

Local Plan Vision and Objectives

Summary of Regulation 18 consultation responses (March 2026)

Question 1 – Do you agree with the Local Plan overall vision?

Total Number of responses received:					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
15	45	27	24	178	391

Summary of issues raised

In total 645 comments were received in relation to this question. Of these 379 standardised representations were received. These representations all related to Tonbridge and objected to the vision and objectives on the basis that the Local Plan fails to define how Tonbridge will successfully evolve and function over the plan period and beyond. The Tonbridge related representations made also considered that the Local Plan fails to define a vision for the way the layout, services and facilities of the town will adapt to accommodate the disproportionate level of expansion proposed for Tonbridge in this Plan.

In relation to the remaining 197 comments received, just under half of the comments were made on behalf of organisations (83), mainly site promoters. Overall, there was a clear divide in the responses received where developers favour meeting housing requirements and residents favour the protection of land and lower growth.

Of those who expressed support for the vision (either strongly agreed or agreed) many respondents stated that the vision is reasonable, balanced, logical and well-intentional and provides a strong foundation for future planning. However, whilst generally the principles of the vision were supported this was under condition where concerns were raised. Key themes from the comments included:

- Concern about delivery and implementation, where whilst the vision is strong, that delivery will be the real challenge including managing complex sites and ensuring infrastructure provision.
- Concern in relation to existing infrastructure (highways, public transport, water, schools, GP and hospital services, parking and other utilities) and whether this can support the scale of growth proposed. A number of respondents requested that the vision explicitly acknowledges infrastructure delivery.
- Reference to how important it is to protect the environment, to deliver on climate change and ensure sustainability. This included respondent's highlighting the importance of protecting open spaces, improving biodiversity, embedding sustainable design, encourage active and sustainable travel, reducing carbon

emissions and pollution and flood risk mitigation. There was also a call for stronger requirements on developers to deliver on climate change through design.

- The identification of local character, heritage and place shaping was supported.
- Concern in relation to equity and quality of life in terms of whether growth will benefit existing communities in relation to the provision of affordable homes, a thriving economy and provision of additional services.
- Some respondents felt that the vision was too long, too generic, not aligned with the objectives as well as a lack of emphasis on mental health, agriculture or specific local issues.

For those who selected a neutral response, comments made generally supported the vision, however doubts were expressed as to how the vision will be achieved. Therefore, such support was again under condition. Key themes from the responses included:

- Concern about infrastructure capacity and delivery, noting that existing infrastructure is already under strain and that the vision should focus more on infrastructure to provide a stronger commitment to infrastructure provision. It was also stressed that housing growth cannot be delivered responsibly without the upfront investment.
- Concern about meeting the Government's housing requirement in relation to the scale of growth, the location of development, the distribution of growth and whether the amount of housing is capable of being delivered.
- Whether the Local Plan should explore higher housing growth to secure a diverse and affordable housing supply and concern from developers that the plan will underdeliver because housing numbers and distribution strategies are insufficient.
- Support for the protection of Green Belt, green spaces and agricultural land whilst also concern that environmental ambitions conflict with large-scale growth on greenfield land, therefore site allocations are incompatible with the overall vision. It was also suggested for the environmental objectives to be supported by credible delivery mechanisms.

For those who selected disagree or strongly disagree, responses expressed a strong opposition to the Local Plan's vision. Unlike the 'agree' and 'neutral' comments, concerns were expressed on a number of matters with many respondents stating that the vision is not credible, not deliverable, or in direct conflict with the proposed allocations. Key themes included:

- Concern that infrastructure capacity (road congestion, GP and NHS capacity, schools, public transport, sewerage and wastewater and water supply shortages) is already overstretched and cannot therefore support the level of growth proposed.

- Concern about the loss of Green Belt, the introduction of Grey Belt and environmental damage including loss of countryside, risk of landscape harm, adverse impacts on habitats and species.
- Concern about flood risk and building on floodplains.
- Concern about overdevelopment where it is considered that growth proposed is disproportionate and harmful and that the Plan fails its own tests of proportionality and sustainability.
- Many respondents explicitly state that the vision is not credible, lacks practical detail, is not deliverable and is not evidence based due to conflicts between the vision and the allocations proposed in the Plan. Specific locations such as Borough Green, Hildenborough, East Peckham, Tonbridge, Wrotham, Ightham and Platt were specifically mentioned.
- Several respondents argue that the plan has not properly explored brownfield land, whilst others call for a new settlement option rather than incremental expansion of existing settlements.
- The loss of village identity and rural character was frequently cited.

