

## Responding to local housing needs (Questions 56 – 68)

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

**Question 56 – Do you agree with Policy H1: Housing to Address Needs? Tell us why you agree or disagree.**

Total Number of responses received: 164					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
3	15	16	79	10	41

#### Summary of issues raised

While there is broad recognition of the need for more homes and support for delivering a balanced housing mix, many respondents and whilst not entirely relevant to this question / policy, focused their comments about the scale, location, environmental impact, and infrastructure implications of the proposed housing strategy. Of this regard, the most widespread concern was that the proposed housing requirement is excessive, algorithm-driven, and does not reflect true local demand. Many argued that market conditions already show low sales and low demand, suggesting the target should be reduced by around 40%.

In relation to comments relating to the policy, respondents who selected the strongly agree or agree sentiment broadly support Policy H1 when it focuses on meeting genuine local housing needs, delivering a balanced housing mix, and ensuring strong provision of affordable and elderly suitable homes, located in appropriate places and designed to a high standard. There is a clear pattern of supporting the intent of the policy especially around affordability, mix, and local need even among those who might have reservations about wider aspects of the plan. Some of the common key themes which were represented are:

- Many respondents expressed broad agreement that Tonbridge & Malling needs more homes, particularly those that meet local needs rather than demand from outside the borough.
- Respondents consistently endorsed the idea of delivering a balanced mix of homes to reflect demographic needs.
- There was support for providing homes for different groups, including families, older residents, and people with disabilities and single storey / bungalow type homes for older people to free up larger family homes.
- Several respondents praised the policy for identifying an appropriate mix of types, sizes, and tenures.

- A major theme among agreed respondents was the need for genuinely affordable housing, not just market led products including social rent levels.
- There was support for 50% affordable housing requirements on former green belt allocations and ensuring developers deliver promised units.
- There was support for homes in suitable settlements where infrastructure can support growth and felt that housing must be located near employment, facilities, and transport, helping to reduce car dependency.
- A few respondents highlighted the importance of good design and traditional quality.
- Some respondents strongly supported the plan's consideration of housing for older people, even on smaller village sites, to enable downsizing and improve family housing availability.

Overall, while neutral responses did not express strong support or dissatisfaction, they consider improvements are required to ensure the policy is locally appropriate, flexible, affordable, and well supported by necessary infrastructure. The key themes from the comments were:

- Several neutral respondents expressed broad recognition that more housing is required, without offering strong support or objection.
- A number of neutral responses highlighted concerns about the balance and affordability of the proposed housing mix.
- There were suggestions for changing the percentage of 2 bed units, especially within affordable tenures, to meet local needs and social rent rather than market-defined affordable products.
- There was support for the idea of flexibility in policy wording, allowing the Council and developers to adapt mix requirements based on local context.
- Some respondents want more clarity on where development should be focused, with an implicit preference for non-green belt or brownfield options.
- Some neutral respondents emphasised that while housing may be needed, it must be supported by infrastructure improvements. There were concerns that transport, schools, GP access, and utilities need significant investment alongside new development.
- A number of neutral responses came from planning or development organisations offering technical feedback. They felt that policies should recognise that housing mix must vary by site, depending on the local context associated with individual sites.
- Several groups supported the policy in principle, provided flexibility was increased to reflect local context and future evidence.
- Some respondents highlighted the importance of quality design and design codes, even when expressing neutral sentiment about the rest of the policy with

reference to the importance of quality traditional design codes and well-designed places.

- Several neutral responses support for a range of accommodation types, serving families, older people, disabled residents, and self-builders.

Disagree and strongly disagree responses were the largest proportion of feedback, showing strong concerns about the policy and its implications. The themes below summarise the issues raised most frequently as:

- Many respondents felt the housing number is “grossly inflated”, driven by a government imposed figure rather than true local demand.
- There was repeated concerns that new and second-hand homes are not selling locally, indicating low market demand.
- Some respondents feel the housing number should be reduced by 40% to reflect actual need.
- Many respondents argued that Green Belt must be protected at all costs. They feel that Grey Belt is a misleading term that masks loss of genuine green space.
- Concerns about loss of biodiversity, landscape character, agricultural land, and flood plains.
- A concern is that current infrastructure is already stretched and cannot support significant development. Road congestion particularly A26, A21 and B245 (Tonbridge–Hildenborough–Sevenoaks corridor).
- Other infrastructure concerns included insufficient school capacity, leading to long travel distances and reduced social/education outcomes for children, existing pressure on GP surgeries, hospitals, drainage, water supply, and sewage networks and frequent water main bursts, power cuts, and traffic gridlock across multiple settlements.
- Many respondents expressed fear that large-scale development will fundamentally change local settlements especially villages like Hildenborough, Hadlow, Borough Green risk becoming urbanised.
- Respondents raised objections about the uneven distribution of housing allocations. They felt Borough Green and Hadlow were repeatedly identified as taking disproportionate levels of housing. So, recommend growth to be spread more evenly across the borough or prioritised in urban/brownfield areas.
- There was concern for loss of countryside, green corridors, and village identity and the joining of separate settlements together (e.g., Hildenborough merging with Tonbridge).
- Some respondents argued the policy will not deliver the right homes.
- Many stated recent developments cater mainly to wealthy incomers, not local people.

- Respondents felt that affordable housing definitions are unrealistic because affordable homes set at 80% of market value are still out of reach for most local people.
- Some respondents expressed distrust in the development process and perceived developers as maximising land value uplift. They felt that developers ensured slow build-out rates to artificially maintain high sale prices.
- Some respondents were concerned about the environmental and sustainability impact; loss of wildlife corridors and natural drainage impacts flood risk.
- Some respondents felt the plan lacked a coherent long-term housing strategy.
- There were requests for planning to encourage northern growth, not more pressure on the South East.
- The developers outlined TMBC's under delivery of housing which is reflected in a 2.89 year housing land supply. They felt that additional sites and flexibility are required to maintain supply.
- Some developers have highlighted that strategic sites are essential and that additional small /medium sites can provide early delivery. They also felt that the Local Plan must include a buffer to ensure a deliverable five-year supply.
- Several developers had concerns about infrastructure constraints, road congestion, lack of schools and health services capacity. There were concerns about the release of green belt ('grey belt') and the need to avoid concentrating housing in inappropriate rural settlements.
- There was differing support amongst developers on the viability of affordable housing targets. They suggested that the mix of affordable housing should also be flexible and reflect site viability. Some think there should be higher proportions of smaller affordable housing and also social rent, not just affordable.

Respondents who did not give a sentiment rating typically provided technical, policy-focused, or site-specific representations. These responses were generally more formal and analytical than resident comments, and many came from developers, landowners, consultants, and organisations. The key themes of their comments include:

- Several respondents expressed support in principle for Policy H1 but requested refinements.
- Support for providing an appropriate housing mix aligned with local needs.
- Developers felt the housing mix requirements are too prescriptive. They disagreed with the requirement to justify any departure through an extensive list of criteria. They felt that the mix should not be applied uniformly to all sites but should instead have flexibility. As a result, many developers requested deletion or revision of Part (5), rewording of Part (6) to allow more flexibility and

recognising that the SHMA mix is a borough-wide indicator, not a site-level requirement.

- Some respondents argued for spatial variation in mix requirements and suggested different mixes for Tier 1 & 2 settlements (more small units) versus Tier 3–5 (more family homes).
- Developers felt different settlements have different needs and as such viability, local character, and existing housing stock should influence the mix. They felt that the policy wording needs to reflect differences between market and affordable housing demands. They suggested weighted mixes based on settlement tiers with bespoke targets for different geographical areas. They also suggested a simplified approach to applying the SHMA.
- A large portion of “no sentiment” submissions came from land promoters advocating their sites and claimed that proposed sites can deliver a wider range of units or higher numbers than indicated by the Council.
- Many developers pointed out that Part (4) conflicts with paragraph 63 of the NPPF and it does not identify specific sites for groups such as older people, disabled residents, students, or self/custom build. They suggested that there was clearer allocation of sites for specialist groups, integration of self-build and custom-build plots as well as identifying the role of small and medium sized sites.
- It was felt that the SHMA talks about flexibility in applying the indicative mix so it should inform strategy but not prescribe site level delivery. Developers felt that the housing mix should be negotiated based on the latest market intelligence. They also felt that evidence older than 3 years should not be automatically discounted.
- Some “no sentiment” respondents welcomed the plan’s provisions, particularly for older households.
- A small number of respondents commented on design standards and the need for design codes based on quality traditional architecture.

#### Summary of feedback from Statutory Consultees

- There were no comments from statutory consultees

#### Summary of feedback from District / Boroughs

- **Turnbridge Wells** generally supported Policy H1 and that the evidence base had supported the draft policy. They recognise that the scale of housing need is significant but felt that the distribution and mix of tenures and the need to integrate balanced communities reflects the evidence particularly the Strategic Housing Market Assessment (SHMA) 2025.

## Summary of feedback from Town and Parish Councils

- **East Peckham Parish Council (EPPC)** expressed strong concern about how TMBC calculated the housing requirement for East Peckham. They recognised that there was a need for housing in the Borough and support delivering housing in appropriate places and appropriate quantities. However, they believe the current proposed allocations in East Peckham are neither appropriate nor deliverable, and that better alternatives exist. They felt that East Peckham's specific housing needs have not been properly assessed. They also felt there was no clear explanation of the methodology or supporting evidence base used to apportion housing numbers across parishes. The parish has requested for TMBC to publish or clarify the calculations to allow proper scrutiny. The parish does not feel the scale of proposed allocations is justified as there was no evidence to show locally assessed housing need for East Peckham. They have concerns about the scale of green belt release and that the required proportion of social rented homes may remain empty if mismatched with local demand. East Peckham Parish Council wants the opportunity to assess all available sites, including those submitted during the 2022 call for sites because they have local knowledge which they feel would allow them to identify more suitable and deliverable option. EPPC has applied for designation of a Neighbourhood Area and are planning to start developing a Neighbourhood Plan. They plan to do a local housing needs assessment as part of the Plan and feel that the Regulation 18 consultation period is too short, preventing EPPC from contributing fully to site assessments.
- **West Malling Parish Council** is generally satisfied that the policy is strong, well considered and largely addresses West Malling's needs. It strongly supports ensuring the housing mix aligns with locally evidenced need, particularly delivery of 2–3 bed homes and a balanced tenure profile. The parish made emphasis on avoiding an oversupply of flats or very large homes.

## Officer response to the consultation feedback

Whilst not directly relating to the question, the most common issue raised by respondents was that the housing target was too high and did not reflect local needs. There were also concerns about lack of suitable infrastructure for the proposed growth and objected to releasing green belt and sensitive landscapes, with preference for brownfield-first sequencing. They highlighted that the community needed genuinely affordable housing to meet the needs of the local community.

Developers were mainly supportive of the policy but felt greater flexibility was needed on the housing mix and recommended to delete Part (5) (fixed mix linked to SHMA table)

and to make Part (6) a flexible, proportionate test. They also felt that the role of small and medium sites for delivery resilience and five-year supply, alongside strategic allocations needed to be emphasised.

