

## Local Plan Spatial Strategy (Questions 4-14)

### Summary of Regulation 18 consultation responses (March 2026)

#### Question 4 – Do you agree with Policy SP1 Spatial Strategy?

Total Number of responses received:					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
11	26	36	31	138	389

#### Summary of issues raised

This question attracted a total of 594 comments. Of these 353 standardised representations were received. These representations objected to the spatial strategy given the scale of growth proposed for Tonbridge and the surrounding catchment area of the town. It was considered by those who submitted this response, that the current housing targets do not reflect the actual needs of the TMBC communities or reflect the long-term well-being of those communities. In particular, that the plan will be harmful for Tonbridge and its residents as it will place an impossible burden on the local infrastructure. Respondents consider that a serious omission was not to consider the option of a wholly new, separated, large settlement. In addition, respondents also considered that the Plan fails to test the 'Brownfield First' approach and does not include a strategic vision for how Tonbridge town centre could be reorganised and that the Plan is an opportunity to reduce the extent of industrial buildings close to the town centre and whether these could be converted to housing given their sustainable location. These representations strongly disagreed with Policies SP1, SP2 and SP3.

In relation to the remaining 241 comments received, just under half of the comments (101) were made by organisations, of which the majority were from site promoters. The responses received were varied where housebuilders / site promoters were generally supportive, focusing on key strategic matters. Residents provided a much more mixed response with a focus on sites or a specific location, particularly Borough Green, Hildenborough and East Peckham. Responses from the community generally focused on local impacts such as roads and junctions, services such as GPs and schools, flooding (particularly in East Peckham) as well as Green Belt protection and calls for brownfield over greenfield development.

For those respondents who expressed support, the direction of Policy SP1 was typically agreed, however, concern was also raised in relation to a number of matters. The key themes included:

- General support for focusing development within sustainable locations agreeing with the concentration of growth in urban areas, well served settlements and locations with good access to public transport.
- There was a strong emphasis on protecting the Green Belt and National Landscapes, as well as maintaining Green Gaps to preserve identity and prevent coalescence and a suggestion that policy wording should be stronger. There was also concern over the introduction of 'Grey Belt'.
- Concern in relation to infrastructure where it is considered that the Plan will only work if infrastructure is delivered before / alongside growth.
- A number of respondents agreed to the strategy but only if the settlement hierarchy is changed.
- There was support to prioritise Brownfield land and a number of respondents noted that brownfield land is however limited.
- Several respondents supported Policy SP1 because it provides structure., directs growth to the places that can cope and reduces piecemeal development.

A number of respondents selected a neutral response. These responses aired broad support for the principles of Policy SP1 but referenced concern that the site allocations contained within the Plan and delivery mechanisms did not match the strategy. The strongest themes included:

- A general acceptance of housing need, however growth must be sustainable.
- Respondents expressed concern over infrastructure, with residents highlighting that this is already overstretched including roads, schools, healthcare, water supply and wastewater. Flood risk was also a concern. It was emphasised that past promises of infrastructure delivery have not been kept, reducing trust.
- Similar to the responses for those who agreed but with conditions, it was considered that some settlements have been misclassified in the settlement hierarchy.
- There was strong opposition to Green Belt release and the Grey Belt concept and concern about the loss of countryside, farmland and that more should be done to prioritise brownfield developments.
- Perceived contradictions between the wording of Policy SP1 and site allocations as well as concern about overdevelopment, loss of village identity and impacts on heritage and the environment. There was also a call for higher design standards.
- Several respondents shared a distrust in the planning and delivery process.

Most respondents to this question either disagreed or strongly disagreed with Policy SP1. These responses were mainly from members of the community. The responses received were varied. However, several key themes consistently appeared where members of the public expressed strong views about loss of countryside,

overdevelopment in rural settlements and the impacts of infrastructure pressures. Also, that housing numbers were too high. Developers by contrast, tended to disagree with the strategy because it does not plan for enough housing or provide a sufficient land supply buffer and therefore the Plan should release more Green Belt to allocate additional sites. Across all groups infrastructure capacity is a concern. The themes included the following:

- There was a strong perception that existing infrastructure is already beyond capacity and that Policy SP1 does not demonstrate how this will be remedied and that infrastructure planning is reactive rather than embedded in the spatial strategy. Overall, there was a lack of confidence that improvements will occur, concern over cumulative effects and infrastructure deficiencies as well as concern that without clear infrastructure commitments, the Plan could fail.
- Concern regarding disproportionate housing pressure on settlements (Borough Green, East Peckham, Hildenborough and Snodland) and a consideration that this contradicts the principles of balanced and sustainable growth. Of this regard, the accuracy and fairness of the Sustainable Settlement Study was questioned, and there was also concern in relation to losing settlement character. Views were also expressed mainly by developers that the Plan under-allocates to sustainable places, such as those with a transport hub.
- Concern that the Plan fails to protect Green Belt and countryside areas, with Grey Belt seen as a mechanism for allowing development. The general concern related to settlement coalescence, loss of farmland, loss of landscape character and permanent erosion of rural identity.
- Environmental issues were raised as a major reason for not agreeing with the spatial strategy including flood risk concerns (particularly relating to East Peckham) but also biodiversity and pollution concern also.
- Some respondents felt that the Plan does not adequately test or prioritise brownfield opportunities, particularly around Tonbridge town centre and industrial areas and it is considered that these areas could be reconfigured for residential use. It is also considered that brownfield sites have been dismissed due to uncertainty regarding availability. Developers however considered that there is insufficient brownfield land and therefore it cannot be relied upon.
- Concern that the spatial strategy results in overdevelopment, where large allocations will fundamentally change settlement character, settlement pattern, transform villages into towns, or degrade quality of life due to pressure on existing services and infrastructure.
- It was considered by a number of respondents that Policy SP1 lacks flexibility, risks becoming outdated and relies on assumptions that will not hold over the Plan period.

- A number of site specific objections were also raised (East Peckham, Borough Green Gardens, Hildenborough, Snodland, Higham Wood), with concerns over numerous matters including flooding, traffic, Green Belt, coalescence, local character.

A large number of responses were not categorised under the sentiment question, this was mainly either due to respondents not answering this question or due to responses being manually inputted into the consultation system by officers and therefore sentiment assumptions were not made. The responses in this category were mainly developer responses, where respondents showed broad support for having a spatial strategy, however there were differences in opinion as to where growth should be located and how it can be delivered. The key themes where there are differences to the points already raised above include the following:

- Infrastructure was again a key theme, however there was also a question as to whether growth associated to large sites can deliver the infrastructure that is required in a timely manner.
- Concern that certain allocations do not reflect their role in the settlement hierarchy, where it is argued by developers that smaller settlements should see proportionate growth to sustain services, and should include smaller – medium allocations, as well as rail adjacent-growth. Residents also objected to the over-burdening of certain locations, fear of coalescence and loss of settlement identity.
- In relation to Green Belt, there was a clear divide where developers accept targeted release of Green Belt asking the Plan to be clearer on exceptional circumstances and to prioritise Previously Development Land / Grey Belt. Whilst residents strongly resisted Green belt loss.
- Environmental matters were also raised with residents citing regular flooding and a call for policy strengthening for flood risk. In relation to National Landscapes developers accept a role for limited development while residents and environmental organisations call for policy strengthening.
- Employment land and mixed use was raised where respondents would like to see sufficient well-located employment floorspace and flexibility and that some growth options under provide employment space, to ensure local jobs alongside housing.
- Numerous growth locations were raised including Hildenborough, East Peckham / Hale Street, Snodland / Aylesford, Kings Hill / West Malling / Offham and Tonbridge with various reasons cited as issues to bring development forward in these locations.

## Summary of Feedback from Statutory Consultees

- **Kent County Council (KCC)** supports concentrating development in settlements with good sustainable transport options or where developers can deliver infrastructure to reduce car dependency. KCC suggests for policy wording to be strengthened in relation to references to walkability and cycling as well as amending some wording to emphasise locating new employment in sustainable locations with good transport access for all modes and where the workforce can be drawn from. KCC welcomes the proposed relief road associated with Borough Green Gardens but stresses that it must be tested in the Kent Transport Model to determine if any homes can be built before the road is completed. KCC note viability for delivering the site. KCC also consider for walking and cycling links to buses and rail should also be assessed to support modal shift. In addition, Figure 5.3 of the Plan lists other strategic sites, KCC notes that further work will be progressed to understand transport impacts and to identify deliverable infrastructure improvements. KCC indicates that the overall level of growth is achievable if appropriate mitigation measures are delivered. However, further strategic modelling and detailed scheme design will be required as allocations progress. KCC recognises and values continued joint working with TMBC in this regard. In relation to health, KCC welcomes the inclusion of this in the policy but recommends clearer definitions and further inclusion of datasets to ensure that health inequality is addressed effectively.
- **National Highways (NH)** confirms that the spatial strategy is consistent with the supporting evidence, noting that the highway modelling assumes completion of the Lower Thames Crossing. They also acknowledge that the plan may need to be revised if suitable mitigation cannot be delivered to support either the overall growth proposed in the spatial strategy or any specific site.
- **Natural England** requests for Policy SP1 to have strengthened wording for point 1 to commit to the protection and enhancement of biodiversity, landscape and the Green Belt, rather than protection alone, to align with the NPPF. Also to recognise the ecological value of some brownfield land, noting that not all brownfield land has a low environmental value as some sites contain priority habitat. Natural England also advises on the use of best available evidence to consider impacts on the natural environment.
- **Network Rail (NR)** supports the justification for the strategy including station-focused growth, as long as required mitigations are secured where required and NR will continue to work with the Council to ensure that growth does not result in any adverse impacts on the railway. Within the NR response it is stressed that Tonbridge Station is a major rail junction with growing passenger demand and is of significant strategic importance. NR would like to see the jointly prepared Strategic Station Plan to be included in the Local Plan evidence base. NR

consider that there are strong opportunities around Tonbridge Station to deliver a number of improvements including the creation of a more welcoming and attractive arrival point. Any development strategy for Tonbridge must include a balanced approach for the provision of car parking and regeneration. NR also highlight the importance of active travel connections and that future developments should contribute to improved pedestrian and cycle links to the station, consistent with relevant Infrastructure Plans and TMBC's emerging Active Travel Strategy. This includes safe crossings, continuous footways, and high-quality cycle parking at both station entrances. NR also note the potential allocations at Borough Green and Wrotham and note that additional car parking may need to be considered as part of Plan preparation and that NR can work collaboratively with the Council.

- **NHS Kent and Medway** support the overall strategy but emphasise that all impacts on health infrastructure must be fully mitigated through developer contributions. Their comments focus on ensuring timely and deliverable healthcare provision aligned with development. In addition, they ask for clarity on how masterplanning will secure timely delivery of land and financial contributions for onsite healthcare facilities and that any such infrastructure should be transferred to the NHS at nil consideration. They request for healthcare contributions to be provided as early as possible, allowing necessary health infrastructure to be in place before occupation of new dwellings.

#### Summary of feedback from District and Boroughs

- **Maidstone Borough Council** welcomes TMBC's intention to meet its objectively assessed housing need but expresses concern that the Local Plan proposes no housing buffer, noting this appears inconsistent with NPPF (2024) paragraphs 72 and 78, which expect plans to include flexibility to ensure delivery.
- **Tunbridge Wells Borough Council (TWBC)** notes that criterion 5 of the spatial strategy rightly prioritises brownfield land and suggests adding a cross-reference to Policy D1(h) on density to reinforce this approach. TWBC also highlights concerns raised in TMBC's own Housing Delivery Strategy, that reliance on large edge-of-settlement strategic sites (600+ homes) poses delivery risks due to market capacity limitations, an issue that has historically resulted in under-delivery.

#### Summary of feedback from Town and Parish Councils

- **Aylesford Parish Council (APC)** notes that releasing grey belt land and increasing development capacity within the Medway Gap would help distribute growth more evenly across the borough and support housing targets, particularly in Tier 1 areas. However, APC raise concerns that several Tier 4 areas already have outline applications and will merge into a single, much larger developed

area. This would result in the loss of distinct settlement identities, which they consider contrary to Policy CP6.

