Helping to address climate change – Questions 15 – 25

Summary of Regulation 18 consultation responses (March 2026)

Question 15 - Do you agree with Policy CC1: Addressing Climate Change?

Total Number of responses received: 125					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
17	13	19	10	17	49

A substantial number of respondents engaged with the consultation on Policy CC1: Addressing Climate Change, representing a wide range of stakeholders including residents, developers, parish councils, statutory bodies, landowners, community groups and professional consultants. Feedback demonstrated significant interest in the role of the Local Plan in tackling climate change.

Summary of issues raised

30 respondents (the majority being residents) supported Policy CC1. Comments included:

- general Support for taking action on climate change - broad support for the council recognising climate change and taking proactive steps.
- support for the Policy's strategic approach – respondents welcomed the comprehensive, holistic, or whole-life policy structure of CC1.
- support for sustainable transport and reduced car use.
- support for nature-based solutions and green infrastructure - approval for the links made between climate resilience and biodiversity.
- support for reuse of materials, energy efficiency, and net zero transition.
- recognition that climate change is happening now (flooding, heat, water scarcity).
- this set of policies could be strengthened by indicating 'must' comply with the requirements, rather than 'should'.
- suggest that the Energy & Climate Change statement is included explicitly in the wording of the Policy.
- welcome the mention of retrofitting but believe too little is said about this in the rest of the Climate Change policies.
- concern about enforcement.
- the Policy should specifically mention solar panels on roofs.
- there is evidence that lower carbon emissions are beneficial for the long-term health of the population.
- policies on flood risk are insufficient.

- a new reservoir is needed to cope with the current demand and for the additional housing.
- query reference to 'major developments' which is not defined in the Policy or elsewhere.

Those respondents who provided a neutral response, generally submitted comments on clarity, deliverability, practicality, and concerns about alignment with allocations. Key themes included:

- lack of detail, clarity, or specificity in the Policy. Where respondents felt that Policy CC1 lacked practical detail, measurable requirements, or clarity on expectations, for example:
    - insufficient explanation of what developers are actually required to deliver;
    - lack of parameters (e.g., carbon neutrality targets, solar panels requirements);
    - query the thresholds for Nationally Significant Infrastructure projects.
- support in principle but questioning practical delivery.
- appropriate that new green infrastructure should be multifunctional, supporting wider benefits.
- reference to Quality Traditional Design Codes.
- comments on transport and infrastructure limitations.
    - a need for policy flexibility and adaptability, for example requirements may need to evolve in line with national guidance as well as the plan needing to be adaptable to technological or policy changes.
    - all allocations should prioritise reducing private transport use.

Respondents who expressed a negative sentiment towards Policy CC1 typically did so because they felt the policy was unrealistic, inconsistent, poorly integrated with site allocations, or misguided in its climate rationale. Comments included:

- policy seen as unrealistic, impractical or overly prescriptive. For example:
    - climate requirements could harm development viability and delivery;
    - expectations around net-zero or carbon reduction were seen as excessive or premature;
    - policy conflicts with national standards or duplicates building regulations;
    - government policy decisions (immigration, rising housing targets) undermines environmental protection;
    - requests for viability tests and more flexibility.
- disagreement with the scientific basis or rationale for climate policy.

- major concerns about flood risk and building in unsafe locations where there was concern that development allocations contradict CC1, especially regarding flooding, surface water issues, and climate resilience. This included:
    - multiple references to historic and significant flooding in specific locations (e.g. TO1, Hildenborough);
    - serious concerns that flood risk assessments ignore surface water runoff;
    - perception that CC1 talks about resilience but the plan does the opposite.
- policy goals seen as incompatible with proposed site allocations including:
    - development in rural, car-dependent villages undermines emissions reduction aims;
    - lack of local transport, services, and active travel infrastructure;
    - allocations on greenfield land contradict circular economy and reuse objectives;
    - climate mitigation objectives clash with the scale and location of development.
- concerns about transport, car dependency, and lack of infrastructure (Kings Hill referenced).
- opposition to loss of farmland, green belt, and carbon-sink features and it being considered that climate change action requires protecting natural assets, not building on them; stop building solar farms on farmland.
- policy considered too weak, ineffective or lacking enforcement.
- View that renewable energy sources are unsustainable and create more waste due to short life spans & toxic materials.
- policy seen as misaligned with local needs or priorities in that the policy doesn't reflect the needs of specific communities. This included:
    - Hildenborough, East Peckham and other villages were highlighted as unsuitable for growth;
    - belief that CC1 ignores or contradicts local realities such as flooding, commuting patterns, or lack of employment;
    - some felt CC1 is ideological rather than practical.

Respondents who did not respond to the sentiment question provided a mix of comments. Supportive comments came from either statutory or other consultees or developers/agents. This included:

- support the principles of the Policy.
- support the requirement for maximum re-use of previously developed land, sustainable travel, circular economy and maximising opportunities for carbon sequestration and storage.

- appropriate that new green infrastructure should be multifunctional, supporting wider benefits.
- support policy with suggestions:
    - but suggest amendment about retrofitting existing buildings;
    - the reference to other proposed interventions needs scrutiny due to the implications for viability, feasibility and deliverability;
    - strengthen policy by reference to Carbon Storage and Sequestration by Habitat report;
    - the level of information provided should reflect that type of application submitted;
    - achieving net zero by 2050 fails to recognise that new housing is emitting significantly less carbon than the existing stock and will be reduced further with the Future Home Standard
    - Policy should be simplified to set key parameters and how this can be addressed through development.
- Policy lacks enforceability.
- support but concerned about:
    - water shortages and the need for appropriate mitigation measures – developers should adopt 'grey' water schemes.
    - the carbon costs of new bricks and other building materials – new housing has already failed the net zero test before occupation
    - demolition and the clearance of site and carbon cost
    - policy must be considered against the cost of development
- support - development should be directed towards locations that are inherently sustainable - Snodland is one of the most sustainable and accessible settlements in the borough. This approach would make policy CC1 more effective and consistent with national policy.
- the policy needs to be considered in light of the new NPPF.
- the policy is not clear and concise so as to provide flexibility for developers to explore a range of options for climate change mitigation and renewable energy on and off-site.
- Object to policy – needs to be re-written. There is no basis for:
    - Reference to developments achieving close to net zero
    - Maximising opportunities for carbon sequestration
- acknowledge the intention of Policy CC1, but concerned that
    - the Plan lacks the key measures needed to achieve this, particularly policies to reduce energy use in existing buildings and to limit increases in road traffic.

    - that although CC1 promotes brownfield reuse, the Local Plan does not include an effective strategy to maximise brownfield development, and several proposed allocations remain car-dependent.
    - achieving the policy aims requires a stronger focus on urban regeneration.
    - elements of the policy suite are considered insufficiently justified and inconsistent with national policy, raising questions about soundness
- sustainable travel must not exclude equestrians.
- strong support for the council's focus on climate change. Advocate modernised retrofits, including improved ventilation, sustainable materials and higher design standards alongside initiatives such as contractor guidance, academic partnerships, and case studies to demonstrate the value of retaining existing buildings. Additional points include enhancing biodiversity through extensive planting, improving flood-defence funding, strengthening transport links, protecting coastlines, and incentivising more sustainable development patterns through the reuse of heritage structures rather than constructing carbon-intensive new buildings.

Summary of feedback from Statutory Consultees

Natural England support the inclusion of this policy and its strong emphasis on Nature-based Solutions, however, revised wording is suggested to strengthen the policy. This included a request to place greater emphasis on maximising opportunities for retrofitting adaptation and resilience measures and green infrastructure within existing settlements and urban areas through interventions such as pocket parks, rain gardens, sustainable drainage systems, and enhanced urban tree canopy cover, for example. It was also suggested that it may be helpful to refer to the Climate Change Adaptation Manual as a key resource in the supporting text.

Kent County Council (KCC) are pleased to see that adaptation has been thoroughly considered within this policy, with a range of climate risks addressed in point 3. KCC are also supportive of the requirement to submit an Energy and Climate Change Statement and would be keen to be involved in confirming the metrics in the Validation Checklist. KCC are also supportive of the reference to overheating risk through the cooling hierarchy but propose that dynamic thermal modelling is required, where possible, in new developments to ensure a more robust overheating assessment has been completed. The same applies to the second and third criteria of Policy CC3: Sustainable Design and Construction.

KCC also recommended that the adaptation measures in point 3 are also required for retrofitting existing buildings to ensure their long-term resilience and safety. It is also suggested that reference is made to other relevant policies in the Local Plan to ensure

further cohesion and signpost developers to the detail required that is not shown in this policy. For example, 3c could include reference to Policy CC8.

Summary of feedback from District / Boroughs

Tunbridge Wells Borough Council (TWBC) supports the general thrust of this policy and notes it is supported by other relevant development management policies in the chapter. TWBC suggests that the set of policies could be strengthened by setting the expectation that developments 'must' comply with requirements, rather than 'should'.

Summary of feedback from Parish Councils

East Peckham Parish Council (EPPC) supports the aims of the Climate Change Policy but considers that the proposed site allocations in East Peckham fail to deliver those aims. The policy seeks a proactive, best-practice approach to reducing greenhouse gas emissions, transitioning to net zero, and maximising climate-adaptation measures. However, Policy CC1 relies on outdated pre-2025 Climate Change Committee guidance, and the allocations in East Peckham, Snoll Hatch and Hale Street run counter to the plan's own climate-mitigation objectives.

EPPC argues that these allocations conflict with TMBC's environmental priorities (including climate neutrality, air and water quality, and biodiversity recovery) because the locations are not low-carbon or transit-accessible. EPPC therefore requests that TMBC reconsider the proposed East Peckham allocations and direct growth instead to areas better aligned with the Local Plan's climate commitments and the Council's Climate Emergency declaration.