For those who did not answer the sentiment question, many respondents particularly site promoters expressed support for the overall vision and its principles including its alignment with national planning policy. Similar comments were received as above including the vision not being matched by the actual spatial strategy, a call for stronger environmental, nature and landscape commitments and that the vision lacks realism given infrastructure and delivery challenges. In addition, a number of responses in this section talk to housing numbers, supply, deliverability, Green Belt, small sites, windfall allowance and the soundness of the Plan. These comments are included here due to the vision stating it will meet housing need requirements. These comments are worth noting under this first question given their importance to the Plan. Key themes include:

- Technical commentary about the minimum housing requirement and the lack of a buffer, which should be 10-20% due to chronic under delivery as well as a call to extend the Plan period to 2043 or 2044 to ensure a full-15-year period after adoption.
- That there is an excessive reliance on large strategic sites which is risky as these are slower to deliver and have infrastructure requirements which are vulnerable to delays. It was questioned whether strategic sites will deliver within the plan period.
- A call to identify more small and medium sites to diversify supply and ensure early delivery and support SME builders.
- Concern over windfall assumptions with a risk of double counting alongside a lack of evidence that historic windfall delivery will continue under the new Plan.

- A number of responses questioned whether the Plan meets the NPPF tests of soundness including that relating to housing, considering reasonable alternatives, whether the plan is effective with its reliance on strategic sites as well as consistent with national policy. Many respondents believe that the Plan requires amendments before Regulation 19, particularly around meeting the housing requirement within the Plan period, as above.

Summary of feedback from Statutory Consultees

- **Historic England** support the identification of the historic environment as a key element of Vision.
- **Natural England** advises that the Local Plan should include a clear vision for the natural environment. While the plan mentions nature recovery, this is not explicitly reflected in the main Vision. Given the close links between the climate and biodiversity crises it is recommended for the Vision to explicitly commit to nature recovery alongside climate resilience. In addition, Natural England would like to see the Plan’s vision and development strategy setting out strong environmental ambition, addressing both impacts on and opportunities for the natural environment. This includes taking a strategic approach to protection and enhancement, delivering biodiversity net gain, and improving ecological connectivity.
- **National Highways** confirmed in their response that the transport related vision and the objectives aligns with the requirements of DfT Circular 01/2022, but further detail will be needed with regards the “Validate” aspects of the Plan for the next stage of the Plan (Regulation 19).
- **Network Rail** supports the inclusion of transport as part of the infrastructure improvements reference as one of the five main parts of the Vision. Transport improvements, especially for the railway, are considered essential and should be embedded throughout the Local Plan in supportive policies and set out clearly within draft site allocations. As noted within para 4.7 of the Vision, there are a number of wider benefits that can be captured as a result of improvement to, and investment in, transport infrastructure.

Summary of feedback from District / Boroughs

- **Sevenoaks District Council** supports the vision. In relation to meeting housing requirements, Sevenoaks note that the buffer is unlikely to be adequate to account for any unforeseeable housing delivery issues but notes that TMBC is progressing further work to address this.
- **Tunbridge Wells Borough Council** agrees with the approach taken for the vision and objectives and considers that they form a strong basis for the development strategy and other policy areas in the Plan. Tunbridge Wells also note matters

around housing delivery as well as other duty to cooperate matters relating to infrastructure provision.

Summary of feedback from Town and Parish Councils

- **East Peckham Parish Council** does not agree with the Local Plan's overall vision or objectives as currently drafted as it is considered that there appears to have been no regard to balancing the provision of housing alongside flood risk, biodiversity, landscape, heritage and green belt protection.
- **West Malling Parish Council** agrees with the vision and considers that it aligns with the priorities and concerns of local residents in West Malling.
- **Mereworth Parish Council** support the proposed Local Plan for Tonbridge and Malling.