Officers have noted the responses, and it is vital to note that the policy reflects the principles of the NPPF to plan for the required housing supply (prescribed by the government) and mix of housing to meet the needs of different groups. The plan will continue to be informed by the Infrastructure Delivery Plan evidence and further engagement with providers. The policy is underpinned by local evidence including the SHMA and housing register data so needs to be guided by the information that the evidence suggests. Officers propose the following:

- The Policy will be refined to include affordability outcomes, especially social/affordable rent where justified by evidence.
- To include monitoring measures to track housing mix delivery over time.
- The Policy will be reviewed to ensure that criteria 5 and 6 are supported by evidence and clarity added if needed.
- The review will also make it explicit, where needed, that proposals should maximise delivery of genuinely affordable homes and we will consider how we can use the Local Housing Allowance as the benchmark.

**Question 57 – Do you agree with Policy H2: Affordable Housing? Tell us why you agree or disagree.**

Total Number of responses received: 181					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
9	28	49	33	18	44

Summary of issues raised

Across all respondent groups, there was broad recognition of the need for affordable housing within the borough while also identifying significant challenges concerning deliverability, viability, and community impact.

Many respondents expressed general support for the principle of increasing affordable housing. They felt that affordable housing is needed locally but recognised that housing costs have increased and so first-time buyers are struggling which makes affordability more urgent.

Respondents who selected the strongly agree or agree sentiment reflect a broadly positive view of the aims of Policy H2, while still highlighting awareness of the

challenges in achieving genuinely affordable and well-located homes. Some key themes from respondents are:

- Many respondents expressed broad, positive support for the principle of providing affordable housing. Their reasons included recognising the essential need for lower-cost homes and the importance of supporting those unable to enter the local housing market.
- Some respondents showed support for focusing on social rent, mixed tenure delivery, and shared ownership where appropriate.
- There was concern that developers would reduce affordable provision to protect profits.
- Stronger enforcement and monitoring of developers are needed during all phases to ensure best-quality affordable housing.
- There was support for the policy if it is for local families, key workers, and younger people.
- A number of responses indicated conditional satisfaction, supportive of the aims, but aware of delivery challenges in viability, market conditions, or infrastructure.
- A small number of formal representations from agents or developers indicate support for the policy's aims, particularly its role in meeting identified need and offering some flexibility. In particular, Bellway supports the overarching objectives of this policy, Cemex supports the requirement for 40% affordable housing and Wealden Land Ltd supports Policy H2 and its objective of securing a meaningful proportion of affordable housing.

Many respondents neither supported nor opposed the policy outright but raised clarifications, uncertainties, or conditions affecting their view. Neutral responses tended to fall into these broad themes:

- A significant number of neutral respondents stated they could not fully judge the policy because the term affordable housing was unclear or inconsistently used.
- Many neutral responses recognised the importance of affordable housing but did not express a clear opinion on whether Policy H2 achieves this appropriately.
- Some neutral respondents supported the principle of affordable housing but were concerned about where it would be located and whether local services could sustain it.
- A number of respondents focused on delivery mechanisms, management, and enforceability, but without expressing satisfaction or dissatisfaction.
- Respondents felt that affordable housing should be built first before other homes.
- Some respondents selected neutral because they could not locate the policy in the draft documents or felt the layout was confusing.

- Developers expressed significant concerns that the draft policy’s requirement for 40% affordable housing (and 50% in the Green Belt) is not viable in many market areas. They question the Local Plan Viability Assessment figures as not achievable in several locations. They cite achieving 50% affordable housing on Green Belt release sites as unlikely to be deliverable without undermining land value to the point that landowners will not release sites. Developers warned that too rigid a requirement will stall housing delivery or lead to developers reducing other planning contributions.
- Some developers had concern that mandatory viability reviews and overage clauses create uncertainty throughout the build programme and impose additional financial risk. In particular, Berkeley notes the requirement for 40% affordable housing but stresses viability must be considered.

Strongly disagree and disagree responses were extensive. They largely reflect concerns about affordability, infrastructure, location, policy robustness, and trust in developers and councils. The key themes expressed are:

- Many respondents expressed strong dissatisfaction with the definition, pricing, and practical availability of affordable housing.
- There was concern that affordable usually means 80% of market value, which is still out of reach for most local people.
- There is a perception that the policy does not address real affordability for key workers or low-income households.
- Many developers objected to the fixed tenure split and requested a more flexible, evidence-led tenure mix, to be agreed during the planning application stage. They felt that the policy should allow for First Homes or Discounted Market Sale, reflecting more recent market conditions. There was concern that Registered Providers (RPs) are increasingly unable to deliver some tenures due to market pressures, refurbishment liabilities, and funding constraints and that the rigid split does not account for site-specific considerations or RP appetite.
- Many respondents objected to delivering affordable housing in rural, unsustainable, or Green Belt locations. There was concern that developments with high proportions of affordable housing would overburden existing infrastructure, already described as failing or overstretched. They particularly felt Borough Green, East Peckham and other villages have insufficient capacity.
- Comments expressed a distrust in developers and frustration with how developers use viability assessments to reduce obligations and an expectation that they will claim 40–50% affordable housing is “not viable”, reducing provision.
- Some respondents expressed dissatisfaction that affordable housing often goes to people relocated from London boroughs or non-local households.

- While developers acknowledged the borough's extremely high levels of affordable housing need, many disagreed that placing responsibility on developers is a workable solution. Developers question whether the Council should reconsider whether a blanket 40–50% requirement is appropriate, especially given the viability evidence in the plan.
- Some respondents expressed concern about how affordable housing mixes may affect local areas.
- Respondents were dissatisfied that affordable housing is not social housing, and feel that social rent should be prioritised.
- There was a lot of commentary about Local authorities being forced to meet unrealistic national targets and that a numbers driven approach fails to address real housing need.
- A few respondents expressed dissatisfaction not with the policy, but with the process.
- Several developers highlighted issues with the structure and clarity of Policy H2. They cited repetition and ambiguity between policy clauses (e.g., viability review vs. overage clauses). They also felt that Parts 7 and 8 of Policy H2 were repetitive and duplicate each other. Clarity is sought between general tenure flexibility in Part 4 and stricter constraints in Part 6 and explanation of how in lieu payments would be calculated.
- Developers /site promoters highlighted the growing use of cascading arrangements in S106 agreements. They argued that Policy H2 should explicitly allow for cascades where RPs cannot be secured and provide clear fallback mechanisms (e.g., off-site contributions).
- Developers felt that unless Policy H2 is revised, many sites may become unviable, resulting in a reduction in overall housing delivery, including affordable homes and their key recommendations include:
  - Greater flexibility in affordable housing percentages
  - More adaptable tenure mixes
  - Clearer policy wording
  - Less reliance on rigid viability review mechanisms
  - Better alignment with real world market conditions and RP capacity.

Respondents who did not provide any sentiment still contributed a variety of substantive comments. These comments tended to fall under several recurring themes:

- Some respondents expressed general agreement with the idea of providing affordable housing, even though they did not record a sentiment.
- Some comments highlighted infrastructure as a critical concern. There was concern that certain villages (e.g., Hildenborough) cannot sustain more housing.

- Some respondents highlighted that affordable housing still does not meet the needs of those with the lowest incomes.
- There was concern that affordable homes fall into poor condition compared to privately owned homes and social housing providers should be required to maintain their properties to a higher standard.
- A few respondents argued for prioritising local households over in-migration.

#### Summary of feedback from Statutory Consultees

- There were no comments from statutory consultees.

#### Summary of feedback from District / Boroughs

- **Maidstone Borough Council** expressed a neutral position on Policy H2 and this was primarily due to the need for clarification on certain policy requirements.
- **Turnbridge Wells** supports the policy's intention and recognised the scale of affordable housing need (11,646 homes) across the plan period and acknowledged concerns that the indicative 647 dwellings per year may not be deliverable. While supporting the policy's intent, they sought stronger guidance on timing of on-site delivery and clearer expectations regarding exceptional circumstances, including examples and acceptable alternatives.

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

- **East Peckham Parish Council** maintains that the proposed site allocations within the Green Belt are inappropriate. East Peckham is not a suitable location for 50% affordable housing across multiple sites. East Peckham lacks sustainable public transport links resulting in high car dependency and the cost of running one or multiple cars for a household runs contrary to the likely affordability for families in affordable housing.
- **West Malling Parish Council** strongly supports Policy H2 and emphasises the acute affordability pressures in West Malling and the need to prioritise affordable and social rent homes.  
The parish outlines the value of tenure-blind design and integration of units and the importance of affordable housing being prioritised but not at the expense of essential infrastructure such as health services, school capacity and active travel connections. They call for a balanced approach between housing need and infrastructure.  
They do not agree with developers being able to reduce affordable housing levels in new developments by claiming financial constraints or by providing such housing elsewhere. Their main concern is that genuinely affordable housing locally must be enshrined in the Local Plan to meet local housing need locally. If

developers are unable to deliver within stronger constraints, then the development should not proceed.

Summary of feedback from other consultation bodies

- **The Kent Downs National Landscape** supports this policy and in particular that lower thresholds will be applied for affordable housing in National Landscapes in line with NPPF paragraph 65.

Officer response to the consultation feedback

Many residents acknowledged rising house prices, barriers to home ownership, and the need for more social and low cost rented homes. Residents largely focused on the need for genuinely affordable homes, local prioritisation, and ensuring infrastructure keeps pace with development. Developers and land promoters emphasised concerns on deliverability, viability constraints, and the need for flexibility. Stakeholder organisations raised concerns regarding market capacity, tenure mix, and long-term sustainability.

Officers consider that Policy H2 seeks to provide affordable housing and the supply of specialist housing, aiming to significantly boost the supply of homes to support sustainable communities. Officers propose that Policy H2 will be reviewed to:

- Ensure that while the council continues to maximise affordable housing delivery, the policy is viable, flexible, and effective in practice.
- The Regulation 19 version will consider clearer wording, will ensure thresholds are robust, will consider enhanced flexibility on tenure mix and viability processes.
- We will consider affordable housing requirements and ensure it is compliant with the NPPF and viability requirements.

**Question 58 – Do you think that affordable housing should be prioritised, even if it comes at the expense of other infrastructure requirements?**

Total Number of responses received: 81			
Yes	Not sure	No	Not stated
15	16	46	4

Summary of issues raised

This question provided a varied response from a range of consultees. A dominant theme from the responses is that infrastructure should be a prerequisite for any further housing development. Many respondents consider that prioritising affordable housing at the expense of infrastructure would create unsustainable communities, leading to pressures on schools, healthcare provision, road and transport networks, drainage,

utilities, and flood mitigation. It was felt that communities already feel overburdened by existing strain. Particular areas that were mentioned included Kings Hill, Hildenborough, and Tonbridge. Some argue that approving housing without infrastructure is 'unacceptable' because it damages existing residents' quality of life.

