

## New and improved infrastructure provision (Questions 91 – 98)

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

#### Q91 - Do you agree with Policy INF1: Provision of Infrastructure and Services?

Total Number of responses received: 138					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
5	17	21	11	84	77

#### Q91 - Tell us why you agree or disagree.

##### Summary of issues raised

Only a small proportion of respondents expressed positive sentiment, the responses shared can be summarised into the following key themes.

- Support for policy INF1 - Some respondents expressed clear agreement with the intent behind Policy INF1, especially the requirement for infrastructure to accompany new development, and that this be delivered in a timely manner ideally at an early stage. This is considered essential for the achievement of sustainable new communities.
- Delivery of Infrastructure - Several respondents emphasised that while the policy wording is good, delivery and enforcement are critical. With several respondents' requesting robust enforcement of legal agreements to prevent developers from reneging on agreed obligations. As such there are requests for the policy wording to be strengthened to replace 'should' with 'must' throughout, and that legal agreements require careful monitoring.
- Integrated long-term approach - Respondents described the need for a more strategic, joined-up approach to infrastructure planning. Responses covered matters including the need for infrastructure to be of high quality and future proofed, that all communities should benefit and that long-term maintenance is considered.
- Support for infrastructure improvements – Several comments related to specific types of infrastructure, including:
  - Transport and highways - Support for improvements to junctions e.g. M2 junction 3 which require upgrade due to Lower Thames Crossing and to support local growth.
  - Active travel - Recognition amongst some that active travel infrastructure is important and should be prioritised.

- Healthcare and education – Support expressed for requirements to provide new primary care capacity and schools in line with growth, but that this be delivered early with strong legal and funding mechanisms.
- Digital connectivity – This is acknowledged as an important provision, both fibre and mobile.
- Viability - Developers and planning professionals expressed satisfaction with the policy’s flexibility to consider viability constraints. They consider that policy INF1 outlines a workable approach, which is aligned to the NPPF. Concerns are however expressed that a balance must be struck between the need for housing delivery and realistic infrastructure delivery expectations. Responses also included a request for site-specific policies to include workable phasing, especially for strategic allocations. Site promoters are keen to discuss site specific requirements with officers in shaping related policies and infrastructure requirements.

Responses received from respondents who expressed neutral sentiment identify several reoccurring themes, which are summarised as follows.

- Policy wording - Several neutral respondents focused on improving the wording of the policy so that this is tightened especially around delivery and enforceability of legal agreements and standards. Some request clearer definitions of what constitutes ‘adequate infrastructure’ as used in the policy and supporting text.
- Policy implementation - Many neutral responses acknowledged the value of the infrastructure policy and delivery of infrastructure but expressed doubts about both ambition and implementation. Some seeking further detail as to how improvements will be delivered.
- Location of development - Several neutral respondents commented on development patterns rather than on the policy itself. Suggesting housing should be near motorway junctions and rail stations, as this could help to minimise transport impacts and infrastructure needs.
- Infrastructure deficits - Some neutral respondents provided suggestions for facilities they felt were missing or constrained, these include a lack of school places in certain areas, pressure on available primary care capacity. With concerns expressed that the provision of these facilities has not kept pace with housing growth previously, and that existing deficits need to be addressed first.

The majority of respondents expressed a negative sentiment about the policy. Amongst these respondents, consistent themes emerged, these are summarised as follows.

- Policy wording – Respondents consider that policy INF1 is seen as too weak, too aspirational, or unenforceable and that the related Infrastructure Delivery Plan

lacks funded, concrete commitments. Without certain infrastructure delivery the Local Plan is considered to be 'unsound' or 'impossible to support'.

- Infrastructure delivery - Strong public concern was expressed about infrastructure funding and delivery, and past failures in local developments. This included a standard / repeat submission which stated that 'Delivery of the necessary infrastructure should be in hand before commencement of any development. There is a long local history of failure to do this, resulting in road congestion, and wholly inadequate services where they are required'.
- Many conveyed frustration and distrust, noting that assurances had been made previously but not honoured.
- Policy implementation – Respondents consider that infrastructure must be in place prior to commencement of development or at an early stage, failure to deliver will worsen existing deficits. Enforcement mechanisms must be binding and stronger.
- Highways and transport - Transport issues were cited extensively, especially in relation to Tonbridge, Borough Green, Kings Hill, East Peckham and surrounding villages. Key concerns raised include narrow rural and overloaded roads and junctions, which are considered unable to support extra traffic. With Cannon Lane, Higham Lane and Cuckoo Lane, Tonbridge cited as examples as well as the A26 and A228. Fear is expressed that increased traffic from new developments will create unsustainable levels of congestion. A lack of reliable and frequent public transport options, especially buses was also identified.
- Healthcare - Healthcare concerns are prominent amongst those who expressed negative sentiment. These respondents expressed that GP surgeries are already at capacity with some having closed their lists to new patients. West Malling Group Practice repeatedly cited as operating overcapacity. Examples cited of developments being approved without corresponding GP expansion being delivered, and concerns expressed that section 106 funds are insufficient without committed delivery. Fears also expressed by some that additional homes will make access to healthcare services worse.
- Schools and education - Many respondents expressed concern regarding the availability of school places, both primary and secondary. With some frustration expressed that past developments have not delivered promised or required school expansions. The lack of secondary school capacity in some areas generates unwanted out commuting for some.
- Utilities - Respondents voiced the following strong concerns regarding utilities.
  - Water supply – Insufficient supply, with hosepipe bans during the summer and low water pressure reported in some areas.
  - Sewage treatment – Untreated sewage releases into watercourses including the Medway.

- Electricity – Capacity of existing infrastructure especially in rural areas, not considered capable of handling load from new developments.
- Cumulative Impacts - Some respondents noted that infrastructure pressures don't originate solely from growth in Tonbridge and Malling, with concern expressed regarding growth in neighbouring Maidstone, Tunbridge Wells, Medway Council areas. Cumulative and cross boundary concerns were expressed regarding highways, primary care and utilities capacity, with calls for a cross-boundary approach towards infrastructure planning.

The following is a summary of the key themes arising from responses provided by those who did not indicate their sentiment to the above question. The views expressed are similar to other sentiment groups.

- Policy wording - Many respondents provided policy drafting suggestions. These include strengthening verbs e.g. replacing 'should' with 'must'. Queries regarding the use of the term 'adequate infrastructure and services', what does this mean and are there related measurable standards. Calls for a clearer explanation of related infrastructure triggers, phasing and enforcement.
- Highways and transport - Several respondents submitted concerns regarding the following issues.
  - Capacity of roads including the A26, A228, other corridors and related junctions due to growth in local and regional traffic.
  - Safety concerns regarding additional traffic on narrow rural roads.
  - Need for better local cycling and walking links to facilities including healthcare, schools and stations.
- Healthcare – Many respondents expressed strong concerns regarding healthcare provision. GP surgeries are considered overstretched or at capacity, with provision in Kings Hill, West Malling, East Peckham, and Tonbridge identified. Requests for new or expanded healthcare facilities, as current provision cannot accommodate planned population growth. This must be committed and funded early in the development process, with calls for greater involvement of the NHS Integrated Care Board (ICB) in shaping and delivering provision.
- Utilities - Infrastructure challenges are expressed similar to the views shared by other sentiment groups. These include.
  - Water supply – Need for significant upgrades with an over reliance upon existing sources and concern regarding recent supply issues.
  - Sewage treatment - Limitations with existing treatment works and the need for new wastewater treatment infrastructure / expansion at treatment works.
  - Concerns expressed by site promoters regarding the need for off-site water infrastructure upgrades which may have long lead-in times and high costs.

- Cumulative impacts - Many of the respondents highlighted concern regarding the cumulative impacts of growth from adjacent boroughs, and that a cross-boundary / sub-regional approach is required towards planning for transport, health care including hospitals and utilities. Concern expressed that some communities in Tonbridge and Malling which are close to areas of strategic growth in neighbouring boroughs will be disproportionately impacted, e.g. East Peckham and Paddock Wood/Capel.