- **Burham Parish Council** stated that they are happy with SP1.
- **Ditton Parish Council (DPC)** responded on two points. Firstly, in relation to the mention of Green Gaps in the policy where DPC states that there is no green gap between the proposed development and existing housing to the east, north and south. And secondly in relation to highways modelling where DPC state that the limited highways modelling does not present sufficient capacity at present and that 'local rat runs' are already over capacity.
- **East Peckham Parish Council (EPPC)** does not agree with Policy SP1 on the basis that the Local Plan vision has not been applied appropriately to East Peckham. It is considered that no or very little regard has been had to balancing the provision of housing alongside flood risk, biodiversity, landscape, heritage and green belt protection and that the balance regarding the allocations in East Peckham has been fundamentally weighted in favour of housing provision, with no meaningful consideration given to the risks and threats of that provision. EPPC would like to work with TMBC to prepare a neighbourhood Plan to identify an appropriate share of growth in a way that is sustainable for East Peckham taking into account constraints. EPPC notes that the spatial strategy for the Local Plan first emerged through consultation in 2022/2023 and notes that in this time the climate crisis has worsened and therefore questions whether a better alternative spatial strategy exists, particularly in relation to flood risk impacts on sites proposed for allocation in the Parish. EPPC argues that it is one of the most flood-prone areas in the borough and that all proposed site allocations there directly conflict with national policy requiring development to avoid high flood-risk zones. They state that existing severe flooding, lack of safe access/egress, climate-change-driven risk increases, and unreliable SFRA evidence make the sites wholly unsuitable. EPPC also says the locations are unsustainable due to poor transport, high car dependency, lack of services, and unclear local housing need, concluding that all five sites should be removed from the Local Plan.
- **Ightham Parish Council (IPC)** understand the pressure on TMBC from central government to achieve new house building targets, however, IPC has concerns about the number of properties, 1,100, that need to be delivered each year until 2042. IPC believe that this number is unrealistic and undeliverable and does not reflect the property market in the area. There is no convincing evidence that market conditions, developer capacity, or infrastructure provision can support this level of growth. IPC request for TMBC to challenge central government on the overall scale of growth and also strengthen infrastructure evidence and delivery mechanisms.

- **Kings Hill Parish Council (KHPC)** considers the Draft Local Plan to be unsound in respect of Kings Hill. KHPC argues that the scale and location of proposed development at Kings Hill cannot be supported by existing or planned infrastructure and state that the proposals would result in severe and irreversible harm to the settlement's character, environment, and ability to function. KHPC identify several NPPF requirements that have not been met. KHPC also consider that the Local Plan evidence base does not demonstrate that Kings Hill can sustainably accommodate or in deed deliver the level of growth proposed.
- **Ryarsh Parish Council (RPC)** raises concerns about Site 58665 in Ryarsh and the wider cumulative impact of development around the village. The main issue highlighted is in regards to local infrastructure supporting further growth. This includes transport, GP access, healthcare, schools, and public transport (noting there is only one weekly bus service and inadequate parking at West Malling station). RPC calls for comprehensive infrastructure planning, including clear requirements from Kent Highways and engagement with GPs, hospitals, and schools to ensure services can meet increased demand. RPC also emphasise the importance of maintaining separation between villages, supporting the Green Gap Policy and protection of Local Green Spaces.
- **Snodland Town Council (STC)** notes that Tonbridge and Malling Borough Council is preparing a new Local Plan. They argue that the Medway Gap, especially Snodland, has already delivered a significant amount of housing, including roughly 1,000 homes at Holborough Lakes, and that the northern part of the borough has seen substantial recent or proposed development (Hermitage Lane, Forty Acres, Ditton Edge, Bradbourne, Bushey Wood). They consider that this area. SPC consider that the area is now overheating, while the southern end of the borough has stronger infrastructure, making it more suitable for growth. STC therefore strongly objects to Policy SN1, which proposes an additional 1,300 homes north of Holborough Lakes.
- **West Malling Parish Council** generally agree with Policy SP1. However, considers that the use of a Green Gap to North of Kings Hill does not provide sufficient protection and would therefore prefer this to be added to Green Belt provision.

#### Summary of feedback from other organisations

- **Kent Downs National Landscape Unit** supports the intention to protect National Landscapes but considers Policy SP1 and its supporting text not to be fully aligned with national policy (NPPF 2024) or statutory duties. They highlight that Paragraph 5.8 does not clearly distinguish between policy requirements for designated National Landscapes and their settings, as required by national policy. They also note that Point 21 does not adequately convey the highest level of protection owed to National Landscapes or the duty to conserve and enhance

natural beauty and point 17 uses the term ‘cherished locations’, which is undefined; clarification is needed to ensure National Landscapes are explicitly included. They recommend re-examining and re-wording Points 17 and 21 of SP1 to accurately reflect national policy and statutory requirements for development affecting National Landscapes.

- **RSPB** share serious concerns with release of green belt around East Peckham (EP2 and HS1) which will impact Turtle Dove and Nightingale, and affect biodiverse habitat and LNRS Priority Species and consider that the allocations should be withdrawn and green belt retained, and alternative locations sought. the RSPB has provided detailed answers in our comments on the specific allocations on the map. The RSPB also highlight the important Nightingale population centred around the Holborough to Burham Marshes Site of Special Scientific Interest (SSSI) at Snodland and nearby Aylesford lakes would be seriously compromised by allocations AY1, AY2 and SN1, and consider that these allocations should be located elsewhere.
- **High Weald National Landscape Unit** - highlighted that para 11 (b) (i) of the NPPF allows for strategic policies in Local Plans to provide for less than the OAN where the application of other NPPF policies that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area.

#### Officer response to the consultation feedback

Comments were invited and received in relation to views on Policy SP1 which sets out the Local Plan Spatial Strategy. Views were wide ranging reflecting the perspectives of residents, parish council’s, statutory bodies, developers and interest groups. Overall, the responses raised issues primarily relating to the distribution of growth and over-concentration of growth in specific settlements, concerns about infrastructure capacity and housing delivery and environmental related concerns. Together these responses provide a valuable indication of where further clarity, justification or refinement may be needed in the spatial strategy.

Policy SP1 sets out the overall spatial strategy for directing growth across Tonbridge and Malling over the plan period. Policy SP1 therefore forms a core part of the Local Plan’s approach to delivering required housing and employment in a sustainable and plan-led way.

The Regulation 18 Local Plan set out that the spatial strategy as presented is draft and that the purpose of presenting a strategy at this time was to engage with our communities, stakeholders, infrastructure providers and landowners and developers ahead of preparing and publishing the Regulation 19 Local Plan. Paragraph 5.10 of the

Regulation 18 Local Plan confirms that conversations and testing of the spatial strategy will continue before we can finalise the Council’s preferred spatial strategy. This includes considering consultation responses, further engagement and testing with infrastructure providers. We can confirm that this work is ongoing and will continue over the coming months.

Whilst further spatial strategy work is being progressed, Officers consider that the general direction of Policy SP1 remains appropriate, justified and necessary and that it aligns and seeks to meet national planning policy requirements. However, it is considered that the policy and / or the supporting text (or indeed supporting evidence / topic papers, as appropriate), can be improved in certain areas. This includes:

- Strengthening environmental and climate commitments.
- Tightening the narrative and cross-reference the Green Belt evidence.
- Providing further clarity on how sustainability principles have been applied in identifying the spatial strategy and the connection to the settlement hierarchy including evidence on the logic behind the spatial strategy.
- Reinforce sustainable transport and active travel.
- Provide further detail in relation to brownfield sites and how these have been considered.
- Strengthen infrastructure within the Policy and how infrastructure needs will be met.
- Demonstrate how the evidence base supports the chosen spatial distribution.

It is considered that these amendments alongside supporting evidence including that relating to the Green Belt, environment, flood risk and infrastructure will help address concerns, strengthen the policy and ensure it provides a robust basis for the Regulation 19 Local Plan. Officers can confirm that as required by national policy, an evidence-based approach to defining the spatial strategy will be progressed for Regulation 19, ensuring that future growth is defined in a positive and sustainable manner.

**Question 5 – Do you agree with the spatial distribution for future growth (table 5.2)?**

Total Number of responses received: 607					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
9	18	22	26	142	391

### Summary of issues raised

The consultation on the draft Spatial Strategy and distribution of growth set out in Table 5.2 generated a significant volume of feedback from residents, parish councils, statutory consultees, developers and neighbouring authorities.

The overall pattern of responses shows broad support for the strategic principles of focusing growth in the most sustainable settlements, but substantial concern regarding the distribution of development to particular locations, especially Tonbridge, Hildenborough, Hadlow, East Peckham, and Borough Green.

Of those respondents who expressed support for the proposed distribution of development across settlement (either strongly agreed or agreed) there was a strong support for the most sustainable settlements of Tonbridge, Kings Hill and the Medway Gap as they have strong public transport links, established infrastructure, and offer access to employment and retail opportunities. Other key themes included:

- A recognition that the proposed distribution closely aligned with the Sustainable Settlement Study findings.
- Some respondents identified that lower tier settlements were protected from inappropriate large-scale expansion, which helped to safeguard rural character.
- There was substantial support for a mixture of strategic and smaller sites.
- A small number of respondents supported the distribution of growth and acknowledge that the proposed levels of growth were necessary to comply with national policy.
- There was some overall support for the spatial distribution, but a number of respondents noted that infrastructure capacity needed to be addressed to accommodate these levels of growth.

Of the number of respondents who selected a neutral response to this question, many expressed concern about the housing numbers assigned to rural settlements, including Hildenborough, Hadlow, East Peckham and Borough Green. Key themes included:

- Many respondents raised concerns over there being inadequate infrastructure to support these levels of growth.
- Some of the respondents stated that Tonbridge was being required to absorb more growth than could be justified, with housing numbers greatly exceeding local need. Other respondents supported the focus of growth around Tonbridge.
- Concerns were expressed about the loss of Green Belt and agricultural land, and likely resulting increases in pollution and flood risk.

A large number of respondents disagreed or strongly disagreed with the proposed distribution of growth, and the majority of these responses relate to site specific objections, particularly objecting to large allocations in rural villages. Around a third of

these responses were standard representations from individuals in relation to proposed growth at Tonbridge, Hildenborough, Hadlow and East Peckham, as well as a number of site-specific objections at Kings Hill and Borough Green. Other key themes included:

- Substantial concern that infrastructure is insufficient to accommodate the proposed levels of growth.
- Disagreement from developers and individuals with the conclusions of the Sustainable Settlement Study and concerns that settlements have not been classified correctly.
- A significant number of respondents objected to the quantum of growth proposed in Tonbridge, and raise concerns about cumulative impacts on congestion, pollution and loss of character.
- Many respondents felt that Green Belt was being released prematurely, and that brownfield options had not been fully explored.
- Respondents stated that the plan was driven by meeting national housing targets rather than local need.
- A small number of respondents expressed support for the proposed distribution, but has reservations about capacity and deliverability.

The majority of respondents did not answer the sentiment question. There was significant concern about the disproportionate growth in some settlements including Hildenborough, Tonbridge, Hadlow, East Peckham and Brough Green, and some site-specific comments about proposed allocations. Other key themes included:

- A significant number of respondents expressed concern about the capacity of infrastructure to support the proposed levels of growth.
- Concerns were raised by developers and individuals about the over-reliance on large strategic sites, with some respondents seeking more small and medium sized allocations.
- There was strong support from individuals for the protection of the Green Belt, and that brownfield options should be explored first.
- There was some criticism of the site selection process.
- A small number of respondents highlighted that some locations would see a substantial level of housing growth without any employment growth.
- Respondents were concerned that the plan does not sufficiently consider major growth in neighbouring authorities, and its potential impact on traffic, infrastructure and landscape.
- Some respondents, particularly developers, called for higher housing figure to be included in the plan to accommodate a minimum 10% buffer. Other respondents, mainly individuals and parish councils, were concerned that the housing numbers were too high.

- Concerns raised by a statutory consultee in relation to inadequate water supplies to support the level of proposed growth.

#### Summary of feedback from Statutory Consultees

- **South East Water** – Have reviewed the latest housing forecast figures, which have been increased to meet government targets. SEW consider that they are unable to accommodate additional growth beyond what was assumed in the current Water Resources Management Plan 2024 (WRMP24) in areas where there is a supply-demand surplus. SEW note that there is a lack of available headroom in their supplies, and would be unable to accommodate any growth exceeding the WRMP24 forecast assumptions throughout the entire planning period. The housing numbers proposed in the period 2025-42 are considerably higher than those within the WRMP24 forecast. To assess the impact beyond the current WRMP24 forecast, then SEW would need to recalculate the demand forecast and rerun the decision-making process. This would assist to identify additional interventions, such as new supplies, transfers, or increased demand reduction programs. However, this will not be known until work is completed for the next plan, WRMP29.

#### Summary of feedback from District / Boroughs

- **Maidstone Borough Council** - is pleased to see that Tonbridge and Malling Borough Council is planning on meeting its' objectively assessed need, however it is concerned that no buffer is to be added (see paragraph 5.26), which seems contradictory to NPPF (2024) paragraphs 72 and 78.

#### Summary of feedback from Town and Parish Councils

- **West Malling Parish Council** - generally agree but do not support housing development of Broadwater Farm to the East of West Malling. Broadwater Farm site development of 900 homes, while mostly outside the Parish of West Malling closely adjoins our Parish and will effectively represent a major increase in the local population as well as representing a major impact on West Malling as a defined rural town. Its impact on traffic, parking and access to local services, particularly health care, is not sustainable.
- **Teston Parish Council** – Concern that there has already been considerable development in T&M “just over the border” from Maidstone Borough. This Reg18 Local Plan contains other sites that potentially threaten to increase traffic volumes through Teston.
- **East Peckham Parish Council** - Table 5.2 is incorrect regarding the proposed site allocations for East Peckham. The allocations for Snoll Hatch (identified as a Secondary Village) are bundled in with the numbered allocations for East Peckham, which is itself identified as a Primary Village. The numbers for Snoll

Hatch should have been separately represented, to be labelled as a Secondary Village. EPPC does not agree with the distribution for growth, and disputes the conclusions that East Peckham, Hale Street and Snoll Hatch are suitable areas for the quantity of development proposed.