Of the 81 respondents, 15 answered 'yes' to the question. The key themes from comments included:

- Some respondents emphasised a shortage of affordable homes within Tonbridge & Malling. They noted affordability issues, insufficient supply in the current Local Plan, and particular impacts on young families.
- Some respondents felt that affordable housing delivery should focus on local people first, rather than being shaped by developer profitability or external market forces.
- Some responses were conditional, they supported prioritising affordable housing as long as it is delivered sensitively, in the right locations, and to high design standards.
- One respondent highlighted viability challenges, noting that large strategic sites with extensive infrastructure requirements may struggle to reach high affordable housing targets.
- One respondent agreed but also stated that the question itself was unclear, or expressed uncertainty about what does 'at the expense of other infrastructure requirements' mean?

A total of 46 respondents selected 'No' to the question. Their accompanying comments included the following key themes:

- The need for infrastructure to come first was a dominant theme. Several respondents argued that essential infrastructure is a prerequisite for any additional housing, including affordable housing. They highlighted risks to service quality, community wellbeing, and sustainability if housing is delivered without infrastructure upgrades.
- Some respondents rejected the idea of infrastructure and affordable housing being prioritised over the other, arguing both need to be delivered together to create balanced, functional neighbourhoods.
- Some respondents raised issues relating to the Green Belt, land use, and environmental sustainability, which contributed to their rejection of prioritising affordable housing alone.
- Respondents believe affordable housing is important, but not at the expense of community services, transport, schools, healthcare, or environmental quality.

- They cited that current national policy expects affordable housing levels to be flexed where site specific viability constraints arise. Developers argue that affordable housing cannot be prioritised over infrastructure because doing so would be inconsistent with policy tests of deliverability and soundness. Several comments stressed that the Council should resolve tension between infrastructure and affordable housing strategically at plan making stage, not at the planning application stage.
- One respondent argued that the Council should increase the overall plan level housing requirement and supply to ensure a higher proportion of affordable housing is deliverable.
- They felt Borough Green should not be treated as a large-scale affordable housing hub without equivalent investment in healthcare, transport, and education.
- Some developer responses argue that the Plan fails to assure adequate infrastructure provision and risks creating unsustainable communities if affordable housing is prioritised above infrastructure. They suggest that the policy requires amendments to ensure infrastructure is integrated into phasing and delivery.
- In addition to referencing policy tests, some developers/site promoter comments highlight practical constraints like existing roads, schools, healthcare and transport already being insufficient. They feel that without new or upgraded infrastructure, new housing, affordable or otherwise is not feasible.

A total of 16 respondents selected 'Not sure'. Key themes included:

- A common theme was uncertainty about what 'at the expense of other infrastructure requirements meant, with some respondents explicitly saying they did not understand the question or found it unclear.
- Many respondents expressed that both affordable housing and infrastructure are essential and therefore cannot be prioritised in isolation.
- A couple of respondents felt their answer would vary depending on the specific development, the area, or the type of infrastructure involved.
- One respondent raised concerns about external or non-local demand and whether increased affordable housing would go to local people.
- One respondent expressed conditional support but emphasised that development must be sensitive, well planned, and integrated into the community.

4 of the 81 respondents did not select Yes/No/Not sure but did include written comments, and the following themes summarise their views:

- Two responses gave detailed planning-policy response. They emphasised that where infrastructure is required (e.g. via Section 106), it is necessary to make development acceptable under CIL Regulations 2010. They also noted that the NPPF/PPG allow flexibility in affordable housing percentages where site viability is an issue, and therefore infrastructure should not be omitted at decision-taking. If affordable housing delivery is being compromised by cumulative obligations, it was suggested this is best addressed through plan making (e.g. overall housing requirement and supply), not by reducing infrastructure asks at application stage.
- Support for having a percentage of social housing on larger sites but stressed it should be distributed among private stock rather than concentrated in one corner. The comment also raised a delivery risk: uncertainty about what happens if local housing associations cannot afford to take on new builds.
- The other entry said to refer to previous rep. This indicates the respondent considered their substantive position to be captured elsewhere.

#### Summary of feedback from Statutory Consultees

- There were no comments from statutory consultees.

#### Summary of feedback from District / Boroughs

- There were no comments from the District/Boroughs.

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

- **West Malling Parish Council** was largely supportive. It suggests strong support for the priority given to affordable rent and social rent and affordable housing should be prioritised but not at the expense of essential infrastructure. The recommendation is to reinforce wording that affordable housing delivery must be balanced against infrastructure capacity, consistent with NPPF viability requirements. It should also clarify how off-site contributions or re phasing may be used where infrastructure upgrades are required.

#### Officer response to the consultation feedback

The general consensus is that infrastructure must come first. Respondents call for the Local Plan to adopt a more balanced, evidence-based approach consistent with national requirements.

Most respondents believe affordable housing is important, but not at the expense of essential infrastructure. Infrastructure and housing must be delivered together to support sustainable, high-quality communities.

Developer/site promoter respondents presented a consistent position. They highlighted that infrastructure delivery cannot be compromised to increase affordable housing;

both must be balanced within national policy, viability constraints, and the Local Plan strategy. They emphasised that policy flexibility, increased housing targets, and evidence based planning are necessary to achieve viable outcomes.

Officers agree that the Local Plan must secure both a affordable housing and timely, proportionate infrastructure. The review will be strengthen clarity, reinforce alignment with national policy, and ensure that relevant policies remain sufficiently flexible and sound at Regulation 19. Officers recommend:

- To continue to test the spatial strategy against infrastructure capacity and deliverability, ensuring that strategic and non-strategic sites demonstrate credible, funded infrastructure solutions and deliver realistic a affordable housing outputs.
- To continue active engagement with infrastructure providers, registered providers, developers and communities to refine the Infrastructure Delivery Plan (IDP), viability assumptions and a affordable housing trajectories ahead of Regulation 19.

#### **Question 59 – Do you agree with Policy H3: Build to Rent?**

Total Number of responses received: 72					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
6	15	24	13	9	5

#### Summary of issues raised

The responses reveal a broad range of views toward Build to Rent (BTR). Support focuses on the potential to expand a affordable rental opportunities, while concerns centre on infrastructure constraints, rural settlement suitability, a affordability of rents, and environmental protections. Developer responses emphasise viability, regulatory clarity, and alignment with national policy. The responses collectively highlight that while BTR has potential benefits, public confidence hinges on a affordability, appropriate siting, strong regulation, and protection of local character.

Of those 21 respondents who expressed support and either strongly agree or agree, many expressed satisfaction because they see Build to Rent (BTR) as a practical way to increase a affordable housing supply. They highlighted a persistent shortage of a affordable rented homes and feel this policy helps address that gap. The key themes which came through the responses are:

- There was strong support for affordable housing provision and recognition of insufficient affordable rental stock in Tonbridge and support for the idea that not everyone can or wants to buy, so rental options are essential.
- Several respondents emphasised that BTR properties must be genuinely affordable for local people. There were concerns about inflated costs in the local area and the need for pricing that supports existing residents. It is felt that affordable housing should be available to private individuals as well as those in housing associations.
- There was preference for council or public sector delivery and positive reactions to the idea of TMBC assessing contracts for BTR tenants. There was a lot of distrust of private landlords turning essential housing into money-making schemes, so some feel that local authorities should build and retain ownership to avoid profiteering. Some respondents support BTR only if it is delivered or overseen by the council rather than private companies.
- The importance of quality, maintenance, and regulation was a common theme and the need for landlords (public or private) to maintain and improve rental housing. Respondents felt positive toward BTR when landlords are obligated to maintain standards and quality and reliability of management are crucial to making BTR a positive solution.
- There was practical concerns about how land availability may affect whether BTR can be delivered effectively in certain areas. They felt that the model works only if local infrastructure can support new developments.

For those who selected a neutral response, their comments generally highlighted conditions, caveats, or broader contextual points, notably affordability, appropriate infrastructure, high design standards, and market protections. Some of the key themes in the comments are:

- They expressed that BTR is acceptable only if affordability is guaranteed. They were uncertain about whether the policy will genuinely achieve this. There was concern that 20% affordable provision may be too low, with fears that tenants could face exorbitant rents.
- A number of respondents emphasised that BTR could work, but only where infrastructure is appropriate.
- Some developers highlighted that Build to Rent (BTR) must be infrastructure led and appropriately located. There is support for BTR on brownfield sites, but only where infrastructure is in place ahead of development. They felt that developments should align with available infrastructure, and the priorities of existing residents should be considered.
- They acknowledged the significance of the rental market and the pressures it faces, noting that BTR might have an important role. There was an emphasis on

the need for high quality design, controlled costs, and ensuring renters' protection. It was felt that the private rental market is under pressure from increased legislation and this was concerning as they felt that BTR should not be overly constrained by policy.

- They noted the need for flexibility in tenure and felt that a balanced approach was needed. There was the recognition of the need for social housing but concerns about landlords profiting excessively.
- There was recognition of the housing market's variety and the importance of BTR within it but acknowledgement that more rental properties at reasonable prices are needed.

For the comments from respondents who expressed either strongly disagree or disagree sentiment, their comments highlight concerns about affordability, location suitability, infrastructure capacity, community impacts, and broader planning principles. Their comments can be themed as follows:

- Some respondents stated that Build-to-Rent (BTR) may be unsuitable in rural or semi-rural areas due to poor transport links, limited services, and infrastructure constraints. It was therefore felt that existing infrastructure is already stretched, with roads and rail services described as over subscribed. Therefore, BTR should be restricted to well-connected town centres, not Green Belt or rural locations.
- Affordability concerns appeared frequently among dissatisfied respondents, with a strong belief that BTR could make housing costs worse. There were doubts that private landlords will keep rents reasonable, especially with a 20% affordable requirement that respondents see as unrealistic and fears that rents will continue to rise and become unaffordable.
- There is concern about the environmental impact of BTR proposals, particularly where respondents believe Green Belt (or Grey Belt) land may be affected. There were strong objections to using Green Belt land, which respondents believe should be protected at all costs.
- Respondents expressed concerns about the placement of BTR schemes in rural or semi-rural locations. BTR is better suited to high density, urban environments with strong transport and service infrastructure. In places like Borough Green, BTR may conflict with settlement character and sustainability principles. They recommended to limit BTR to urban, well-connected locations and exclude Green Belt or rural areas from BTR eligibility.
- Several respondents expressed concern that BTR developments may undermine community cohesion or transfer power to large corporations. There was a strong preference for long term residents rather than investment driven absentee landlords. It was felt that absent landlords could weaken community ties, with owners less likely to contribute to the village community.

- Some respondents object on principled planning grounds rather than specific local issues. They felt that the planning system should not differentiate by tenure type (rent vs sale) because tenure can change without planning involvement. Affordability and rental levels should be managed through fiscal controls and fair rent legislation, not planning policy. There is concern that standards for BTR should match building regulations, and policy should not create separate categories.
- Developers argued that certain aspects of BTR policy should align more closely with planning fundamentals and building regulations. There should be no distinction between tenures in planning policy because tenure can change without planning consent. Developers feel that affordability and rental levels should be tackled through fiscal controls, not planning policy. They also highlighted that space and amenity standards for BTR should be identical to market sale units and be set by building regulations, not planning policy.
- There were concerns that car dependent BTR schemes will worsen congestion in poorly connected areas. It is felt that suitability of BTR depends on the area and available infrastructure, with priorities of existing residents needing consideration first.
- Developers raised concerns about the interaction between infrastructure requirements, affordable housing obligations, and viability. They stressed that infrastructure required through S106 agreements must remain deliverable and necessary to make development acceptable. They iterated that the Council should resolve tensions between obligations at the plan making stage, potentially by increasing the overall housing requirement to improve affordable housing delivery. They felt that the NPPF and PPG allow flexibility in affordable housing levels where viability issues arise, and any policy must reflect this and that a 'sound' policy cannot deprioritise infrastructure at the decision making stage.