West Malling Parish Council (WMPC) welcomes the Local Plan's strong emphasis on addressing climate change and its alignment with both national net-zero commitments and TMBC's ambition to achieve carbon neutrality by 2030. The Council supports Policy CC1, recognising it as a comprehensive strategic policy that places climate considerations at the core of sustainable development and promotes a proactive, best-practice approach to reducing emissions and adapting to climate change. WMPC strongly endorses this aspect of the draft Local Plan.

Summary of feedback from other organisations

Kent Downs National Landscape Unit support the Policy.

The Woodland Trust support this Policy.

Officer response to the consultation feedback

The Council welcomes the extensive feedback received on Policy CC1. Responses demonstrate broad support for the principle of addressing climate change, alongside

clear expectations that the policy should be more precise, deliverable, aligned with allocations, and reflective of up-to-date national guidance.

As part of preparing the Regulation 19 consultation document, a number of refinements to the Policy and the supporting text will be considered to address concerns about clarity and deliverability and to ensure compliance with national guidance.

Question 16 - Do you agree with Policy CC2: Circular Economy?

Total Number of responses received: 70					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
16	16	19	5	7	7

The majority of respondents supported Policy CC2 (Circular Economy). Most respondents indicated that they were residents of the borough.

Consultation responses to Policy CC2 show broad recognition of the importance of a circular-economy approach to reducing waste, reusing materials, cutting embodied carbon and supporting climate-change mitigation. However, respondents also highlighted several areas where the Policy and supporting text could be strengthened, clarified or adjusted for proportionality.

Summary of issues raised

Most supportive comments welcome the waste-reduction / reuse focus of CC2 and its contribution to lower carbon / net-zero goals. Several also urge monitoring and enforcement, to ensure that the policy delivers in practice. A summary of the comments of support received is indicated below:

- support for reducing waste & increasing reuse/recycling - respondents endorsed CC2's emphasis on the circular economy - designing out waste, reusing materials and cutting landfill.
- support for the provisions for the sequential test and flood risk assessments.
- support but policy seems aspirational. The Energy and Climate Statement required of developers does not seem to set targets or minimum standards. To ensure the policy achieves real change it will be important to provide clear guidance and robust monitoring.
- contribution to net zero / lower carbon & embodied carbon reduction, supporters link CC2 directly to climate goals and carbon reduction. Planet resources are finite therefore everything should be recycled.
- Council should expect all developments to adopt best practice and facilitate material banks to encourage maximum re-use.

- delivery, monitoring and enforcement. Some respondents want clearer targets and oversight so aspirations become outcomes.
- health & wider societal benefits. Positive links are made between lower emissions and public health.
- innovation, skills & local jobs. Potential for new techniques and skills in construction and associated employment.
- preference for brownfield / reusing buildings & materials. The re-use of land and materials, including prioritising brownfield was welcomed.
- practical local measures (recycling services, bins, tips). Suggestions for service-level improvements to reinforce the circular approach.

For those respondents who selected neutral, comments showed a mixture of uncertainty, practical concerns, ambivalence and cautious agreement. This included:

- uncertainty about implementation / lack of clarity. For example, uncertainty about how CC2 will operate in practice, including enforcement, parameters, and the council's role in delivery.
- cost / viability concerns - concerns about financial impacts, particularly on smaller builders or development viability.
- Green Belt concerns in relation to perceived unintended consequences of the policy in that a lack of existing buildings on Green Belt sites may make them appear more favourable through the lens of circular economy scoring.
- reference to Quality Traditional Design Codes.

A total of 12 respondents expressed a negative sentiment (disagree or strongly disagree). These comments reflect concerns about practicality, viability, unintended consequences, and conflicts with other policy frameworks. This included:

- policy is impractical, unrealistic or overly bureaucratic. Policy CC2 is viewed as idealistic, overly bureaucratic or detached from development realities.
- Economy Statement should not be required as part of an outline planning application where there are no existing buildings as the majority of the information would not be known.
- query how objectives will be applied given that NPPF 2025 requires policies not to duplicate with building regulations and many of these objectives fall beyond the scope of the local plan.
- implementation locally has been inconsistent. The demolition of relatively modern employment buildings in Kings Hill undermines circular economy objectives. There appears to be no attempt to consider alternative employment uses.
- there is no proposal in Hildenborough to repurpose existing structures – rather, just using Green Belt.

- flooding / site-specific constraints. Respondents from areas affected by flooding question how Policy CC2 fits alongside drainage realities – site TO1.

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

- reuse of buildings / previously developed land requirements - respondents commenting on the wording of Policy CC2 regarding the reuse of buildings and redevelopment of previously developed land. This includes comments in relation to the policy not being realistic or viable in all cases.
- technical / developer-focused concerns - comments from developers or their agents, focused on technical feasibility, capacity, and required documentation.
- flexibility and proportionality concerns – calls for the policy to include flexibility, particularly for different scales and contexts of development.

Summary of feedback from Statutory Consultees

None received.

Summary of feedback from District / Boroughs

Tunbridge Wells Borough Council supports Policy CC2 including the provisions made for the sequential test, flood risk assessments and flood resilient measures.

Summary of feedback from Parish Councils

West Malling Parish Council (WMPC) supports Policy CC2, recognising its clear commitment to a circular economy focused on reducing waste, embodied carbon and the use of natural resources, particularly in construction. The policy's emphasis on repair, reuse, recycling and prioritising brownfield land is welcomed, though WMPC notes that full environmental assessments remain essential, as some brownfield sites are important for biodiversity.

The Parish Council also highlights the potential for innovation and new skills in sustainable construction and stresses the need for flexibility to retrofit older and listed buildings to improve energy efficiency. While supportive of the policy's aims, WMPC considers it largely aspirational at this stage and emphasises the need for clear guidance, measurable standards and robust monitoring to ensure effective delivery.

Officer response to the consultation feedback

The consultation responses indicate strong support for the principle of a circular economy, but they also highlight the need for clearer, more proportionate, and more practical policy requirements. In preparation for the Regulation 19 Local Plan, it is proposed that Policy CC2 and its supporting text are reviewed and updated to address the issues raised. The following will be considered:

- Reviewing the policy to ensure it is clearer, more proportionate and more practical to implement.
- Strengthening supporting text, ensure environmental considerations are appropriately reflected, and confirm that the policy aligns with national standards without duplicating other regulations.

Question 17 - Do you agree with Policy CC3: Sustainable Design and Construction?

Total Number of responses received: 79					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
16	15	19	4	7	18

Overall, there was a positive response to policy CC3, with respondents recognising the importance of reducing carbon emissions, responsible sourcing of materials, energy efficiency and whole-life thinking.

Summary of issues raised

A total of **31 respondents** (the majority being residents) expressed positive sentiment and support toward Policy CC3. Their written comments highlight strong support for CC3's ambition, sustainability focus, and whole-life-cycle approach. Comments included:

- Overall support including:
    - the Policy is essential to drive best practice; reducing impact on planet.
    - higher sustainability and construction standards and aligning well with Policies CC1 and CC2;
    - support the policy's whole-life-cycle approach, including energy efficiency, material sourcing, and waste reduction from construction through to end-of-life;
    - requiring Whole Life Carbon Assessments;
    - general agreement that construction emissions are significant, and endorsement of CC3's holistic focus on reuse, recycling, and minimising embodied carbon;
    - support for using the policy to drive best practice in sustainable construction.
- suggestion to require battery storage in new developments, particularly where homes can generate energy and where rural grid capacity is limited.
- solar panels:

    - calls for mandatory rooftop solar panels on all new buildings, rather than relying on solar farms that use agricultural land;
    - requests for CC1 and CC4 to explicitly include solar-panel requirements where feasible.
- recommendation to clarify that scheme profitability should not determine feasibility.
- concern that phrases like “where possible” risk weakening policy intent.
- recognition that the Local Plan is an opportunity to ensure all new development is as environmentally sustainable as possible.
- public health organisational support - support the alignment with NHS Net Zero goals.
- additional support noting that collective action and scale are needed to achieve meaningful progress toward net zero.

Tentative support for CC3’s intentions was expressed by those respondents who indicated a neutral sentiment response to this question. A number of respondents raised concerns about feasibility, clarity, proportionality and practical delivery. The key themes included:

- uncertainty about implementation, enforcement and scope - respondents agreed with the intent of sustainable design but highlighted that the policy lacks clarity on how requirements will be delivered or enforced.
- concerns about cost, viability and proportionality. It was questioned whether the policy is realistic for all developers or whether it could increase costs disproportionately.
- criticism of Whole Life Cycle Carbon Assessment (WLCA) feasibility - unease expressed about WLCA being required without adequate guidance or evidence.
- desire for clearer expectations on renewable and low-carbon technologies - request clarification on what ‘maximising renewable energy’ means.
- general agreement with sustainable principles but mixed views on tone and approach – respondents agreed with the goal but felt the policy wording was overly prescriptive or top-down.
- properties should be capable of adaptation to the needs of the resident.
- reference to Quality Traditional Design Codes.

Respondents who did not support the Policy focussed concerns around feasibility, proportionality, cost, and the justification for certain requirements, especially the Whole Life Cycle Carbon Assessment (WLCA):

- the ability to comply with this policy at outline stage for major developments is impractical and onerous.

- the policy and supporting text lack detail on which benchmarks (e.g., Future Home Standard, LETI, etc.) are expected to be addressed therefore more detail is required before the draft policy can be considered 'justified' or 'effective'.
- difficult to implement without going beyond the scope of the local plan:
    - query whether the policy is going beyond a national requirement
    - question implementation;
    - statements about construction materials, and building services are matters for building regulations, not local plans. If it meets building regulations it should be approved.
- prioritise brown field - unless allocations in on greenfield sites are restricted there will be no incentive.
- policies restricting development in established settlement areas need to be redrafted to encourage infill and intensification where it delivers more dwellings.
- Policy should place stronger emphasis on the protection of ancient woodland, priority habitats, and high-grade agricultural land, all of which play a role in carbon sequestration.
- creating housing developments in East Peckham and Hale Street contradicts the principles of reducing greenhouse gases and mitigating climate change.
- brownfield land in Hildenborough is not prioritised – therefore difficult to comment on the use of sustainable materials and methods. Concerned about loopholes in the methodology.
- corner cutting and cheap materials give developers an excuse to build badly.