- **Burham Parish Council** - agrees with the principle to building close to or in tiers as described.
- **Aylesford Parish Council** - Tier 4 areas require similar infrastructure and facilities as tier 1 and 2 areas offer, or should be developed to a lesser degree.

#### Officer response to the consultation feedback

Table 5.2 sets out the proposed housing and employment growth by settlements throughout the plan period. It seeks to demonstrate that growth has been directed toward the higher tier settlements, as these are deemed the most sustainable locations with the most services and facilities.

A large number of representations were received in response to this question, both technical and community led. The consultation has highlighted important issues around the balance of growth, infrastructure capacity, deliverability and the need to include a buffer. Officers consider that the overarching distribution remains sound, but that clarifications, refinements, and additional evidence will be necessary to address concerns.

A number of refinements will be considered to the strategy to address concerns and respond to further evidence. This will include:

- Refining the sites proposed for allocation and their yields in light of further emerging evidence.
- Further discussions will take place with the statutory consultee regarding water supplies to ensure that sufficient infrastructure can be in place to support growth.
- Consider opportunities for how a housing buffer can be included within the spatial strategy.
- Undertake additional transport modelling to further understand impacts of the spatial strategy on the highway network.
- Update Infrastructure Delivery Plan to reflect on-going discussions with infrastructure and service providers.

## Question 6 – Do you agree with the settlement hierarchy (table 5.6)?

Total Number of responses received: 246					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
4	21	24	22	126	49

### Summary of issues raised

The 246 comments provided by respondents to this question reflect a wide range of views, from support for the settlement hierarchy, as set out in Table 5.6, to concerns that the methodology had produced anomalies in the results. While some respondents were satisfied with the methodology and outcomes, the majority raised concerns suggesting that specific settlement ranking should be lowered, whilst some others expressed support for a ranking or suggested that it should be upgraded. There was also a high level of concern expressed regarding the reliability of services and infrastructure evidence and a lack of transparency in how scores and tier boundaries had been calculated.

A minority of respondents who expressed a view who strongly agreed or agreed with the settlement hierarchy (table 5.6). Key themes from these responses included:

- Makes more sense to add to existing urban areas as they have infrastructure which can be increased rather than starting from scratch.
- Support for Kings Hill being at least a Tier 2 Service Centre but should have additional growth to that currently planned.
- Seems a good representation of settlements and a rational/logical approach.
- Support subject to implementing the green gap strategy within Tier 1 settlements, specifically the Medway Gap and checking the accuracy of the hierarchy for Wouldham and Eccles.

A minority of respondents expressed a neutral view of the policy. Key themes included:

- Approach appears to be sensible.
- Approach applies a very broad brush.
- The hierarchy should not be used as a template for new development.
- Borough Green is Tier 2 but does not have the shops and public infrastructure of West Malling and Kings Hill. It is therefore least able to cope with the level of housing allocated. A much wider range of shops and adequate parking required before further housing is added.
- Support for Ightham being in Tier 4.
- The hierarchy is hard to argue with, but conclusions are problematic in terms of Tonbridge due to town's structure centred around limited crossing of the

Medway. Adding more development to the edges of Tonbridge will make traffic in and around the town worse.

- Support for the description of West Malling in the Sustainable Settlement Study which demonstrates suitability as a location for additional housing growth.

A significant majority of respondents either disagreed or strongly disagreed with the settlement hierarchy. Some comments were related to the amount and impact of development proposed (e.g. Tonbridge, West Malling), limitations in existing infrastructure (e.g. Kings Hill, Snodland) or the need for existing infrastructure to be increased to accommodate new development (e.g. Borough Green, East Peckham, Hadlow, Hildenborough) and not to the approach or specific findings of the settlement hierarchy.

There were 55 repeated representations stating that the settlement hierarchy should not be considered as fixed forever as development in a lower tier settlement that is accompanied by significant improvements in facilities and services can raise the settlement to a higher tier, with benefits for local residents. The 55 respondents also considered that the omission of the option of a new settlement has created a disproportionate loading of capacity onto Tonbridge and the surrounding areas.

Key themes related to the hierarchy methodology included:

- Most respondents disagreed with the hierarchy, focussing on incorrect settlement categorisation, methodological flaws and anomalies in scoring and a lack of transparency about how the hierarchy was created. The hierarchy has unsound conclusions and ignores real infrastructure capacity, including road, bus, rail, GP, school, water and sewerage capacity, and proximity to the Kent Downs AONB.
- Appendix A of the study shows the results, not the actual assessment and factors applied to generate that score. No explanation or justification for the cut off/threshold for each tier has been provided. These should be published. The distinction between village types seems very arbitrary.
- Approach does not appear to assess the impact of new development on villages outside but adjacent to the borough boundary.
- Development should be focused on existing urban areas where car ownership and use are an option rather than an essential, as is the case in primary and secondary villages.
- The settlement hierarchy works on a false premise, that living in these areas means better accessibility to necessary services.
- Lack of recognition of recent development already increasing pressure.
- The settlement tiers make no reference to the rail or motorway connectivity of each settlement.

Settlement-specific responses related to the hierarchy included the following:

- Disagree that Addington and Addington Clearway are identified as separate Tier 5 settlements. Settlement is much larger than and should be recategorised as a Tier 4 settlement.
- Birling should be Tier 5, not 4, due to existing infrastructure constraints with most homes too far from Ryarsh (over 800m walking distance). Trottiscliffe, has more facilities yet is Tier 5.
- Whilst one respondent supported Borough Green as a Tier 2 settlement, others rejected its elevation to a Service Centre, highlighting a range of existing infrastructure constraints, making it more comparable with Hildenborough in Tier 3.
- Ditton does not appear to be listed within the table.
- East Malling is not a sustainable centre, with a limited range of shops, insufficient for day-to-day needs.
- East Peckham should not be a Primary Village due to a lack of existing infrastructure, including no GP/health facility and limited public transport accessibility, offering limited services to Hale Street and Snoll Hatch.
- Hadlow is proposed to be moved from Tier 2 to Tier 3, which does not appear to be justified based upon the sustainability credentials set out in the Sustainable Settlement Review paper. For example, West Malling and Kings Hill scored below Hadlow in the assessment table ranking yet are included in Tier 2 whilst Hadlow is shown as a Tier 3 settlement.
- Hildenborough should be in Tier 4 or Tier 5 as it is much smaller with much less infrastructure than East Malling for example. Contrary to this view, it was stated that Hildenborough has a mainline railway station and a high level of existing and potential housing and should be listed as a Service Centre. Concern regarding the difference in methodology and outcome compared with the adopted and withdrawn Plans.
- Some respondents objected to the merging of Tonbridge and Hilden Park for the hierarchy as there was no basis for moving village from Tier 3 to Tier 1 and citing existing infrastructure constraints.
- Regarding Tier 5 settlements, no justification provided for the omission of other rural settlements and so exclusion of small settlements like Lower Haysden is likely to be unsound.
- Given the access to services and facilities within the settlement and its location on a main route into Tonbridge, Shipbourne is more akin to a Tier 4 settlement. The results do not appear to tally with other villages with similar service levels (i.e. Ryarsh).
- Snoll Hatch and Hale Street are areas within East Peckham and should not be considered as secondary villages over West Peckham, Offham etc.

- Concerns about Tonbridge absorbing too much development with negative impacts due to lack of new settlement options.
- Kings Hill and West Malling should not be within the same tier as they perform very different roles. Kings Hill is a far more sustainable site than West Malling with easy access to all important services.
- Wouldham should be Tier 5, not Tier 3, due to a lack of or overstretched infrastructure. Halling railway station is only close as the crow flies. Comparisons made with Burham, which has more facilities but is Tier 4.

A significant minority of respondents did not express a sentiment towards the policy. Key themes relating to the methodology included:

- Many respondents argue the methodology in the Sustainable Settlement Study (2025) is flawed. Key concerns include inconsistent scoring and anomalies across settlements, arbitrary weightings of facilities/infrastructure including transport accessibility, particularly rail, over rigid 800m walking distance rule which doesn't reflect real travel behaviour or cycling and a lack of transparency in how scores have been generated and applied.
- Disagreement with the methodology, which has produced outcomes that differ markedly from the adopted Development Plan and the withdrawn Local Plan.
- Some respondents express support for the overall settlement hierarchy and its logic, including the principle of distributing growth across Tiers 1–4 and Tier 5 villages being protected from inappropriate growth.
- The overuse of land released from the Green Belt is partly driven by the settlement hierarchy structure.
- Inconsistent application of evidence such as the classification of agricultural land, presence of priority habitats and heritage constraints.
- All settlements from Tier 1 to Tier 4 should have a development boundary as they are sustainable locations for development.
- Rail stations have varying degrees of facilities, for which consideration needs to be given to any improvements to facilitate large scale and cumulative development nearby, to ensure they remain able to accommodate increasing rail patronage.

Settlement-specific responses related to the hierarchy included the following:

- Aylesford Village should be upgraded to Tier 3, due to considerations such as close links to the Medway Gap and access to rail station and cycling accessibility not considered.
- Birling should be Tier 5 in line with Addington and Trottiscliffe, not Tier 4, due to infrastructure constraints including almost no public transport and no shops, GP or school.

- Burham Tier placement supported but lack of allocations despite positive Sustainability Appraisal findings was challenged.
- East Malling & Mill Street should be separated from the Medway Gap in the scoring due to differing rural/urban characteristics.
- East Peckham should not be a Primary Village due to a lack of existing infrastructure, including no GP/health facility and limited public transport accessibility, offering limited services to Hale Street and Snoll Hatch. Others, however, considered the rankings to be appropriate and noted the proximity of Beltring and Yalding rail stations in enhancing the settlement's sustainability.
- Some supported Hadlow's classification as a sustainable Tier 3 settlement but others queried the scoring, which ranked Hadlow and also Hildenborough above West Malling and Kings Hill.
- Hildenborough should be in a higher tier.
- Some respondents agreed and disagreed that Kings Hill is an appropriate Tier 2 growth location.
- Medway Gap has been appropriately identified as one of the Borough's Principal Service Centres.
- Plaxtol should be downgraded from Tier 4 to 5 due to limited services and infrastructure.
- Support for Tonbridge and Hilden Park as a Principal Service Centre, which reflects the role of Tonbridge as the leading centre for services and facilities.
- Support for Shipbourne being in Tier 5.
- West Malling should not be in Tier 2 with Kings Hill which is a planned urban centre with extensive services whereas West Malling is a small market town with limited capacity and heritage constraints. Sustainability profiles are different, particularly rail access versus service provision.

#### Summary of feedback from Statutory Consultees

**Network Rail Property (Southern)** did not express a sentiment view. Tonbridge as a Tier 1 settlement was supported as it is served by a station that offers several regular rail services through Kent and into London. However, the cumulative impact of development on the station must be considered to ensure it remains able to accommodate increasing rail patronage. Tier 2 settlements at Snodland and Borough Green are serviced by railway stations whilst West Malling and Kings Hill are both likely to utilise West Malling station. These stations have varying degrees of facilities for which consideration needs to be given to any improvements to facilitate both large scale and cumulative development nearby. It is noted from the Local Plan Key Diagram at figure 5.13, that there are large scale draft allocations east and west of Barming. Network Rail is seeking funding for step free access at Barming station alongside other

improvements and development around the station should continue to contribute towards these necessary improvements to ensure the station can accommodate future growth.

#### Summary of feedback from District / Boroughs

There were no comments from districts and boroughs.

#### Summary of feedback from Town and Parish Councils

- **Aylesford Parish Council** were dissatisfied with the hierarchy, stating that the reasoning was undermined by the quota of development within Tier 4 areas.
- **Birling Parish Council** did not express a sentiment view but stated that Birling should be downgraded from Tier 4 to 5 in the hierarchy, based on the range of services and facilities available and comparisons with other villages in Tier 5. School in Ryarsh is within walking distance (for some), the distance involved is such that there is concern that children living in Birling may be disadvantaged in gaining entry in the future.
- **Burham Parish Council** were unhappy with the hierarchy, stating that Burham is rightly allocated to tier 4 but Wouldham, with much fewer facilities should be tier 5 or possibly tier 4. There are knock on effects to this mistake across the East Bank.
- **East Peckham Parish Council** were unhappy with the hierarchy, stating that East Peckham should not be a Primary Village and Hale Street and Snoll Hatch should not be Secondary Villages due to a lack of existing infrastructure, including no GP/health facility, broadband speed and limited public transport accessibility.
- **Ightham Parish Council** expressed a neutral view of the hierarchy and support for Ightham being in Tier 4.
- **West Malling Parish Council** were satisfied with the hierarchy, stating that it seemed a good representation of settlements.