#### Summary of feedback from Statutory Consultees

- **Network Rail** - Welcomes the inclusion of this draft Policy and supports early engagement on infrastructure as identified at paragraph 1. In paragraph 8 of the draft Policy, Network Rail supports the phasing of development to ensure infrastructure is provided and the use of planning conditions can restrict commencement and occupation of development. They encourage the Council to include reference to planning conditions within paragraph 8 of the draft Policy.
- **Environment Agency** - All new developments or redevelopments should ensure provision of suitable wastewater infrastructure and aim to connect to the mains sewer network where possible. Re Policy INF1 the Environment Agency recommend that it makes specific reference to wastewater infrastructure and mains sewerage connections for new development, as this provides protection to groundwater from private discharges. They would object to major development sites that do not connect with local sewers or provide upgrade where this is required.
- **Kent County Council** – KCC’s comments are summarised as follows.
  - Flood and water management: KCC, as Lead Local Flood Authority, welcomes alignment with its Local Nature Recovery Strategy and drainage policies, and emphasises the need to consider TMBC’s Surface Water Management Plan and Southern Water’s plans when assessing infrastructure requirements.
  - Libraries, adult education, and youth services: KCC supports continued use of S106 funding for libraries and requests explicit recognition of adult education and youth services within the Local Plan as vital community infrastructure needing developer contributions.
  - Developer contributions and viability: KCC calls for earlier payment triggers, stronger contribution monitoring, and a unified approach with TMBC to reviewing viability assessments. Developers should be required to seek alternative funding before reducing infrastructure contributions.
  - Highways and transport responsibilities: KCC clarifies that S106 transport contributions will only be accepted where schemes are already in its programme; otherwise, developers must deliver mitigating works through

- S278 agreements. They also support a ‘decide and provide’ (vision-led) approach consistent with Local Transport Plan 5.
- Transport modelling and mitigation delivery: Continued cooperation on strategic and junction modelling is welcomed. Each transport mitigation measure must have a clearly identified responsible developer and be based on an agreed understanding of trip generation.
  - Sustainable transport: KCC consider that a Sustainable Transport Study is needed to determine which Local Plan sites are genuinely sustainable. Priority should be given to public transport and active travel, with highway schemes used only for residual or safety needs. They reserve the right to object to sites they consider to be unsustainable.

### Summary of feedback from Districts and Boroughs

- **Maidstone Borough Council** - Inform that MBC has an adopted policy LPRSP13 in their Local Plan Review 2021-2038, which sets out the priorities for infrastructure spend in their borough which is in line with the NPPF (2024) paragraph 20 (b). They state that it would be useful to understand what the infrastructure priorities are for TMBC.
- **Medway Council** – No specific comments regarding draft policy INF1 were provided. Specific comments are however provided regarding the future impacts of traffic growth upon local roads and junctions of the M2, A228 and A229. A specific policy focus regarding Blue Bell Hill is requested. In relation to Blue Bell Hill, given the complexity of modelling links at capacity and uncertainties around the distribution of trips between the A228 / Borstal Street / A229 / A249 (trips across our shared border), it would be helpful to have a section focused on this topic. In turn, with a stronger understanding of these impacts it may be possible to better evidence the impact of enhancements at Blue Bell Hill on traffic otherwise using the A228 or A249.
- **Tunbridge Wells Borough Council** – No specific comments regarding draft policy INF1 were provided. The comments provided are summarised as follows.
  - Need for coordinated infrastructure planning: TWBC stresses that TMBC’s Infrastructure Delivery Plan (IDP) lacks sufficient detail to fully understand the required highways, flood infrastructure, utilities, and public service upgrades to support growth, and calls for deeper collaboration at Regulation 19.
  - Education provision alignment: TWBC supports new and expanded primary/secondary schools in TMBC but notes gaps especially affecting Paddock Wood and calls for continued Duty to Cooperate work with KCC to ensure aligned school place planning across borough boundaries.
  - Healthcare and emergency services capacity: TWBC notes pressure on GP practices and the need for new healthcare premises, plus concerns about

ambulance “Make Ready” capacity. It urges TMBC to continue working with the NHS to ensure provision matches planned population growth.

- Flood risk and water infrastructure: Flooding remains a significant issue across both boroughs; TWBC calls for ongoing cross-authority engagement with KCC and Southern Water on surface water and wastewater capacity.
- Waste and recycling facilities pressure: With the North Farm Waste Transfer Site near capacity, TWBC calls for joint work on a new or expanded facility to support growth in both boroughs.
- General principle: All planned growth in Tonbridge and Malling must be supported by adequate, timely, and jointly planned infrastructure, with TWBC expecting to comment further when detailed evidence is released at Regulation 19.

#### Summary of feedback from Parish Councils

- **Aylesford Parish Council** - Developers provide some infrastructure but only focus upon their developments. Wider investment in infrastructure is required. As more development takes place, the negative impacts upon local services and utilities increases.
- **Burham Parish Council** - The east bank infrastructure needs significant investment which is beyond the capabilities of individual developers. Rural roads are unsuitable for additional traffic, and the GP Surgery is over subscribed.
- **East Peckham Parish Council** – The parish council raised a number of matters which are summarised as follows.
  - Schools: East Peckham Primary is already full, with no plans for new provision. Further housing would force families to travel elsewhere, increasing car use.
  - Digital and utilities: Broadband coverage is patchy; electrical capacity may be insufficient. The parish council asks for evidence of consultations with utility providers.
  - Healthcare: No local GP surgery and neighbouring practices are at capacity. Proposed housing (and wider regional growth) would significantly worsen access unless new facilities are planned.
  - Cross-boundary pressures: Growth planned in nearby boroughs (Paddock Wood, Capel, Marden, Maidstone, Tunbridge Wells) will compound pressure on healthcare, roads, and hospitals.
  - Transport: Major congestion risks on routes to Maidstone and Pembury Hospitals particularly the A26 and A228/Colts Hill, and on other local roads. Highway capacity issues especially at Wateringbury will worsen without mitigation.
  - Emergency access: Concern about slower ambulance travel times due to congestion and request specific “blue-light” modelling.

- Water & Sewerage: Local water networks and aquifers have limited capacity and slow recharge. EPPC seeks clarity on how additional demand will be met.
- **Birling Parish Council** - Is concerned that any development should be supported by appropriate infrastructure and not result in a deterioration in the facilities for existing residents. Whilst policies INF1 and INF2 seek to achieve these aims, this has not always been borne out by experience in the past, in particular GP provision.
- **Kings Hill Parish Council** - No specific comments regarding draft policy INF1 were provided. They state that the draft Plan does not satisfy the NPPF requirement for infrastructure led development (para 20). Kings Hill already has infrastructure deficits including primary and community care, secondary education, bus services, utilities, sport and leisure, no credible mitigation is proposed.
- **Hadlow Parish Council** – No specific comments regarding draft policy INF1 were provided. Concern expressed about future sewage infrastructure capacity. Hadlow has a very old foul water system which has resulted in numerous discharges into the River Bourne and current demand is considered to exceed capacity.
- **Hildenborough Parish Council** - The parish council raised several matters which are summarised as follows.
  - Shortage of early years and primary places: There is already a shortfall in early years and 3–4-year-old childcare places in Hildenborough, meaning families often travel elsewhere for provision.
  - Primary school capacity: The Local Plan does not clearly show whether existing schools can absorb new pupils arising from proposed developments, nor whether new schools will be funded or delivered. The parish council stresses that primary places must be provided near new housing, not simply somewhere in the wider borough.
  - Proposed school expansions: Proposals for new or expanded primary schools (e.g. at Grange Farm or South Tonbridge) remain vague and subject to feasibility, with no firm commitments at this stage. The expansion of Stocks Green Primary is considered feasible, whereas expanding Hildenborough CE Primary is not.
  - Need for impact assessments: The Parish Council calls for health impact and educational provision assessments for each site allocation to ensure infrastructure needs are understood early.
  - Specifically, regarding policy INF1, this is considered contrary to national planning policy, due to insufficient clarity on school capacity and provision.
- **West Malling Parish Council** – The parish council raised several matters which are summarised as follows.

- Infrastructure must keep pace with development: Strong concern that new housing is being approved without the necessary transport, healthcare, education, and utility infrastructure in place.
- Healthcare pressures: West Malling has no GP surgery, local practices are overstretched, and past commitments (e.g. Leybourne Chase medical centre) have failed to materialise. The parish seeks firm commitments, ring-fenced funding, and partnership with the NHS to ensure new health facilities are delivered *in parallel* with growth.
- Transport and accessibility issues: Limited public transport and reduced local services mean residents face difficulties accessing essential facilities, highlighting the need for better transport-linked infrastructure planning.
- Utilities and connectivity: Concerns about strain on water and sewage infrastructure, and poor mobile signal in the area. Support for stronger requirements on developers to secure carbon-neutral utilities and early broadband/mobile provision.
- Developer obligations and viability: The Council's viability policies are seen as too flexible, potentially allowing developers to reduce infrastructure commitments. The parish seeks clearer definitions and stronger safeguards to prevent dilution of obligations.
- Long-term delivery and maintenance: Calls for legally binding arrangements for the long-term upkeep of infrastructure, and for S106 funds to be available earlier to benefit communities.
- Better consultation and accountability: The parish urges early, ongoing engagement with local health groups and service providers, with full transparency throughout the plan-making process.
- **Teston Parish Council (in Maidstone Borough)** – No specific comments regarding draft policy INF1 were provided. Concern expressed regarding the impacts of traffic growth and rat-running on rural roads in East Malling, Wateringbury and Teston, especially during peak periods. Local roads and junctions with the A26 are unsuitable for additional traffic which results in significant queueing of vehicles and poor air quality.

#### Officer response to the consultation feedback

Officers recognise the strength of feeling around the timely delivery of infrastructure, the capacity of local services, and the cumulative impacts of growth. Based on the issues raised, officers will consider the following in relation to the supporting text and the policy:

- Strengthening the policy and supporting text where it is possible to do so in accordance with national planning policy. We will consider whether terms such

as 'should' can be replaced with 'must' where appropriate. We can make it clearer that the Council's intention is for infrastructure delivery to be a firm and integral part of the planning process. This aligns with extensive respondent feedback calling for stronger policy intent and enforceability.