Respondents that did not answer the sentiment question, provided comments. Key themes included:

- support in principle **-** support the general principles of sustainable design and construction promoted by Policy CC3. Some support for sustainability aims such as reducing lifecycle carbon, promoting reuse of land and materials, and discouraging car use.
- concerns about additional requirements and burdens:
    - the Policy introduces additional requirements beyond the Energy and Climate Change Statement in Policy CC1, which would hinder development and place unnecessary and costly demands on applicants;
    - requiring compliance with Policy CC3 at the outline application stage is impractical, onerous, and not feasible without detailed design information;
    - some of the Policy requirements stray into Building Regulations matters.
- object to the mandatory requirement for a WLCCA:
    - it is not justified by the evidence base.
    - the Climate Change Study identifies WLCCA as a "medium priority" and confirms it adds significant developer cost.

    - the Climate Change Study recommends WLCCA be tested in the Local Plan Viability Assessment, but respondents report that this has not been done.
    - WLCCA is used primarily in dense, large-scale central London regeneration, and not considered appropriate or proportionate for a largely rural authority such as TMBC.
    - the Policy should instead embed general sustainable design principles within the standard Energy and Climate Change Statement.
    - varying WLCA methodologies and limited product data make it difficult for decision-makers to assess WLCA results or mitigation.
    - decisions should not be refused on the basis of WLCA performance given current technical limitations.
- requests for clarification – the Policy lacks detail on which benchmarks developers are expected to address (e.g. Future Homes Standard, LETI, RIBA);
- alternative recommendations:
    - replace mandatory WLCA with an encouragement-based approach, focusing on reducing embodied and operational carbon "where possible and feasible".
    - include sustainable design principles within the Energy and Climate Change Statement rather than creating a separate WLCA requirement.
- additional suggested amendments:
    - add explicit policy wording to integrate multifunctional Green Infrastructure and Nature-based Solutions, with support for existing NbS examples in the draft policy.
    - requests additional wording requiring construction-phase measures to prevent polluted runoff and sediment; clarification on the need for fully watertight foul drainage systems in areas with high groundwater.
- other technical and infrastructure concerns:
    - some respondents argue that the plan as a whole leaves drainage and flood-risk considerations to planning application stage, without robust mechanisms to ensure mitigation.
    - community respondents highlight recent examples (e.g. Powdermills, Fidelity development) as evidence that existing drainage and wastewater networks are already overstressed.
    - concerns raised that major new developments could exacerbate flooding and sewage system failures unless significant new infrastructure investment is secured from risk-management partners.
- general support for sustainability - support for the Policy's broad climate objectives, including reducing lifecycle emissions, reusing land, and encouraging low-energy construction.

Summary of feedback from Statutory Consultees

- **NHS Kent and Medway** - is supportive of this policy. It is in line with NHS Net Zero and sustainability targets.
- **Natural England** – Supports Policy CC3 but advise that the incorporation of Green Infrastructure and Nature-based Solutions (NbS) should be considered an integral part of sustainable design. We therefore advise that point 1 includes a related criterion, such as: *"Integrate multifunctional green infrastructure and nature-based solutions;"* Support the inclusion of 3a as a good example of NbS.
- **Southern Water** - Southern Water is the wastewater service provider for the TMBC district and asked for additional wording in this policy to account for the construction phase of development:
    - Requested wording (A): Developments will not be supported unless they contain details of the measures that will be taken in the construction phase to ensure that polluted runoff (including suspended sediment) does not leave the site. Temporary trade effluent consents can be granted by the appropriate wastewater service provider to help ensure lawful discharge from building sites.
    - Requested wording (B): Also please could you acknowledge within this policy the need for delivery of watertight foul systems that are essential to areas of high groundwater - the draft LP acknowledges in paragraph 6.103 the presence of high groundwater in some areas. It is particularly important to ensure no groundwater infiltration/exfiltration with foul only networks in such areas:
    - Design and construction must also ensure a watertight foul system.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

West Malling Parish Council – Policy CC3 aligns with the objectives of Policy CC1 Addressing Climate Change and dovetails with CC2 The Circular Economy. The policy is welcome because it sets much higher standards for design and construction than are currently in use.

Policy CC3 promotes design for sustainability and minimises the impact of development on the climate and the natural environment. CC3 takes a 'whole life cycle' approach to all developments, promoting energy efficiency, responsible sourcing of materials and waste reduction from the planning stage to the 'end of life'/ demolition stage.

The requirement for developers to produce a Whole Life Carbon Assessment (WLCA) is welcome because the methodology of these assessments is regulated and comprehensive, taking account of operational carbon and embodied carbon over the

lifespan of a building. All buildings must demonstrate efficient use of energy and water, as well as regulating internal air quality.

Officer response to the consultation feedback

Consultation responses demonstrate broad support for the principles of sustainable design and construction. However, responses also raised a number of technical concerns, particularly regarding the requirement for a Whole Life Cycle Carbon Assessment (WLCA) and whether some CC3 expectations are viable, proportionate, or appropriately evidenced.

In response to the full range of comments received, and in preparing the Regulation 19 consultation document, Policy CC3 and the supporting text will be reviewed to clarify requirements, strengthen guidance, in line with the evidence and national guidance; ensure alignment with planning powers, incorporate environmental considerations, and reflect appropriate proportionality and viability.

Question 18 - Do you agree with Policy CC4: Energy and Heating?

Total Number of responses received:68					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
16	10	18	8	5	11

The majority of respondents did not state whether they either supported or disagreed with Policy CC4. Of those respondents that did respond, the majority were residents.

Summary of issues raised

26 respondents expressed clear support for the aims of Policy CC4. These comments highlight the need for strong local action on energy efficiency, renewable energy, and future-proofed development. Key themes from those who agreed / strongly agreed included:

- support for policy Intent:
    - strong support for Policy CC4's aims to reduce emissions from heating and powering buildings, which account for 28% of TMBC's carbon emissions.
    - support TMBC's net zero ambitions for 2030 and the national 2050 target.
    - the policy is good/a laudable aim and an opportunity to ensure new development is as green as possible.
- energy efficiency, standards and measurement:

    - support for requiring new development to reduce energy demand, use energy efficiently, generate and store renewable energy, and monitor energy use.
    - objective measures such as HQM 3-star and BREEAM Very Good are welcomed.
    - query whether detached and semi-detached new housing is compatible with energy-efficiency ambitions.
- retrofit and existing buildings:
    - high proportion of older housing stock (including over 100 listed buildings in West Malling) means TMBC should provide guidance for appropriate, efficient retrofitting.
    - there is significant scope for retrofitting insulation and low-carbon heat sources (e.g., heat pumps) across the Borough.
    - support for including retrofit within the policy.
- renewable energy and on-site generation:
    - calls for requiring solar panels on all new roofs unless there is unacceptable visual impact or insufficient generation potential.
    - advocate the installation of batteries in all homes that can generate power due to grid inadequacy in some areas.
    - general climate and health benefits
    - reducing carbon emissions is seen as essential for climate protection and long-term population health.
    - achieving net zero "helps towards net zero" and that an economy of scale is needed.
- implementation and regulation - support but concerned about effective implementation and regulation.

Those respondents who provided a neutral sentiment response, typically expressed general agreement with the aims of Policy CC4, but also raised significant questions, uncertainties, and reservations relating to feasibility, clarity, targets, deliverability and TMBC's ability to enforce the policy:

- reference to Quality Traditional Design Codes.
- broad agreement with the principle, but criticism that there is no explanation of how TMBC will facilitate or enforce the policy.
- the policy lacks accountable detail.
- query whether "reducing energy demand" means total energy demand in TMBC must fall from 2024 to 2042.
- calls for tangible targets, for example requiring all new sites to be energy-self-sufficient, with clarity on "how much/what percentage" renewable energy must be generated and stored.
- query how building-related transport emissions are treated within "energy demand".

- TMBC must set a clear borough-wide target before assessing development proposals against it.
- broad agreement with the principle, but criticism that there is no explanation of how TMBC will facilitate or enforce the policy, weakening its intent.
- query whether temporary heating equipment exists for when boilers fail, and noting difficulties experienced with a heat pump.
- technology is changing quickly and therefore question the future role of solar panels versus solar farms.

Respondents who did not support Policy CC4, raised a number of concerns:

- the policy application to all development proposals effectively requiring an energy and climate statement for all planning applications regardless of their nature or scale is not justified.
- the requirement for all major residential developments to meet a minimum 3-star Home Quality Mark standard raises concerns, particularly because a new BREEAM product is expected to replace it.
- Local Plans should align with Building Regulations to avoid a proliferation of different local standards, noting that national regulations (Parts F, G and O) continue to tighten.
- the forthcoming Future Homes Standard will also need to be incorporated as Policy CC4 is refined, as acknowledged in the supporting text.
- the targets set by Policy CC4 must be robustly tested to be considered justified or effective, including when assessed cumulatively with other proposed standards that may increase development costs and affect overall viability.
- soil erosion and degradation probably causes the greatest harm to the living environment of all human activities. Grazing with ruminants is considered by many to be the best way of mitigating this harm
- concerns about renewable-energy infrastructure and land use (solar farms).
- suggest a balanced approach to fossil fuels and renewable energy generation supported by an effective grid
- delivery and enforcement – query how this can be managed and delivered.
- overlap with Building Regulations
- query the policy position for retrofitting heat exchangers or solar panels
- stronger guidance is required to ensure new buildings achieve high energy efficiency standards (e.g. EPC A-rating), supported by robust post-construction monitoring.
- invest more to help people create energy efficiencies in existing homes.
- criticism of heat pumps and new-technology reliability and costs - doubts about the practicality of modern low-carbon heating systems.
- damp, insulation and housing deficiencies – Policy CC4 does not address persistent issues like damp.