Summary of feedback from other organisations

- **Kent Downs National Landscape Unit** – Raised concern that the vision contains no reference to, or aspirations for, the natural environment of the Borough. They recommend that the Vision should clearly establish a vision for the natural environment of the Borough in 2042 and that this should specifically reference the conservation and enhancement of the natural beauty of the National Landscapes within its boundaries.
- **Kent Wildlife Trust** are generally supportive of the policies put forward but has been noted that no reference has been made to nature recovery and enhancement within the vision or plan objectives.

Officer response to the consultation feedback

The Regulation 18 consultation invited comments on the overall Vision for the Local Plan. A substantial number of representations were submitted by residents, parish councils, community groups, statutory bodies, infrastructure providers, developers and land promoters. These responses have offered valuable feedback on the scope, clarity and effectiveness of the Vision, and on how well it reflects the challenges and opportunities facing the borough over the plan period.

The Vision is intended to provide a high-level, strategic narrative for what Tonbridge and Malling should look and function like by the end of the plan period. It is not intended to operate as a policy or to predetermine the spatial distribution of growth, nor to promote one theme such as housing, environment, infrastructure or economy above any other. Rather, it sets an overarching direction for the plan, with detailed policies and the spatial strategy providing the mechanisms for delivery.

Officers consider that the Vision remains broadly appropriate and balanced, and that it aligns with the requirements of the NPPF by addressing key themes such as climate

change, sustainable transport, high-quality places, environmental protection, affordable and mixed housing provision, and infrastructure improvements. However, several areas of the Vision and its supporting explanation will be refined to address concerns raised through the consultation and to ensure clarity and consistency with national policy. These refinements will not alter the high-level purpose of the Vision but will improve its relevance, precision and deliverability.

Reflecting the consultation responses, updates proposed include:

- a) Clarifying the purpose of the Vision within the supporting text, explaining its role as a unifying statement for the Plan rather than a detailed policy tool or spatial distribution mechanism.
- b) Strengthening references to environmental resilience, including clearer acknowledgement of flood risk, water security and climate adaptation, ensuring that these issues are appropriately recognised at strategic narrative level.
- c) Providing explicit recognition of the borough's valued landscapes, Green Belt and settlement identities, making clear that growth will need to be sensitively integrated to avoid harmful coalescence and maintain local character, where consistent with national policy.
- d) Reinforcing the importance of infrastructure-led growth, by clarifying that delivery of homes, employment sites and community facilities will be supported by timely and coordinated infrastructure investment.
- e) Adding clearer language on sustainable travel and rail-accessible development, reflecting the strong feedback regarding transport constraints and opportunities for reducing car dependency.
- f) Recognising the borough's acute affordability pressures and the need to support a balanced housing market that meets the needs of all communities, consistent with the evidence base.
- g) Referencing the need for nature recovery and biodiversity enhancement, in line with national requirements and widespread community interest in strengthening ecological outcomes.
- h) Improving the readability and coherence of the Vision, ensuring that the five thematic components (Climate, Local Character, Homes, Economy, Infrastructure) are clearly connected and internally consistent.

These refinements will help ensure that the Vision remains ambitious but achievable, reflects local priorities raised through consultation, and provides a robust and NPPF compliant foundation for the next stage of plan preparation.

Question 2 – Do you agree with the Local Plan Objectives?

Total Number of responses received:					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
8	49	32	23	154	37

Summary of issues raised

The comments provided by respondents to this question reflect a wide range of views on the Local Plan's objectives, demonstrating strong concern about the scale and location of development, the impact on existing communities, and the deliverability of the plan overall. Of those respondents who expressed support for the objectives (either strongly agreed or agreed) there was a broad consensus that the objectives seemed reasonable, that they provided a balanced approach across housing, the environment, transport and infrastructure and some stated that they were SMART objectives. Key themes from these responses included:

- A general agreement with the strategic direction and this being in line with what is needed.
- Respondents were appreciative for objectives relating to high-quality design, biodiversity and the natural environment, sustainable development and climate-conscious growth, particularly welcoming commitments to protecting the built and natural environment and ensuring that development is well-designed.
- Some respondents accepted that housing growth is required and felt the objectives reflected this appropriately, highlighting the need for homes for local people, the importance high-quality and affordable housing, support for meeting assessed need and the acceptance that greenfield development may be unavoidable.
- A welcomed focus on supporting town and village centres, maintaining thriving economies, providing premises for businesses and sustaining local facilities.
- Welcomed the inclusion of active travel, sustainable transport and the integration with infrastructure planning.
- Respondents also noted concerns over implementation challenges including infrastructure delivery, the enforcement of design standards as well the delivery of sustainability measures. ly to be challenging.

