's Design and Sustainability DPD.	Local Plan updates shared including timings of DPD Regulation 19 consultation. Integration of Local Plan policies with DPD discussed as well as TMBC's previous consultation comments.
Gravesham Borough Council	14.6.23	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Updates were provided regarding respective Local Plan timetables and evidence preparation. Timetable. Officers agreed to provide future updates regarding key evidence and potential cross-boundary matters, including transport modelling, Lower Thames Crossing, Green Belt and AONB impacts as well as Gypsy and Traveller needs.
Medway Council	12.6.23	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Updates shared on Local Plan progress, timetables, and evidence. Potential cross-boundary site discussed. Officers agreed to continue to liaise regarding matters including transport modelling and Lower Thames Crossing.
Maidstone Borough Council	26.5.23	Response to the Maidstone Borough Council, Design and Sustainability DPD –	Written response submitted.

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
		Regulation 18b preferred approach.	
West Kent including Sevenoaks District Council, Tunbridge Wells Borough Council	18.05.23	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	A joint West Kent officer update meeting following the May elections, covering Local Plan progress updates, evidence and infrastructure matters as well as changes to political representation.
Tunbridge Wells Borough Council	28.04.23	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	TWBC officers updated on work responding to their Examination Inspector's initial findings, this was ongoing including preparation of a Bus Study. TMBC Local Plan evidence preparation was ongoing, including transport modelling.
Tunbridge Wells Borough Council	27.04.23	Meeting to discuss TMBC's Strategic Flood Risk Assessment modelling.	Agreed to share the JBA SFRA fluvial flood risk modelling to Tunbridge Wells BC – for areas around Paddock Wood.
Maidstone Borough Council	17.04.23	Response to Regulation 18a Gypsy, Traveller & Travelling Show people consultation.	Written response submitted. This advised that TMBC were unlikely to be able to assist with unmet need.
Tunbridge Wells Borough Council	23.03.23	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	TWBC Local Plan update on work progressing to respond to Examination Inspector's initial findings, including transport modelling. Statement of Common Ground reviewed.
Maidstone Borough Council	07.03.23	Response to Maidstone's Local Plan Examination Inspectors Matters Issues and Question's.	Written response submitted. This covered the Inspectors matters, issues and questions on Matter 8 (Housing Delivery), Issue 3 (Provision for Gypsies, Travellers, Travelling Showpersons and households not seeking bricks and mortar homes)
Sevenoaks District Council	11.01.23	Response to The Sevenoaks District Council Local Plan Regulation 18 consultation & request for help with unmet need.	Written response provided. Advised SDC that TMBC was not able to assist owing to similar environmental constraints and market absorption rates.
Kent County Council, Tunbridge Wells Borough Council	16.12.22	Meeting to share Local Plan updates and discuss cross-boundary matters specifically relating to Tudeley Village.	Local Plan and evidence updates shared, relating to Tunbridge Wells Bus Study, transport modelling and active travel work.

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
Maidstone Borough Council	12.12.22	Response to the Maidstone Regulation 18 Design and Sustainability DPD consultation.	Written response submitted.
Maidstone Borough Council	08.12.22	Meeting to introduce Maidstone's Regulation 18 consultations on their Design and Sustainability and Gypsy and Traveller Development Plan Documents.	TMBC agreed to review and respond to the forthcoming consultations.
Sevenoaks District Council	08.12.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	SDC to write to TMBC requesting a response to the consultation and highlighting unmet need.
Tunbridge Wells Borough Council	06.12.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Update provided on TWBC Local Plan Examination and Inspector's initial findings, primarily in respect of Tudeley Village.
Kent County Council	30.11.22	KCC Minerals and Waste Local Plan Regulation 18 II consultation	Written response submitted covering - Local Plan timeline, vision, objectives, policies, sustainability appraisal, strategic flood risk assessment and safeguarding map.
West Kent including Sevenoaks District Council, Tunbridge Wells Borough Council	22.11.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Short presentation provided on Sevenoaks Local Plan Regulation 18 consultation, with updated provided on key sites and evidence preparation.
Maidstone Borough Council	04.11.22	Meeting (including portfolio holders) - To share Local Plan updates and discuss any cross-boundary matters.	Short presentation shared on TMBC Local Plan Regulation 18 Consultation. Update provided on Maidstone Local Plan Examination.
Sevenoaks District Council	02.11.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Ongoing Local Plan evidence work discussed, including viability, Green Belt, landscape, biodiversity, open space & play space, air quality, Habitats Regulations Assessment, Equality Impact Assessment.