Key themes from those respondents who did not answer the sentiment question included:

- There were concerns that housing obligations should be managed through plan making, not at the decision taking stage.
- One non-sentiment respondents emphasised wider housing market challenges. There was concern about persistent shortage of affordable housing, including both market rent and social rent and caution that rental developments must not inflate costs for residents or become profit driven at the expense of affordability.
- Policy H3 is viewed mostly positively, with recognition that it supports one of several types of affordable housing.

- One respondent emphasised that renting is currently more expensive than having a mortgage, and that TMBC has limited new rental homes, so the policy could help address that gap.
- They questioned whether Build to Rent is appropriate in certain settlements. Issues raised were limited transport links and infrastructure capacity in rural villages and importance of placing BTR only where infrastructure and services already exist.
- They questioned if there is a case for increasing the overall Plan-level housing requirement and identified supply to provide more affordable homes as a proportion.

#### Summary of feedback from Statutory Consultees

- There were no comments from statutory consultees.

#### Summary of feedback from District / Boroughs

- There were no comments from the District/Boroughs.

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

- **West Malling** is generally in support of Build-to-Rent (BTR) as part of a broader housing offer. They expressed a Strong preference for small-scale, well-designed schemes in sustainable locations and support for 20% Affordable Private Rent requirement.

They recommend inserting guidance on scale expectations in smaller settlements and strengthening design expectations, referencing Design Codes where relevant.

#### Officer response to the consultation feedback

Respondents expressed a wide range of views, from strong support to clear opposition. However, respondents were generally in support of BTR because they saw it as a positive means of increasing affordable rental supply and a way to support those unable or not wishing to buy. While broadly positive, respondents also highlighted safeguards needed to ensure affordability, quality, and public benefit.

There was concern that BTR may suit urban, well connected areas as it may pose significant challenges and potential harms in smaller settlements and environmentally sensitive areas. Opposition also focused on environmental grounds, especially regarding development on Green Belt or Grey Belt land, potential loss of natural character and landscape and the desire to prioritise brownfield sites over greenfield locations.

Developers also commented on broader strategic issues particularly the need to balance affordable housing, infrastructure, and market requirements holistically and the potential benefits of adjusting overall housing numbers to meet affordable housing needs more effectively. There was concern to ensure BTR policy does not unintentionally restrict the wider housing market or compromise future development flexibility.

Officers consider that Policy H3 remains appropriate and compliant with the requirements of the NPPF. However, developers/site promoters raised issues regarding planning policy principles, including viability, the role of S106 obligations, and the relationship between tenure and planning regulation.

Officers propose updates to the supporting text to better reflect NPPF/PPG expectations on site-specific viability, clarify the relationship between infrastructure requirements and affordable housing delivery, and ensure the policy continues to align with national guidance. Respondents highlighted concerns about the long-term management of BTR schemes and the potential for absentee or corporate landlords to reduce community cohesion.

Concerns were raised about BTR development within or near the Green Belt, particularly where respondents considered 'Grey Belt' land to remain functionally greenfield. The Council acknowledges these concerns and will ensure the policy and supporting text continue to reflect national Green Belt protections. No changes are proposed to enable BTR development on inappropriate Green Belt locations.

Officers have reflected on the consultation responses and proposed updates include:

- a) Ensure the Policy is robust in relation to viability, infrastructure capacity, reflect national viability and policy guidance;
- b) Consider housing options that respond to local affordability pressures.
- c) Consider expanding supporting text to reflect consultation comments and ensure clarity for applicants and decision-makers where necessary.
- d) Consider strengthening supporting text to emphasise the expectation that BTR schemes will need to deliver genuinely affordable outcomes, including clarity on tenure, rent levels and local affordability mechanisms.
- e) Consider strengthening supporting text around management expectations and design standards, ensuring schemes integrate positively with local communities and provide high-quality living environments.

**Question 60 – Do you agree with Policy H4: Gypsy Traveller and Travelling Showpeople – Safeguarding Sites?**

Total Number of responses received: 73
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Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
4	9	27	15	13	5

### Summary of issues raised

Responses demonstrated a broad spectrum of views, ranging from strong support for safeguarding existing lawful traveller sites, to significant objections focused on Green Belt protection, infrastructure capacity, and fairness in planning processes. Key concerns included crime, fairness, burden on local taxpayers, environmental harm, retrospective permissions, and inadequate local services. Strong opposition was expressed toward locating sites in the Green Belt or rural areas lacking infrastructure.

After analysing all respondents who expressed positive sentiment (strongly agree or agree), several clear themes emerged across their comments. The key themes are:

- Respondents expressed positive views because they see traveller site provision as part of creating a diverse community.
- Some respondents recognised that travellers, like all residents, require appropriate accommodation and need a home like everyone else.
- They see this as a potential way of avoiding unauthorised sites being bought and occupied in the wrong locations. However, they felt that Lawful sites should be safeguarded and Unlawful sites must be discouraged.
- One person acknowledged that it is a NPPF requirement.

The neutral respondents generally expressed uncertainty, conditional support, or balanced views about Policy H4. They had reservations, requirements, and areas where more clarity or evidence is expected. The key themes to their comments are:

- Some neutral respondents stated that they did not feel informed enough to form a clear opinion, or that they had no strong feelings either way.
- Some respondents expressed broadly neutral positions but supported safeguarding lawful existing sites, provided certain limitations or caveats were met. There was caution that safeguarding did not become a gateway for expansion or new development and that safeguarding should not enable unlawful or inappropriate site growth.
- Respondents mentioned appropriate siting, infrastructure, and the need to ensure that any decisions are practical and sustainable. They felt that sites should be close to schools, healthcare, and services, avoid remote rural areas with limited access and ensure that travel routes and local infrastructure can cope.
- Some neutral respondents highlighted that, while they did not oppose safeguarding outright, Green Belt protections must remain central to decision

making and that Grey Belt and similar designations should not be treated as expendable.

- One respondent felt that Grey Belt land around Borough Green should not be used for new sites unless there's a clear and demonstrated local need supported by proper infrastructure planning.
- They were concerned about fairness, emphasising that traveller sites should contribute appropriately to local services and comply with planning rules. There was support for provision if travellers follow local expectations.
- They emphasised on the need for strict safeguards to prevent unintended expansion and avoiding intensification beyond what infrastructure supports. They felt that there was need to ensure prevention of creeping expansion into the countryside.

Respondents who chose strongly disagree or disagree generally expressed strong concerns and opposition about traveller site provision under Policy H4. There were several themes from the comments including perceived impacts on safety, fairness, the environment, enforcement, and local infrastructure. The key themes include:

- One respondent questions the need for creating additional traveller pitches, arguing that traveller communities often do not integrate well and may create tensions with existing residents. They raise practical concerns about proposed sites in Hildenborough especially Hilden Park, stating that these locations lack suitable road access and would struggle with increased caravan movements. They also highlight that there are no accompanying plans for new schools, healthcare, or jobs to support additional population growth. They highlight potential landscape and environmental impacts, including increased flood risk and the likely loss of mature trees (some protected by preservation orders) needed to create access routes.
- Some respondents said that areas with Gypsy Traveller and Travelling Showpeople have an increased crime rate which they don't want anywhere near their village.
- Green Belt protection is essential - the use of Grey belt should be outlawed and Green belt land should be protected at all costs.
- One respondent expressed discomfort with the policy, arguing that many Holiday Parks are actually being used for permanent residence. They believe some residents are not paying council tax and note that certain parks are high-density with large lodge.
- They disagree with creating new traveller sites, expressing concerns that such sites may cause community disturbance, environmental impacts, and challenges with policing and rule enforcement.

- One respondent questioned whether travellers are required to pay for their stay on the site if provided by the council. They describe issues where private land is reportedly developed and used without proper permission and argue that such actions should be prevented. They feel these groups do not contribute financially in the same way as other residents while still receiving public services, and believe this issue needs addressing.
- They feel it is unfair that travellers can establish lawful development sites in rural areas where development is otherwise tightly controlled. They argue that all residents should be subject to the same planning policies and restrictions.
- They object to providing services or sites for travellers at the expense of local taxpayers. They argue that unless travellers contribute by paying council tax like other residents, there is no justification for offering such support.
- They feel that partially developed Gypsy or Travelling Showpeople sites should be assessed for their full potential capacity and counted toward meeting local pitch requirements. They believe maximising existing sites should be prioritised before identifying any new ones.
- They feel that if the travelling community want permanent sites, they should pay land rent.
- They highlighted that there is a traveller problem regarding racing of horses on the A228.

Some respondents did not answer the sentiment question, nonetheless, provided written comments. These responses tended to be policy focused, technical, or issue specific, often containing detailed critiques or observations about Policy H4 and wider traveller site provision. The key themes emerging from these comments are:

- One respondent objects to the draft Local Plan's Gypsy and Traveller policy, specifically opposing the proposal to regularise existing traveller sites that have temporary permissions or were previously unauthorised. They argue this contradicts efforts by local MPs to prevent intentional unauthorised encampments from gaining retrospective planning consent. They believe the Local Plan should not reward intentional unauthorised encampments through retrospective approval.
- Another respondent objected to the approach to Traveller sites specifically in the Green Belt. They cited that Paragraphs 142-151 and 153-156 of the National Planning Policy Framework (NPPF) acknowledges that Traveller sites are "inappropriate" development in the Green Belt, and as such, harmful. They also discussed previous Traveller site appeals and very special circumstances.
- They feel that the plan should end planning by appeal and should be plan led which provides certainty and fairness to the travellers but the current criteria-based formulation of Policies H4 and H5 still leave Traveller families to find their

own locations and all users open to issues of misunderstanding, differing translations and importing weighting. They feel that those flaws in the policies would, if absorbed into the statutory Plan, enable the Council to avoid challenges at development control stage. They feel that the appropriate way ahead is for the Council to abandon their criteria policy based approach and instead treat traveller's homes in the same way that sites are delivered for affordable, self-build, special needs and other social requirements and with a range of tenures.

- One respondent felt this was a problem locally and felt it was good to see it being addressed. They struggled to understand that their taxes were being used to address this and felt providing sites for travellers seem to be the opposite to travellers wanting to travel.
- 

#### Summary of feedback from Statutory Consultees

- There were no comments from statutory consultees.

#### Summary of feedback from District / Boroughs

- **Turnbridge Wells** supports the approach to safeguarding and protecting lawful existing sites and the supporting policy criteria set out under development management.