#### Officer response to the consultation feedback

The Regulation 18 consultation invited comments on the settlement hierarchy (table 5.6). A number of representations were received from residents, land promoters, parish councils and other stakeholders. The comments have provided valuable feedback on the clarity, appropriateness and deliverability of the policy.

The settlement hierarchy (table 5.6) is intended to be a key part of delivering our spatial strategy. A number of checks and refinements will be made as we progress towards Regulation 19. This includes supporting text and evidence base to address concerns about clarity, interpretation and application and to ensure that matters raised are taken into account. These will include:

- Reviewing information related to the tier assessment methodology to ensure it is accurate, considers best practice and explained clearly.
- Ensuring that the methodology has been applied consistently across settlements.
- Consider responses related to the methodology to ensure that it is aligned with best practice.
- Taking account of any amendments to the hierarchy in terms of effects on the tiers of other settlements, such as nearby settlements.

**Question 7 - Do you agree with Policy SP3: Settlement hierarchy and general development principles?**

Total Number of responses received: 537					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
4	27	31	25	126	324

Summary of issues raised

The comments provided by respondents to this question reflect a wide range of views, from support for the settlement hierarchy approach to concern that the concept lacked flexibility. A total of 537 responses were received. Whilst there was support for the settlement hierarchy approach as a concept, many respondents argued that the hierarchy itself is inaccurate, unjustified or flawed. There were, however, also disagreement regarding whether settlements had been appropriately assessed. Others considered the approach was too rigid and a permissive approach to sites adjacent to development confines would support housing delivery at sustainable settlements or prevent settlements stagnating. There was also a high level of concern expressed regarding the reliability of services and infrastructure evidence and concern regarding a lack of transparency in how scores and tier boundaries had been calculated.

A minority of respondents who expressed a view strongly agreed or agreed with SP3. Key themes included:

- The policy makes complete sense.
- Agree with the need to focus development within sustainable settlements (Tiers 1 – 4) where there is access to services, employment, affordable housing and transport, if this does not destroy natural boundaries between towns/villages.
- Vital that sympathetic development is permitted in villages and the countryside to ensure sustainable communities.
- Tonbridge and Malling is predominately a rural borough and it is important that development policies recognise and protect this.

- Broadly agree, but tier 4 and even tier 5 settlements can contribute to housing numbers.
- Sites within but also adjoining sustainable settlements should be prioritised to meet the identified housing need, in line with the preferred growth option, and this should be reflected in the policy.
- Agreement that only limited residential development adjacent to Tier 5 settlements would be considered acceptable proportionate to size of settlement.
- Green Belt or green field buffers between Tier 5 settlements and other settlements (inc. Tier 1) must be maintained, as a minimum of 500m, and there should be Green Gaps between major growth centres.
- Settlement hierarchy seen as a logical approach, but some respondents expressed concerns regarding the position of specific settlements.

Some responses were related to specific settlements. These included:

- Support for infilling within East Peckham but would be very strongly against the village boundaries being further expanded.
- Birling should be a tier 5 settlement.

Some respondents expressed a neutral view of the policy. Key themes included:

- The principles appear sound.
- First sentence of policy: 'Development will be supported in addition to allocations proposed within this plan...' needs to be redrafted to be crystal clear as to its intended meaning and scope.
- The Tier allocations need to be reviewed by people with local knowledge.
- The hierarchy is not correct.
- Agree with the identified hierarchy but Tier 3 and 4 settlements could have made a greater housing contribution. Sustainability is a laudable objective but equally important to sustain the vitality of existing small settlements, some of which are stagnating.
- The settlement hierarchy and general development principles are fine if the use of "Grey" belt is removed, as it is green belt and not brown field land.

Some responses were related to specific settlements:

- Do not agree with Birling being Tier 4.
- Proximity of additional 1300 homes to Upper Halling should make proposed site unsuitable but, because the village is in Medway, this has not been considered.
- No allocations for West Malling, despite its role as a Tier 2 Service Centre, yet other settlements in this tier receive significant allocations.

- Policy appears to be good, but Tiers are incorrect especially Wouldham which should be Tier 5 as it does not have any of the facilities you are describing.

A significant majority of respondents that expressed a view disagreed or strongly disagreed with the policy. These included 61 repeated representations stating that the omission of the option of a new settlement has created a disproportionate loading onto Tonbridge and the surrounding areas. There were also 15 repeated representations, and 5 that were similar, stating that the cumulative effects of the planned growth resulting from the settlement hierarchy approach in and around Tonbridge and the neighbouring TWBC area will be unsustainable and have serious consequences for the town. The rigid application of the policy approach meant that “edge of settlement sites” have clearly been the first option, excluding equally sustainable sites only slightly away from the settlement.

Other key themes included:

- Many respondents argued that the settlement hierarchy is inaccurate, unjustified or flawed.
- Many respondents also stated that allocations exceed the capacity of rural villages, harming their character and identity, lead to coalescence, e.g. Hildenborough and Tonbridge, and are not proportionate to their level of services.
- Infrastructure was often considered already overstretched and unable to support further growth, including severe congestion on key routes, overcrowded trains and poor public transport, Insufficient school places, GP access, parking, and community facilities, water supply, sewerage, and flooding pressures.
- No confidence that infrastructure providers will be willing or able to cope with the challenges arising from proposed developments.
- Respondents raised environmental concerns regarding loss of countryside, biodiversity and local green spaces, impact on Kent Downs AONB and other sensitive landscapes, existing flooding problems e.g. East Peckham and loss of Best and Most Versatile agricultural land.
- Criticism of site selection and evidence base including inconsistencies between assessments, omissions or inaccuracies, e.g. regarding agricultural land classification and priority habitats, brownfield sites that should be prioritised but had been dismissed without adequate investigation and a lack of transparency regarding the settlement hierarchy and Sustainable Settlement Study.
- Policy seen by some as overly permissive. Others, however, agreed that whilst policy should focus windfall growth to the most sustainable locations or locations of housing need within the built-up areas of settlements, the policy should be amended to be sufficiently flexible to adapt to locations at the edges which may otherwise be classified as ‘countryside’. Part 2 of the policy was

ambiguous on this point and should anticipate situations where the five-year housing land supply cannot be met.

- Some planning authorities have moved to a position where a site's relationship to the built-up area is assessed in each case. A similar approach could be adopted for Tier 1-3 settlements i.e. the more sustainable locations. Such a policy could also require a higher proportion of affordable housing from unallocated sites on the periphery of sustainable settlements.
- Policy wording open to interpretation and does not guarantee protection for rural communities.
- Support for policy principles, not the detail. Another view was not supportive.
- Support for a Tier 5 rural settlements policy but criterion 3d not considered justified as often difficult to gain community support for development.
- Agree with criteria under point 3 of SP3, regarding tier 5 developments, but the meaning of SP3 points 1 and 2 should be made clearer.
- The restrictions applied to tier 5 settlements should be assumed by tier 3 & 4 settlements, where these are distant from sustainable traffic hubs, railway or motorway, and are closely linked to the surrounding agricultural and rural land.
- The concentration of development within established settlement boundaries is supported and should be prioritised over expansion into green areas.
- Countryside policies should be amended to recognise the importance of agriculture and food production and resist creeping residential and leisure use through horsiculture.
- Housebuilders should propose places to build only if they can resolve the consequences for existing infrastructure.
- SP3 not supported as sustainable development requires flexibility, not a top-down hierarchy that freezes settlements into fixed categories. Funnelling most development into a limited number of higher-tier settlements restricts the social and economic resilience of villages and rural areas, risking long-term decline as younger people are unable to access housing and local services lose the population needed to remain viable.
- Concentrating development disproportionately on a few larger settlements risks overloading infrastructure, eroding local character, and creating congestion and environmental strain.
- Settlements with limited services today could improve if modest, well-planned development were allowed.
- The policy does not meet Core Strategy policies (CP 13. CP 6. CP 2. CP26).
- There should also be space for nature and public open space.
- Housing numbers for the borough do not seem to reflect a fair national distribution and overly target this region.

- Don't want green belt areas built on but see no other options if you are to meet these targets.
- A small minority of respondents stated that developers ride rough shod over requirements and then wait to see what the consequences are or felt the consultation offered insufficient opportunity for detailed comments or the process was predetermined.

Some responses were related to specific settlements. These included:

- Borough Green, Hildenborough, Tonbridge and other settlements are incorrectly classified, leading to over development.
- Tier 5 settlements (e.g., Shipbourne, Plaxtol) wrongly assumed to be unsuitable for growth.
- Some settlements (e.g., Hilden Park) are considered artificial or unrecognised by residents, creating confusion.
- Calls for Hadlow to remain in Tier 2, not downgraded.
- Growth at Hildenborough seen as disproportionate and harmful to local character. Insufficient public transport and community infrastructure.
- Lack of infrastructure or capacity at Borough Green, Wrotham, Platt, East Peckham/Hale Street/Snoll Hatch, Wouldham, Peters Village and Snodland/Holborough Lakes.
- No allocations for West Malling, despite its role as a Tier 2 Service Centre, yet other settlements in this tier receive significant allocations in the plan. A contrary view was that West Malling should be tier 3 and was only classified as a service centre because of proximity to Kings Hill.

Most respondents did not express a sentiment towards the policy. There were 254 repeated representations, stating that the cumulative effects of the planned growth resulting from the settlement hierarchy approach in and around Tonbridge and the neighbouring TWBC area will be unsustainable and have serious consequences for the town. The rigid application of the policy approach meant that “edge of settlement sites” have clearly been the first option, excluding equally sustainable sites only slightly away from the settlement.

Other key themes included:

- Broad support for the settlement hierarchy as a concept with many respondents agreeing with the principle of directing development to the most sustainable locations (Tiers 1–4). Respondents supported using the hierarchy to shape growth, prioritising Tier 1 and Tier 2 locations with good services and transport. Most concerns related to how the hierarchy has been applied.

- A recurring theme was that the hierarchy puts excessive growth pressure on locations including Tonbridge, Hildenborough / Hilden Park and Kings Hill, with concerns including infrastructure (e.g. roads, schools, health provision) already not be able to cope, loss of character and cumulative impacts with planned growth in neighbouring local authority areas.
- Many submissions highlight infrastructure as a major constraint that does not appear to be addressed sufficiently in the application of SP3.
- Many representations argue that the application of SP3 has been too rigidly focused on “edge of settlement” sites, resulting in an over-reliance on Green Belt release. Respondents also argue the policy has been inconsistently applied with similar sites treated differently and is based on incorrect or incomplete evidence, e.g. regarding agricultural land classification (BMV land), priority habitats, heritage constraints and accessibility assessments. Several respondents stated that more sustainable, non-Green Belt sites were dismissed unnecessarily.
- Recurring argument that Tier 3 (Primary Villages) and Tier 4 (Secondary Villages) are sustainable locations and should take more growth, reducing over-reliance on strategic sites. Additional small/medium sites in these tiers would improve deliverability, support rural services and create a more balanced pattern of growth.
- The Tier 5 element of the policy was seen by some as self-contradictory and undeliverable in practice. Respondents argued that it allows development in “very limited” or “infill” form, even though Tier 5 settlements are defined as unsustainable locations with very limited services. Contrary concerns include criteria creating a local veto on development and undermining the windfall allowance which has been dependent on small sites at settlement edges.
- There is a need for a small sites policy with SME developers, landowners, and planning consultants arguing that SP3 restricts small and medium sites too heavily. A dedicated policy should allow development adjacent to Tier 1–4 settlement boundaries, unlock sites above one hectare and up to 60 dwellings, support SME builders, diversify housing supply, reduce reliance on strategic sites and to align the Plan with 2025 draft NPPF requirements for 10% of housing to be on small and medium sites. Tight development boundaries also make delivery more difficult.
- Several respondents challenge how settlements have been classified. For example, Hilden Park should be treated as part of Hildenborough, not Tonbridge, while Kings Hill and West Malling have fundamentally different functions and grouping them together in Tier 2 is not justified and risks policy inconsistency. Aylesford Village should be reclassified from Tier 4 to Tier 3 due to size, services and the amount of allocated growth.

- There was support where site allocations clearly relate to settlement hierarchy classification and where the Sustainable Settlement Study provides strong justification.
- There has been an over-dependence on releasing Metropolitan Green Belt and a lack of consideration of alternative non-Green Belt sites. There was also disagreement over “Grey Belt” identification and fears of coalescence (e.g. Kings Hill/West Malling and Borough Green with neighbouring parishes).
- Several respondents argue that sustainability scoring appears inconsistent or inflated for some locations, with some settlement assessments double counting services in neighbouring areas. Some respondents have noted dramatic but unexplained changes from earlier assessments.