- Related clarity regarding expectations of the type, scale and timing of required infrastructure, will be set out in the Infrastructure Delivery Plan and related delivery schedules. This is an iterative document, that is informed by the business and service plans of infrastructure and service providers (as available), their latest capacity assessments and advice regarding future requirements. A further and more detailed draft of the IDP will be published at Regulation 19 stage.
- Make clear expectations regarding delivery. While it is not always feasible for all infrastructure to be delivered and fully operational before first occupation of residential developments for example (e.g. major highways schemes have long delivery timescales), we will consider whether we can strengthen expectations around phasing.
- The depth of public concern is noted regarding primary care provision and we will consider whether firmer language in the policy to make clear that early engagement with infrastructure and service providers is 'essential, not 'expected'. Strengthening supporting text will also be considered.
- Update supporting text to reflect work undertaken (and ongoing) in relation to cross-boundary and cumulative impacts, in assessing and identifying future infrastructure requirements, as part of the plan making process. Further detail on this will also be provided in next draft of the Duty to Cooperate Statement with regard to 'other partners' including infrastructure and service providers that are 'non-statutory'. For example, transport modelling work and healthcare planning undertaken by the ICB take account of growth in neighbouring boroughs.
- Concerns from both developers and the community regarding viability and related delivery risks are noted. Policy INF1 clearly sets out the Council's approach regarding this at paragraphs 11 to 13. This wording will be reviewed to stress the importance of delivering and not compromising the delivery of essential infrastructure e.g. healthcare, education and transport provision.

The amendments proposed will help to improve the robustness and enforceability of Policy INF1 and the Policy will be devised to respond to long-standing community concerns regarding the delivery of infrastructure to support growth.

Concerns raised by respondents regarding specific infrastructure matters will be considered and discussed with relevant partners. Further detail regarding future infrastructure requirements will be included in the next version of the Infrastructure Delivery Plan. Officers will continue to work proactively with statutory bodies,

infrastructure and service providers to prepare and refine this to support the emerging Local Plan growth strategy.

**Q92 - Do you agree with Policy INF2: Sustainable Transport and Active Travel?**

Total Number of responses received: 85					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
6	15	26	13	25	130

Summary of issues raised

In total 87 written responses were received, of these thirteen expressed positive sentiment, eleven expressed neutral sentiment, and thirty expressed negative sentiment. Responses were received from a mix of statutory consultees, borough and parish councils, as well as site promoters/developers, other organisations and individuals. Below is a summary of responses for respondents who also indicated positive sentiment to the above question.

- General support for policy INF2 – Several respondents expressed broad agreement with the aims of Policy INF2 and were supportive of its overall direction. In particular, encouraging active travel, reducing car dependency and related emissions as well as promoting healthier lifestyles.
- Improved public transport - A common theme among positive responses was the desire to see better, more frequent, or more reliable public transport. Including enhancements to bus services and better bus-rail integration. With recognition by some that improving public transport options could help to tackle congestion and car dependency. A single response was received requesting better consideration of those with disabilities in relation to the provision of step free access at stations.
- Walking and cycling infrastructure – Several respondents support the improvement of better cycling and walking routes including provision of more cycle parking, to encourage active travel uptake. With requests for safer, continuous, and more accessible walking and cycle routes, and for these to link to local services or public transport hubs.
- Development mitigation - Some respondents including developers expressed support for the policy’s intent, particularly around transport assessments and mitigation. With acknowledgement that active travel and public transport measures should be integral to development proposals, and recognition that

sites near rail stations and bus routes provide good opportunities for sustainable travel. Developers are keen to engage with the Council on these matters.

- Policy Implementation – Several respondents expressed that the policy intention is good, but that delivery must match the ambition. Related concerns raised include securing sufficient funding to deliver required mitigations, and for legal agreements to be robustly enforced.

Of those who answered neutral to the sentiment question, respondents tended to provide conditional viewpoints. Key themes from the comments included:

- Conditional support for policy INF2 –The intent of policy INF2 is positive but warned that implementation challenges could undermine its effectiveness. Deliverability can be uncertain due to funding gaps, weak enforcement of legal agreements and a lack of delivery commitment.
- Rural connectivity - The current unsuitability of rural settlements for walking, wheeling, or cycling, due to narrow roads, high traffic speeds, lack of pavements and cycle routes, as well as adequate lighting. A lack of frequent and regular bus services was also expressed. These limitations make alternative active and sustainable journeys challenging vs using cars.
- Accessibility and inclusive travel – Similar concerns again expressed regarding the need for better accessibility provisions and more inclusive transport options. It was stressed that active travel options do not meet the needs of all groups, especially older and disabled residents. Some people will remain reliant upon car use for local journeys.
- Mode integration - To improve use of sustainable and active transport modes, better integration is required by.
  - Linking bus services to train stations,
  - Providing better footpath provision especially in rural areas,
  - Ensure cycle routes link to local services and facilities, and
  - Ensure that new developments connect with and improve existing networks.
- Evidence base and modelling - Several responses highlighted concerns with the transport evidence base and modelling that underpins the policy and related mitigations. These include the evidence being incomplete, insufficiently validated and not reflective of real-world conditions. With related requests for further modelling work to be based upon a more up to date baseline, consideration of queue interactions between junctions, and detailed junction modelling.
- Policy implementation – Some neutral respondents also questioned whether the policy would be workable in practice. With support expressed for the policy

wording but scepticism that new development will not be accompanied by sufficient mitigation, especially so given existing infrastructure pressures.

Respondents who expressed negative sentiment in response to the above question have concerns about Policy INF2. Key themes included:

- Public transport - A dominant theme was frustration with insufficient, unreliable, or reduced public transport, especially buses. Some respondents stating that many rural areas have infrequent or no bus services, that cuts in recent years have left some communities isolated, and that some routes lack evening and weekend services. Without significant investment buses won't be able to replace more car journeys.
- Cycling infrastructure – Three respondents were critical of current cycle infrastructure provision, referring to this as inadequate. Key concerns being that infrastructure is fragmented and poorly designed. Some dislike was expressed for shared pedestrian/cycle paths, due to narrow widths in some places, poor surfaces, and potential conflict between users.
- Car dependency - A core message was that for many residents, car use is unavoidable due to living in rural areas, limited alternatives and the need to undertake linked trips or those which require the transport of goods or people. Concern expressed by some respondents that more new housing will further increase car use not reduce this. Some expressed that significant modal shift is likely to be unrealistic.
- Traffic congestion – Related to the above theme, respondents frequently described current congestion as unacceptable, expressing concern that new development will worsen conditions on roads and pinch points including, A26, A228, B245, A227 and that network resilience will decrease as remaining capacity is consumed by traffic growth. Concern was also expressed regarding further rat-running through villages to avoid congested routes or incidents.
- Evidence base and modelling – A couple of respondents challenged the robustness of the policy's supporting evidence. This being described as incomplete, not reflective of the lived reality of queues and delays on the road network, and concerns expressed about the accuracy of the capacity conclusions reached.
- Policy implementation - Dissatisfied respondents consistently expressed low confidence in INF2 delivering outcomes as intended. With concerns expressed that delivery of improvements won't keep pace with housing growth. Some expressing concern that the implementation of the policy could result in reduced parking in some locations.

Many respondents who did not select a sentiment response still provided substantive comments, again the feedback provided is consistent across key themes.

- Public transport - Numerous respondents in this group expressed concern about poor bus connectivity with rail stations both peak and off peak, particularly a lack of bus connectivity to settlements including Kings Hill.
- Walking and cycling infrastructure - Support for active travel improvements was expressed by some respondents in this group, who acknowledged the value of walking and cycling to support journeys to local facilities. However, respondents raised significant concerns regarding the safety and practicality of active travel, particularly in rural areas. Again, due to similar issues identified by other respondents, which include narrow roads, incomplete cycle routes and traffic. These concerns and negative perceptions of safety make walking or cycling unrealistic for many residents, especially those in rural areas.
- Car dependency - Several comments focused on highways capacity concerning larger site allocations, and that the network won't be able to cope with the additional traffic created. Car dependency is considered to be unavoidable and unsustainable in some settlements e.g. East Peckham due to out commuting for work and to access services.
- Traffic congestion – Respondents in this group frequently expressed concerns about existing congestion, particularly relating to the A228 and B245, and that additional traffic from new development is likely to make this worse.
- Highways improvements - Some respondents in the group explicitly called for highway interventions not only sustainable and active travel improvements. A few respondents suggesting that without major highway upgrades, sustainable transport measures will be insufficient or unachievable due to congestion which also affects bus services.
- Policy implementation – Some respondents highlighted examples where transport impacts were considered to have either not been properly anticipated or mitigated, raising doubts about future policy outcomes. Requests were made for clarity as to how transport improvements will be delivered and funded. Fernham Homes expressed repeated concern regarding the fair apportionment of infrastructure costs, requesting clarity as to how contributions will be pooled, and that phasing is clear where multiple site allocations are proposed within the same settlement.