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
Kent County Council	20.10.22	District liaison meeting with various service leads to discuss growth and emerging Local Plan infrastructure requirements.	Local Plan update shared by TMBC officers. Infrastructure and Service capacity issues were discussed covering, highways, education, flood risk and heritage.
Medway Council	10.10.22	Meeting (with members) this followed the officer meeting below.	Short presentation on TMBC Regulation 18 Consultation.
Medway Council	10.10.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Short presentation shared on TMBC Regulation 18 consultation. Update and timescales for Medway Council Local Plan work. Lower Thames Crossing DCO discussed.
Maidstone Borough Council	06.10.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Short presentation on TMBC Regulation 18 Consultation. Maidstone Local Plan Examination update. Maidstone advised on preparation of DPD's on Design and Sustainability and Gypsy and Travellers Flood Risk and water cycle matters discussed.
West Kent including Sevenoaks District Council, Tunbridge Wells Borough Council	04.10.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	TMBC to share list of their Local Plan evidence to be commissioned, in consideration of opportunity to joint commissioning. SDC identified that they will have a potential circa 6000 dwelling shortfall, however varying scenarios were being considered.
Gravesham Borough Council	29.09.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Short presentation on TMBC Regulation 18 consultation shared. Gravesham informed that TMBC would be engaged on their gypsy and traveller work when this is progressed.
West Kent including Sevenoaks District Council, Tunbridge Wells Borough Council	07.09.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Local Plan updates shared. Matters discussed – housing, Green Belt, transport, gypsy and traveller needs and TMBC Regulation 18 Local Plan Consultation.

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
West Kent including Sevenoaks District Council, Tunbridge Wells Borough Council	21.07.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Local Plan updates shared. Strategic matters discussed including – Green Belt, transport, gypsies and travellers and development in protected landscapes.
Maidstone Borough Council	18.05.22	Meeting with Maidstone to discuss TMBC's representations to their Local Plan Regulation 19 re Gypsies and Travellers.	Local Plan updates shared, no actions agreed.
West Kent including Sevenoaks District Council, Tunbridge Wells Borough Council	11.05.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Local Plan updates shared. Other matter discussed included requests for assistance with unmet need from other authorities, ability of authorities to meet their own needs and ensuring a consistent approach to exceptional circumstances for Greenbelt release and major development in national landscapes.
Medway Council	03.05.22	Meeting (including portfolio holders) - To share Local Plan updates and discuss any cross-boundary matters.	Discussed the following strategic issues, gypsy and traveller needs, economic development, infrastructure including Lower Thames Crossing, flood risk, air quality and future engagement.
Medway Council (meeting cut short and rearranged for 03.5.22).	19.04.22	Meeting (including portfolio holders) - To share Local Plan updates and discuss any cross-boundary matters.	Discussed strategic and cross boundary matters including housing sites and transport.
Maidstone Borough Council	29.03.22	Meeting (including portfolio holders) - To share Local Plan updates and discuss any cross-boundary matters.	Updates shared on matters including – housing. employment including retail, protected landscapes, biodiversity, air quality, flooding, highways, education and gypsy and traveller needs.
Maidstone Borough Council	28.03.22	Final agreement of Statement of Common Ground	SoCG signed 28.03.
Tunbridge Wells Borough Council	22.03.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Update on TWBC Local Plan and potential for unmet housing need in the West Kent Housing Market Area. Cross-boundary working on highways and flooding matters in relation to strategic sites.

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
Gravesham Borough Council	09.03.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Updates shared on matters including – housing and objectively assessed needs, development strategy and strategic sites, gypsies and travellers, employment including retail, gypsy and traveller needs, highways, flood risk and protected landscapes.
West Kent including Sevenoaks District Council, Tunbridge Wells Borough Council	21.02.22	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Local Plan updates shared on matters including – housing, employment including retail, Infrastructure, opportunities for commissioning joint evidence.
Kent County Council	09.02.22	Response to the Kent County Council Minerals and Waste Plan Regulation 18 Consultation.	Written response submitted. Comments related to, vision, objectives, policies and text, and the Sustainability Appraisal scoping report.
Sevenoaks District Council	08.02.22	Meeting (including portfolio holders) - To share Local Plan updates and discuss any cross-boundary matters.	Updates shared on matters including – housing, gypsy and traveller needs, economic development, infrastructure, flood risk, environment, air quality and future engagement.
Maidstone Borough Council	12.12.21	Response to Regulation 19 Local Plan consultation.	Written response submitted.
Tunbridge Wells Borough Council	28.10.21	Tunbridge Wells Local Plan Examination Statement of Common Ground.	Signed Statement of Common Ground submitted.
Medway Council	13.10.21	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Updates shared on matters including – housing, economic development, transport, environment, and unmet needs requests from other areas.
Maidstone Borough Council	27.09.21	Meeting (including portfolio holders) - To share Local Plan updates and discuss any cross-boundary matters.	Members were introduced to the DtC engagement process. Updates shared on draft SoCG, highways infrastructure at Hermitage Lane, housing and gypsy and traveller needs.
Maidstone Borough Council	04.08.21	Meeting to share Local Plan updates and discuss any cross-boundary-matters.	Updates shared on matters including – Maidstone Local Plan timetable key dates, draft Statement of Common Ground, cross boundary transport issues, housing delivery including proposed garden communities, employment, gypsies and travellers, biodiversity and environment.