#### Summary of feedback from Parish Councils

- **West Malling** agrees with Policy H4. Safeguarding existing lawful sites is important in meeting identified needs and reducing pressure for new sites in sensitive locations such as the landscape setting around West Malling. The policy ensures that no sites are lost without equivalent replacement and supports fair and consistent treatment of these communities.

#### Officer response to the consultation feedback

Some respondents were generally supportive about providing traveller sites and felt that this supports a diverse community and recognised that travellers, like all residents, need suitable accommodation. There was strong support for Green Belt protection. Some questioned the need for additional traveller pitches and objecting to travellers in their area as they felt this would lead to increased crime and community tension. There was objection to the proposal to regularise existing traveller sites that have temporary permissions or were previously unauthorised.

Officers are satisfied that the policy has been drafted in compliance with the principles of the NPPF. Officer's recommendations include:

- Officers will review the policy and refine as needed to ensure consistency with national policy to both the policy and supporting text.
- The supporting text will also be amended to clarify that all development, including Traveller sites, is subject to the same Green Belt, transport, landscape, and environmental policies.

In addition, the matters raised that fall beyond the remit of a Local Plan will be passed on to relevant colleagues in the Council including Council tax and enforcement.

**Question 61 – Do you agree with Policy H5: Gypsy, Traveller and Travelling Showpeople – Site Criteria?**

Total Number of responses received: 67					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
3	8	25	16	9	6

Summary of issues raised

There was a wide range of responses, reflecting differing levels of support, concern, and opposition. Several respondents agreed or were satisfied that Policy H5 provides clarity and a more consistent, criteria-led approach compared with ad-hoc or appeal-driven decision-making. A group of respondents, many neutral or moderately supportive, felt the policy requires further strengthening to ensure it delivers consistent and sustainable outcomes.

Only four respondents who selected strongly agree or agree provided a comment. This included the following:

- Lawful sites should be provided on the understanding that the communities take ownership of the care of the site.
- Gypsy and Travellers need to be respected for their way of life, providing it is respectful of their local community.
- One respondent felt that everyone should follow national and local government bylaws.

A total of 8 respondents who answered neutral to the sentiment question submitted comments. This included:

- Some neutral respondents stated that they did not have strong feelings or did not know enough to form a definitive view.
- One respondent stated that Green Belt should be protected at all costs.
- The criteria are reasonable, but they should include stronger checks on road safety, access, and landscape impact. Some of Borough Green's narrow lanes and country roads are already unsafe for more traffic, particularly large vehicles. Any future site proposals should only be approved if they meet strict environmental and access standards.
- The criteria-based approach is supported in principle, but the Council should commit to consulting both settled and travelling communities early in the process. Borough Green's surrounding lanes are already under pressure, and further intensification of vehicle movements must be carefully managed. Suggested amendment: include explicit reference to highway capacity, pedestrian safety, and environmental limits as mandatory assessment criteria before approving new or expanded sites.
- One respondent talked to design codes and another about the LP consultation overall.

Only 7 respondents who answered strongly disagree or disagree to the sentiment question, submitted comments. The summary of these are:

- One respondent objected to the approach to Traveller sites specifically in the Green Belt. They cited that Paragraphs 142-151 and 153-156 of the National Planning Policy Framework (NPPF) acknowledges that Traveller sites are "inappropriate" development in the Green Belt, and as such, "harmful. They also discussed previous Traveller site appeals and very special circumstances. They feel that the plan should end planning by appeal and should be plan led which provides certainty and fairness to the travellers but the current "criteria-based" formulation of Policies H4 and H5 still leave Traveller families to find their own locations and all users open to issues of misunderstanding, differing translations and importing weighting. They feel that those flaws in the policies would, if absorbed into the statutory Plan, enable the Council to avoid challenges at development control stage. They feel that it is both unfair, and also looks to have been designed deliberately to push Travellers to sites where they are "out of sight and mind". They feel that the appropriate way ahead is for the Council to abandon their "criteria policy based" approach and instead treat traveller's homes in the same way that sites are delivered for affordable, self-build, special needs and other "social" requirements and with a range of tenures.
- Appropriate sites need to be designated to meet the required number of pitches but further intensification should not be permitted if not aligned with the controls that have to be met by other residents in the borough.

- They felt that areas with Gypsy Traveller and Travelling Showpeople have an increased crime rate and they don't want this near their village.
- They raise practical concerns about proposed sites in Hildenborough especially Hilden Park, stating that these locations lack suitable road access and would struggle with increased caravan movements. They also highlight that there are no accompanying plans for new schools, healthcare, or jobs to support additional population growth. They highlight potential landscape and environmental impacts, including increased flood risk and the likely loss of mature trees (some protected by preservation orders) needed to create access routes.
- One respondent felt that even sites with the strictest rules will be difficult to manage and strongly disagrees that any additional traveller sites should be created because they don't have a positive impact on the local area. They felt that these sites are often poorly managed and enforcement is not possible.
- Greenbelt land should be protected at all costs, the use of Grey belt should be outlawed, as it is in fact green belt land ie not brown field sites.
- One respondent questioned why Gypsy traveller and Travelling Showpeople are given special status.

Although 6 respondents did not select a sentiment category, some still provided written comments. Their responses were mixed. The key themes which were expressed are:

- One respondent felt that the appropriate way ahead is for the Council to abandon their criteria based approach and instead treat traveller's homes in the same way as sites are delivered for affordable, self-build, special needs and other social requirements and with a range of tenures. This would involve distributing the required number of pitches across general housing sites in the Local Plan, supported by a single combined policy. This approach would ensure pitch numbers are fully met and kept up to date, place sites in sustainable locations, allow designs to blend into local environments with appropriate planning benefits, and enable modern tenure and management arrangements such as commonholds and resident-led service contracts to support better site management and community integration.
- One respondent agreed with the principle of Policy H5 in that it sets out criteria for assessing Gypsy, Traveller and Travelling Showpeople sites. They felt that clear criteria are preferable to ad-hoc or appeal-led decision-making. They suggested that the policy requires tightening and clarification to ensure it delivers fair, consistent, and sustainable outcomes for both site residents and the settled community.
- One respondent felt site provision on appropriate sites can help reduce the number of unauthorised sites in more sensitive locations.

### Summary of feedback from Statutory Consultees

- **Natural England** welcomes the inclusion of criterion 1c but advise that it should be amended to: “In cases where proposals are within or adjacent to a National Landscape, the scale and the extent of development should be limited. Proposals in their setting should be sensitively located and designed to enhance, mitigate or avoid impacts”. This is better in line with NPPF paragraph 189.

### Summary of feedback from District / Boroughs

- There were no comments from District / Boroughs.

### Summary of feedback from Parish Councils

- **West Malling Parish Council** supports Policy H5. It provides clear criteria to guide proposals toward sustainable, appropriate locations with good access to services. This helps protect sensitive landscapes around West Malling especially green belt edges while ensuring fair provision. The emphasis on integration, safe access, minimal visual impact and good amenity standards is appropriate.

### Summary of feedback from other consultation bodies

- **The Kent Downs National Landscape** supports this policy.

### Officer response to the consultation feedback

Respondents recommended stronger wording on highway safety, vehicle movements, and access constraints, particularly in rural locations with narrow lanes. They also felt that the policy could have clearer criteria relating to landscape impact, environmental sensitivities, and proximity to services.

There were concerns about locating Traveller sites within the Green Belt as they considered Traveller sites as inappropriate development as per national policy.

There was a lot of perceived negative impacts associated with Traveller sites and doubts about enforcing planning conditions. There was also concern about insufficient local infrastructure.

Policy H5 will continue to align fully with national policy regarding Traveller sites in the Green Belt and continue to emphasise the need for well-located, deliverable, and

sustainable Traveller accommodation that aligns with the wider Local Plan objectives. Recommendations include:

- Officers will review the wording of Policy H5 to remove any ambiguity, reinforce assessment requirements, to allow consistent interpretation at the development management stage.
- The supporting text will be reviewed and refined where necessary to reflect the need for sites to demonstrate adequate infrastructure and deliverability without significant adverse environmental impacts.

**Question 62 – Do you agree with Policy H6: Specialist Housing to Meet the Needs of Older and Vulnerable People?**

Total Number of responses received: 91					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
11	22	24	10	4	20

Summary of issues raised

The responses to Policy H6 reveal broad recognition of the growing need for specialist housing for older and vulnerable people, but they also show significant differences in views about how and where such housing should be delivered.

The comments from respondents who chose strongly agree or agree are broadly in support of Policy H6 with themes about specialist housing for older and vulnerable people. The key themes occurring in these comments are:

- One Respondent felt that providing better options for older/vulnerable people could perhaps free up some of the family properties they are currently living in alone. They felt that a reasonably priced retirement village with small single storey dwellings, doctors, small shops, hairdressers etc., and a mini bus service into shopping towns, would still give elderly people the independence they want, could be a better development option.
- Commendable aims and objectives to deal with an increasing population requiring specialist homes and facilities.
- They support housing that helps older and vulnerable residents live independently but feel the infrastructure is needed. They felt that Borough Green lacks sufficient GP and support services, so it's not an ideal area for larger specialist schemes. The focus should be on towns where medical and social care facilities already exist.
- This specialist housing should be available locally for local people so that older people can live in their community where they have the support networks.

- May not interest existing dwellers in their own property enough to make them move.
- The respondent highlights that while Policies H1 and H6 address housing for older people, these provisions mainly apply to medium and large developments. In smaller village settlements, multigenerational families are common, but elderly-suitable homes are often not provided due to limited site size. Offering appropriately designed homes for older residents would free up larger family dwellings and support strong local family networks. The respondent suggests amending Policy H6 to allow consideration of elderly-adapted C3 homes in smaller developments, in consultation with parish councils.
- Reasonable size housing is necessary to allow the elderly to be near vital services and not worry about giving up driving but service charges put many off.
- Some way of easing the transfer of the single elderly into more suitable homes would help the general housing shortage.
- One respondent felt that the private providers of retirement complexes are too expensive for most elderly people. They felt that there should be sufficient housing for all requirements.
- One respondent noted that Tonbridge has an ageing population so this sort of housing will be increasingly necessary. Whilst another highlighted that with an ageing population these facilities are necessary. Stating 'We are all potential customers'.

Respondents marked as neutral provided a mixture of cautious support, practical concerns, and wider planning reflections. The key themes which were highlighted included:

- All sections of the community need to be catered for.
- Providing homes for older and vulnerable residents is positive, but these developments must be located close to accessible services and health facilities. They felt that Borough Green lacks sufficient GP capacity and community support infrastructure and suggested prioritising specialist housing in Tonbridge, Kings Hill, or Aylesford, where health and care services already exist, rather than dispersing small schemes into Grey Belt sites with limited accessibility.
- There is already quite a lot of accommodation specifically for older people perhaps to the detriment of the younger generation.
- The respondent acknowledged that there is an ageing population in the borough and suitable housing needs are not being met for them. However they felt that Hildenborough did not have the infrastructure needed for this type of housing.