#### Summary of feedback from Statutory Consultees

- **Network Rail** - Strongly supports the emphasis on public transport and active travel in the policy, however requests additional content to support rail use. Rail stations should be central to achieving 20-minute neighbourhoods and reducing

car dependency. The policy should have regard to the Tonbridge Strategic Station Plan and its outcomes as well as any future rail studies published prior to adoption. The draft policy should be amended at para 3b to include specific reference to improving station access and cycle storage.

- **Natural England** – Support is expressed for the policy with the following comments.
  - Commitment to protecting and enhancing rights of way networks is welcomed, it is requested that the policy is strengthened to explicitly protect and enhance the North Downs Way National Trail.
  - An additional criterion is requested to point 3 of the policy to maximise opportunities to utilise transport networks to enhance green and blue infrastructure and create and connected habitats.
  - Natural England also request that a commitment is included in the policy to ensure that active travel networks include green and blue infrastructure. This could be achieved by amending para 4 to state; *‘Active travel infrastructure should be accessible, inclusive, and incorporate high-quality green and blue infrastructure.’*
- **National Highways** - Support the focus on public transport and active travel measures and the aim to reduce vehicular travel demand.
- **Kent County Council** - The County Council’s comments regarding policy INF2 are summarised as follows.
  - Para 3e – Support is expressed for car clubs and mobility hubs, to further encourage sustainable and active journeys. Developers should be responsible for travel planning and encouraging new residents to use sustainable and active modes.
  - Para 4 – Support is expressed for cycleways for adapted cycles; infrastructure should also include adaptive cycle parking facilities.
  - Para 5 - KCC agrees that non-motorised travel should always be prioritised, not just where segregated provision cannot be achieved.

Further related comments are provided as follows.

- Strategic Sites - Where strategic allocations are providing on-site schools, new and improved walking and cycling connections to school locations, both within the site and surrounding communities, are required to be provided prior to the opening of the school on-site.
- Planning obligations – KCC would like TMBC to support more flexible wording in related s106 clauses.

#### Summary of feedback from Districts and Boroughs

- **Maidstone Borough Council** – Supports for a Maidstone to Tonbridge cycle route as per the Kent Local Transport Plan 5, and also the Maidstone Walking & Cycling Strategy 2011-2031 including actions RMB7, SWM1 and delivery of a cycle route from Barming to Kings Hill.
- **Tunbridge Wells Borough Council** - The borough council supports the improvement of sustainable transport routes, particularly in and around Tonbridge and where these facilitate connection with routes across the borough

boundary with Tunbridge Wells. Support is also expressed for the proposed improvements to railway stations in Tonbridge and Malling to improve accessibility, cycle parking and wayfinding.

The borough council also supports the approach to enhancing existing bus services, especially those connecting rural service centres and larger villages.

Stating the importance of integrating bus services at an early stage in new developments, as travel patterns are quickly established. The A20 and A26 corridors remain an important focus for related service improvements.

The borough council also expresses support for the establishment of a car club scheme in Tonbridge and Malling, and ongoing transport related duty-to-cooperate discussions.

### Summary of feedback from Parish Councils

- **Aylesford Parish Council** – No comments provided regarding policy INF2. Concern expressed that the Active Travel Strategy does not mention improvement plans for the north-east part of the borough. Concern expressed about sections 13 and 16 of the Medway Gap cycle route audits.
- **Burham Parish Council** - No comments provided regarding policy INF2. Concern expressed that rural roads are considered unsafe for pedestrians and cyclists, and that these should be 40mph max.
- **East Peckham Parish Council** - No comments provided regarding policy INF2. Concerns were however expressed about the following.
  - Public transport - East Peckham has limited and inadequate bus services. The nearest station Beltring is poorly connected, lacking facilities, and difficult to reach due to unsafe routes.
  - New transport infrastructure – Site allocations are considered undeliverable without major transport infrastructure upgrades.
  - Car dependency - Limited local facilities results in additional trips by car to surrounding towns.
  - Highways capacity - The A228 and surrounding routes are already regularly congested at peak times, further housing (including at Paddock Wood) will worsen congestion.
  - Climate Change - TMBC's Climate Change Strategy suggests reducing the need to travel, yet East Peckham's remote location will result in increased car travel and potentially related emissions.
- **Birling Parish Council** – Concern expressed regarding the amount and type of traffic rat-running through Birling, especially when there are network problems elsewhere. The parish council have been working with KCC Highways to manage this situation. Work ongoing to prepare a Highways Improvement Plan to reduce the volume and speed of traffic through the village. The parish request that policy INF2 be strengthened to make clear that cumulative traffic impacts including Lower Thames Crossing should be considered in assessing proposed Local Plan growth.
- **Kings Hill** - Policy INF2 is considered to conflict with NPPF para 110. The following related concerns were expressed.

- Local Plan modelling identifies the A228 and A20 corridors as operating at or above capacity.
- Active travel routes are incomplete and unsafe.
- Bus services are insufficient to support modal shift.
- **Hadlow Parish Council** - No comments provided regarding policy INF2. The following related concerns were expressed.
  - Highway capacity / congestion – Proposed developments will add to congestion, especially on rural roads. Worsening congestion on the A26 could have implications for emergency services.
- **Teston Parish Council (in Maidstone Borough)** - No comments provided regarding policy INF2. Concern expressed regarding the modelling of cumulative traffic impacts in the transport evidence, within Tonbridge and Malling and neighbouring Maidstone borough.
- **West Malling** - The parish mostly supports policy INF2 and agrees with the importance of delivering and enhancing sustainable and active travel infrastructure. The following related concerns are expressed.
  - Investment - A lack of investment in strategic infrastructure and congestion on local transport networks is a key economic development issue. The Local Plan must address this.
  - Congestion - Further development will put increased pressure on the strategic and local road networks. The Local Plan must seek transport methods that do not rely on private use of cars and note the negative impact of a greater number of cars on parking throughout the local area.
  - Vehicular access – A policy on access requirements for emergency vehicles in new developments is requested.
  - Rail - Increase in population within TMBC will require increases in train services and further parking capacity and station access improvements will be required at West Malling Station.
  - Bus – These services should be prioritised to link new developments to existing communities and urban centres. Ideally at low or no cost to passengers. Recent service reductions are of concern.
  - Walking and cycle routes – Support is expressed for safe links between homes, schools and other key destinations including stations. Routes should ideally be segregated or otherwise low speed where road space is shared. In addition to new and improved routes, interest is expressed in a potential cycle hire scheme. A specific policy on Quiet Lanes is also requested.
  - Mode shift / climate crisis – Support is expressed for mode shift away from private car use and the Local Plan should seek to achieve this by improving public transport and active travel infrastructure. Schemes such as car sharing and car clubs are also supported.

#### Officer response to the consultation feedback

A significant number and range of consultation responses were received in response to policy INF2. These spanned residents, parish councils, transport interest groups, developers and site promoters, and statutory consultees. While views varied, several

consistent themes emerged regarding how INF2 and its supporting text could be strengthened to improve clarity, deliverability, and alignment with national policy. The following will be considered in progressing this Policy:

- Policy wording - Officers will review policy INF2 and supporting text to consider if the clarity of wording can be improved. The next draft of INF2 will make clear that the mitigation measures in part 3 are not priority-ordered and are to be applied proportionately to site context. Recognition will be added regarding the differing opportunities for transport and active travel improvements between rural/urban areas in line with NPPF paragraph 110, ensuring outcomes are appropriate given known constraints and opportunities.
- Implementation and developer contributions - Officers acknowledge requests for improved clarity regarding these matters, the wording of the policy and supporting text will be reviewed.  
Updates aim to reassure stakeholders that transport interventions will be delivered in a timely and coordinated manner.
- Evidence base – The progression of transport evidence is ongoing, and further work will be undertaken to inform the Regulation 19 Local Plan.  
The Active Travel Strategy will also be updated to reflect the consultation feedback received and to align this to the Regulation 19 Local Plan.

**Q93 – This question was incorrectly placed in the online survey. Responses received against this question have been analysed as part of question 57 relating to policy H2.**

**Q94 - Do you agree with Policy INF3: Parking?**

Total Number of responses received: 115					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	19	11	7	76	101

#### Summary of issues raised

A total of 102 written responses were received, 11 of which were related to positive sentiment responses, 6 related to neutral sentiment responses and 77 related to negative sentiment responses.

Of those who indicated positive sentiment, several agreed that the policy recognises the importance of ensuring enough parking spaces in new developments. Key points raised include.

- Support for provision of sufficient off-road parking for all new homes.

- Support for acknowledgement of current shortfalls in parking provision.
- Adequate parking is essential where public transport provision is infrequent.

Respondents who expressed neutral sentiment shared views which are summarised as follows.

- Provide sufficient public parking provision.
- Support expressed for policy INF3 and the provision of appropriate and well-designed parking within new developments, including for electric vehicles. Acknowledging the trade-offs between on-site parking, development density and prioritising sustainable transport.
- New estate roads are often narrow and unsuitable for on-street parking which should be avoided.