There were some substantive comments from those who did not select a sentiment option for Policy CC4. Comments were similar to the above:

- developer and industry objections to HQM / BREEAM requirements.
- concerns that Policy CC4 duplicates or exceeds Building Regulations / Future Homes Standard – Policy CC4 should align with national standards (Building Regulations & Future Homes Standard), rather than introduce local standards.
- viability concerns and cumulative policy burden - the cost implications of Policy CC4. The targets set by Policy CC4 must be robustly tested, to be regarded as justified or effective, including cumulatively in respect of other propose standards that may impact development costs and therefore overall viability.
- Council will need to have regard to the outcomes of the consultation on the draft NPPF in taking this policy forward
- support for 'fabric-first' design from construction-sector.
- stronger energy-efficiency requirements for new builds - some residents demand stricter standards than Policy CC4 currently requires: no further development around Kings Hill without imposing stringent requirements on developers to incorporate energy saving measures in new homes
- concern about solar-farm proliferation and land-use balance.
- objections to requiring energy & climate statements for all development.
- concerns about implementation, monitoring and TMBC's technical capacity.
- broader public commentary on heating systems, grid constraints, and retrofitting.

Summary of feedback from Statutory Consultees

Kent County Council - The inclusion of the energy hierarchy within this policy is supported by the County Council, as is the recommendation for a fabric-first approach. The prioritisation of zero and low-carbon technologies is key, and consideration of the inclusion of measures that will make living more affordable for our residents, such as rooftop solar PV, should be considered from the outset.
The consideration of passive design in paragraph 6.53 is supported by the County Council to reduce the risk of overheating and artificial cooling demands. More detail on how developers can achieve this would be supported.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

West Malling Parish Council supports and welcomes the policy given that heating and powering buildings account for 28% of TMBC's carbon emissions. WMPC consider that reducing these emissions is crucial to achieving net zero greenhouse gas emissions by

2050 and the Borough's ambition to reach net zero by 2030. WMPC also called for TMBC planning to provide guidelines to help homeowners of historic buildings to retrofit their houses appropriately and efficiently.

Officer response to the consultation feedback

Consultation responses to Policy CC4 demonstrate clear support for the overall direction of the policy, particularly around reducing carbon emissions, improving energy efficiency and establishing a net-zero-ready development pathway. However, a significant number of respondents, particularly from the development industry, raised concerns relating to viability, alignment with national policy, and the appropriateness of specific standards (such as the Home Quality Mark). Others requested greater clarity, expanded guidance, and a stronger focus on retrofit and building-scale renewable energy.

In summary, consultation responses show strong endorsement for the Policy's strategic aims, but also highlight the need for clearer explanations, proportionate requirements, updated standards and closer alignment with national policy. For the Regulation 19 consultation document, further work may be needed to refine policy expectations, clarify regulatory relationships, strengthen supporting information, and ensure the approach remains practical and deliverable.

Q19 - Do you agree with Policy CC5: Renewable and Low-Carbon Energy and Heat Projects?

Total Number of responses received: 61					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
14	11	18	8	6	4

The majority of respondents supported Policy CC5 with the majority of respondents, being residents. The results show strong support for renewable-energy generation, localised and community-led schemes, and the need to reduce emissions in line with climate goals.

Summary of issues raised

Of those that supported the Policy, many also expressed preference for certain types of renewable energy (e.g., rooftop solar over solar farms) and emphasised environmental protection and responsible siting. A number of comments were submitted indicating:

- strong support for renewable and low-carbon energy generation - welcomed the inclusion of Policy CC5 as an essential contribution to local and national climate-change goals.

- preference for building-integrated and small-scale renewable energy (vs large solar farms) - renewable energy must be delivered in a sensitive and appropriate way, prioritising rooftops, car parks and non-agricultural land.
- support for protecting agricultural land, landscapes and biodiversity that CC5 must ensure environmental protection.
- support for community-led and decentralised energy schemes - Community-led energy is seen as essential to building acceptance and making renewable energy locally meaningful. Homes can be mini power stations.
- interest in expanding renewable technologies beyond solar - give more explicit attention to other renewable or low-carbon technologies.
- support for the policy's environmental safeguards - CC5 includes safeguards to avoid harm to sensitive environments.
- recognition that renewable energy is essential for climate and long-term health - lower carbon emissions are beneficial for the long-term health of the population.

Respondents that indicated a neutral sentiment response, most typically recognised the importance of renewable energy but raised uncertainties, concerns, or calls for clarification around siting, technology choices, and policy scope. Key themes included:

- there must be provision for solar panels to be sited in suitable locations that are not high in biodiversity. Concerned about panel design and materials and the potential impact on wildlife and biodiversity.
- the Policy could go further / lacks sufficient ambition.
- query how the Policy will be enforced.
- reference to Quality Traditional Design Codes.
- some disagree that heat pumps are effective replacements for gas boilers. Others want TMBC to consider ground source heat pump stations where there is space eg Swaffham.

Negative comments in relation to Policy CC5, focussed on the following main areas:

- many developments already planned do not have the policy provisions.
- corrections to the supporting text is required – target for increased tree and woodland cover.
- there is a need to sort out the national grid. There is also a possibility of nuclear fusion becoming commercially viable, in which case there could be an almost inexhaustible supplies of clean and cheap energy provided it can be distributed.
- the retention of mature trees should be prioritised, as they provide significantly greater carbon absorption than newly planted replacements
- strong opposition to large-scale solar farms on agricultural land - solar farms:
    - Remove high-quality farmland from food production;

    - Damage valued landscapes;
    - Create cumulative visual and ecological harm;
    - Should not be encouraged by local policy;
- concern that CC5 gives developers too much flexibility – the wording appears to allow developers to avoid renewable-energy requirements if they claim non-viability.
- preference for other technologies (wind, hydro, nuclear fusion) over solar farms.

Comments submitted by respondents who did not answer the sentiment question included the following:

- support the inclusion of requirements to avoid and mitigate impacts on the natural environment and National Landscapes and their setting.
- support the inclusion of the criterion requiring development to avoid the loss of significant areas of the best and most versatile agricultural land.
- support this Policy and welcome reference to the Kent Downs Renewable Energy Position Statement.
- concerned that the draft local plan does not yet appear to be alive to the increasing likelihood of speculative proposals for renewable energy development and associated infrastructure, in particular large scale solar, across the borough. The NPPF require local plans to plan positively for renewable energy infrastructure and to identify suitable areas for such development, while ensuring that impacts on the natural and rural environment are properly addressed.
- the plan should be providing a clear strategic framework that addresses the capacity, scale and appropriate siting of solar development, identifying where such proposals may be acceptable in principle and, just as importantly, where they would not be.

Summary of feedback from Statutory Consultees

Natural England - Support the inclusion of requirements to avoid and mitigate impacts on the natural environment and National Landscapes and their setting. This includes support for the inclusion of criterion 1c, requiring development to avoid the loss of significant areas of the best and most versatile agricultural land.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

West Malling Parish Council – fully support the advancement of renewable energy and low carbon schemes but note that renewable energy requirements do not override

environmental protection. Cautious about the concept of solar and wind farms within the Borough.

The Parish Council opposes large solar or wind developments on high-grade agricultural land, particularly within the Green Belt, as this land is vital for food production and national food security. With a 9.4% population increase in Tonbridge and Malling since 2011 and continued local development, protecting the Green Belt is increasingly important. The Council favours smaller, locally appropriate renewable schemes that minimise environmental impact. The policy overlooks opportunities such as installing solar panels on car park roofs, public buildings, and industrial units, or supporting homeowners to adopt solar technology. It also gives insufficient attention to air- and ground-source heat pumps, which are widely used across Europe, including in community energy projects.

Summary of feedback from other organisations

Kent Downs National Landscape Unit - Supports this Policy and welcomes reference to the Kent Downs Renewable Energy Position Statement in the Policy Implementation section.

High Weald National Landscape Unit - expressed concern that the overall text of policy CC5 does not adequately reflect the restrictive and cautionary nature of the High Weald Position Statement Solar Farms and the High Weald National Landscape (2025). They are also concerned that neither policy CC5 nor the supporting text makes reference to the 'rooftop first' commercial scale rooftop solar strategy promoted in the HWNL Position Statement.

RSPB - supports increased solar power but advised that solar panels must be located in areas without high biodiversity value. They advised that Panels near rivers or waterbodies should use special coatings to avoid attracting aquatic insects and to reduce the 'lake effect', which can draw in waterbirds and cause harm. Expert advice from groups such as Buglife or other entomological specialists should be sought to ensure appropriate, wildlife-safe panel design and placement.

Officer response to the consultation feedback

Consultation responses demonstrate overall support for the principle of renewable and low-carbon energy generation, particularly in the context of national targets and the Borough's climate emergency declaration. A significant number of respondents welcomed the promotion of community-led energy schemes, the transition to clean energy, and the potential for buildings to integrate renewable energy technologies. At the same time, concerns were raised about the siting of large-scale solar developments, impacts on high-grade agricultural land, landscape character, ecology, and grid capacity.

In light of the comments received, as part of the preparation of the Regulation 19 consultation document, a number of amendments to the policy and supporting text may need to be considered, including:

- strengthening guidance on renewable energy development;
- ensuring appropriate environmental and landscape protections;
- improving clarity on key technical and engagement considerations; and
- maintaining a flexible, technology-neutral approach aligned with national policy.