- A couple of respondents felt that green belt land should be protected at all costs and the use of Grey belt should be outlawed, as it is in fact green belt land ie not brown field sites.
- One respondent made reference to Quality Traditional Design Codes with evidence from leading Academics and Architects.

Respondents who strongly disagree or disagree expressed reservations about viability, location, necessity, and practical deliverability of Policy H6. The key themes of their comments are:

- One respondent agrees that we need more accessible accommodation for elderly and disabled people but question whether 5% is enough.
- One respondent welcomed the inclusion of Policy H6, supporting the policy's aim to provide a range of housing types, including age-restricted housing, retirement living, extra care, and care homes, which aligns with demographic trends and national planning guidance but they had significant concerns about the policy's effectiveness and ability to deliver meaningful outcomes. They felt that the policy lacks clear delivery targets and concern that a lack of site allocations in the policy may limit developer confidence and reduce the likelihood of timely delivery. They highlighted that the policy should provide flexibility to ensure these schemes remain viable and deliverable. Without such guidance, older residents may remain in under-occupied family homes, reducing housing mobility and limiting opportunities for younger households. They provided amended recommendations to strengthen the policy ensuring it delivers real, practical housing options for older residents and supports sustainable, balanced communities in Tonbridge & Malling.
- The respondent feels that older and vulnerable people would benefit more from added social help and care rather than new development. They felt that there are already several care homes around Hildenborough so priority should be to take care of already existing people with needs.
- One respondent stated that 'In Wrotham we had this. It has been empty for years and is now being repurposed so is clearly not needed!'
- It was highlighted that it is unreasonable to expect sites between 20 to 99 dwellings to provide 5% special accommodation as specialist C3, the threshold for specialist C3 provision should be at least 100 units. They felt that the provision and management of specialist C3 accommodation on smaller sites is not practical and will prevent housing from coming forward. They suggested that it would be more appropriate to provide bungalows or maisonettes to enable independent living.
- They felt that many older people remain alone in large houses due to lack of suitable independent living options. If attractive downsizing options for the

elderly were available, many larger houses would be freed up, increasing the stock of family-sized homes.

- One respondent stated ‘No locally there is plenty of provision.’
- They felt that provision of dwellings for people with special needs rarely remain in this use when people move or are deceased. They feel that a more flexible approach is needed to enable dwellings to be adjusted to meet the needs of each resident. They suggest more single storey, step free accommodation, delivered by infill development and residential annexes.
- There is a lack of this type of accommodation.
- One developer disagrees with the approach outlined in draft Policy H6, arguing that requiring 5% of homes on developments to be specialist age-restricted accommodation is unrealistic and unsupported by evidence. They note that specialist housing needs dedicated operators, suitable locations, and economies of scale, which cannot simply be incorporated into standard residential schemes. They consider the policy is unjustified and ineffective, as tests of soundness and suggest that allocating specific sites for specialist accommodation would be a more realistic approach.

Although 20 respondents did not select a sentiment category, some still provided comments. The following key themes emerged from these comments:

- A developer supports the overall aims of Policy H6, recognising the importance of planning positively to meet the housing needs of older and vulnerable residents. They note that specialist housing can promote independent living, ease pressure on health and social care services, and help release under-occupied family homes.
- Too many vulnerable people are forced to leave the areas they know to live in suitable housing.
- One respondent notes that recent local developments have not included any bungalows, instead offering mainly apartments. They argue that bungalows are ideal for older residents who want to remain independent, especially for health reasons, but supply is already very limited and the lack of new provision is worsening the situation. They add that they have even considered self-build because they cannot find a suitable next home.
- Policy H6: Mostly Positive: All sections of society need and deserve appropriate housing.
- A number of developers had concerns with the policy. This included:
  - a consideration that the 5% requirement is unrealistic and impractical where delivery in a scheme of 20-99 homes is not feasible and that providers generally need 50-100 units or around 60-70 beds, which is far above what a 5% contribution would deliver.

- Specialist housing requires dedicated operators and purpose designed sites;
- That allocating a small number of specialist units would reduce development capacity and undermine viability and risk non-delivery;
- That locational requirements are not compatible with general housing sites;
- restricting specialist accommodation to settlement boundaries is too limiting and will constrain delivery
- That the evidence does not justify 5%;
- That the policy applies too widely and some sites might not be appropriate for specialist accommodation;
- There was support for an allocation-led or strategic site led delivery for specialist accommodation.

#### Summary of feedback from Statutory Consultees

- **Natural England** starts consider that this policy could be strengthened to ensure development proposals for older and vulnerable people, who may be more compromised in their ability to directly engage with nature, are within close proximity of a greenspace and incorporate sufficient Green Infrastructure, possibly by amending 2c and 2e.

#### Summary of feedback from District / Boroughs

- **Kent County Council** is broadly supportive of the aims of Policy H6 and emphasises the importance of aligning the Local Plan with Adult Social Care (ASC) evidence and future need. They highlight that there is an over-supply of standard residential care and a significant under provision of dementia and nursing care. They pointed out that the borough requires at least one extra care housing scheme to meet growing need. They encourage continued engagement with KCC's Adult Social Care team and recommended that officers strengthen the evidence base with reference to:
  - Kent Adult Social Care Accommodation Market Position Statement (MPS)
  - AECOM ASC Accommodation Evidence Base (2025)

They also recommended points for strengthening the policy as follows:

- Define the required balance of specialist provision (dementia, nursing, extra-care).
- Formalise accessibility expectations, with M4(2) as standard and an evidence-based proportion of M4(3).

- Support growth of supported-living schemes for working-age adults with complex needs.
  - Set expectations for modernity and financial viability of new care homes.
  - Require assistive-technology-ready solutions in new specialist schemes.
- **Turnbridge Wells** strongly supports the policy and feels that it responds well to the identified need within sustainable locations, and the accessible design requirements. They recognise that Tonbridge and Malling borough has amongst the highest 85+ age demographic in the county and that the SHMA and supporting evidence demonstrate a clear need to increase the supply of accessible dwellings.

Summary of feedback from Parish Councils

- **West Malling Parish Council** agrees with Policy H6. The town has an ageing population and a shortage of suitable downsizing and supported-living options. Requiring a proportion of specialist housing on larger schemes will help ensure that older residents can remain within the community. Locating specialist housing in walkable, well-connected areas aligns well with West Malling’s sustainability goals.

Officer response to the consultation feedback

Overall, there is clear consensus that specialist housing is needed, driven by an ageing population and a desire to support independent living. However, there is difference in opinions on how this should be delivered or whether the current approach will effectively or sustainably meet the borough’s needs.

Most of the developer/site promoters support the principle of meeting specialist housing needs but have expressed concerns about the deliverability, justification, and workability of the policy as drafted.

Officers will review the policy and also supporting text taking into account comments made as part of the consultation. This will include comments from developers and KCC to ensure that the policy is robust and deliverable including being supported by evidence.

**Question 63 – Do you agree with Policy H7: Accessible and Adaptable Homes?**

Total Number of responses received: 85
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Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
10	24	23	7	4	17

### Summary of issues raised

A total of 85 respondents commented on Policy H7 (Accessible and Adaptable Homes) during the Regulation 18 consultation.

Overall, respondents expressed a broad range of views, reflecting varied priorities around accessibility, local character, development impacts, and evidence led planning. Supportive respondents generally endorsed the policy's aims, while others raised concerns about feasibility, proportionality, and wider implications.

Respondents who strongly agree or agree with Policy H7 support its inclusive intent, its focus on independence and the future proofing that adaptable homes bring. The key themes in these responses are:

- Commendable aims and objectives to deal with an increasing population requiring specialist homes and facilities.
- Enables people to stay in their own homes.
- It is necessary to include all members of society.
- Peoples housing needs change through life and the ability to adapt properties is important.
- One respondent felt it was very important to future proof and to have properties that are adaptable/adapted.
- This should apply to smaller developments within villages so that the smaller developments there can get these assets into the village housing stock.
- Completely support making new homes accessible and adaptable because this benefits everyone. They highlighted that instead of using this as a reason to justify new large developments, the council should help improve accessibility in existing homes and neighbourhoods through grants and renovation incentives.
- One respondent said 'Having nursed my husband I often wondered how others would cope with all the equipment and accessibility required'
- The respondent agrees with the principle of Policy H7 and agrees that accessible and adaptable homes are important given an ageing population and the needs of people with disabilities or reduced mobility. However, they emphasise that the policy must be applied proportionately and based on clear evidence. They highlight four key conditions: requirements should reflect demonstrated local need; accessibility standards must not undermine viability or delivery, especially on smaller sites; homes must be well designed, integrated, and appropriate to local character; and accessible housing must be supported by suitable

infrastructure such as transport, healthcare, and safe pedestrian routes. Homes that are technically accessible but poorly located would not meet the policy's underlying objectives.

- Some provision must be made.
- One developer supports Policy H7's requirement for all new homes to meet M4(2) accessibility standards but argues the policy should be more ambitious on wheelchair-accessible housing. They are concerned by the M4(3) standards' split percentages across tenures and maintain that high accessibility requirements should not be limited to affordable housing. They recommend increasing M4(3) provision to at least 10% across all tenures, noting the social, health, and economic benefits. They also emphasise the importance of accessible neighbourhood design and tracking delivery of accessible homes.

Although sentiment was neutral, many responses contained strong views often about issues other than the core principles of accessible and adaptable housing. The key themes expressed are:

- The respondent questions the need for high levels of accessible or specialist housing in light of evidence showing lower disability rates in the borough. They argue that large increases in housing numbers, particularly in Hildenborough, are unsustainable. They suggest that the former Fidelity site should have been used for genuinely affordable and specialist accommodation for older and vulnerable people rather than high-priced market homes. They feel that current approaches prioritise developer profit over meeting local needs and that more consideration should have been given to affordability and demographics when permissions were granted.
- They strongly support enhanced accessibility standards (M4(2) and M4(3)), but these standards should apply primarily to existing urban extensions and regeneration areas, not be used to justify new mass housing in the countryside. They suggested an amendment to include a clause encouraging retrofitting and adaptation of existing housing stock to improve accessibility within current settlements.
- A couple of respondents felt that Green belt land should be protected at all costs.
- One respondent made reference to Quality Traditional Design Codes with evidence from leading Academics and Architects.

Respondents who selected strongly disagree or disagree sentiment expressed clear concerns about Policy H7 being overly prescriptive, insufficiently evidence based, and potentially unviable, with several arguing that the proposed levels of accessible housing especially M4(3), are both unnecessary and financially burdensome. The key themes of the comments are:

- They felt that this policy goes hand in hand with Policy H6.
- One respondent did not believe plans of added development for accessible and adaptable homes in rural areas is a good strategy to address the issue. They felt that the infrastructure needed was insufficient in rural areas. They were not in favour to add those kinds of homes in the area of Hildenborough due to the impact on the environment and wildlife and character of the village as well as requiring changing green belt category to grey belt.
- M4(2) may be reasonable for flexibility in new developments but M4(3) is rarely used by people who actually need it and does not help meet the need. Greater flexibility for adaptation and extension is required to meet particular needs.
- One developer supports the principle of including a percentage of M4(3) compliant homes within new developments but argues that Policy H7 needs greater flexibility. They note that while viability issues are acknowledged in the draft policy, physical site constraints such as steep gradients that make step-free access difficult may also limit the ability to provide M4(3) homes. They recommend adding explicit wording to the policy (not just the supporting text) to ensure such practical constraints are properly considered in decision-making and to make the policy more effective.