A large number of respondents to this question expressed a negative sentiment to the above question, there were however forty-seven repeat responses relating to site TO1 in Tonbridge. This short response is as follows, *‘ The Policy only refers to parking on the allocated sites, not to parking issues arising elsewhere because of the development. Development of TO1 and other sites in and around Tonbridge will place huge pressure on parking spaces in the town centre’*.

The remainder of the responses received are summarised as follows.

- Parking provision – Several respondents state that new housing developments lack adequate off-street parking, often providing only one space per dwelling. This leads to overspill onto surrounding streets, conflict with existing residents and long-term parking pressures as households own multiple vehicles. Concerns expressed regarding pressure upon public parking provision as a consequence of growth. Problem locations for parking cited by respondents include - Kings Hill on some residential roads, West Malling station, Borough Green village centre and Hildenborough village centre.
- Public parking - respondents state that new housing areas consistently lack adequate off-street parking, often providing only one space per dwelling. This leads to overspill onto surrounding streets, conflict with existing residents, and long-term parking pressures as households own multiple vehicles. Some object to redevelopment proposals that will remove parking spaces. I.e. the redevelopment of sites East of High Street in Tonbridge.
- Policy wording - Some respondents fear that policy INF3 will be ineffective

Main criticisms include a perception that the policy is vague, and that it focuses upon new developments and not wider impacts/provision.

Respondents who did not respond to the sentiment question, expressed similar views to others, amongst these there were 6 repeat responses from Fernham Homes. Their responses express support for policy INF3 as drafted, they however request that the policy wording is checked to avoid any repetition of other guidance. They express concern regarding the land take for parking within new developments, particularly for larger 3-4+ bedroom homes. This should be taken into consideration in calculating development yields.

Comments arising from other non-sentiment responses received include the following.

- **Parking provision** – Two respondents raised concerns about parking pressures at Kings Hill relating to poor design in some development phases, and high demand for the parking provision within retail sites at Liberty Square and West Malling Station at peak times. Similar views were expressed regarding parking provision in Tonbridge town centre.
- **Policy wording** – A single respondent expressed support for policy INF3 as drafted including reference to the KCC parking guidance. Another expressed that the policy should have regard to wider parking provision within town centres.

#### Summary of feedback from Statutory Consultees

- **Network Rail** – Network Rail state that station parking provision is kept separate from parking provided for new development. There may be the need for existing station parking to be expanded to support growth. Whilst travel by car should be minimised, Network Rail acknowledge that many rail users drive to larger stations where rail services are more frequent. Southeastern are currently undertaking a detailed review of parking demand at large stations in Kent, including Tonbridge.

#### Summary of feedback from County, Districts and Boroughs

- **Kent County Council** – KCC provided comments on aspects of draft policy INF3, which are summarised as follows.
  - **Part 3** – KCC ask that development parking should be deterred from taking place on internal site roads where it might restrict bus or refuse vehicle movements. Developers should have to ensure that larger vehicles can move

freely, using parking restrictions to maintain movement, this should be reflected in the policy.

- Part 5 – KCC ask that mention is made of van parking/large parking spaces for bigger vehicles to assist with home deliveries, this is not currently provided for.
- Part 6 – KCC ask that the use of parking management plans be included, as these can be vital to the effective operation of on-site parking, particularly where reduced provision is proposed or there are known local issues.
- **Maidstone Borough Council** – The borough council expressed that a similar policy approach is included in its adopted Local plan review 2021-2038.

#### Summary of feedback from Parish Councils

- **Aylesford Parish Council** – Policy considered to be best practice however not likely to be well implemented or supported by the public.
- **Burham Parish Council** – High car dependency is acknowledged in Burham and nearby villages. Parking provision is considered to be inadequate in existing villages and new developments.
- **Kings Hill Parish Council** – Kings Hill business park has long suffered from inadequate parking, concern expressed that further growth will increase parking pressure and related congestion.
- **Hadlow Parish Council** – Concern expressed about impact of growth upon parking provision due to lack of public transport alternatives.
- **West Malling Parish Council** – Express support for policy INF3, and that new developments will be required to consider and provide adequate and well-integrated parking for all types of vehicles, taking account of KCC's Parking Standards (2025) or any subsequent guidance. Specific comments are summarised as follows.
  - Part 2(e) the parish council agree that when considering new parking provision, the applicant should consider local circumstances, including existing parking controls. The parish council would like to see more detail in the policy about the need for an applicant to consider the impacts of parking on the wider local infrastructure.
  - The Local Plan needs to protect the availability of public parking provision. Free or cheaper parking would encourage longer dwell times increasing both footfall and frequency of visits to West Malling and its facilities. If parking options within West Malling are not viable, visitors will drive to other retail destinations.
  - Station parking demand will increase as a consequence of proposed growth; additional provision will be required.

- Support is expressed for electric vehicle and bike charging (part 5 of the policy). The parish council would like provision of these facilities to be expanded across local public car parks.

#### Officer response to the consultation feedback

A significant number of consultation responses were received in relation to Policy INF3: Parking. These responses demonstrated a strong level of public interest and highlighted several recurring concerns regarding the adequacy, clarity and implementation of parking standards across the borough. Respondents raised issues relating to both the policy wording and the supporting text, with many suggesting revisions.

The following will be considered to inform updates to Policy INF3 and its supporting text within the next iteration of the TMBC Local Plan.

- Off-site and cumulative parking impacts - Officers recognise the need for a comprehensive approach within parking assessments prepared for planning applications and we will look to strengthen policy and supporting text where possible and to ensure this aligns with national policy.
- Realistic parking provision - Many respondents noted that some developments within the borough have provided insufficient parking, resulting in overspill parking on narrow estate roads creating safety and access issues. We will consider how the Policy and supporting text can be updated to strengthen the position.
  - Public transport - Concerns were raised that limited public transport, particularly outside urban areas and during off-peak periods, reduces the feasibility of reducing car use by switching to alternative modes. We will consider where we can strengthen the policy and supporting text to ensure that parking assessments are realistic and reflect existing public transport accessibility, frequencies and walk distances and consider the approach for developments in less accessible areas to provide sufficient off-street parking.
- Clarification of references to KCC Parking Standards - Several professional respondents (including developers) recommended removing references to the specific dated version of KCC's Parking Standards (January 2025), noting this risks the policy becoming quickly outdated. Officers disagree with this as the wording at part 1 of the policy clearly states that *“new developments will be required to consider and provide adequate and well-integrated parking for all types of vehicles, taking account of KCC's Parking*

*Standards (2025) for these or any subsequent replacement guidance*". No change to the policy is therefore suggested.

- Clarity and removal of duplication - Some respondents noted that the policy wording and supporting text repeat existing guidance unnecessarily and could be written more succinctly. In response, officers will review the policy wording for brevity and clarity, removing duplication where it does not add value.
- Land-take implications and development density - Developers requested that the supporting text more clearly acknowledges the land-take required to meet parking standards, particularly for larger homes, and how this can affect development yields.

Officers acknowledge the tension which can arise between providing adequate parking provision and the achievement of well-designed developments at appropriate densities. The supporting text to the policy is clear at paragraph 13.34, that the application of the KCC guidance is *“intended to be a starting point in considering the provision required”*, and that a pragmatic approach is encouraged that is also informed by site-specific considerations. Further detail on this is provided in the policy at parts 1 and 2, which officers consider provides sufficient flexibility for applicants. No changes to the policy or supporting text are therefore suggested.

The consultation has provided valuable insight into community and stakeholder concerns regarding parking provision across Tonbridge and Malling. The updates proposed above will strengthen the effectiveness of INF3 and better support well-designed, accessible and sustainable development across the borough.

**Q95 - Do you agree with Policy INF4: Community Facilities?**

Total Number of responses received: 112					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
6	19	53	13	21	104

Summary of issues raised

102 written responses were received, of these only 10 expressed related positive sentiment, 44 neutral and 25 negative. Comments provided by those who indicated positive support to the above sentiment question, include the following.

- General endorsement of the policy / importance of community facilities - Respondents voiced broad support for protecting existing and providing new community facilities.
- Capacity of existing facilities - Existing facilities may become overwhelmed unless upgraded alongside growth. More dedicated space requested for youth and community groups e.g. Scouts.

A significant number (37) repeat representations were received from those who expressed neutral sentiment to the above question. This included the following comment.

*“The Policy does ~~not~~ REQUIRE an early commitment to provide adequate community facilities, [this] is vital. Such as: Retail facilities, Health facilities, Parking provision and Schools”.*

Comments received in the remaining responses from those who expressed neutral sentiment, reflect a range of views and are summarised as follows.

- Policy support - Support expressed for policy INF4 however it could increase development costs affecting viability.
- Location and accessibility - Concern about the accessibility of existing facilities in town centres.
- Safeguarding and investment - Not enough attention given to retention and enhancement of community facilities.
- Early delivery - The policy should require the early delivery of adequate community facilities.
- Community use – Such use of facilities should be specifically identified in the policy e.g. schools.

Many respondents expressed negative sentiment when asked whether they agree with Policy INF4. 11 of these are the same as the standardised response outlined above. The other thirteen responses can be summarised as follows.