The majority of respondents who answered this question either felt neutral, disagreed or strongly disagreed with the objectives. Respondents who answered neutral neither supported nor opposed the objectives but raised the following:

- That the objectives lacked clarity, detail or prioritisation.
- Some concern around interpretation and implementation

- That the objectives seemed reasonable but achieving them would require investment and coordination
- That there should be a stronger focus on heritage, agriculture, character and protecting landscapes.

For those who disagreed or strongly disagreed, the prevailing line was that the Local Plan does not align with its stated objectives with the growth proposed causing long-term harm to communities, alongside a lack of confidence that the objectives do not align with the actual proposals and that the Local Plan overall reads as theoretical and aspirational rather than practical. Key themes from the responses included:

- Concern that the borough's infrastructure is already overstretched and cannot support the proposed levels of development without major upfront investment. Particular concern was expressed in relation to road congestion, GP surgeries, hospitals, dentists and social care services, schools and water supply, drainage and sewerage.
- That growth proposed is disproportionate as well as distributed unfairly, with concern about the excessive burden on specific communities.
- Concern about environmental harm and landscape change including the loss of Green Belt, loss of productive farmland, urban sprawl as well as irreversible harm to biodiversity and also the boroughs heritage and settings;
- Concern that the environmental objectives of the Plan contradict the growth and site allocations proposed.
- Flood risk was highlighted by many respondents, particularly in relation to Tonbridge, Hildenborough and East Peckham with concerns about the impact of development in relation to surface water flooding, increased pressure on drainage systems and the potential for increased flooding.
- A number of respondents questioned whether homes that will be delivered through the Local Plan will meet local need and will be truly affordable and there was concern about a lack of provision for smaller homes, social rent and housing for older people.
- Respondents also considered that sustainable travel ambitions are not realistic across much of the borough due to its rural nature, limited bus services in rural areas, roads not being walking or cycling friendly, as well as it not being possible for public transport infrastructure to absorb extra use. Concern was also raised about development increasing traffic which is contrary to sustainability objectives.

For those who did not answer the sentiment question, feedback tended to be either supportive in principle, critical on the detail, there was a focus on soundness, deliverability and policy refinement, which was generally linked to site promotion or formal organisational positions. A small number of comments from residents / the

community expressed concerns about flood risk, evidence accuracy or the government's housing policy.

Summary of feedback from Statutory Consultees

- **Kent County Council** supports the vision and objectives and considers that the TMLPD should include consideration of additional policies, such as a dedicated Health & Wellbeing Policy aligned with the vision objectives, to reinforce this important focus.
- **National Highways** have confirmed that the objectives to prioritise sustainable transport and active travel options align with DfT Circular 01/2022.

Summary of feedback from District / Boroughs

- **Maidstone Borough Council** suggested that Objective 2 could reference heritage.
- **Sevenoaks District Council** stated that 'The vision and objectives of the Plan, focusing on addressing climate change, respecting local character, providing sufficient housing and employment, and infrastructure improvements including sustainable transport are all supported. These objectives complement the aims of the Sevenoaks Local Plan, which sets out similar priorities.
- **Tunbridge Wells Borough Council** agrees with the approach taken for the vision and objectives set out, which form a strong basis for the development strategy and other policy areas in the Local Plan.

Summary of feedback from Town and Parish Councils

- **West Malling Parish Council** agrees with the objectives and stated that 'The Local Plan objectives feel strongly aligned to the overarching vision set out above. The Parish Council welcomes the strong emphasis on climate change in Objective 1, noting it depends on several other objectives being achieved, especially Objectives 2, 3, 5 and 7. Considers Objective 2 as vital for protecting its character, but stresses the need to balance this with the housing growth required under Objective 3. For new housing, the Parish Council highlights the importance of high-quality, sustainable, well-designed homes of varied sizes and types. Objectives 6 and 7 are seen as closely linked, with better sustainable and physical transport infrastructure needed to support the High Street and manage traffic impacts. Improved public transport connections, particularly between West Malling, Kings Hill, Leybourne and the train station are viewed as essential for the town's future.