Question 20 - Do you agree with Policy CC6: Water Efficiency

Total Number of responses received: 78					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
16	13	15	7	7	20

Most respondents supported Policy CC6. However, across the board there was a shared recognition of the borough's serious water stress issue. Neally all of these respondents who indicated support, also indicated that they lived in the borough.

Summary of issues raised

29 respondents (nearly all being residents) indicated that they supported Policy CC6. Of these, the following themes emerged:

- strong support for water efficiency measures in a water-scarce borough - many respondents explicitly acknowledge Tonbridge & Malling's serious water stress, frequent hosepipe bans, and the need for stronger water-saving measures - agreement that reducing household water use to 110 litres per person per day is necessary and appropriate. With water resources already overstretched no development should be permitted unless it has a zero impact on water supplies.
- building on fields without ponds should include a requirement to introduce ponds and waterways. Building developments should include restrictions on concreting over gardens and driveways. We have a hosepipe ban every year. It is important that new developments have realistic water plans.
- rainwater harvesting, greywater reuse and sustainable design - support for incorporating rainwater harvesting and greywater reuse into new homes; recognition that such measures reduce pressure on potable supplies; the policy is viewed as a meaningful part of climate change adaptation.
- supportive but seeking stronger policy ambition or clarity - calls for better alignment with water providers, especially Southern Water; desire for more detail on how the policy will be delivered or monitored; the policy should push further (e.g., more water-saving devices, ponds, water storage features).

- support due to climate and infrastructure pressures (flooding & drought).
- support for Policy CC6's role in achieving net zero / climate targets - water efficiency seen as part of climate change mitigation and adaptation; recognition that reducing water consumption contributes to environmental resilience.
- strong evidence that lower carbon emissions are beneficial for the long-term health of the population. More needs to be done to ensure water use is sustainable

For those respondents who indicated a neutral response to the question, comments contain clear patterns of concern, uncertainty, or requests for improvement:

- water supply and infrastructure concerns - respondents expressed serious concern about existing water supply problems, uncertainty about future capacity, and frustration with water companies rather than the policy itself highlighting frequent hosepipe bans and water outages undermining confidence; repeated repairs, leaks and poor maintenance by water companies cited; while some argue no further growth should occur until supply resilience improves.
- requests for clearer policy requirements and thresholds - ambiguity around when a water efficiency calculator must be submitted (especially for outline applications); need for clearer thresholds for minor vs major development; desire for clarity on whether 110 litres per person is a target, minimum standard, or enforceable cap.
- concern about duplication with Building Regulations - respondents questioned whether CC6 duplicates requirements already set out in Part G of Building Regulations.
- uncertainty about practicality and enforceability - doubts about whether households can reliably meet 110 litres/day; questions around monitoring, enforcement, and the role of water companies; perception that behaviour, not design, influences real-world water use.
- Reference to Quality Traditional Design Codes

Respondents who did not support Policy CC6, raised a number of concerns, similar to those indicated above:

- surface water should be saved for watering gardens etc.
- looks like punishing home owners and taxpayers for the government's failure to properly regulate the water industry.
- water supply system cannot cope with current demand.
- Policy seen as unenforceable, impractical, or unrealistic.
- insufficient detail – what about our failing water companies. A much better water delivery and water waste removal infrastructure is needed - reservoirs and

protection of our natural waterways from sewage. No expansion of housing developments should begin until this issue is resolved.

- concerns over unrealistic or inappropriate technical requirements (greywater / rainwater reuse).
- belief that the policy unfairly penalises homeowners / is misdirected - Some respondents feel that the Policy places responsibility on residents and developers instead of regulating water companies.
- duplication with Building Regulations.
- Policy seen as insufficiently strong to protect residents from flooding and drought.

Of those respondents who did not respond to the sentiment question, comments included:

- A respondent commented that the Environment Agency and Ofwat (the regulators) have assessed the WRMP Annual Review 2025 and have highlighted serious concerns with South East Water's security of supply. Existing water supply cannot keep pace with current demand. Placing an additional demand on this already limited basic need makes no sense. Supply issues should be resolved and in place to ensure that current residents are provided for before even considering increasing demand.
- professional/technical stakeholder support was evident with a request for a standardised water efficiency calculator to ensure consistency and effective application.
- professional/technical stakeholder objection to any requirement to introduce greywater or rainwater reuse systems as standard in areas that require water neutrality; a policy requirement to improve water efficiency through greywater and rainwater reuse systems could cause significant problems for delivery.
- supports any commitment to sustainable design of new residential and commercial development.
- recommends the need for mandatory housing standards for water use which would support water efficiency in new buildings and promote collaboration between councils and developers.
- sustainable design standards for all residential and non-residential developments, including water use standards, should be a focus for developers as well as a monitoring responsibility for councils.
- support for policy and advise that reference is made to installing water-saving devices in new developments, alongside rainwater harvesting.
- support for Policy CC6 in an area of known water constraints.
- new water infrastructure is needed - there are frequent hosepipe bans due to drought in Kent and Sussex; there is insufficient reservoir capacity for the existing

population. We therefore cannot add 1000s new residents to these areas in the knowledge that water supply/capacity is currently insufficient to supply their needs. New reservoirs/better water management needed.

- concerns about policy practicality and deliverability.
- environmental and hydrological concerns (aquifers, groundwater, drainage).

Summary of feedback from Statutory Consultees

Natural England - Support the inclusion of a water efficiency policy in this area of known water constraints.

Southern Water - We do not feel that the current draft local plan is suitably ambitious to adequately address water scarcity in the South East, and would like reference to an industry report published last year, which aims to inform the Government's roadmap for water-efficient new homes. This report sets out a roadmap to target lower per capita consumption (PCC) for new housing in water-stressed areas like ours, aiming for 100 litres per person per day by 2025, 90 litres by 2030, and 80 litres by 2035. We fully support this ambition and encourage local authorities to adopt these targets within your strategies where possible.

South East Water strongly supports any commitment to sustainable design of new residential and commercial development. South East Water recommends the need for mandatory housing standards for water use which would support water efficiency in new buildings and promote collaboration between councils and developers. Sustainable design standards for all residential and non-residential developments, including water use standards, should be a focus for developers as well as a monitoring responsibility for councils.

Future plans should incorporate methods to validate developer claims regarding water efficiency in new developments, specifically aiming to confirm that the target of 110 litres per person per day (l/p/d), (or lower) is achieved. This data is crucial for assessing the effectiveness of current approaches, identifying the need for further user behavioural change or compliance, and understanding the impact of other factors like pets, jet washing, or hot tubs on water consumption. The absence of this information currently hinders effective future planning and resource management.

Kent County Council - The County Council is satisfied with policy CC6 – Water efficiency. Further, would advise that reference is made to installing water-saving devices in new developments, alongside rainwater harvesting.

Summary of feedback from District / Boroughs

None received

Summary of feedback from Parish Councils

West Malling Parish Council – The Environment Agency classify Tonbridge and Malling as an area of 'serious water scarcity'. Water is a finite resource and climate change is having a negative impact on its quality and quantity. Policy CC6 aims to reduce individual water consumption in New Build Residential Development to 110 litres per person. West Malling Parish Council recognises the need to save water and supports the policy. The policy requires water usage to be measured, providing clear outcome measures.

Officer response to the consultation feedback

The consultation responses to Policy CC6 highlight a strong shared recognition of Tonbridge & Malling's serious water-stress context, with many respondents acknowledging the need for water-efficiency measures. However, consultees also raised a number of issues relating to clarity, proportionality, practicality, and alignment with national regulation.

In preparing the Regulation 19 consultation document, further refinement of the policy and supporting text will be progressed. This includes clarifying how the policy aligns with regulatory requirements, ensuring technical expectations are proportionate and practical, strengthening references to local water resource challenges, highlighting partnership and monitoring roles, and improving integration with related water management policies.

Question 21: Do you agree with Policy CC7 (Managing Development within Flood Risk Areas)?

Total Number of responses received: 109					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
13	9	8	3	57	19

The majority of respondents indicated that they lived in the borough. The data also shows that the majority of respondents did not support policy CC7. This was linked, in many responses, to an objection to a site allocation.

Summary of issues raised

22 respondents indicated support for Policy CC7. Their comments reflect broad support for the policy's intent, alignment with national guidance, and emphasis on safe development in areas of flood risk. A summary of comments is indicated below:

- support for alignment with national planning policy and guidance - Policy CC7 is viewed as consistent with the National Planning Policy Framework (NPPF) and Planning Practice Guidance.
- recognition that development must be appropriately managed in flood-risk areas.
- without such important control measures, there could be safety risks to life going forwards.
- not correctly covered in the plan as additional development within the Medway and Bourne river areas should not be considered due to additional flood risk.
- floods are inevitable eventually and no one wants to be flooded out.
- no building in flood areas.
- general support toward flood-risk considerations - value the inclusion of flood-risk management in the Local Plan.

Of the 8 respondents who indicated a neutral response, a range of comments were made. The key themes included:

- note that there is ongoing work to understand the flood risks withing the Borough fully. Until this is complete it is hard to judge. The measures suggested to mitigate the risks, and the effects of flooding appear sensible, but given the instability of climate change and the unpredictability of the weather, building in an area prone to flooding seems unwise.
- flooding issues that do occur are the result of poorly maintained flood infrastructure
- nature-based solutions, such as tree planting in areas at risk, can also mitigate against climate change, as well as helping to absorb rainwater and enhancing biodiversity
- development in flood risk areas seems on the face of it to require great caution.
- policy support but the cumulative impact of development of green areas only reduces natural run off and increases water pollution and flood risk. Assessing applications individually does not allow the cumulative impact to be assessed.
- reference to Quality Traditional Design Codes.