#### Summary of feedback from Statutory Consultees

- Kent County Council did not express a sentiment but supported the Settlement Hierarchy, where development sites are close to services and facilities and/or are well-connected by public transport, walking and cycling. Some sites may be adjacent to existing settlements but connected by routes which are unsuitable for sustainable travel modes and have no potential to improve these or provide alternatives. This needs to be considered as TMBC bring sites forward. It was requested that paragraph 5.58 included a reference to active travel infrastructure also being minimal in settlements at the bottom of the hierarchy and policy criterion 3e be amended to read: "Suitable and safe vehicular access for all can be provided to the site with separate provision for pedestrian footpaths."
- Natural England did not express a sentiment but noted that some draft Tier 5 settlements fall within National Landscapes and advised that an additional criterion is added to policy point 3, requiring development to conserve and enhance landscape character where Tier 5 settlements lie within a National Landscape.

#### Summary of feedback from District / Boroughs

- **Maidstone Borough Council** expressed a neutral view of SP3 and were pleased to see at paragraph 5.38 that early transport modelling indicates growth can be mitigated on the highway network but would like to understand better if any mitigations are needed or have any implications for the network in Maidstone Borough.
- **Tunbridge Wells Borough Council** supported the methodology set out in the Sustainable Settlement Study 2025 and noted that the tiers (1 to 5) correlate with TMBC’s proposed housing allocations.

#### Summary of feedback from Town and Parish Councils

- **Aylesford Parish Council** were dissatisfied with the policy as it does not meet Borough Core Strategy policies (CP13. CP6. CP2. CP26).
- **Borough Green Parish Council** did not express a sentiment but stated that it was following the lead of Solihull MBC by running a consultation concurrent with the local plan consultation with a view to adopting Town Status. The Parish Council have been advised this could restore the coalescence protection afforded to Parishes prior to recent changes in NPPF and Greenbelt rules. This could prevent Borough Green sprawling and coalescing with neighbouring Parishes, particularly in the north where the existing Green Wedge is only one field wide.
- **Burham Parish Council** considered that SP3 was sensible and the Parish Council was happy with the policy.
- **East Peckham Parish Council** did not express a sentiment view but disagreed with the application of the policy, stated that proposed site allocations in East Peckham, Hale Street and Snoll Hatch do not offer sustainable development and that it was in the early stages of commencing work on a Neighbourhood Development Plan.
- **Hildenborough Parish Council** did not express a sentiment but objected to SP3 as it was not effective and was not consistent with NPPF paragraph 69 (housing requirements for designated neighbourhood areas). The Plan was supporting development across Tiers 1-4, treating settlements of very different sizes, roles, and capacities as equivalent when it comes to planning for growth. By failing to recognise these differences, the Plan risks prioritising locations where development cannot be delivered sustainably. TMBC incorrectly classify Hilden Park as part of Tonbridge, but it is part of Hildenborough. Allocations fail to take adequate account of Hildenborough's limited capacity and low sustainability, increasing car dependency and infrastructure pressures while undermining the village's identity and the integrity of the Green Belt. Tonbridge, as a Principal Service Centre, should be prioritised for larger allocations. The hierarchy should be amended, removing Hilden Park from 'Tonbridge' in the list of Principal Service Centres and Hildenborough from the list of Tier 3 Principal Villages.
- **Kings Hill Parish Council** did not express a sentiment view but stated that Kings Hill is a master-planned community with a defined structure and limited capacity for further expansion. The proposed allocations undermine the settlement hierarchy and threaten coalescence with surrounding areas.
- **West Malling Parish Council** were satisfied with the policy, stating that it seemed reasonable to create housing where there is access to services, if this does not destroy natural boundaries between towns/villages.

### Officer response to the consultation feedback

The Regulation 18 consultation invited comments on policy SP3: Settlement Hierarchy and General Development Principles. A significant number of representations were received from residents, statutory consultees, developers, land promoters, other local authorities and parish councils and other stakeholders. The comments have provided valuable feedback on the clarity, appropriateness and deliverability of the policy.

Policy SP3 is intended to be a key part of delivering our spatial strategy. The premise is that development will be supported within Tier 1 – 4 settlements within a defined settlement boundary. Outside of these boundaries countryside policies will apply.

Settlement boundaries have been drawn to include draft site allocations and taking into account constraints and also other planning matters such as sustainability. It is worth noting that development outside of these boundaries can come forward under certain circumstances but development must meet certain criteria as set out in the rural development policies.

Checks and refinements will be considered to the policy, supporting text and evidence base to address concerns about clarity, interpretation and application and to ensure that matters raised are taken into account. These will include:

- Reviewing information related to the tier assessment methodology to ensure it is explained clearly.
- Ensuring the methodology has been applied consistently across settlements.
- Considering responses related to the methodology to ensure that it is aligned with best practice.
- Reviewing the policy wording in response to the comments submitted, where this would align with national policy and guidance.
- Taking account of any amendments to the hierarchy in terms of ‘knock on’ effects on the tier classification of other settlements.

### **Question 8 - Do you have any comments on the Sustainable Settlement Study?**

Total Number of responses received: 179		
Yes	No	Not stated
73	79	27

### Summary of issues raised

There were 179 responses received to this question. Comments expressed a range of views on the methodology and findings in the Sustainable Settlement Study. Many respondents acknowledged that the study was a necessary piece of evidence for the

spatial strategy, providing a structured assessment of settlement sustainability and a way to compare services and facilities. However, many respondents challenged how the assessments had been conducted, stating the findings were inconsistent, insufficiently transparent and not robust enough to underpin the settlement hierarchy or site allocations. Most objections focussed on transport accessibility, services capacity, environmental sensitivity and mismatches between scoring and final settlement rankings. Many communities argued that their settlements were too high in the classifications, with significant implications arising from development, whereas other respondents including developers had a contrary view, arguing that specific settlements had been classified correctly or should be placed into higher tiers.

Comments on the Sustainable Settlements Study were also received in response to questions related to Table 5.6 and policy SP3. Those comments have been summarised against those questions but will form part of the overall consideration of the study.

Key themes set out by respondents who provided comments on the Sustainable Settlement Study included:

- Many respondents expressed concerns with the Sustainable Settlement Study methodology, including a lack of transparency over scoring and weighting, inconsistencies between scoring outcomes and final settlement tiers, subjective judgements overriding quantitative result and use of outdated or desk-based data that does not reflect the reality on the ground. There were concerns regarding apparent errors in public transport scoring (especially bus services), undervaluing transport accessibility and overestimating sustainable transport potential, lack of capacity considerations (schools, healthcare, parking, broadband), underweighting of environmental constraints and landscape sensitivity and the grouping of some settlements (e.g., Tonbridge with Hilden Park). The functional relationships between settlements were also queried.
- The methodological approach differs markedly from the adopted Development Plan and the withdrawn Local Plan. The latest quantitative scoring approach and vague qualitative judgements have produced different and unexplained results compared to the earlier studies. Some detailed methodology critiques were submitted.
- Some respondents stated that the Settlement Sustainability Study had not been published early enough for scrutiny or included a sufficient explanation of the methodology employed.
- Many responses set out concerns regarding infrastructure capacity. Transport issues included severe road congestion (e.g. A25, A228, B2016), inadequate bus service, unsafe or unrealistic cycle routes, overcrowded trains (e.g., Borough Green station) and cumulative impacts of multiple developments had not been addressed. Service issues included GP and dentist shortages, pressure on

schools and a lack of local shops and community facilities in some villages. Utility issues included water supply shortages, recent hosepipe bans, wastewater treatment capacity concerns and broadband coverage.

- Many respondents raised concerns regarding environmental and landscape issues including protection of Green Belt and greenfield land, coalescence between settlements (e.g., Snodland, Halling), impacts on SSSIs (e.g., near Holborough Lakes), the Importance of the Kent Downs AONB and threats to landscape character and wildlife corridors.
- Regarding the spatial strategy, it was argued that the plan should consider a new settlement to distribute growth more sustainably.
- There was support for focussing growth in the most sustainable locations, but concerns were also expressed about heavy reliance on large settlement extensions and fears that sustainable settlements would be overburdened.
- Over-reliance on large sites could risk housing delivery, due to long lead-in times. Smaller sites in sustainable settlements should play a stronger early role.
- General concerns were expressed regarding the need for stronger protection for historic settlements, loss of village character and rural identity, distrust of developers and decision-makers, the long-term sustainability of allocations, climate impacts and carbon emissions and a feeling that real world lived experience is ignored in favour of theoretical modelling.
- No justification provided for the omission of other rural settlements under the Tier 5 category.
- Some respondents claimed that sites appear to have been scored to justify preferred allocations and that developer interests seem to shape outcomes more than community needs.

Whilst some individual settlement classifications were supported, others were disputed. In some cases, different parties requested changes to lower or raise a tier classification for the same location. These included:

- Some respondents supported Borough Green as a sustainable and accessible Tier 2 settlement, but others disagreed citing infrastructure constraints.
- Burham, correctly identified as having a good range of local services, access to public transport and strong connections to the wider Medway Valley. The settlement is sustainable and capable of accommodating modest, well planned growth.
- East Peckham, Hale Street & Snoll Hatch had been scored too highly, with concerns including inadequate bus services, lack of GP and dentist services, no rail station and broadband limitations. Others promoted the settlement as a sustainable Tier 3 settlement with good transport accessibility and established employment opportunities.

- Process flawed as Hadlow scored as more sustainable than either West Malling or Kings Hill. Others argued the settlement should be moved from Tiers 3 to 2, based on its services score.
- Hildenborough has been incorrectly placed in Tier 3, despite a very high quantitative sustainability score, and should be reclassified as Tier 2. Confusion and inconsistency regarding functional relationships with Tonbridge. Others raised concerns that allocations (e.g., HI2) are not sustainable.
- There were concerns regarding the grouping of Tonbridge and Hilden Park as a Principal Service Centre, but this approach was also supported.
- Support for the high sustainability rating of Kings Hill. Some respondents argued it should take more development, while others warn against further pressure on infrastructure including on the A228.
- Shipbourne should be in Tier 4, not Tier 5, due to relatively good local services.
- Watlington recognised as ranking highly within Tier 3, with some arguing that it was a clearly sustainable location suitable for further modest growth.
- Some supported the Tier 2 classification of West Malling whilst others queried whether services shared with Kings Hill had been double counted. The differences between the 2 settlements and the infrastructure available were cited as reasons they should not be in the same tier. Concern was expressed about lack of housing site allocations for West Malling as a Tier 2 settlement.
- Wouldham should be Tier 5, not 3 or 4, due to infrastructure problems and congestion.

Individual settlement site allocation sustainability scores were disputed. These included TO1, Borough Green, Hildenborough sites, Holborough Lakes/Snodland, with issues raised including congestion and poor access, insufficient public transport, flood risk, inadequate local services to support large numbers of dwellings and a lack of comparative assessment between sites.

#### Summary of feedback from Statutory Consultees

- No responses received for this question.

#### Summary of feedback from District / Boroughs

- No responses received for this question.

#### Summary of feedback from Town and Parish Councils

- **Aylesford Parish Council** commented that without a local plan, developers carry on, as they have business and stakeholder objectives to meet, and local government has less control of "when, what and where" development takes place. A statutory local plan hopefully should bring an element of control back to local government.

- **East Peckham Parish Council** stated that residents do not agree with the Settlement Hierarchy which identifies East Peckham as a Primary Village and Hale Street and Snoll Hatch as Secondary Villages. The settlements have a limited bus service, no train station or GP and limited broadband access and do not offer sustainable development locations. The Parish Council considered that the scoring system produces inconsistencies and undervalues transport accessibility, leading to unsound conclusions.

Officer response to the consultation feedback

The Regulation 18 consultation invited comments on the Sustainable Settlements Study. A significant number of representations were received from residents, statutory consultees, developers, land promoters, other local authorities and parish councils and other stakeholders. The comments have provided valuable feedback on the clarity, appropriateness and deliverability of the policy.

The study is a key part of the evidence base supporting our spatial strategy. Checks and refinements will be considered to the study to address concerns about clarity, interpretation and application and to ensure that matters raised are considered. These will include:

- Reviewing information related to the tier assessment methodology to ensure it is explained clearly.
- Ensuring that the methodology has been applied consistently across settlements.
- Considering responses related to the methodology to ensure that it is aligned with best practice.
- Taking account of any amendments to the hierarchy in terms of ‘knock on’ effects on the tier classification of other settlements.
- Working again with Members and Parish Council’s as relevant to ensure information is up-to-date.

**Question 9 – Do you agree with Policy SP5: Future Employment Growth?**

Total Number of responses received:296					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	19	40	11	30	16

The majority of respondents (219) were residents with over 60 being developers/agents.