Provision to support growth - More community facilities are required to support proposed growth, to support community groups.

- Early delivery - The policy fails to require the upfront delivery of community facilities.
- Management of facilities - Ownership and management of community facilities needs to be considered, with local ownership/control preferred.
- The policy must ensure that new community facilities are delivered, especially in settlements where significant growth is proposed e.g. Hildenborough and Borough Green. Particular concern is expressed regarding primary healthcare.

Key themes from comments provided by those who did not select a sentiment category include the following.

- Policy support – Support expressed for the policy and that new and improved infrastructure is provided.
- Healthcare - This is by far the most prominent theme among this group of respondents. With respondents expressing concern about the capacity of existing primary care facilities including the West Malling Group Practice and elsewhere. Primary care capacity must be addressed and provided to support proposed growth. Related to this NHS Property Services are seeking more flexibility in the policy regarding any potential future disposal of sites, where these are demonstrated to no longer be required.

- Schools and childcare facilities – Several respondents in this group highlighted problems including the lack of sufficient local secondary school capacity in the north of the borough (Kings Hill), overcapacity of some primary schools and waiting lists for nursery places. Calls for new education facilities to be clearly tied to housing delivery.
- Community facilities including libraries - Several responses emphasised the importance of providing more community facilities to support growth, to provide more for community groups and young people. The role of libraries as educational and social hubs was also identified, with a request for dedicated library facilities in growth areas including at Kings Hill.
- Early delivery - Respondents repeatedly stressed that infrastructure must be provided before or alongside housing growth, with concerns expressed about the s106 process leading to delays and delivery shortfalls.
- Management of facilities – Dislike was expressed for developer-controlled stewardship models utilising management companies. Community facilities should be owned and managed by the community.

#### Summary of feedback from Statutory Consultees

- **Natural England** – An additional criterion is requested at part 3 which states in relation to new or additional community facilities, that... “They seek opportunities to maximise accessible multifunctional open space and green and blue infrastructure”.

#### Summary of feedback from Districts and Boroughs

No responses from neighbouring authorities were received in response to this question.

#### Summary of feedback from Parish Councils

- **Aylesford Parish Council** - Policy maybe best practice, but concern expressed regarding barriers to delivery of new community facilities, specifically staffing of schools and primary care facilities.
- **Burham Parish Council** – Expressed concern regarding a lack of facilities in some villages.
- **Kings Hill Parish Council** - Expressed concern about the following.
  - Healthcare - West Malling Group Practice is considered to be operating beyond safe capacity and is closed to new patients. There is no NHS dental provision within Kings Hill currently and concern that this is lacking from the detail of the Infrastructure Delivery Plan. As such this is considered contrary to NPPF (2024) para 20 c).
  - Education - Primary schools are considered to be at or near capacity with limited expansion potential. No secondary school exists within Kings Hill, resulting in unsustainable travel patterns, as such this is considered to be contrary to NPPF (2024) chapter 9.
- **Hadlow Parish Council** – Expressed concern about the following.

- Healthcare – Local medical facilities are at capacity both in terms of accommodation and parking, there is a shortage of GPs too. Hospitals are considered to be at capacity too and would not be able to maintain services with a significant increase in population.
- Education - Schools will not be able to cope with such an increase in pupil numbers. Filling/expanding existing schools will lead to an increase in related trips and traffic.
- **West Malling Parish Council** – The parish council express support for the recognition of new and improved infrastructure as outlined in policies INF1-4. They outlined the following concerns.
  - Healthcare – Specifically the adequacy and timing of health infrastructure provision, given the scale of proposed development. The Plan proposes over 900 new homes at Broadwater Farm and other allocations too, which will substantially increase the local population. West Malling Group Practice is experiencing high demand; without timely investment there are risks to patient care and staff wellbeing.
  - Public toilets - Securing the provision of local toilet facilities is a priority in West Malling, an affordable replacement site is required.
  - Other facilities/services - An increase in residents will lead to an increase in demand for dementia care, warm spaces, youth and other groups, and library services.

#### Officer response to the consultation feedback

Consultation feedback on Policy INF4 demonstrated strong public interest in how the Council safeguards, delivers, and seeks to enhance community facilities across the borough. Respondents generally supported the principle of protecting community assets, but expressed concern that the current drafting is not sufficiently firm regarding securing the timely delivery of accessible, and adequately funded provision, particularly in areas with significant planned growth.

Policy wording and enforcement - Many respondents felt some current policy wording is insufficiently strong, giving developers discretion and limiting the Council's ability to secure facilities. We will therefore consider the following in our review of the Policy:

- Replace 'should' with 'must' where expectations are intended to be mandatory.
- Introduce clearer criteria for related planning obligations, including evidence requirements at application stage.

Early delivery of community facilities - Officers accept that the policy should be as clear as possible regarding the Council's expectations on timing, phasing and delivery. The following changes will therefore be considered.

- Strengthening policy wording to require phased delivery of community facilities in line with housing trajectories, supported by the Infrastructure Delivery Plan (IDP) which will include detail on phasing.
- Cross-referencing to policy INF1 to make clear that section 106 mechanisms are explicitly focused towards early-stage provision.

- Additional supporting text explaining how the Council will monitor the delivery of facilities through the Infrastructure Funding Statement.

Health and primary care - Officers recognise the importance of health care facilities and will consider updating INF4 and supporting text to:

- Strengthen the expectation that residential applications must demonstrate adequate primary care capacity exists or will be delivered to support the scale of growth proposed.
- Make clear that active engagement with NHS Kent & Medway ICB is required at the planning application stage.
- Provide flexibility for alternative uses where evidence demonstrates a site is no longer required for healthcare and disposal will support reinvestment into modern facilities.

Schools, childcare and youth provision - Concerns were raised regarding existing pressures on school capacity, absence of a secondary school at Kings Hill, childcare waiting lists, and lack of dedicated spaces for youth groups. In response officers will review the wording of INF4 and supporting text to consider:

- Including reference to education and youth facilities within the scope of community facilities.
- Make clear the links to the Infrastructure Delivery Plan schedules and the importance of using the latest available KCC forecasting data for education.
- Support early delivery of new schools where required and safeguard land for educational use where identified.

These refinements will help to strengthen the policy’s effectiveness and application for future decision taking.

**Q95 - Do you agree with Policy INF4: Community Facilities?**

Total Number of responses received: 112					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
6	19	53	13	21	104

Summary of issues raised

102 written responses were received, of these only 10 expressed related positive sentiment, 44 neutral and 25 negative. Comments provided by those who indicated positive support to the above sentiment question, include the following.

- General endorsement of the policy / importance of community facilities - Respondents voiced broad support for protecting existing and providing new community facilities.
- Capacity of existing facilities - Existing facilities may become overwhelmed unless upgraded alongside growth. More dedicated space requested for youth and community groups e.g. Scouts.

A significant number (37) repeat representations were received from those who expressed neutral sentiment to the above question. This included the following comment.

*“The Policy does ~~not~~ REQUIRE an early commitment to provide adequate community facilities, [this] is vital. Such as: Retail facilities, Health facilities, Parking provision and Schools”.*

Comments received in the remaining responses from those who expressed neutral sentiment, reflect a range of views and are summarised as follows.

- Policy support - Support expressed for policy INF4 however it could increase development costs affecting viability.
- Location and accessibility - Concern about the accessibility of existing facilities in town centres.
- Safeguarding and investment - Not enough attention given to retention and enhancement of community facilities.
- Early delivery - The policy should require the early delivery of adequate community facilities.
- Community use – Such use of facilities should be specifically identified in the policy e.g. schools.

Many respondents expressed negative sentiment when asked whether they agree with Policy INF4. 11 of these are the same as the standardised response outlined above. The other thirteen responses can be summarised as follows.

Provision to support growth - More community facilities are required to support proposed growth, to support community groups.

- Early delivery - The policy fails to require the upfront delivery of community facilities.
- Management of facilities - Ownership and management of community facilities needs to be considered, with local ownership/control preferred.
- The policy must ensure that new community facilities are delivered, especially in settlements where significant growth is proposed e.g. Hildenborough and Borough Green. Particular concern is expressed regarding primary healthcare.

Key themes from comments provided by those who did not select a sentiment category include the following.

- Policy support – Support expressed for the policy and that new and improved infrastructure is provided.  
Healthcare - This is by far the most prominent theme among this group of respondents. With respondents expressing concern about the capacity of existing primary care facilities including the West Malling Group Practice and elsewhere. Primary care capacity must be addressed and provided to support proposed growth. Related to this NHS Property Services are seeking more flexibility in the policy regarding any potential future disposal of sites, where these are demonstrated to no longer be required.
- Schools and childcare facilities – Several respondents in this group highlighted problems including the lack of sufficient local secondary school capacity in the

north of the borough (Kings Hill), overcapacity of some primary schools and waiting lists for nursery places. Calls for new education facilities to be clearly tied to housing delivery.