All 58 of the 60 of the negative responses were submitted by local residents. No negative comments were received from professionals/statutory consultees/ developers. A very large majority of dissatisfied responses relate to flood-risk concerns, particularly around specific sites (notably TO1 (43 responses which were a repeat / standard response), HI2 and other sites in East Peckham). The dissatisfaction is strong, consistent, and often repeated, indicating widespread community anxiety about flood risk and insufficient confidence in the Local Plan's evidence base. The majority of the 60

negative responses were from residents of Higham. A summary of the comments is indicated below:

- the Strategic Flood Risk Assessment (SFRA) is inadequate - this is by far the most dominant theme. Respondents assert that the SFRA does not accurately reflect real-world flooding, particularly at TO1 (43 negative comments), Hadlow, Hildenborough, and East Peckham:
    - SFRA fails to account for surface-water runoff, especially from saturated farmland;
    - historical flood events have not been reflected in TMBC evidence;
    - flooding has been documented repeatedly over decades but is not acknowledged;
    - SFRA uses rainfall projections lower than historic actual flood events;
    - Level 2 SFRA data released mid-consultation contains errors and inconsistencies.
- the policy is applied to development sites if at flood risk themselves - there needs to be a risk assessment for all proposals where there is lower lying land that will be impacted by extra run off from the development. This policy is not fit for purpose in a Borough with so much land at risk of flood exacerbated by development.
- increased housing and development will only increase water run-off and flooding.
- there should not be development in flood plains; stop building housing on fields in the Green Belt. Create a new reservoir.
- flood resilience measures – query on data; how will these be assessed when Green Belt is removed (a water absorber reducing flood risk) eg Little Postern Farm is on higher land absorbing excess water
- disconnect between investment in flood defences and housing delivery in defended areas, raising questions about the strategic alignment of spending and outcomes.
- the policy as currently drafted reads as if it is incomplete. Further work is required to understand flood risk and once undertaken, this policy needs to be revisited and revised.
- area specific comments:
    - Hildenborough regularly has to deal with flood issues and run off, particularly in the Stocks Green road area and the Brookmead estate. More homes means greater flooding risks and TMBC are building on natural soakaway areas.

    - some gardens along B245 have flooded since the new Oakhill development - it's only one step away from houses flooding, which will happen if further development occurs above the B245
- Strong opposition to allocating development sites in high-risk flood areas:
    - sites at TO1, HI2, and East Peckham are regularly flooded or adjacent to floodplains;
    - historically unsuitable sites are being re-proposed despite decades of refusals;
    - national policy (NPPF) requires steering development *away* from flood-risk areas;
    - allocating land in high-risk areas is viewed as reckless and unsafe.
- Concern that CC7 contradicts itself and is not adhered to by TMBC - the policy intent is sound, but TMBC is not applying its own rules, especially regarding sequential testing:
    - no clear evidence of sequential or exception testing for allocated sites;
    - decisions appear inconsistent with NPPF flood-risk hierarchy;
    - some reports of developers being told flooding was caused by burst pipes.

19 respondents did not indicate a sentiment response, but submitted comments. These comments mainly related to substantive technical or location-specific feedback:

- many comments supporting from a developer but noting that the Policy should relate to the most up-to-date Environment Agency (EA) flood mapping.
- Strategic Flood Risk Assessment for site TO1 does not take account of flooding due to surface water runoff from the saturated fields.
- site-specific concerns (site TO1 and East Peckham);
- Support but note that the Council has undertaken a Level 1 SFRA which advises that the borough is at risk from fluvial, tidal, ground water, surface water, and reservoir flooding. Further work to understand flood risk will need to be progressed to help inform the Regulation 19 document.
- The risks of flooding in Tonbridge town centre are such that the 'East of High Street Masterplan Framework' recommends residential development beginning from first floor upwards, and highlights risks to street level commercial spaces. It is essential that flood risk is taken seriously in determining appropriate sites for development.
- An assumption that SuDS will be sufficient relies on proper analysis of the suitability of the geology. The impermeable nature of the Wealden Clay, which underlies much of the Medway flood plain, explains why there is so much reliance on a complex network of ditches and streams for surface water drainage of this area. Localised flooding during extreme events becomes inevitable. A lot

of work will be required to demonstrate that mitigation proposals will adequately deal with surface water disposal.

- the application of Policy CC7 recognises that allocations comprising multiple parcels may present different outcomes when considered as individual sites rather than as a single composite area. (E.g site EP2). A more granular approach, consistent with the Level 2 SFRA methodology, would allow development to be directed to the lowest risk areas within a site and ensure that the sequential approach is applied proportionately.
- support the inclusion of the criterion that encourages the use of natural flood management measures.
- concern that drains cannot cope with rainwater/sewage and require overhaul before any new properties are built.

Summary of feedback from Statutory Consultees

Environment Agency – Broadly in agreement with the policy wording, however we have a number of comments in response to specific sites.

Natural England - Support the inclusion of criterion 1d that encourages the use of natural flood management measures.

Kent County Council - The County Council is satisfied with policies CC6 – Water efficiency, CC7 - Managing Development and CC8 – sustainable drainage systems. Level 2 SFRA.

Summary of feedback from District / Boroughs

None received

Summary of feedback from Parish Councils

East Peckham Parish Council – Policy CC7 and CC8 require avoiding flood risk areas and using Sustainable Urban Drainage Systems (SuDS) for all developments. EPPC notes with concern that East Peckham site allocations fundamentally fail to comply with the avoidance of flood risk areas. The development proposed within East Peckham runs contrary to national policy and guidance. As East Peckham is an area of highest flood risk. The Local Plan (and TMBC) should direct development away from such areas. Detailed Parish Council comments refer to the flooding events in East Peckham; the current and predicted risk of flooding; lack of flood protection; sources of flooding; climate change impact on flooding; the Climate Change Study and SFRA; flooding impact on roads; extensive photographic evidence; KCC's county level flood assessment; and flooding impacts downstream. The Parish's submission in terms of Policy CC8, relates the proposed development allocations in East Peckham. The Level

1 SFRA screening is referred to in addition to the Technical Note covering the TMBC Level 2 SFRA scoping exercise (published November 2025).

EPPC contend that all five sites should be removed from the draft Local Plan on flooding grounds, as their inclusion does not comply with national NPPF policy and PPG and has not been justified by the evidence base provided to support the draft Local Plan. It is also noted that Kent's growth plan acknowledges areas like East Peckham should not see major growth due to known flood issues. Sequential Testing data is a crucial element of EPPC being able to understand, review and coherently analyse the current site allocations for East Peckham. Failure to publish that testing methodology prevents EPPC and others from being able to fully assess the rationale of the site allocations. Other sites can be identified in line with the requirements for sequential testing which would meet the draft Local Plan Spatial Strategy. All the sites allocated in East Peckham are within or immediately adjacent to flood zones, so reasonable alternatives with lower risk must be considered and should be preferred under NPPF and PPG.TMBC is requested to demonstrate sequential testing and provide that for review.

Given the flooding risks that are posed to East Peckham as a result of its proposed site allocations, and allocations/development elsewhere, a joint/multi Council/KCC/EA framework that identifies thresholds of development that would lead to investment in additional flood mitigation measures, should be considered.

West Malling Parish Council – The measures suggested to mitigate the risks, and the effects of flooding appear sensible, but given the instability of climate change and the unpredictability of the weather, building in an area prone to flooding seems unwise. This policy has little relevance for West Malling which is a low flood risk area. The problems that do occur with flooding relate to poorly maintained infrastructure. Nature-based solutions, such as tree planting in areas at risk, can also mitigate against climate change, as well as helping to absorb rainwater and enhancing biodiversity.

<u>Officer response to the consultation feedback</u>

The large volume of consultation responses highlights the importance the community places on effective flood-risk management, the safety of new and existing communities, and the need for evidence-led decision-making. Policy CC7 will need to reviewed in light of an updated Level 1 SFRA; the production of the Level 2 SFRA and importantly, the sequential testing of potentially allocated sites. The following will be considered as part of the Policy review:

- alignment with national policy and EA requirements;
- clarity and enforceability of flood-risk mitigation measures;
- safe access, exceedance routing, construction risk and watercourse protection;

- reflection of site-specific evidence, local ground conditions and climate-change projections;
- recognition of statutory processes and cross-boundary considerations;
- transparent explanation of the sequential and exception testing approach.

These changes will improve the robustness, clarity and deliverability of Policy CC7, ensuring it effectively manages flood risk and supports resilient, sustainable development across the Borough.

Question 22 - Do you agree with Policy CC8 (Sustainable Drainage Systems (SuDS))?

Total Number of responses received: 109					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
13	11	11	3	54	17

The majority of responses to Policy CC8 came from residents. A significant proportion of respondents expressed that they strongly disagreed with the policy. These comments mostly centred on flood risk, local drainage capacity, site-specific concerns, and the real-world feasibility of SuDS.

Summary of issues raised

24 respondents supported Policy CC8. Of those that supported, comments included:

- Infrastructure needs to be available; sustainable infrastructure measures are paramount; the policy is necessary; its an important part of climate adaptation.
- Questioning whether the private water companies can be influenced.
- Recognising the importance of SuDS to prevent pollution incidents and to mitigate against flood risk.
- The Local Plan is a great opportunity to ensure new development is only allowed if flood risk measures are adequate.
- Concern that the current drainage system cannot sustain 1600 new homes in North Tonbridge without new drainage infrastructure and new treatment plant.
- Essential to control rainwater runoff in storms.
- Policy appears to be in line with national planning policy guidance.
- New development should not contribute to increased surface water. The policy requires developers to provide long term maintenance of SuDS.
- SuDS must be able to detain and retain water where it falls, using nature-based solutions relying on water soaking into the ground and then following a natural course. It would be helpful if there were regulations dictating the kind of

permeable hard surface that should be laid down when people replace garden space with parking.
- Drainage is not compatible with a first world country.