### Summary of issues raised

For those respondents (21) who expressed clear support for Policy SP5 (mainly residents), their comments centred on confidence in the employment strategy, endorsement of the evidence base, and appreciation for positive economic growth. Specific comments included:

- Support the overall employment strategy:
  - a reasonable forecast;
  - people need jobs; more jobs for Tonbridge and Malling residents must be provided;
  - employers should be encouraged to recruit locally;
  - the borough performs well in this area;
  - the improvement of services is needed;
  - the economic centres are well spread out and where they need to be.
- Support the overall approach to the allocation of appropriate employment sites and retaining existing employment premises;
  - notes that the Study advises that forecasts may need to be revised closer to the Local Plan examination given high uncertainty and variability in the labour market;
  - supports that TMBC seeks to meet its own employment needs in full by delivering a minimum 301,000 sqm of B2 and B8 floorspace and 60,500 sqm of office floorspace over the plan period through the provisions of this Policy SP5, as well as Policies E1: Supporting a Prosperous, Inclusive and Sustainable Economic Future;
  - support the positive economic growth and the Council's objective to meet employment needs in full;
  - the policy is essential for future employment prospects - pleasing to note that TMBC is able to meet the need for the supply of industrial land and a substantive proportion of the area sought for office need - with ongoing call for more sites at the present time.
- Concern about allocation of employment at Spider Hall where it is considered that the access is inadequate for increased traffic generation that will increase rat running through Birling.
- The retention of existing employment premises; in the case of Tonbridge, the availability of parking and also the increasing business rates may be a factor preventing the use of small retail units to increase employment.

A good proportion of respondents answered neutral to the sentiment question. From this group, comments included:

- Support for the policy – particularly in relation to rural areas and farm diversification.
- Local employment is restricted by the lack of affordable housing. The attempt to instal affordable housing, to keep it affordable, and to manage BTR contracts and provision is good.
- Support the policy but disagree about site selection particularly farm diversification or adding employment premises in the area of Hildenborough. Any new development in this rural area will significantly impact its character, wellbeing of local residents and will negatively impact surrounding nature and wildlife.
- Kings Hill and the immediate environs – concern about employment/housing balance and impact of commuting.
- Support for the policy in terms of increased revenue; local employment opportunities and improvement to social well-being.
- Borough Green needs more jobs, to allow local employment and less commuting.
- Policy is not relevant to Wouldham Development.
- Acceptable apart from Spider Hall, Birling. Inadequate access plus excess traffic generation leading to congestion and further increase of rat running through the village.
- Unclear what the employment provision is for – uncertainty expressed about the provision of new employment space within the context of new technologies such as AI, and within the context of the current economic climate (business rates, tariffs; lack of apprentice and vocational schemes).
- The focus should be on improved local infrastructure, e.g. GPs, local shops, dentists; health centre.
- A good balance is needed between new employment and too many houses being built, destroying open spaces.
- Reference to Quality Traditional Design Codes.

The majority of respondents who disagreed with Policy SP5 were local residents. Comments included a number of different issues such as scepticism about employment need, location of allocations, infrastructure constraints, sustainability issues, and misalignment with housing growth and local character. Comments included:

- employment allocations are excessive or unjustified - respondents argued that the Local Plan is allocating far more B2/B8 floorspace than required, contrary to the evidence base.

- the Local Plan is over-providing employment land while ignoring falling office demand and rising permitted development losses.
- concern that employment growth is not realistic - respondents doubted the underlying economic assumptions and predicted weak growth.
- Policy SP5 creates a mismatch between housing and jobs (Hildenborough Focus) - SP5 does not align employment growth with housing distribution.
- Respondents were concerned about transport, congestion and highway safety concerns. There was a particular emphasis on locations around Tonbridge, Hildenborough, Spider Hall (Birling), and the A228 corridor. In addition there was concern that employment developments will not guarantee junction improvements or public transport upgrades.
- Environmental and Landscape Concerns (Including Green Belt Sites) - objections to employment allocations within sensitive landscapes. Specifically, there was particular objection to Site E8 (Little Postern) with concern that it is entirely within the Green Belt, contains nearby listed buildings and is distant from the M20/M2 corridor including poor access. Others worried about impact on wildlife, rural character, and former quarry/landfill sites.
- Lack of a new settlement option creates pressure on existing areas. Therefore, SP5 and the wider spatial strategy are missing the option of a new settlement, leading to disproportionate pressure on Tonbridge.
- Concern about local character and community impact concerns. This includes industrial development described as destroying Kentish rural character, contributing to urban sprawl and reducing quality of life.
- Concerns expressed in relation to SP5 encouraging employment in areas with no transport, few services, or limited community infrastructure.
- Lack of clarity on type of employment being delivered - No detail of what type of employment will be increased for example. It was also considered that the policy is poorly written and fails to establish how businesses would support future employment growth.
- Water, utilities and environmental capacity concerns - SP5 fails to address pressure on water supply, sewage systems, and utilities, already under strain.

16 respondents did not answer the sentiment question. These responses tend to fall into several major themes, reflecting detailed technical analysis, site-specific concerns, and broader strategic observations:

- Support the future employment growth policy:
  - where development sites are in sustainable locations which are close to existing services and facilities and/or are well-connected by public transport, walking and cycling, with suitable and safe access provided for all;

- supports this policy but note the expansion of settlements, particularly to the north of Tonbridge town and at East Peckham, are not closely situated to the employment allocations placing further strain on transport infrastructure;
  - support the provision of green space which can be easily reached by active travel.
- strong support in principle to deliver 301,000 sqm B2/B8 and 60,500 sqm office space, acknowledging alignment with the Economic Study 2025.
- calls for higher ambition with the suggestion that Scenario 3 (Labour Supply) should be used to adopt a more ambitious employment growth scenario than the draft plan proposes. Reasons for this included:
  - scenario 3 (Labour Supply) reflects the higher jobs needs generated by future population/housing levels
  - industrial/warehouse demand is stronger than the plan assumes, and TMBC should therefore plan for more B2/B8 floorspace; identify additional employment sites; allow flexibility for office and E(g) uses
- detailed technical evidence submissions where some organisations provided extensive technical commentary on economic modelling; floorspace requirements; supply/demand forecasting; replacement of outdated stock; regulatory changes (e.g., EPC requirements).
- Concern that there is misalignment between housing growth and job locations, particularly to the north of Tonbridge town and at East Peckham, where these are not closely situated to the employment allocations placing further strain on transport infrastructure.
- calls for flexibility and mixed-use approaches where developers and consultants commonly argued for flexibility between B-class and E-class uses; allowance for mixed-use office/industrial employment clusters; avoiding overly restrictive limits on how floorspace is used.

#### Summary of feedback from Statutory Consultees

- **Kent County Council** - Highways and Transport  
 The County Council supports TMBC's Future Employment Growth Policy, where development sites are in sustainable locations which are close to existing services and facilities and/or are well-connected by public transport, walking and cycling, with suitable and safe access provided for all.  
 Paragraph 5.92 (Highways and Transport) - The County Council supports the provision of green space which can be easily reached by active travel.

### Summary of feedback from District / Boroughs

- **Tunbridge Wells Borough Council** - TWBC supports the overall approach to the allocation of appropriate employment sites and retaining existing employment premises.
  - Note that the Economic Study 2025 considers 3 growth scenarios and that the study recommends taking forward Scenario 1 in relation to office space provision and Scenario 2 in relation to industrial and distribution provision (with proposed provision being in excess of the minimum requirements of Scenario 2). TWBC agrees with this approach but notes that the Study advises that forecasts may need to be revised closer to the Local Plan examination given high uncertainty and variability in the labour market.
  - Note and support that TMBC seeks to meet its own employment needs in full by delivering a minimum 301,000 sqm of B2 and B8 floorspace and 60,500 sqm of office floorspace over the plan period through the provisions of this Policy SP5, as well as Policies E1: Supporting a Prosperous, Inclusive and Sustainable Economic Future, E2: Strategic Employment Sites and Policy A1: Employment Allocations.

### Summary of feedback from Parish Councils

- **West Malling Parish council** - Seems a sensible strategy

### Officer response to the consultation feedback

The significant volume and breadth of feedback received on Policy SP5 is welcomed. Responses ranged from broad support for planning positively for economic growth to detailed technical commentary on the evidence base, alongside concerns regarding infrastructure capacity, spatial distribution of employment land, and the suitability of specific site allocations.

**1. Clarifying Employment Need, Floorspace Levels and the Evidence Base** - A number of respondents, particularly from the development and planning sectors, expressed support for TMBC's commitment to meeting employment needs in full and recognised the robustness of the Economic Study 2025. However, concerns were raised regarding:

- the rationale for selecting Scenario 1 (office) and Scenario 2 (industrial) rather than Scenario 3 (labour supply),
- the effect of future EPC regulatory changes on the viability of older stock, and
- the importance of ensuring that the policy is framed around minimum floorspace figures rather than maximum ceilings.

Moving towards Regulation 19, further work will be considered in relation to employment to ensure that the Plan and its economy policies are robust and align with employment need requirements.

**2. Spatial Distribution of Employment Land and Alignment with Housing Growth -**

Several responses (particularly Hildenborough and Tonbridge residents) highlighted concerns that housing and employment growth are not spatially aligned, potentially increasing out-commuting, traffic congestion and demand on rail infrastructure (particularly Hildenborough Station). Officers acknowledge the importance of ensuring good spatial alignment between jobs and homes. Following a review of the Economic Study, further refinement of the supporting text may be appropriate to explain how the plan seeks to balance these considerations across the borough and how other policies operate together with SP5 to promote sustainable patterns of development.

**3. Transport, Highway Capacity and Wider Infrastructure -** these concerns will be considered alongside the Infrastructure Delivery Plan (IDP) and the Transport Assessment. Officers will ensure that the supporting text for SP5 clearly signposts to other policies that cover these matters for completeness.

**4. Flexibility in Employment Land Supply and Use Classes -** A number of technical submissions requested greater flexibility within SP5 to support windfall employment sites; enable a broader mix of E(g) uses; recognise the importance of light industrial space (E(g)(iii)) for SMEs; avoid overly restrictive allocations that focus only on B2/B8 uses. Officers will explore whether strengthening the policy or indeed other employment related policies could help reinforce the Local Plan's positive approach to flexible, adaptable forms of employment space, including for small businesses, start-ups and research-based activities. Any amendments will be drafted to ensure consistency with national policy and the spatial strategy.

**5. Suitability and Justification of Specific Employment Allocations -** Some respondents objected to the suitability of individual employment sites (particularly E8 (Little Postern) and Spider Hall, Birling). Site-specific comments will be assessed in full during the next stage of site allocation review.

**6. Addressing Concerns Regarding Over-Allocation or Under-Allocation -** Some respondents expressed concerns that the plan over-allocates B2/B8 floorspace, while others argued it under-allocates office floorspace or should adopt a more ambitious economic strategy. Officers will continue to review the employment trajectory, supply assumptions, and evidence on commercial market dynamics as part of the review of the Economic Study. The supporting text may be expanded to more clearly explain how the employment need is calculated, how extant permissions and completions factor into supply, and how the plan addresses any gaps in provision.

**7. Ensuring Sustainable and High-Quality Places** - Some respondents emphasised the need to ensure that employment growth does not undermine the Council’s wider objectives for high-quality places, biodiversity, climate resilience, and the protection of rural character. Officers will consider strengthening cross-references to relevant environmental and design policies, ensuring that SP5 is read within the wider context of the Local Plan’s approach to climate mitigation, landscape protection, nature recovery and placemaking.

The consultation has highlighted several areas where clarifications, refinements, or supporting text updates may be appropriate to strengthen the policy, ensure soundness, and improve clarity.

In response, officers will consider the following::

- clarifying in supporting text that SP5’s floorspace requirements are minimums, not maximum.
- enhancing explanation of economic scenarios and evidence.
- flexibility for different employment uses, including SMEs and E(g) uses.
- strengthening links to infrastructure and transport policies.
- improving supporting text on sustainability, site suitability and spatial alignment.
- reviewing site-specific concerns through the allocation refinement process.

These changes will help ensure that Policy SP5 is transparent, justified, and effective, while supporting a prosperous, sustainable and resilient local economy.

**Question 10 – Do you agree with Policy SP7: Green Belt?**

Total Number of responses received: 224					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
11	30	22	13	118	30

Summary of issues raised

A significant volume of responses were received to Policy SP7 and its supporting text. Feedback spanned a wide range of perspectives, with detailed representations from residents, parish councils, statutory bodies, land promoters, community groups and neighbouring authorities. The majority of responses to this policy relate to specific sites, rather than Policy SP7 itself.

The respondents who either strongly agreed or agreed with Policy SP7 expressed clear support for the principle of protecting the Green Belt and for the aims of the policy. Key themes from these responses included:

- Support for the role of the Green Belt in preventing coalescence of settlements and protecting rural character.
- The majority of respondents support for the extension of the Green Belt.
- Some concern about the piecemeal/incremental loss of Green Belt.
- Some acceptance of limited small-scale release of Green Belt land for development where it can be justified, well evidenced and in sustainable locations, but that brownfield sites should be fully exhausted first.
- Some respondents highlighted the importance of Green Belt land for biodiversity, landscape value, and agricultural land to ensure food production.
- However, some respondents expressed concerns about the concept and use of “Grey Belt”.

Respondents who selected a neutral response expressed mixed views toward Policy SP7. They express some support for Policy SP7, dependent on clearer justification, stronger environmental safeguarding, and greater transparency in how the policy is applied. Key themes included:

- General support for Green Belt to safeguard land from inappropriate development.
- Some respondents questioned whether exceptional circumstances can be demonstrated to justify the release of Green Belt land for development.
- Concerns about the concept of Grey Belt.
- Some respondents seek stronger protections for biodiversity and rural character.