Other Local Authorities or Public Bodies Involved	Date	Purpose of Meeting or Engagement	Summary of Matters Discussed, Actions and/or Outcomes
Tunbridge Wells Borough Council	03.06.21	Response to Regulation 19 Local Plan consultation.	Written response submitted.

Annex 2. Other Organisations Engaged

The table below provides a list of other organisations which have and will play a role in informing the policies and other content in the Local Plan and related documents including the Infrastructure Delivery Plan. It sets out how in response to consultation and other feedback received, commitments to agreed actions and outcomes will be addressed. As the Local Plan progresses this table will be updated to outline the matters/issues identified, what if any agreement has been reached between parties involved and the level of commitment secured e.g. the issues are outlined in a Statement of Common Ground that has Member level support/signature.

Body	Name	Summary of Engagement, Key Matters, Actions and/or Outcomes
Other prescribed bodies	Marine Management Organisation	Prescribed bodies have been engaged in the development of the Local Plan and evidence base as outlined in this document. Ongoing partnership work will take place to progress evidence in preparation for Regulation 19, and to take account of feedback received in response to the Regulation 18 Stage 2 consultation.
Infrastructure providers	- Kent and Medway Integrated Care Board - South East Water - Southern Water - Southern Gas Networks - UK Power Networks - Network Rail - Mobile UK	All infrastructure and service providers have been engaged in the preparation of the Interim Infrastructure Delivery Plan during August and September 2025. Feedback regarding planned investments and upgrades, as well as future requirements to support proposed Local Plan growth is outlined in the document. Bi-monthly meetings are held with NHS partners including the Kent and Medway Integrated Care Board, Maidstone and Tunbridge Wells Hospital Trust and NHS England, to discuss primary, community and acute health care requirements, and the delivery of capital projects. Further detail is included in the IDP. The IDP is a live document and will be further updated at Regulation 19 to take account of feedback received in response to the Regulation 18 Stage 2 consultation.
Parish Councils	- Addington PC - Aylesford PC - Birling PC - Borough Green PC - Burham PC - Ditton PC - East Malling PC - East Peckham PC - Hadlow PC - Hildenborough PC - Ightham PC - Kings Hill PC - Leybourne PC - Mereworth PC	Parish Councils will be further engaged in the Local Plan process through meetings of the Parish Partnership Panel and consultation process. To be updated at Regulation 19 to take account of feedback received in response to the Regulation 18 Stage 2 consultation.

	• Offham PC • Platt PC • Plaxtol PC • Ryarsh PC • Shipbourne PC • Snodland PC • Stanstead PC • Trottiscliffe PC • Wateringbury PC • West Malling PC • Wouldham PC • Wrotham PC • West Peckham PC	
Other organisations	• Kent Downs National Landscape Unit • High Weald National Landscape Unit • Kent Wildlife Trust	A meeting was held with the Kent Downs and High Weald National Landscape Units on 1st July 2025, to provide an update on Local Plan progress and discuss any emerging issues. TMBC provided a Local Plan update including overview of the emerging spatial strategy, options testing and policies. The following evidence was discussed. • Habitats Regulations Assessment • Landscape Character Assessment • Landscape Sensitivity Assessment • Landscape and Visual Assessment, and Renewables Landscape Sensitivity Assessment To be updated at Regulation 19 to take account of feedback received in response to the Regulation 18 Stage 2 consultation.

Annex 3. Strategic Planning Issues Proforma

1. Strategic planning issue <i>Define the issue</i>
2. Evidence base <i>What is the evidence used to develop the LP's strategic policies?</i>
3. Strategic partners <i>List of bodies engaged</i>
4. Actions <i>How have you worked collaboratively with your partners?</i> <i>What actions did you take to manage the strategic issue?</i> <i>Was there any joint evidence developed? Who was involved? Summary of Key Matters, Actions and/or Outcomes to be included at Annexe 2 in relation to meetings held.</i>
Action: Partners: Outcome: Date:
Action: Partners: Outcome: Date:
5. Outcomes from strategic working <i>What was the result of the strategic cooperation and how has this influenced the plan (include specific references to relevant policies and wording where relevant). Include any issues that remain unresolved and how the authority plans to manage these. Outline what the implications are of these unresolved matters.</i>
6. Ongoing cooperation <i>How will the strategic issues be managed on an ongoing basis? What are the mechanisms/structures being used to do this? How will this be monitored?</i>

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