Of the 11 neutral responses, comments related, in some instances to a wider geography, design and natural solutions. Key themes included:

- Need to be considered catchment wide. The policy allows development that is likely to increase flood risk elsewhere. Therefore, inadequate protection for properties elsewhere.
- Main issue is lack of maintenance of drainage infrastructure. Install drainage that works.
- Water logged earth can only be mitigated with tree coverage – plant more oak trees.
- SuDS should be a compulsory part of the planning application process. Example cited of extensions being granted despite drainage issues causing flooding.
- Examples of quality traditional design codes cited.

Of the 57 respondents who did not support Policy CC8, 46 of the responses related to a repeat / standard response. This response did not relate to policy wording but instead indicated that any SuDs proposed for site TO1 will have to take account of the previous serious flooding from the land and the inadequate state of the local drainage system from Higham Wood to Tonbridge treatment works. The concern being that SuDS are unlikely to prevent future flooding.

Others that indicated that they were not happy with Policy CC8 commented:

- SUDS have a significant drowning risk for small children.
- TMBC has based its SuDs policy on the 1 in 100 year storm risk and yet Flood Hub shows there is now a 63.4% chance of a 1 in 100 year storm occurring each year. Relying on this 1 in 100 year mantra shows a disregard for the flood risk that residents of the Borough experience and allows developers to inadequately mitigate against flood risk. This is a particular concern for urban Tonbridge and East Peckham.
- There is a high identified flood risk along Stocks Green Road and the known culverts in the area and therefore no additional drainage and wastewater capacity for a large number of dwellings.
- The priorities are correct but the policy still allows the existing situation to be made worse by new development being allowed to connect surface water to foul drains, where no alternatives are not "feasible" with disastrous consequences for the environment and residents.

- It doesn't take account of the existing flooding in the area of H12. There is no amount of additional drainage that can be described as 'sustainable', when the area already floods and due to the elevation cannot accommodate any further drainage.
- More effort should be put into capturing and reusing surface water - perhaps via beds - also developments should be designed to avoid if possible. B245 floods in several places.
- Too much reliance on developer and ongoing monitoring unlikely to prevent a worsening situation. Unclear how additional sewage/foul water will be dealt with. Developers are unlikely to find this cost effective so large-scale developments TO4 and H12 should be removed from the draft plan.
- Observed issues in Kings Hill, including sinkholes and erosion around shared drives, suggest that either guidance or enforcement is insufficient.
- An increase in impermeable surfaces (roofs, roads, driveways), generates faster surface water runoff. East Peckham's ground conditions severely limit SuDS options to manage this runoff. Much of East Peckham has a shallow water table. This means infiltration techniques (like soakaways) do not work; the ground is often saturated or impermeable.
- Plan doesn't seem to meet the proposals set out. A fix to the drainage system, and all the other infrastructure issues would be a massive investment from TMBC to address this before any development work even starts.

Those respondents who did not indicate a sentiment response, made a range of comments:

- Comments from 2 developers generally supported the Policy, noting that it was broadly in line with national policy and guidance. Suggested that elements of the Policy could be included in supporting text (eg the definition of Qbar).
- 2 residents from Higham similarly commented to other residents that SuDs proposed for site TO1 will have to take account of the previous serious flooding from the land and the inadequate state of the local drainage system from Higham Wood to Tonbridge treatment works.
- Object to certain elements of the policy which are overly prescriptive and risk becoming out of date.
- Repeat comment regarding an increase in impermeable surfaces (roofs, roads, driveways), generates faster surface water runoff. East Peckham's ground conditions severely limit SuDS options to manage this runoff. Much of East Peckham has a shallow water table. This means infiltration techniques (like soakaways) do not work; the ground is often saturated or impermeable.
- Resident suggesting that new developments should split dirty water and grey water and be equipped with ponds and waterways for wildlife, noise control, and

pleasure. Rules should govern concreting over of gardens and use of plastic grass to allow rainwater soakaway.
- Resident suggesting the need for good design in Hadlow.
- Some statutory consultees (as indicated below) indicating policy support, with further technical detail.

Summary of feedback from Statutory Consultees

Natural England - Support the inclusion of this policy and the requirement for SuDS systems to be designed for multifunctional green infrastructure.

Environment Agency - Note the section on sustainable drainage however, are disappointed this contains no mention or reference to water quality. The EA further note the mention of sustainable drainage systems on page 360 but are disappointed that this only relates to flood risk, however, it does not consider water quality. Proposals for Sustainable Drainage systems involving infiltration must be assessed and discussed with the EA to determine their suitability in terms of the impact of any drainage (foul or surface water) into the groundwater aquifer. Policy CC8: Sustainable Drainage Systems (SuDS) focus is on water quantity, with limited reference to water quality and treatment. If adequate water treatment is not provided by SuDS, this presents a risk to the receiving waterbody. We therefore strongly recommend that reference is made to providing appropriate water quality treatment in SuDS, in line with CIRIA SuDS Manual (C753).

Southern Water - strongly supports all policy requirements which seek to ensure that surface water is appropriately managed, as close to source as possible. We support adherence to the National Standards for Sustainable Drainage issued by Government in June 2025 and request these be embedded within this policy. Detailed suggested wording include a correction to a reference in point 2 of Policy CC8 and subsequent correction of paragraph 6.110, plus suggested rewording of point 3 of the policy to help ensure compliance with standards; paragraph 6.109 may also need a review.

Kent County Council supports the policy, particularly the design of SuDS for multiple benefits, but recommends adding climate-resilience. It notes that the 2026 DEFRA SuDS standards change the hierarchy of drainage features and strengthen runoff requirements, so TMBC should update the policy to match national standards. The policy also omits guidance for brownfield sites, which is covered in Section 3.2.1 of the DEFRA standards. KCC further highlights that SuDS can affect the historic environment, and impacts should be assessed early using advice from the Historic Environment Record and KCC's SuDS and heritage guidance.

Summary of feedback from District / Boroughs

No comments were received.

Summary of feedback from Parish Councils

East Peckham Parish Council

- An increase in impermeable surfaces generates faster surface water runoff. EPPC notes Policy CC8 in the draft Local Plan, however East Peckham's ground conditions severely limit SuDS options to manage this runoff. Much of East Peckham has a shallow water table. This means infiltration techniques (like soakaways) do not work; the ground is often saturated or impermeable.
- Steep discharge limits into the Medway/Bourne/Coult rivers means:
    - Large attenuation tanks/pits required
    - Risk of surcharge during high river levels
    - Need for complex outfall control structures
    - Underlying fine grained strata (likely at phreatic surface) inhibit vertical infiltration, thus SuDS not feasible unless large balancing ponds are utilised. This amplifies flood storage demand and increases development land take.
- SuDS solutions with ponds would require major excavation and maintenance regimes, increasing long-term cost and reducing usable housing land.

West Malling Parish Council – Despite water scarcity, a 10% increase in rainfall is predicted for Tonbridge and Malling by 2042, and rainfall is likely to be extremely heavy at times. Managing surface water to efficiently reduce run off surface water is essential for any new development. New development should not contribute to increased surface water. Sustainable drainage systems (SuDS) are intended to remain effective in the event of a climate adjusted 1:100 years storm. Since the existing water and drainage systems would be overwhelmed, SuDS must be able to detain and retain water where it falls, using nature-based solutions relying on water soaking into the ground and then following a natural course. Tree planting, green roofs, rain gardens and swales provide health benefits for people, shade in hot weather, and enhance biodiversity.

The policy requires developers to provide long term maintenance of SuDS.
It would be helpful if there were regulations dictating the kind of permeable hard surface that should be laid down when people replace garden space with parking.

Officer response to the consultation feedback

The consultation responses to Policy CC8 show widespread recognition of the importance of SuDS in reducing flood risk, managing surface water, and supporting climate-change adaptation.

Respondents also highlighted several areas where the Policy and its supporting text could be strengthened, clarified or updated. In preparing the Regulation 19 consultation

document, further refinement of the policy and supporting text will be considered. This will include:

- updating the SuDS hierarchy and runoff requirements to match national standards (2025);
- potentially adding water-quality, aquifer-protection, and pollution-treatment wording;
- clarifying restrictions on sewer discharge;
- recognising ground-condition limitations on infiltration SuDS;
- potentially adding heritage, climate-resilience, maintenance and safety considerations; and
- reviewing text on urban creep (managing impermeable surfacing) and cross-sector collaboration.

Question 23 - Is anything missing from the climate change policies?

Total Number of responses received: 92			
No	Not sure	Yes	Not stated
7	12	72	1

The majority of respondents felt that the Climate Change chapter was not complete. Most of the responses originated from residents.

Summary of issues raised

7 respondents indicated that they felt that there wasn't anything missing from the climate change policies. The only comment received which supplemented a response was from West Malling Parish Council, as indicated below.

Of the 12 responses that indicated that they were 'not sure', 2 comments were submitted:

- solar panels should be encouraged to be sited on public building roofs covering car parks and other low impact areas rather than on Agricultural Land;
- concerns over the impact of so much more infrastructure and building which are all very environmentally unfriendly.

The vast majority of respondents to this question indicated that they felt that there was something missing from the policies. These responses were supplemented by the following issues:

- the most frequently cited issue from a repeat / standardised response (48 comments) was that 'the policies omit to recognise the adverse effects of the

removal of local food production on BMV land, resulting in increased CO2 emissions. This omission undermines the effectiveness of Policy CC1.'