The majority of respondents disagreed or strongly disagreed with this policy indicate disagreement, concern, or objection to Policy SP7 (Green Belt). The overarching themes are:

- Respondents expressed opposition to Green Belt release or reclassification as Grey Belt.
- The majority of responses were in connection with the allocation of specific sites over others parcels of land.
- Respondents were concerned that loss of Green Belt would result in coalescence of settlements, particularly around Tonbridge and Hildenborough, and West Malling and Kings Hill.
- Concern that Green Belt land has been proposed for allocation whilst brownfield land has been rejected.
- A number of respondents raised concerns about the lack of transparency in how the Green Belt Assessment has influenced the allocation process, and the lack

of consistency in the application of this evidence in relation to specific proposed allocations such as TO1, Hildenborough, Borough Green and East Peckham.

For those who did not answer the sentiment question, key themes included:

- Many respondents expressed support for the protection of Green Belt, but concerns expressed about the concept of Grey Belt.
- Mixed responses on whether exceptional circumstances have been demonstrated, with some supporting and some disagreeing.
- Many respondents expressed site-specific objections, especially concerning rural identity, flood risk, traffic, and settlement coalescence, and some submitted alternative Green Belt assessments of specific sites.
- A number of these respondents also raised concerns about the lack of transparency in how the Green Belt Assessment has influenced the allocation process, and the lack of consistency in the application of this evidence in relation to specific proposed allocations such as TO1, Hildenborough, Borough Green and East Peckham.

#### Summary of feedback from Statutory Consultees

- **Natural England** support the policy's emphasis on protecting and enhancing the borough's green and blue infrastructure network and supporting nature recovery, within the context of the continued protection of the Green Belt in line with national policy.

#### Summary of feedback from District / Boroughs

- **Tunbridge Wells Borough Council** notes that the policy is supported by updated Stage 1 and Stage 2 Green Belt Assessments. It is also noted that TMBC cannot meet its housing needs and has therefore allocated some sites for release based on their adjacency to a Principal Service Centre or Service Centre, or locations which would not fundamentally undermine the purposes of Green Belt, as set out in the Stage 1 assessment.  
TWBC is concerned that this policy lacks clarity on the approach taken to selecting sites to release, and that there is a lack of justification for the allocation of land, which is not recommended as provisional grey belt in the Stage 2 Assessment. TWBC therefore advises that TMBC should ensure that this policy is more robust and well evidenced ahead of the Regulation 19 consultation, especially with regard to strategic sites including Borough Green Gardens.

#### Summary of feedback from Town and Parish Councils

- **Aylesford Parish Council** notes that quality green belt areas, should always be maintained, as it is in no one's interest to have a complete urban sprawl within SE England.

- **Burham Parsh Council** support SP7 for its prime function of stopping London spreading. However, small developments around existing settlements on brown field sites is very much to be encouraged.
- **East Peckham Parish Council (EPPC)** submits that exceptional circumstances do not exist for altering the Green Belt in and around East Peckham to the extent proposed. The draft Local Plan evidence base fails to demonstrate that the proposed site allocations within East Peckham are sustainable as required by the NPPG.

Further, the reclassification of the land to grey belt would require new accessible green space contributions to be made. EPPC questions the evidence base supporting the alteration of the Green Belt in and around East Peckham.

EPPC requests that TMBC demonstrate that the draft Local Plan evidence base sufficiently evidences that development is maximised in all non-Green Belt locations and that it has prioritised lower performing Green Belt land elsewhere in the Borough.

EPPC notes the intention to extend the Green Belt in other areas whilst seeking to justify the removal of East Peckham Green Belt. Full evidence base justification for this is sought by EPPC.

EPPC seek evidence and assurance from TMBC that all the non-green belt land in the Borough put forward as part of the call for sites exercises has been proposed for allocation, and that lower performing Green Belt land elsewhere in the Borough has been prioritised for proposed allocations, noting that there are sites outside of the Green Belt that have not been proposed for allocation in the draft Local Plan.

- **Teston Parish Council** raises concerns over development in the north-east of the borough and the impact on Parishes within the Borough and beyond the borough boundary.
- **West Malling Parish Council** have submitted a petition to extend the Green Belt to the East of West Malling.

#### Officer response to the consultation feedback

A substantial number of responses were received on Policy SP7 from a range of stakeholders. The policy identifies, via the Policies Map, those areas designated as Green Belt in the borough, and how land in the Green Belt can be used and managed to achieve multifunctional benefits. Officers disagree with the response from Tunbridge Wells Borough Council that land which is not recommended as provisional grey belt, is being proposed for allocation. Provisional grey belt in the borough is identified in Table 7 and Figure 8 of the Stage 2 Green Belt Assessment. All sites within the Green Belt that are proposed for allocation fall within areas identified as provisional grey belt.

Officers acknowledge the strength of opposition regarding release of land from the Green Belt for development in order to meet assessed housing need in the borough, and the desire to see remaining Green Belt protected from inappropriate and incremental development in the future. Officers consider that Policy SP7 remains appropriate and balanced, and in line with National policy, with further detail on managing development in the Green Belt provided by Policy SP8.

However, a number of refinements will be considered to address concerns around clarity and interpretation. This includes:

- Undertaking work to set out the case for Exceptional Circumstances, where land is proposed to be released from the Green Belt.
- Clarification of terms and the role and application of the evidence in the supporting text.
- Undertake additional evidence to demonstrate that all brownfield options have been explored.

#### **Question Q11 – Do you agree with SP8 Managing Development in the Green Belt?**

Total Number of responses received:237					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
8	33	19	19	108	50

#### Summary of issues raised

A significant volume of responses was received to Policy SP8 and its supporting text, the majority coming from individuals. The comments provided by respondents to Question 11 reflect a broad spectrum of views on Policy SP8, with strong representation from both technical planning professionals and local residents. The feedback from individuals predominantly objected to development on Green Belt land in principle, with a large number of site-specific objections. Responses from developers were much smaller in number but included a number of detailed requests for refinement to ensure Policy SP8 avoid duplication and aligns with the NPPF. It should be noted that a large number of responses to SP8 relate to specific sites and the site selection process.

The respondents who either strongly agreed or agreed with Policy SP8 expressed a mixture of views. Key themes from these responses included:

- Support for managing development in the Green Belt Support and the need for a robust policy framework to prevent inappropriate development.

- There was some concern about overlap between policy SP7 and SP8, with suggestions that the wording could be amended to avoid duplication and clarify interpretation.
- There was also some concern that Policy SP8 introduced additional tests beyond those set out in the NPPF, which may cause confusion with the national policy.
- Support for enhanced affordable housing delivery on sites in the Green Belt, although some concern about enforcement of the Golden Rules.

Respondents who selected a neutral response expressed mixed views toward Policy SP8. Key themes included:

- There was support for the need to manage development in the Green Belt, but that is dependent on strong implementation.
- However, there were some concerns about the loss of landscape and village character through incremental development.
- Development on brownfield land should be maximised before Green Belt is considered for development.
- Concern about the concept of Grey Belt.
- Concern about the pressure that would be placed on existing infrastructure by development land in the Green Belt.

The majority of respondents disagreed or strongly disagreed with this policy indicate disagreement, concern, or objection to Policy SP7 (Green Belt). The overarching themes are:

- Respondents expressed opposition to Green Belt release or reclassification as Grey Belt.
- The majority of responses were in connection with the allocation of specific sites over other parcels of land.
- Respondents were concerned that loss of Green Belt would result in a loss of productive agricultural land and pressure on infrastructure.
- Concern that settlements may coalesce, and character would be lost.

For those who did not answer the sentiment question, key themes included:

- Many respondents objected to development on land in the Green Belt.
- A number of respondents expressed concern that SP8 is overly prescriptive and goes beyond national policy.
- Concern that the policy places unnecessary burdens on appropriate development.
- Concern that this policy duplicates other development management policies in the plan.

- Respondents asked that SP8 be simplified, clarified and aligned with national Green Belt criteria.
- Requests for the removal of some specific policy criteria.
- A number of respondents also raised concerns about the lack of transparency in how the Green Belt Assessment has influenced the allocation process, and the lack of consistency in the application of this evidence in relation to specific proposed allocations.

#### Summary of feedback from Statutory Consultees

- **Kent County Council** suggests that part 2d should be amended as follows: “Appropriate parking provision, safe access and egress for all modes, and landscaping is provided to ensure vehicles are parked safely.”
- **Natural England** support the inclusion of criterion 2c that requires developments to reflect local landscape character in line with the National Landscape Management Plans.
- **Southern Water** Southern Water considers that should the need arise, special circumstances exist in relation to the provision of essential wastewater infrastructure (e.g. a new pumping station) required to serve new and existing customers. This is because there can be limited options available with regard to location, as the infrastructure would need to connect into existing networks. The draft National Planning Practice Guidance recognises this scenario and states that ‘it is important to recognise that water and wastewater infrastructure can have specific locational needs (and often consists of engineering works rather than new buildings). This means exceptionally otherwise protected areas may have to be considered, where this is consistent with their designation.’

#### Summary of feedback from District / Boroughs

- No feedback was received from District/Boroughs

#### Summary of feedback from Town and Parish Councils

- **Aylesford Parish Council** Without the use of grey belt areas for development, the development quota would not be achieved.
- **Burham Parish Council** The proposal to allow development on the brown sites in the Green Belt Areas in the west of the Borough is most welcome. This will allow the housing development required across the Borough to be more evenly spread. In the past 20 years, the east of the Borough has taken the majority of the housing development and even in this draft local plan more is allocated to the East Bank of the Medway. So, it is important that areas in the west of the Borough outside of the M25 corridor take their share of the required housing development.

- **East Peckham Parish Council** Whilst SP8 seeks to ensure appropriate design considerations for development within the Green Belt, should Green Belt release in East Peckham be required, then EPPC would seek to develop locally specific design guidance to reflect the local vernacular of East Peckham.
- **Hildenborough Parish Council** The allocations within the Parish are not justified, as some are not supported by the conclusions of the Green Belt Assessment and they are not consistent with national policy due to the failure to demonstrate exceptional circumstances for Green Belt release. The Draft Plan should therefore be amended either to remove allocations that conflict with the Green Belt Assessment or provide a robust and transparent justification explaining why other sites identified for release are required and why less harmful alternatives cannot meet identified development needs. In the absence of such changes, the proposed Green Belt releases should not proceed. Policy SP8 is unsound as it is inconsistent with The National Planning Policy Framework.
- **West Malling Parish Council** While we welcome the proposal that such housing development contains 50% affordable housing, we are greatly concerned that at this % such homes would remain unaffordable by those in housing need. We prefer to see a reasonable % of homes let at social rent levels. We also wish to see such homes being 1-3 bed rather than the 4-5 bed homes that have largely been what developers seem to want to build in our Parish.

#### Summary of feedback from other organisations

- **Kent Wildlife Trust** - recommended that Policy SP8 is amended to require major housing development to provide a 20% Biodiversity Net Gain (BNG) where it will be situated in the Green Belt, or on Grey Belt land released from the Green Belt, alongside the requirements to adhere to the NPPFs 'Golden Rules'.

#### Officer response to the consultation feedback

A substantial number of responses were received on Policy SP8 from a range of stakeholders, most notably site promoters and local residents. The policy seeks to set out the local criteria against which proposals within the Green Belt will be tested.

Officers acknowledge the strength of opposition regarding release of land from the Green Belt for development in order to meet assessed housing need in the borough, and the desire to see remaining Green Belt protected from inappropriate development in the future. Officers consider that Policy SP8 remains appropriate and balanced, and in line with National policy.

However, a number of refinements will be considered to address concerns around clarity and interpretation. This includes:

- Consideration of policy wording to remove duplication and overlap with other development management policies and provide cross-referencing where relevant.
- Clarification to ensure compliance with national Green Belt policy.
- Clarification of terms within the policy that may be open to interpretation.

### Question 12 – Do you agree with SP9: Local Green Gap?

Total Number of responses received: 263					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
25	13	45	34	20	126

#### Summary of issues raised

The comments provided by respondents to this question reflect a range of views. Responses to Question 12 reveal a significant level of engagement with Policy SP9, the Local Green Gap. Feedback demonstrates a combination of strong community desire to protect countryside and settlement identity, alongside technical objections relating to legality, evidence, policy justification and consistency. Many responses are detailed and reflect long standing local concerns regarding heritage protection, landscape character, managing development pressures, and achieving a balanced spatial strategy. A significant number of standard responses were received, which sought to extend the boundary southwards.

Of those respondents who expressed support for Policy SQ9 (either strongly agreed or agreed), many expressed strong agreement with creating a Local Green Gap between Kings Hill, West Malling, East Malling and the Medway Gap. Key themes included:

- General agreement in the need to prevent the coalescence of settlements and protect landscape, wildlife, heritage and rural character.
- Support for the extension of the boundary further south to include the New Barns and Broadwater Farm Conservation Area.
- Some respondents raised concerns about the potential future erosion of the boundary and expressed a desire for a clear definition of key terms contained in the policy to avoid ambiguity.