17 respondents did not select a sentiment, but some still made comments. There was general support for the policy but also concern that the policy was not supported by sufficient evidence, had viability risks, design and site-specific constraints. The key themes that were prevalent are:

- It allows for people to remain in their own homes.
- General support for the aim of increasing accessible and adaptable housing, particularly M4(2), recognising benefits for inclusive communities and reduced long term adaptation costs.
- Calls for strong, locally specific evidence and robust viability testing to justify any accessibility requirements, especially for M4(3) wheelchair user dwellings.
- Concerns that proposed M4(3) percentages exceed identified need: Evidence indicates a need for around 2–2.3% M4(3) homes (approx. 450–453 homes).
- Policy requirements could deliver roughly 880–945 M4(3) homes which is almost double the assessed need.
- Developers report low market demand for M4(3) homes, noting that levels of need in local plans often do not translate into sales.
- Viability concerns highlighted across multiple responses, including:
  - Higher construction costs for M4(2) and M4(3) dwellings.
  - Potential impacts on development density and land take.
  - Risk of undermining overall deliverability of housing sites.

- Arguments that M4(2) for all homes is unjustified and inconsistent with national guidance, which requires consideration of site specific constraints such as gradients, parking arrangements, and topography.
- Frequent calls for greater flexibility, including:
  - Allowing site specific assessments to determine appropriate numbers of M4(2) and M4(3) homes.
  - Embedding flexibility directly in the policy wording—not just supporting text.
  - Recognising that physical constraints may make step free access or full compliance unachievable.
- Recommendation to distinguish between M4(3)a (adaptable) and M4(3)b (accessible) to ensure clarity and alignment with Building Regulations.
- Views that M4(3) market homes should not be required, as wheelchair user homes are typically delivered through the affordable housing sector.
- Concerns that the policy, as drafted, is overly rigid, unjustified, and inconsistent with national policy, risking failure to meet the tests of soundness.
- Suggestions for a more evidence led, negotiated approach, similar to the Maidstone Local Plan Review, where M4(3) requirements are agreed based on need, viability, and site characteristics.
- Alternative proposed wording that:
  - Treats M4(2) as an ambition rather than a fixed requirement.
  - Applies M4(3) only where there is identified local need.
  - Allows flexibility where design, site suitability, or viability considerations limit full compliance.

#### Summary of feedback from Statutory Consultees

- There were no comments from Statutory Consultees.

#### Summary of feedback from District / Boroughs

- There were no comments from District / Boroughs.

#### Summary of feedback from Parish Councils

- **West Malling Parish Council** supports Policy H7. Requiring all new homes to meet M4(2) standards and a proportion to meet M4(3) will help futureproof housing stock and avoid costly adaptations later. This aligns with local need and national guidance. West Malling’s ambition for high-quality, inclusive design is strengthened by this policy.

#### Officer response to the consultation feedback

Officers feel that the policy aligns with national guidance, but we will review the viability testing that supports M4(3) thresholds to reinforce the policy justification at Regulation 19. Officers will strengthen clarity, ensure consistency with national policy, and improve transparency for communities and applicants alike to both the policy and supporting text and recommendations include:

- Officers propose to investigate distinguishing between M4(3)a (adaptable) and M4(3)b (accessible) in the policy and supporting text, with M4(3)b.
- Viability will continue to be tested strategically and at application stage where appropriate. We propose to retain a clear viability clause in H7 and to extend the policy’s flexibility to acknowledge demonstrable design and site constraints (topography, flood risk, access levels) alongside viability if necessary. The supporting text will signpost proportionate evidence for any departure.

**Question 64 – Do you agree with Policy H8: Self and Custom Build Homes?**

Total Number of responses received: 86					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
4	11	31	9	6	25

Summary of issues raised

There were varying levels of support, concern and understanding of the policy but there was a clear recognition across all respondent groups that self and custom build can contribute positively to housing choice.

The respondents who expressed strongly agree or agree with Policy H8 highlighted several recurring supportive themes. These can be grouped into the following main themes:

- Agreed subject to the compliance of developers with the stated requirements must be enforceable.
- All and various initiatives are relevant.
- One developer welcomes the policy and notes that the policy allows flexibility regarding the 5% provision between self and custom build. They are pleased with the policy wording because self-build can present challenges and inconsistencies regarding adherence to design codes and the surrounding character of proposed and approved housing forming part of major housing schemes.
- Good idea as long as it is closely monitored.

- It's good to put some house building in the hands of ordinary people, and this would be an affordable way to buy a house.
- Provides opportunities for all to own their own home.
- Provision should be made for this option.

Neutral respondents generally did not express strong support or opposition to Policy H8. Instead, their comments tended to focus on uncertainty, conditions, or wider issues surrounding housing, planning, and development. Their feedback can be grouped into these key themes:

- They felt that the policy should not be used to justify isolated development in the countryside or incremental erosion of rural character. Appropriate locations that they should be directed towards are small scale sites, brownfield land and locations within or well related to existing settlements.
- Green belt land should be protected at all costs.
- One respondent stated, 'I agree, however with keeping the character of areas protected by conservation laws'.
- If this just means more 'executive developments' gobbling up land, not keen.
- One respondent referenced Quality Traditional Design Codes with evidence from leading Academics and Architects.
- Another respondent supports the aspirations of Policy H8 and recognises the importance of delivering self and custom-build homes but raise concerns about practicality, viability, and implementation. They note that self-build plots can harm the appearance of a wider development unless tightly controlled, but they question whether strict design codes may undermine the very purpose and appeal of self-build, reducing market interest and viability. They also question how reasonable price will be defined and argue that requiring serviced plots to be fully prepared and marketed for six months places financial risks on developers, may delay sales of nearby homes, and could affect overall site values. They suggest that non-serviced plots could be marketed earlier and that detailed self-build proposals should be considered alongside the main application. Overall, they conclude that Policy H8 places an untested and ill-conceived burden on development and is unsound.

Feedback from respondents who strongly disagree or disagree with Policy H8 focused on perceived risks to landscape, infrastructure, build quality, development pressures, and the practical challenges of self-build on larger sites. The themes below summarise their comments:

- One respondent felt we could end up with poorer quality housing or design monstrosities.

- They felt that Custom and self-build homes are a lovely idea in theory but adding them as part of big rural housing sites risks further pushing development onto open countryside. Their suggestion is to encourage smaller, locally led self-build projects within current settlement boundaries, not as part of new Grey Belt estates.
- One respondent felt that self and custom-build housing should be encouraged within settlement boundaries, where it can make good use of smaller, sustainable sites that may not be viable for larger developers. They argue it should not be promoted on greenfield land but may be appropriate for reusing redundant rural structures.
- Self-build and custom-build housing adds diversity to the market, but allocating 5% of large rural sites to this use encourages speculative development pressure on the Grey Belt. They feel that Borough Green does not have the infrastructure to support large clusters of custom-build plots. They suggest to encourage small infill or brownfield self-build plots within existing settlements instead of allocating them within new countryside expansions.
- The respondent argues that the scale of proposed development in the borough is fundamentally unsustainable, regardless of the demographic it is intended to serve. They believe that infrastructure capacity and environmental impacts make the growth levels unacceptable. They also feel that the consultation questions focus too much on the principles or ethos of the plan rather than addressing its actual suitability and sustainability for the area, and they express frustration at being asked similar questions repeatedly.
- One developer felt that the proposed 70-unit threshold for requiring 5% self-build plots may be too low. They note that on sites with 50% affordable housing, an additional 5% specialist housing (Policy H6) and 5% self-build plots could leave only 40% of homes available for market sale, making such schemes less attractive to developers and potentially delaying delivery. They suggest raising the threshold to 100 units. They also note that evidence indicates demand for only around 22 self-build homes per year, which could be met through larger allocations and windfalls. They support provisions to prevent stalled delivery where plots do not sell and suggest that self-build plots could be more appropriately delivered on the edges of smaller villages as exceptions to countryside policies, where demand is typically stronger.
- One developer does not agree that larger developments should be required to provide a proportion of new homes as self-build plots. They argue that self-build plots within larger developments can disrupt construction, slow delivery, and lowering overall delivery rates. They also note that self-build buyers often expect discounted land, but such discounts cannot be required because self-build is not defined as affordable housing in the NPPF, leading to low uptake in practice.

They recommend that the Plan should look for opportunities to allocate sites specifically for self-build development, where they have been promoted for such by the landowner. This approach is more likely to be 'effective' as a test of soundness.

Although 25 respondents did not provide a sentiment answer, they provided comments which was mainly from developers/site promoters.

The comments key themes are:

- Many developers argue that the requirement for 5% self or custom-build plots on sites of 70+ homes is not justified, citing low and declining demand evidenced by the self-build register and SHMA.
- Several respondents highlight that the policy would create significant over-provision, with estimates suggesting 587–642 plots would be delivered against identified needs ranging from 101–203 plots (and as low as 111 in some assessments).
- Multiple developers state that self-build demand is typically for rural, flexible locations, not large housing estates, and therefore the blanket requirement is inappropriate.
- A common recommendation is to raise the threshold for on-site self-build provision, with suggestions including:
  - Sites of 100+ homes
  - Sites of 500+ homes
  - A sliding-scale approach to reduce proportional requirements on very large sites.
- Several developers suggest that dedicated self-build allocations on suitable sites promoted by willing landowners would be more effective and sound than applying requirements to all large developments. Concerns are raised about:
  - Viability impacts
  - Construction disruption and coordination difficulties
  - Safety issues of integrating self-build in active construction sites
  - Risk of incomplete or stalled plots
  - Difficulty enabling purchasers to meaningfully influence design within a large development.
- Developers state that marketing periods are too long and/or too complex; many propose that unsold plots should revert to market housing after the initial 9-month period to avoid delays in delivery.
- Some developers note that self-build purchasers often expect discounted plots, which cannot be required, leading to low take-up and increasing the risk of unbuilt or long-vacant plots.

- A number of respondents state the policy lacks sufficient evidence, particularly regarding demand for self-build plots on large sites rather than smaller bespoke developments.
- One respondent requested more information about the self-build register, noting they were previously unaware of it.
- A small number of respondents were supportive in principle, acknowledging the value of self and custom-build in widening housing choice and contributing to supply.
- Some developers support the concept but argue Policy H8 must be more flexible, allowing provision “where appropriate” rather than through a rigid requirement.
- One developer welcomes the flexibility between self and custom-build in the policy, noting that self-build can be difficult to integrate into design-coded major schemes.
- Some developers propose specific site allocations, including one promotion for serviced plots west of Scarborough Terrace, Burham, arguing allocations are necessary to make the policy effective.

#### Summary of feedback from Statutory Consultees

- There were no comments from Statutory Consultees.