- Community facilities including libraries - Several responses emphasised the importance of providing more community facilities to support growth, to provide more for community groups and young people. The role of libraries as educational and social hubs was also identified, with a request for dedicated library facilities in growth areas including at Kings Hill.
- Early delivery - Respondents repeatedly stressed that infrastructure must be provided before or alongside housing growth, with concerns expressed about the s106 process leading to delays and delivery shortfalls.
- Management of facilities – Dislike was expressed for developer-controlled stewardship models utilising management companies. Community facilities should be owned and managed by the community.

#### Summary of feedback from Statutory Consultees

- **Natural England** – An additional criterion is requested at part 3 which states in relation to new or additional community facilities, that... “They seek opportunities to maximise accessible multifunctional open space and green and blue infrastructure”.

#### Summary of feedback from Districts and Boroughs

No responses from neighbouring authorities were received in response to this question.

#### Summary of feedback from Parish Councils

- **Aylesford Parish Council** - Policy maybe best practice, but concern expressed regarding barriers to delivery of new community facilities, specifically staffing of schools and primary care facilities.
- **Burham Parish Council** – Expressed concern regarding a lack of facilities in some villages.
- **Kings Hill Parish Council** - Expressed concern about the following.
  - Healthcare - West Malling Group Practice is considered to be operating beyond safe capacity and is closed to new patients. There is no NHS dental provision within Kings Hill currently and concern that this is lacking from the detail of the Infrastructure Delivery Plan. As such this is considered contrary to NPPF (2024) para 20 c).
  - Education - Primary schools are considered to be at or near capacity with limited expansion potential. No secondary school exists within Kings Hill, resulting in unsustainable travel patterns, as such this is considered to be contrary to NPPF (2024) chapter 9.
- **Hadlow Parish Council** – Expressed concern about the following.
  - Healthcare – Local medical facilities are at capacity both in terms of accommodation and parking, there is a shortage of GPs too. Hospitals are

- considered to be at capacity too and would not be able to maintain services with a significant increase in population.
- Education - Schools will not be able to cope with such an increase in pupil numbers. Filling/expanding existing schools will lead to an increase in related trips and traffic.
  - **West Malling Parish Council** – The parish council express support for the recognition of new and improved infrastructure as outlined in policies INF1-4. They outlined the following concerns.
    - Healthcare – Specifically the adequacy and timing of health infrastructure provision, given the scale of proposed development. The Plan proposes over 900 new homes at Broadwater Farm and other allocations too, which will substantially increase the local population. West Malling Group Practice is experiencing high demand; without timely investment there are risks to patient care and staff wellbeing.
    - Public toilets - Securing the provision of local toilet facilities is a priority in West Malling, an affordable replacement site is required.
    - Other facilities/services - An increase in residents will lead to an increase in demand for dementia care, warm spaces, youth and other groups, and library services.

#### Officer response to the consultation feedback

Consultation feedback on Policy INF4 demonstrated strong public interest in how the Council safeguards, delivers, and seeks to enhance community facilities across the borough. Respondents generally supported the principle of protecting community assets, but expressed concern that the current drafting is not sufficiently firm regarding securing the timely delivery of accessible, and adequately funded provision, particularly in areas with significant planned growth.

Policy wording and enforcement - Many respondents felt some current policy wording is insufficiently strong, giving developers discretion and limiting the Council's ability to secure facilities. We will therefore consider the following in our review of the Policy:

- Replace 'should' with 'must' where expectations are intended to be mandatory.
- Introduce clearer criteria for related planning obligations, including evidence requirements at application stage.

Early delivery of community facilities - Officers accept that the policy should be as clear as possible regarding the Council's expectations on timing, phasing and delivery. The following changes will therefore be considered.

- Strengthening policy wording to require phased delivery of community facilities in line with housing trajectories, supported by the Infrastructure Delivery Plan (IDP) which will include detail on phasing.
- Cross-referencing to policy INF1 to make clear that section 106 mechanisms are explicitly focused towards early-stage provision.
- Additional supporting text explaining how the Council will monitor the delivery of facilities through the Infrastructure Funding Statement.

Health and primary care - Officers recognise the importance of health care facilities and will consider updating INF4 and supporting text to:

- Strengthen the expectation that residential applications must demonstrate adequate primary care capacity exists or will be delivered to support the scale of growth proposed.
- Make clear that active engagement with NHS Kent & Medway ICB is required at the planning application stage.
- Provide flexibility for alternative uses where evidence demonstrates a site is no longer required for healthcare and disposal will support reinvestment into modern facilities.

Schools, childcare and youth provision - Concerns were raised regarding existing pressures on school capacity, absence of a secondary school at Kings Hill, childcare waiting lists, and lack of dedicated spaces for youth groups. In response officers will review the wording of INF4 and supporting text to consider:

- Including reference to education and youth facilities within the scope of community facilities.
- Make clear the links to the Infrastructure Delivery Plan schedules and the importance of using the latest available KCC forecasting data for education.
- Support early delivery of new schools where required and safeguard land for educational use where identified.

These refinements will help to strengthen the policy’s effectiveness and application for future decision taking.

**Q96 - Do you agree with Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision?**

Total Number of responses received: 61					
Happy	Satisfied	Neutral	Unhappy	Dissatisfied	Not stated
10	16	22	4	9	155

Summary of issues raised

Respondents who were happy or satisfied generally endorse the intent and direction of Policy INF5. The following is a summary of responses from those who indicated positive support to the above sentiment question.

- Policy support – Several respondents expressed positive support for the policy, stating that this strengthens the Council’s commitment to both existing provision and future improvements. Sport England expressed support and positive sentiment for the policy, which is informed by an up-to-date evidence base.
- Importance of open space for quality of life - Some respondents emphasised that open spaces and sports facilities are vital to wellbeing and community

enjoyment. Residents consider these facilities are important for quality of life, wellbeing and exercise.

- Support for existing facilities - Several respondents expressed satisfaction that policy INF5 reinforces and protects current sports and recreation assets. They feel the policy builds appropriately on existing strengths and supports continued provision and improvement.

The following is a summary of the responses received from six respondents who indicated neutral support to the above sentiment question.

- Policy support – A single respondent expressed support for the policy, but raised concern regarding developer contributions, funding and implementation.
- Lack of facilities – Several requests for more facilities to be provided in the borough that are accessible and affordable. With one respondent commenting that constraints around access to some facilities including hockey, mean that they are having to travel outside of the borough to access provision.

Seven respondents who expressed negative sentiment provided comments on policy INF5, these are summarised as follows.

- Lack of facilities – Two respondents expressed concerns regarding a lack of facilities in some areas, with reference to the north east of the borough (Larkfield) and provision for hockey, a 3G pitch and courts for tennis and padel.
- New facilities – Support is expressed by several for new facilities to be required to support growth and for these to be accessible and affordable for everyone in the community, not higher priced private clubs.

Five respondents who did not express any sentiment, provided comments on policy INF5, only two of which were substantive and are summarised as follows.

- Royal British Veterans Enterprise – The RBVE recognise the importance of policy INF5 in protecting and enhancing open space, sport and recreation facilities. They also support the use of up-to-date evidence to inform requirements and a site-specific approach, but express concern that requirements sought should not undermine development viability or delivery.
- Tonbridge Angels Football Club – The club seeks stronger and clearer policy protection of existing facilities but expresses support for the up-to-date evidence base and Infrastructure Delivery Plan. The club consider that growth will increase demand for accessible and high-quality facilities. The club notes that the policy seeks to promote health and wellbeing, and express that football clubs play an important role in delivering these outcomes.

#### Summary of feedback from Statutory Consultees

- **Natural England** – Expressed support for the policy and the open space evidence which identifies deficits in accessible greenspace. Part 10 of the policy

is supported but Natural England request that this be strengthened to include reference to the ‘the integration of open space within the wider green and blue infrastructure network’.

#### Summary of feedback from Districts and Boroughs

No responses from neighbouring authorities were received in response to this question.

#### Summary of feedback from Parish Councils

- **Aylesford Parish Council** – Expressed support for the policy which promotes general well-being, exercise and participation in community activities.
- **Burham Parish Council** – Expressed support for the improvement of sports facilities in relation to the consented residential development at Bell Lane, Burham.
- **Kings Hill Parish Council** – Concern expressed that Kings Hill lacks public indoor sports facilities including a swimming pool and courts. The parish request that this is addressed in the Local Plan given significant proposed growth.
- **West Malling Parish Council** – Expressed support for Policy INF5 part 1. By improving health and wellbeing, this policy could also help reduce pressure on local health care services. They highlight the importance of sustainable transport connections to sport and recreation facilities, as well as adequate parking. The parish council would like to see more emphasis placed on effective deliverability of infrastructure at the planning stage, including financial guarantees. They would like the policy to include a requirement for applicants to consult with the local community re the type of on-site facilities proposed, where included. The parish express concern regarding part 3 of the policy and that the exceptional circumstances outlined could be used by applicants as a reason not to provide community facilities. They request the earliest consideration of S106 funding in the planning process, especially for the improvement and provision of facilities that they manage on behalf of the local community. The parish also express support for part 10 of the policy, but would like the wording to be strengthened, replacing ‘expected’ with ‘required’.
- **East Malling and Larkfield Parish Council** – The parish council supports the inclusion of the Larkfield Playing Fields, Recreation Ground and grassed area at Martin Square within the relevant evidence base and Infrastructure Delivery Plan (as identified). These are valued facilities used for formal and informal recreation.