Of those respondents who expressed a neutral view on Policy SP9, the majority neither strongly supported nor strongly opposed the Green Gap. A key theme is that while the Green Gap has support in principle, there are concerns about the clarity and implementation of the policy, and concern that it is unevenly applied across the borough. Other key themes included:

- Some concern that the policy is being applied selectively and that some areas of the borough are not being given the same level of protection.
- Some respondents suggested that the policy could constrain development in sustainable locations near to train stations, and push development pressure on other areas of the borough which may result in further Green Belt release.
- Concern about the potential future erosion of the boundary.
- That there is insufficient evidence to justify this approach.

For those who disagreed or strongly disagreed, there was general disagreement with the proposed boundary and that other areas of the borough should also be considered for Green Gaps. Other key themes included:

- Concern that the policy would restrict development in sustainable locations, including near to train stations, which is supported by national policy.
- That a Green Gap risks directing more development into the Green Belt.
- Some respondents felt that Policy SP9 was unnecessary as other policies in the Local Plan control development effectively.
- Some concern about the boundary overlapping with proposed employment allocations.
- There was some concern that there is insufficient evidence to justify such an approach.

For those who did not answer the sentiment question, there was strong concern about the coalescence of settlements and loss of individual settlement identity. Other key themes included:

- General support for a Green Gap in principle, but that the boundary should be extended to include the New Barns and Broadwater Farm Conservation Area.
- Desire for stronger protection for conservation areas, quiet lanes, and rural hamlets.
- Strong emphasis on the heritage, landscape, biodiversity and community wellbeing role that the area plays.
- Some respondents identified that there are other areas of the borough that would also benefit from a Green Gap.
- A number of respondents raised concerns that a Green Gap would restrict the ability of the council to meet its housing targets, both now and in the future.
- Some concerns over the compatibility of Green Gaps with national policy.

#### Summary of feedback from Statutory Consultees

- **Natural England** - support the inclusion of a requirement for developments in this gap to contribute positively to the landscape, biodiversity, or recreational value of the area. We note that the Open Space Study identifies poor provision of

accessible greenspace in Kings Hill, and that we advise that this deficit could be highlighted in the policy wording or supporting text.

#### Summary of feedback from District / Boroughs

- **Tunbridge Wells Borough Council** notes that this policy is intended to seek to prevent the coalescence of Kings Hill with nearby settlements such as East Malling, Larkfield, and Leybourne, to preserve the open character of the countryside in the case that a Green Belt extension is not supported by evidence. TWBC recognises that TMBC's Green Gap Study 2025 considers that a Green Gap policy is justified and shown to comply with the NPPF. It is also noted that the policy allows for some development within the green gap, especially on the edge of larger sustainable settlements such as Kings Hill and West Malling, which may be needed to assist in meeting housing need.

#### Summary of feedback from Town and Parish Councils

- **East Malling and Larkfield Parish Council** - strongly support the Green Gap Policy for Kings Hill and the Medway Gap. While we strongly support the Policy, we understand investigation is continuing into whether the Green Belt could be extended eastwards from its current boundary at West Malling, and this is something we would also support.
- **West Malling Parish Council** - The Green Gap idea is too poorly defined to give sufficient protection from development. We would much prefer this land be given full Green Belt status.
- **Hildenborough Parish Council** - wishes to designate the area between Tonbridge and Hilden Park as a Local Green Gap in line with Policy SP9. The purpose of this designation is to retain the separate identities of the two settlements, prevent coalescence, and protect the long-term openness of the countryside between them. A Green Gap, would ensure that Tonbridge's built-up area does not physically merge with Hilden Park and Hildenborough, preserving the distinct character and setting of each community.
- **Kings Hill Parish Council** - supports the principle of a Local Green Gap; however, the proposed boundary:
  - is insufficient to prevent coalescence
  - excludes key recreational and ecological areas
  - fails to protect quiet lanes and green corridors
  - is inconsistent with the stated purpose of SP9.
- **Birling Parish Council** - We support the proposed Green Gap policy, to maintain the separation of West Malling and East Malling, and the aspiration to potentially extend the Green Belt here in due course (Local Plan policy SP1 point 20; SP9; para. 5.93).

- **East Peckham Parish Council** - does not agree with the proposed Local Green Gap in this location or the proposed boundary relating to it and further requests TMBC to review site 58587 again in relation to its allocation and provision of the Green Gap.
- **Burham Parish Council** - Green gap is essential to stop villages joining up and should be considered on the East Bank to stop Aylesford
- **Aylesford Parish Council** - Within part of the Medway Gap starting from Eccles, through towards Aylesford, Ditton, East Malling and on towards Kings Hill may become a complete urban settlement.

Officer response to the consultation feedback

A significant volume of responses was received on Policy SP9 and its supporting text, including submissions from residents, parish councils, landowners, planning consultants, and organisations. The feedback demonstrates strong but polarised views, ranging from significant support for the Green Gap to prevent coalescence, through to objections questioning the policy’s justification, evidence, and alignment with national policy.

The Green Gap Study (2025) considered a number of potential locations in the borough outside of the Green Belt for a Local Green Gap, but concluded that such an approach could only be justified in the area between Kings Hill, West Malling and the Medway Gap.

Officers note the high volume of responses to SP9 and the strong local engagement with issues relating to settlement identity, landscape protection and countryside accessibility. While recognising concerns about national policy alignment, spatial consistency and the potential for duplication with other policies in the Local Plan, officers consider that a policy mechanism to protect against coalescence remains justified given the characteristics of the area.

However, a number of refinements will be considered, including:

- Ensuring the policy wording is clear, proportionate and aligned with the NPPF.
- Reviewing boundary justification to ensure defensibility and clarity.

**Question 13 – Is there anything missing from the Spatial Strategy policies?**

Total Number of responses received: 179		
Yes	No	Blank
113	39	27

Summary of issues raised

The comments provided by respondents to this question reflect a range of views on whether anything considered to be missing from the Spatial Strategy chapter. Responses have been provided by a mixture of individuals, developers, parish councils, statutory consultees and neighbouring authorities.

Of those respondents who confirmed that they believed that there were omissions from the chapter (113), the majority were from individuals, and around half were site-specific standardised comments in response to the TO1 allocation in north Tonbridge. These responses identified that housing need had not been defined by the needs of local communities and that a stand-alone new settlement had not been considered as an option. Other key themes included:

- Some respondents raised concerns that there was insufficient protection of the environment, landscape and biodiversity.
- Other respondents raised concerns about insufficient emphasis placed on the delivery of new infrastructure to support growth.
- A small number of respondents called for a greater focus on sustainable transport.
- Respondents sought a clearer commitment to ensuring that infrastructure was delivered before or alongside new development, including the phasing of the proposed relief road in BG1.
- Clarity was sought regarding how safeguarded minerals deposits, waste management and minerals processing infrastructure has been had regard to in the site allocation process.
- Support from a neighbouring authority for Policy SP4: Gypsy, Traveller and Travelling Showpeople.
- Support from a neighbouring authority for Policy CP6: Town Centre Needs.
- Some respondents raised concern that a housing buffer had not been included, which was needed to provide some flexibility.
- A number of respondents sought a Green Gap designation on the East Bank.

For those who did not answer the sentiment question, feedback tended to identify other areas respondents believe to have been missing from the Spatial Strategy chapter. Responses from developers identified that the higher level of growth should have been planned for in Policy SP2, and tested through the Sustainability Appraisal process. Other key themes included:

- There was a request for the inclusion of a small-sites policy to support SME developers throughout the plan period.
- Some concern over the alignment of the spatial strategy with the new draft NPPF (2025).

- Some respondents raised concerns about specific sites, infrastructure capacity and loss of green belt.

39 respondents selected the 'No' response to this question, indicating that they did not believe there was anything missing from this chapter.

#### Summary of feedback from Statutory Consultees

- **Kent County Council** - is encouraged to see health in this section and would recommend this section also defines what health and health inequalities are, and how TMBC will address tackling the health inequalities gap for residents within the Borough. The County Council is also concerned that the key diagram makes no mention of any potential constraining effect of the safeguarded mineral deposits. There is no reference in the plan or the associated evidence base. There is also no mention of safeguarded waste management and mineral processing infrastructure. There appear to be potential housing allocations that are both co-incident with land-won safeguarded mineral deposits and potentially within 250m of safeguarded waste and mineral infrastructure.  
The allocations for new development, where they potentially conflict with the presumption to safeguard land-won mineral deposits and safeguarded minerals and waste management infrastructure, should be subjected to assessment of whether there are any justifiable grounds to invoke any exemption from the presumption to safeguard.
- **Natural England** - note that as submitted, SP4 does not identify specific sites or locations where Gypsy, Traveller and Travelling Showpeople accommodation will be delivered, indicating that this will likely be met through the upgrading, enhancement or intensification of existing authorised sites. Where proposals for Gypsy, Traveller and Travelling Showpeople accommodation are located within or affecting a National Landscape, they should be limited and only permitted where it can be demonstrated that the proposal conserves and enhances landscape character, with no adverse impacts on its special qualities.

#### Summary of feedback from District / Boroughs

- **Maidstone Borough Council** - is supportive of policy SP4 and is pleased to see that Tonbridge and Malling Borough Council are planning on meeting their identified need. Supporting paragraph 5.67 refers to the updated PPTS (December 2024) Annex 1 definition but does not reference that this can include 'all other persons with a cultural tradition of nomadism or of living in a caravan'. This is a key difference compared to the previous definition and TMBC may wish to reference this when clarifying the criteria for determining Gypsies and Travellers. Policy SP6 is supported as the Council is looking to meet its identified needs.

## Summary of feedback from Town and Parish Councils

- **West Malling Parish Council** – reference to housing let at Social Rent levels should be included.

### Officer response to the consultation feedback

Question 13 of the Regulation 18 consultation invited respondents to identify if there was anything considered to be missing from the Spatial Strategy chapter. A significant number of representations were received from a range of stakeholders, and the comments have provided valuable feedback.

Officers consider that the chapter provides an appropriate and balanced framework that is consistent and compliant with the NPPF.

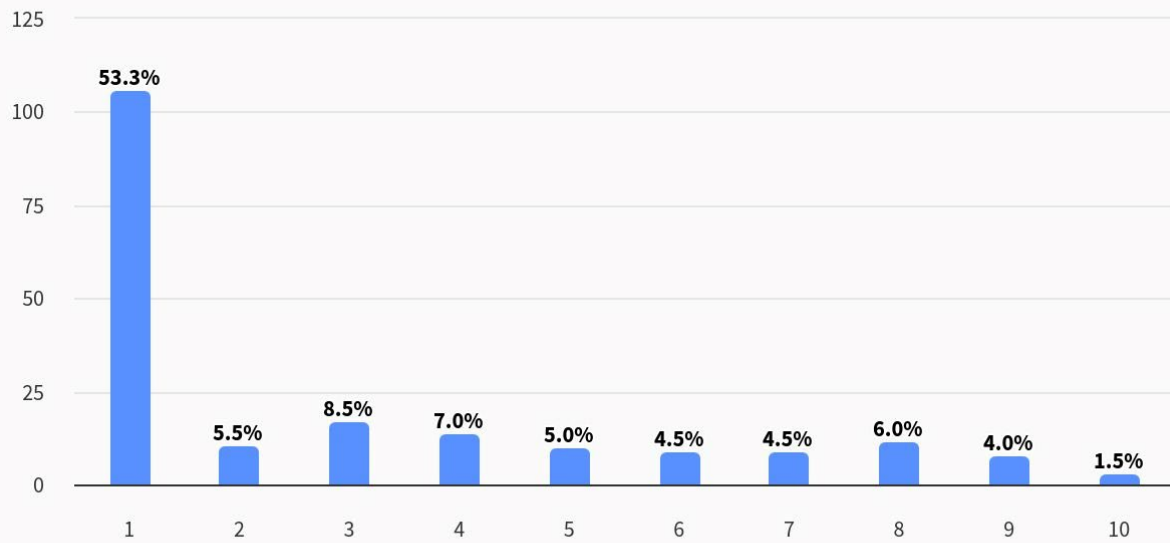
However, a number of refinements will be made to policies and the supporting text to address the following:

- Continue work to identify how the timely delivery of key pieces of infrastructure can be secured in relation strategic sites.
- Clarifying the wording of the supporting text to SP4 to reflect the full updated PPTS (December 2024) Annex 1 definition.
- Consider updating the Key Diagram to include reference to safeguarded minerals deposits and include reference to the Waste and Minerals Local Plan policies within site specific policies where relevant in relation to housing allocations that may co-incident with land-with safeguarded mineral deposits and potentially within 250m of safeguarded waste and mineral infrastructure.

### **Question 14: 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 Spatial Strategy policies?**

This question asked on a scale of 1-10 how satisfied people are with the Spatial Strategy policies. 199 responses were received to this question. Most answered that they were not satisfied with the policies. Proposed amendments to individual policies and supporting text have been set out under respective question responses.

**14 - 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 Spatial Strategy policies?**



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