Other issues included:

- renewable and low-carbon energy opportunities - solar PV on public buildings and car-park canopies; wind power (micro-generation and larger scale); hydropower from local rivers; requirement that domestic solar includes battery storage.
- retrofitting of existing buildings - adapting existing houses and commercial buildings, retrofitting, is another key part of a holistic approach.
- broader climate adaptation: extreme weather, drought and water security - adaptation policies focus too narrowly on flooding and miss other climate impacts. Missing areas include, preparing for heatwaves , drought, storms, hurricanes, and wildfires; water-scarcity planning, including new reservoirs; more ambitious SuDS requirements; local resilience strategy for severe events.
- transport, active travel and behavioural change - some respondents felt climate policies do not adequately address transport emissions, the largest source of CO_2 in the borough. Key missing elements included: segregated cycling infrastructure; safe walking routes; better public transport (especially for children); support for car-sharing schemes (e.g., Zipcar); stronger policy push to reduce car dependency.
- whole-life carbon assessment and embodied carbon - Whole-life carbon assessments (not just operational emissions); embodied carbon from construction materials; mandatory carbon-offsetting (tree planting, meadows, habitat creation).
- biodiversity, ancient woodland and wildlife corridors - explicit avoidance of ancient woodland and priority habitats, as defined by DEFRA; wildlife corridors and joining up parks with other boroughs; more tree cover (especially cooling/shading).
- gas infrastructure and low-carbon heating options - no mention of gas - unfortunately many older houses are unsuitable for the current heat pumps; some areas have been affected by low gas pressures because of increased demand from new build estates; electric boilers are not economical unless cheaper electricity becomes the norm.
- water quality, pollution and sewage discharges - there are no figures of how much sewerage TMBC considers acceptable to flow into rivers. There is no plan/target to improve i.e. reduce energy needs, reduce water consumption, reduce traffic.
- governance, enforcement and developer accountability - stronger enforcement mechanisms; guarantees that developers cannot dilute sustainability measures; independence of environmental assessments.

- other comments included **-** reduce street lighting at night to lower CO_2; immigration and population-growth concerns (non-planning matters); flood-insurance availability for flats in high-risk areas; conflicting climate evidence or scepticism.

Only 1 comment was received by a respondent who did not state whether there was something missing from the policies. The comment related to a perceived conflict that there is going to be less rainfall and then putting in infrastructure because there is going to be more rainfall. “The amount of effort being put into "climate change" is disproportionate given that the whole of the UK might give off 1% of CO2 the 99% is from the rest of the world.”

Summary of feedback from Statutory Consultees

Environment Agency – Disappointed not to see any reference in the Plan to groundwater protection. Policy CC8 refers to sustainable drainage systems but we are disappointed that this contains no mention or reference to water quality.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

West Malling Parish Council - Requiring developers to calculate their whole carbon usage, not just by the land, but also the materials, then to offset these emissions by carbon sequestration with tree planting and creating meadows. Wildflower meadows can sequester up to 3 tonnes of carbon per hectare annually, while grass meadows are exceptionally efficient at capturing carbon, making them crucial for climate change mitigation.

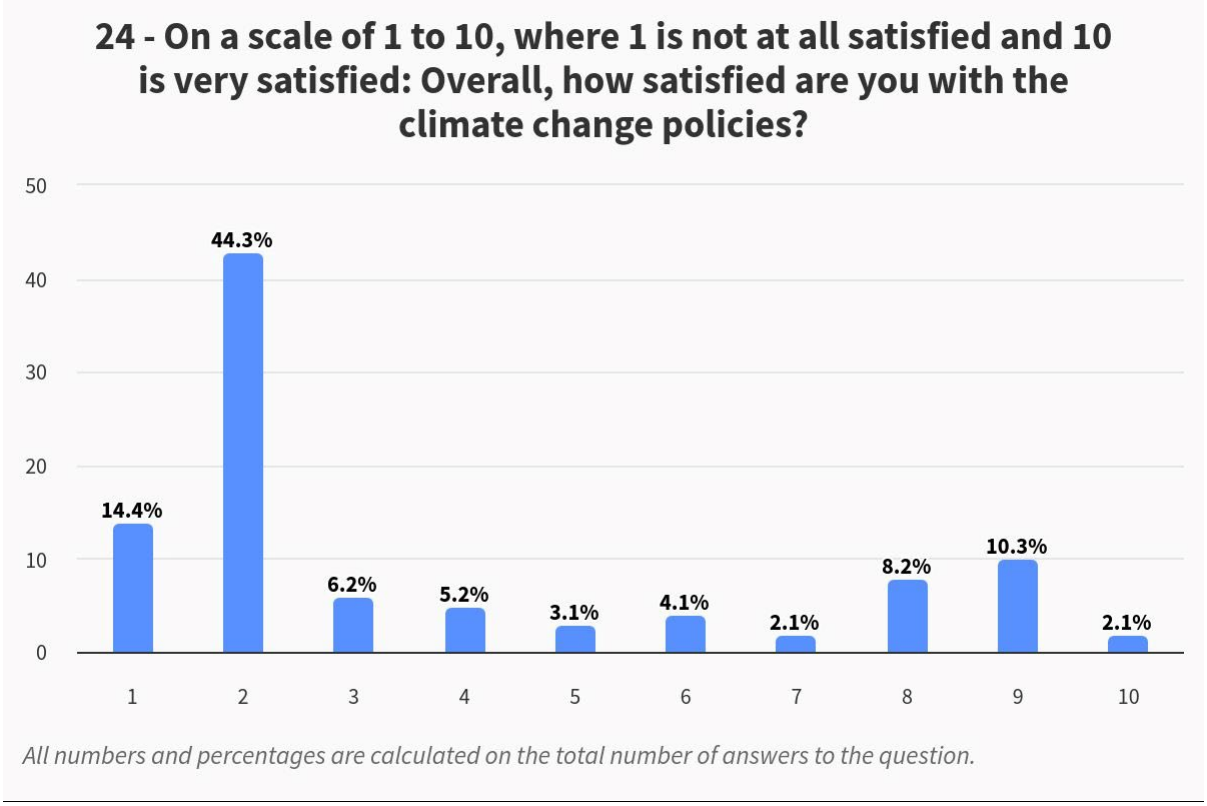
Officer response to the consultation feedback

The consultation responses reflect strong community and stakeholder interest in strengthening climate-change policy coverage. In looking at the chapter as a whole, and in drafting the Regulation 19 consultation document, the following will be considered:

- strengthen cross-references between climate, transport, natural environment and spatial policies;
- groundwater protection to be included in a policy;
- update supporting text to reflect wider adaptation issues (heat, drought, storms);
- enhance clarity around embodied carbon, retrofitting and energy standards
- update policies to better reflect water-stress, quality and new national SuDS standards;
- clarify the relationship between climate policies and site-allocation decisions;
- address renewable-energy opportunities more clearly in CC5; and

- improve clarity and feasibility across the climate-change policy suite.

Question 24 - Overall satisfaction with climate change policies (1–10).



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

Officer response to the consultation feedback

Of the 97 respondents who answered this specific question, the majority indicated a degree of overall dissatisfaction with the policies. In response, proposed amendments to individual policies and supporting text have been set out under the question responses.

Question 25 - Will these policies help transition to net zero by 2050?

Total Number of responses received: 70			
Yes	Not sure	No	Not stated
15	22	30	3

Summary of issues raised

Of the 15 respondents who expressed a positive view, stated that the climate-change policies will help the borough move toward net zero and increase climate resilience. A number of comments supplemented this view:

- these policies offer a comprehensive approach making good use of nature-based solutions including tree planting.
- important action - this is one of the most important responsibilities we have for future generations; if you do not plan for something it won't happen; it has to or we will be at a loss;
- Yes, if accompanied by a programme of retro-fitting insulation, the creation of small power stations, and water planning.
- These policies will help as part of an overall aim to meet net zero and should be widely publicised to bring about behavioural change.
- How far they need to go is anyone's guess but they must be helpful. It will certainly help.
- 2050 is a sensible target.
- Not enough attention has been taken for the actual housing needs across the borough, due mainly to general needs from elsewhere. Policies are not consistent

Respondents who answered "Not sure" generally expressed uncertainty about whether the Local Plan's climate policies are sufficient, feasible, enforceable, or aligned with broader factors affecting net zero. Their comments tend to focus on implementation concerns, external constraints, and unknown variables. Comments included:

- largely depends on how rigorously the policies are adhered to.
- there are too many variables. I would be delighted if this was possible but it may already be too late by then.
- much depends upon the clarity of drafting of the respective policies and their consistent implementation across future developments.
- transport needs to be addressed.
- who will enforce the policies? Developers want to make lots of profit
- whilst walking / cycle routes are fine, as people get older, they will more reliant on their car. This needs to be considered.
- broadly in favour and good to see key elements are being addressed. Building in areas already prone to flooding is clearly madness though.
- the policies contained within this plan will help ensure a transition to net zero by 2050, but it is important that the plan is in line with national policies and building regulations which are either in force now or might come into force during the plan period. Flexibility within the plan is vital to ensure that these can be enforced as necessary while ensuring the Boroughs' housing market stays competitive with the wider housing market area.
- important that planning applications for small-scale development proposals or outline planning applications are not over-burdened.

- the policies are great but
    - the key is implementation – difficult given the financial pressure on TMBC and its limited staff;
    - big areas affecting greenhouse gas emissions are left out, notably agriculture.
    - no detailed numbers are presented to show how the policies add up to net zero.
- reference to Quality Traditional Design Codes.
- don't believe this will happen. No place for large scale developers/large scale developments in and around Kings Hill. Priority should be given to smaller builders/developments which seem to work harder towards the objectives in this section.

Where no response was provided, other written comments were submitted:

- concern about car dependency and transport emissions;
- desire for active implementation and enforcement;
- references to specific sites or development contexts.

Summary of feedback from Statutory Consultees

None received.

Summary of feedback from District / Boroughs

None received.

Summary of feedback from Parish Councils

West Malling Parish Council – commented that ensuring everyone is working from these policies is, at least, a start.

Officer response to the consultation feedback

The consultation confirms that while the climate policies are broadly well-supported, further improvements may be needed to ensure they are:

- clearer and more enforceable;
- aligned with national standards and future regulatory changes;
- better integrated with adaptation, transport and spatial policies;
- reflective of whole-life carbon and retrofit priorities;
- deliverable, realistic and resilient to implementation challenges.