#### Officer response to the consultation feedback

Officers acknowledge the concerns raised regarding the potential erosion of existing and provision of new sport recreation and open space provision. The intention of policy INF5 is to protect and provide new and enhanced provision. Officers consider that the

policy and supporting text is already comprehensive, covering many issues raised by respondents. The consultation, however, demonstrates that some aspects could be improved or expressed differently. Officers will therefore consider amending the policy wording and supporting text to:

- Set out clearer criteria for the assessment of proposals involving loss of facilities.
- Where there is a loss, ensure replacement facilities provide equal or better quality, accessibility, and capacity.
- Clarify requirements for mitigation in relation to proposed allocations in the Local Plan, to be further set out in the Infrastructure Delivery Plan.

These changes will help to improve clarity, ensuring the policy is robust, deliverable, and reflective of local needs.

### **Q97 - Is there anything you think is missing from our infrastructure policies?**

Total number of responses received: 119		
No	Yes	Not sure
6	93	20

#### Summary of issues raised

The comments received were substantively made by respondents who responded ‘yes’ to the above question. Only three comments were received from those who responded, ‘not sure’, these expressed support for the infrastructure policies with one respondent stating that support and investment is also required from other stakeholders.

Of the comments provided by those who responded ‘yes’, forty-six of these were repeat responses, which are as follows “*There should be an accurate, independent analysis of the infrastructure impacts of any development. There should be a binding commitment to early delivery of necessary infrastructure improvements and mitigation*”.

The other responses received raise concerns regarding gaps in existing local infrastructure, particularly healthcare and transport services. There is concern about existing services being overstretched due to population growth from developments across the borough. There are calls for robust analyses of infrastructure impacts and future requirements, and early delivery of mitigations / improvements within the phasing of developments. Respondents demand that a comprehensive Infrastructure Delivery Plan is prepared to support the Local Plan growth, for the benefit of new and existing communities.

Key themes arising from the responses are summarised as follows.

- Healthcare provision - Many respondents said that the Local Plan lacks sufficient consideration of primary care facilities, some respondents request commitments to ensure new healthcare facilities are operational before homes are occupied.
- Transport and highways - Concerns raised include existing roads being already congested, with specific mention of Tonbridge High Street, Brook Street and Quarry Hill. Better bus services required including frequency and extended hours of operation, and better integration of bus and rail services (multi-modal transport). Some respondents call for an integrated and ambitious approach to transport planning, not piecemeal mitigation.
- Water, drainage and flooding infrastructure - Several respondents highlighted water supply shortages, hosepipe bans and the need for improved fresh water supply/storage e.g. reservoirs and improved network infrastructure. Concerns also raised regarding sewage system capacity and related watercourse pollution incidents. Three respondents raised concerns regarding local flood risk in some areas, especially surface water flooding, the adequacy of existing drainage systems and the need for Sustainable Urban Drainage Solutions.
- Utilities, energy and digital connectivity - Some respondents identified infrastructure that could be improved, including water supply and power network infrastructure, as well as high speed broadband and 5G mobile coverage, which is not fully available across the borough. A lack of sufficient EV public charging was also identified.
- Cumulative impacts - Two respondents expressed concern that the Local Plan treats developments in isolation, fails to consider borough wide or cross border cumulative impacts, and ignores the combined strain on facilities including hospitals, roads and water systems.
- Delivery, viability and monitoring - Concerns identified from residents include whether infrastructure commitments are realistic or deliverable, with developers expressing related concerns regarding development viability. Residents further expressing concerns regarding delivery risks if s106 contributions are delayed or are insufficient. Some expressed a need for better transparency and monitoring of related delivery.

#### Summary of feedback from Statutory Consultees

- No responses from statutory consultees were received in response to this question.

#### Summary of feedback from Districts and Boroughs

- **Maidstone Borough Council** - The Council would like to understand if TMBC will be introducing a Community Infrastructure Levy, to assist coordination of funding for cross boundary infrastructure.

#### Summary of feedback from Parish Councils

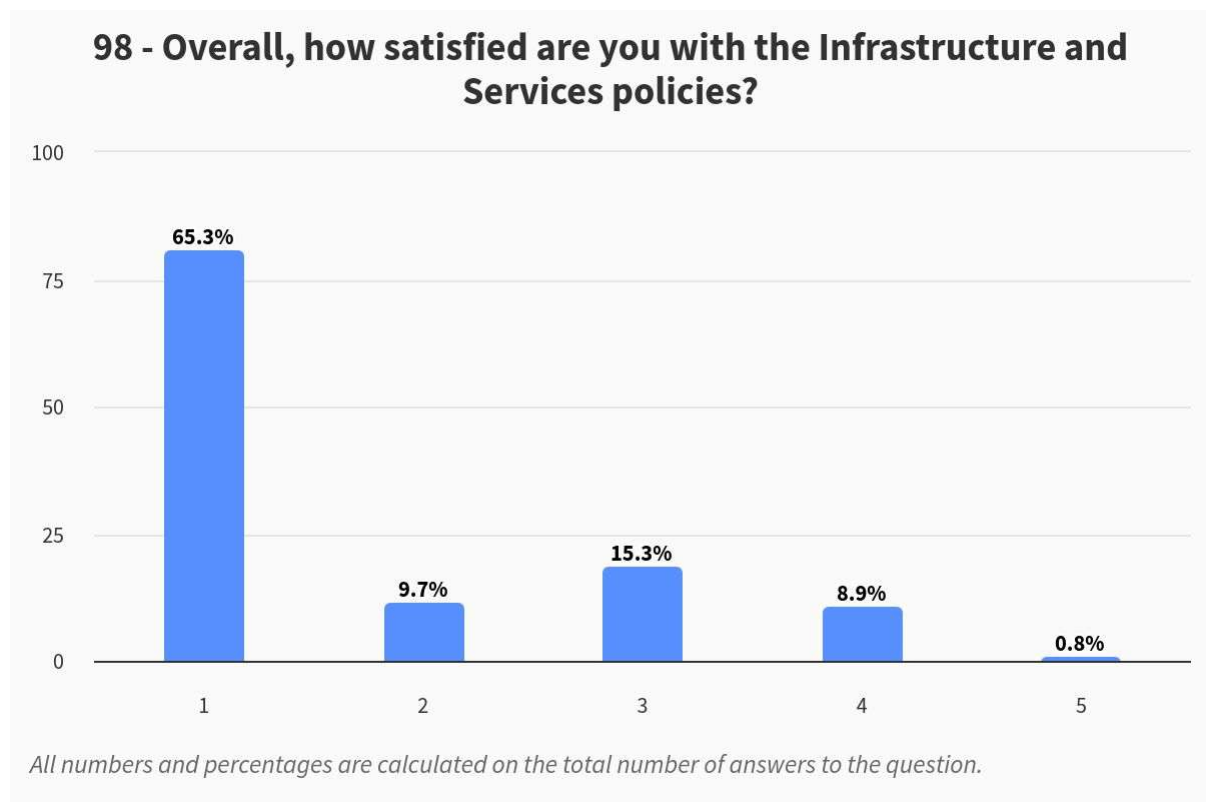
- **Aylesford Parish Council** - The improvements detailed in the policies are considered positive, however these require support and investment from other stakeholders in some cases to ensure delivery.
- **Burham Parish Council** - The roads on the east bank of the Medway are considered to be inadequate, this is not addressed in the Local Plan and must be resolved. Concern expressed regarding the future improvement of M20 junction 6 which forms part of the KCC proposals for the upgrade of Bluebell Hill A229, which TMBC supports.
- **Kings Hill Parish Council** – Expressed concern regarding utilities in their area, including water pressure issues, sewage odour complaints, and inconsistent broadband/mobile coverage remain unresolved. They are not convinced given the information in the Interim Infrastructure Delivery Plan, that utility providers can support the level of growth proposed. This is considered contrary to the NPPF (2024) para 20. b).
- **West Malling** - Would like to see more detail on the Council’s policy/approach towards managing the expected increase in demand for places at local schools and other education facilities.

#### Officer response to the consultation feedback

This question generated a significant number of comments, many of which reiterate views and concerns shared in response to other questions, regarding the draft Local Plan infrastructure policies, existing infrastructure and future provision. Whilst these are acknowledged, no specific comments received identified any matters that are missing or not otherwise suitably addressed by policies INF1-INF5.

Officers acknowledge the importance of ongoing partnership work with all infrastructure and service providers, to refine and complete the Infrastructure Delivery Plan and delivery schedules, which are considered to be essential in identifying what infrastructure is required, and where, when and how this will be delivered. A further draft of the IDP will be published alongside the Regulation 19 Local Plan.

**Q98 - Overall, how satisfied are you with the Infrastructure and Services policies?**



Officer response to the consultation feedback

Of the 124 respondents to question 98 who responded to how satisfied they were with the infrastructure and services policies, the majority indicated a score of not satisfied with the policies. Proposed amendments to individual policies and supporting text have been set out under respective question responses.