Summary of feedback from other organisations

- **Kent Wildlife Trust** - noted that no reference has been made to nature recovery and enhancement. KWT sees this as a missed opportunity to show that the Plan

seeks to protect and improve biodiversity and that that nature recovery will be a key priority.

- **Kent Downs National Landscape Unit** - expressed concern that the objectives do not make it clear that the conservation and enhancement of the areas of the two National Landscapes that lie within the borough, and which significantly contribute to the quality of its character and the wellbeing of those who live and work in the Borough, will be conserved and enhanced over the plan period. They recommend that the objectives are reviewed and amended to clearly identify objective/s for the borough's natural environment and the National Landscapes that lie within its boundaries over the plan period.

Officer response to the consultation feedback

The Regulation 18 consultation invited comments on the seven strategic objectives. A significant number of representations were received from residents, parish councils, land promoters, statutory bodies and other stakeholders. The comments have provided valuable feedback on the clarity, appropriateness and deliverability of the objectives.

The objectives are intended to provide high-level and balanced strategic direction across the borough. The purpose of these objectives is not to predetermine the spatial distribution of sites or to prioritise one objective over another. Each objective must be considered of equal strategic importance. In addition, the objectives are not intended to function as detailed policies. Officers consider that the seven objectives remain appropriate and balanced and provide a consistent and NPPF compliant framework.

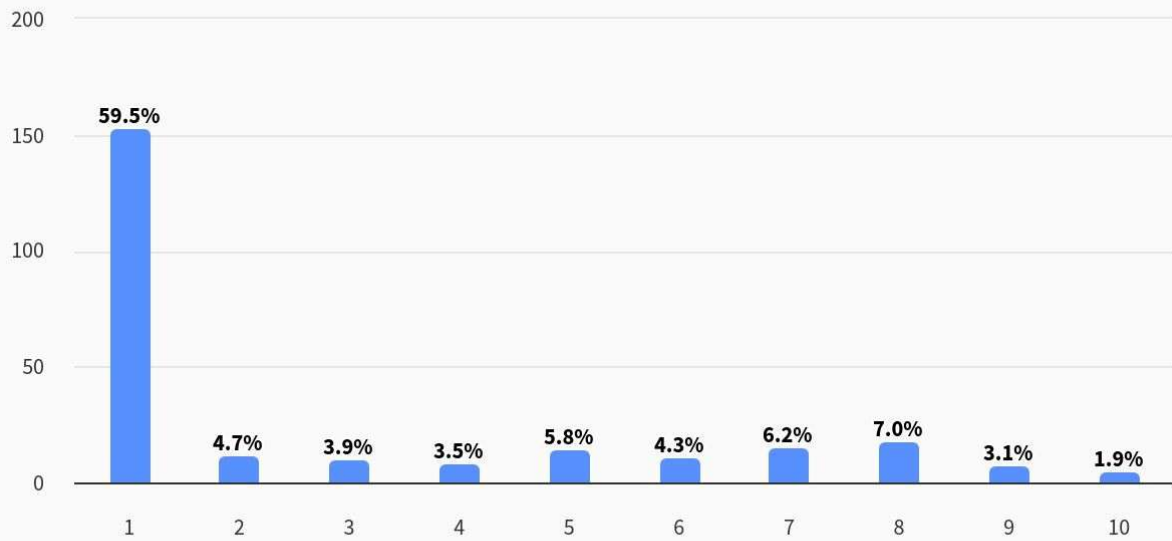
However, a number of refinements will be made to supporting text to address concerns about clarity, interpretation and application and also to the objectives themselves to ensure matters raised are included. This will include:

- a) Providing clearer links in the supporting text to explain the role of the high-level strategic objectives and how these will be delivered through detailed policies;
- b) Clarify the approach to the objectives in supporting text as relevant;
- c) Strengthening the objectives in line with consultation responses where this is justified and NPPF compliant.

Question 3

This question asked on a scale of 1 to 10 how satisfied people are with the vision and objectives. 287 responses were received to this question. The data shows that most respondents raised were not satisfied with the Local Plan vision and objectives.

3 - On a scale of 1 to 10, where 1 is not at all satisfied, and 10 is very satisfied: Overall, how satisfied are you with the vision and objectives for the Local Plan?



All numbers and percentages are calculated on the total number of answers to the question.