#### Summary of feedback from District / Boroughs

- There were no comments from District / Boroughs.

#### Summary of feedback from Parish Councils

- **West Malling Parish Council** agrees with Policy H8. Providing a small proportion of plots for self-/custom build increases choice and supports innovation. In West Malling, delivery should be small-scale and design-controlled to ensure compatibility with the Conservation Area and settlement character. The requirement for Design Codes for larger clusters is also appropriate and aligns with West Malling’s intention to develop local design codes through the Neighbourhood Plan.
- 

#### Officer response to the consultation feedback

Positive respondents welcomed the increased choice and opportunities for home ownership that self-build and custom build plots could provide. They felt this would enable people to participate in housing delivery.

Neutral respondents generally expressed uncertainty. Many were supportive if self-build were directed toward appropriate locations especially brownfield land or areas well related to settlements. They also felt that the green belt should be protected.

Negative responses focused on the risks and practical challenges of requiring self-build plots, particularly on large strategic sites.

The overarching message is that while the principle of self-build is broadly acknowledged, its implementation must be carefully managed, evidence based, and sensitive to local character and capacity. Respondents raised issues regarding the balance between design control and flexibility.

Officers will consider the consultation responses in progressing the policy further including its supporting text to address clarity, evidence, and implementation concerns without undermining the strategic objective of supporting self- and custom-build delivery.

**Question 65 – Do you agree with Policy H9: Houses in Multiple Occupation?**

Total Number of responses received: 62					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	15	29	10	5	1

Summary of issues raised

A total of 62 respondents provided feedback on Policy H9 relating to Houses in Multiple Occupation (HMOs). Responses ranged from supportive to strongly opposed, with the majority offering nuanced perspectives influenced by local character, housing need, and community impact.

Respondents who strongly agree or agree generally support Policy H9 for HMOs, highlighting their role in meeting local housing needs, offering affordable options, and helping prevent homelessness. The key themes of their comments are:

- A couple of respondents noted that all forms of accommodation are needed to meet individual requirements.
- The respondent agreed that HMOs need to be well-managed and balanced. Borough Green should not see an over-concentration of shared housing that could change the community character or add parking issues. They suggested to apply a clear local cap on HMO numbers in smaller settlements.
- In the right location, these are necessary.
- It is vital that HMO are only permitted in suitable locations.

- One respondent supports greater housing density.
- A respondent feels that there is a real need for this accommodation and to prevent homelessness.

Neutral respondents generally recognise that HMOs play a role in meeting housing need particularly for lower income individuals but emphasise the importance of strong regulation, zoning, and density management to safeguard communities. Comments also highlight preferences for converting existing housing stock over new HMO developments and note concerns about the accessibility and length of the consultation materials themselves. The neutral responses can be summarised under these key themes.

- The respondent agrees with the need to regulate HMOs for safety and community cohesion. However, they feel the Council should clarify that HMO concentration thresholds will apply across all new developments to prevent large single-tenure clusters forming in Borough Green's proposed new estates. Suggested amendment: apply a maximum HMO density cap per settlement to maintain balanced communities.
- The respondent notes that HMOs can provide low-cost accommodation in suitable contexts but emphasises the need for careful management. They support the policy's aim to apply appropriate controls but suggest that zoning may be necessary to prevent over-concentration of HMOs in specific areas, which could undermine social integration.
- They would rather the conversion of existing properties to multiple occupation than the creation of new properties on green belt land.
- The respondent referenced Quality Traditional Design Codes with evidence from leading Academics and Architects.
- There is a need for those who cannot afford to rent a complete flat/house.

Respondents who selected strongly disagree or disagree, expressed significant concerns focused primarily on protecting rural and green belt areas, preventing overdevelopment, and avoiding social and infrastructure pressures associated with HMOs. The key themes of the comments are:

- Can be stressful living with other people who have different standards. This can cause conflict for surrounding neighbours.
- A couple of respondents felt that Green belt land should be protected at all costs.
- The respondent is not opposed to shared rented accommodation in principle but objects to creating new HMO-type development in the rural village of Hildenborough. They believe such development would have a negative impact on the village's unique character, damage the natural environment and wildlife,

strain limited local infrastructure, and increase traffic, offering no benefit to the local community.

- One respondent commented 'Not in rural villages'.
- One respondent felt that they do nothing to help the social cohesion and always tend to add to issues such as parking when the same is at a premium.

Only one respondent did not select a sentiment option, and they did not provide substantive feedback on the policy. The respondent stated 'no comment for this area of focus'.

#### Summary of feedback from Statutory Consultees

- There were no comments from Statutory Consultees.

#### Summary of feedback from District / Boroughs

- There were no comments from District / Boroughs.

#### Summary of feedback from Parish Councils

- **West Malling Parish Council** supports Policy H9. HMOs can meet an important housing need but do require strong management and appropriate location. Clear design, parking and amenity standards are essential to avoid harmful impacts, particularly in West Malling where streets and services are constrained.
- 

#### Officer response to the consultation feedback

There is general support for HMO as a useful type of housing for low-income individuals, but respondents emphasised the importance of strong regulation, zoning, and density management to safeguard communities.

Some respondents highlighted a preference for converting existing housing stock over building new HMO developments.

The objections focused on potential impacts on rural character and Green Belt, infrastructure and parking pressures, and the perceived unsuitability of HMOs in small settlements.

Officers will retain a positive, criteria based policy enabling HMOs where impacts are acceptable. Recommendations include:

- Officers will review the policy and supporting text to strengthen cross-references to licensing and national HMO standards and embed a management plan requirement for larger HMOs where necessary.

- Parking pressure was a recurrent theme so officers will review the policy to ensure the inclusion of criterion linking proposals to local parking assessments, require secure cycle storage and align car parking with local standards.

**Question 66 – Do you agree with Policy H10: Residential Extensions, Alterations, Annexes and Ancillary Accommodation?**

Total Number of responses received: 64					
Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
3	19	31	5	2	4

Summary of issues raised

The consultation responses reflect a wide range of views on Policy H10 (Residential Extensions, Alterations, Annexes, and Ancillary Accommodation), with a strong overall focus on ensuring good design, protecting neighbourhood character, and managing impacts on residential amenity. Sentiment was mixed but more towards the agree, with many respondents supporting the principles of the policy while raising concerns about implementation and enforcement.

Respondents who strongly agree or agree with Policy H10 generally supported that people could adapt their homes but that changes were regulated and in keeping with local character and amenity.

The key themes from the responses are:

- They felt that all development should be of good design, use appropriate/matching materials and not impact adversely on neighbouring properties or the locale. Proper implementation of Policy H10 is necessary to achieve this goal.
- One respondent felt that as needs change this gives the option to adapt.
- The respondent fully supports this policy. They felt that it's essential to keep extensions and conversions in keeping with the area's character. Borough Green's existing homes already fit beautifully with the surroundings, and this policy will help preserve that charm.
- They felt that good design and protecting residential amenity is very important.
- One respondent agreed with the statement but felt that it needs to be closely monitored.
- They highlighted only if it does not overdevelop a site and cause privacy and noise problems for surrounding neighbours. Also, it does not cause parking problems.

- One respondent said, 'People should be allowed to invest in their homes.'
- The respondent supports the design-led approach ensuring extensions respect local character and amenity. They feel that this policy is essential to maintain Borough Green's existing architectural character and should remain strongly enforced, particularly if future large-scale developments proceed nearby.
- They felt that the stated aims and objectives are reasonable but suitable planning officer resources must be available to monitor such proposals. Permitted Development proposals must also be closely scrutinised.
- There seems to be a shortage of larger houses so extending is one way to meet this need and these categories enable adaptations to meet changing needs.

Neutral respondents generally did not oppose Policy H10, but they provided issues of concerns focused more on implementation, clarity, and wider planning context than on the core aims of the policy. The key themes from their responses are:

- Alterations and extensions should still be well controlled.
- Currently, it seems that every other property is being extended as residents' needs change - this is not likely to change.
- A couple of respondents feel that Green belt land should be protected at all costs.
- One respondent made reference to Quality Traditional Design Codes with evidence from leading Academics and Architects.
- The respondent feels that policies on extensions, annexes and infill development should encourage the intensification of existing residential areas in order to deliver more dwellings within the existing settlement boundary. They state that while character and amenity should be considered, some change to building scale such as greater height or depth must be accepted if the policy is to reflect NPPF 2025.
- Restrictions should be put on repeated expansion and proper attention should be given to bending of the rules.

Only 2 respondents who strongly disagree or disagree provided comments on the policy and the 2 comments are:

- One respondent said 'I agree current policy is efficient enough, i do not think there needs to be any change'.
- The other respondent described his past experience of 'the monstrous re-build of a bungalow in Hartfield Close. This was agreed by the local council and then they said it should never have been given permission. It has blighted all our lives.'

The four respondents who did not select a sentiment made only brief comments. The key themes are:

- The respondent felt that it was better to extend (within reason) existing properties than build new ones.
- There was concern that extensions are a cause of concern if not properly controlled. An additional bedroom with no increase in toilets, living or storage space diminishes the quality of the housing stock.
- One respondent commented 'no comment for this area of focus'.
- One respondent noted that development should be well designed, in character, use appropriate materials, and avoid adverse impacts on the occupiers of adjoining dwellings or the locale.

#### Summary of feedback from Statutory Consultees

- **Southern Water** strongly supports strengthening Policy H10 to prevent rainwater from extensions and annexes being discharged into foul sewers. They emphasised the environmental and operational impacts of extensions, the need for stricter drainage controls, and the importance of sustainable drainage solutions. They referred to their ongoing work across the region to remove surface water from foul networks and provide further context through their published resources. Southern Water emphasised that planning policy, including Policy H10, should encourage the use of SuDS and take a stronger stance on the separation of surface water and foul water. They argue that planning policy must evolve to support proactive, integrated water management, recognising the complexities of drainage in the context of climate change. Their response calls for clearer policy wording to ensure compliance with national standards and promote climate-resilient, well-managed drainage infrastructure.

#### Summary of feedback from District / Boroughs

- There were no comments from District / Boroughs.

#### Summary of feedback from Parish Councils

- **West Malling Parish Council** agrees with Policy H10. Extensions and annexes are common in West Malling and must be designed sensitively particularly within or near the Conservation Area. The policy provides an appropriate framework to ensure alterations respect local character, avoid overdevelopment, and support the need for multigenerational living.

#### Officer response to the consultation feedback

Many respondents particularly those who strongly agree or agree, expressed support for ensuring extensions are well-designed and within the character of existing neighbourhoods. Many supported Policy H10's objectives but emphasised that its success depends heavily on robust monitoring, consistent enforcement, and clear guidance. There were consistent concerns about how well the policy is implemented in practice.

Officers consider that the policy sufficiently addresses design quality and character but recommend the following:

- Officers will review the supporting text to signpost how amenity impacts should be assessed, including cumulative extensions.
- Southern Water proposed specific wording to ensure rainwater drainage from extensions and annexes is not permitted to discharge into foul-only sewers. Officers support incorporating this requirement into both the policy wording and the supporting text. This amendment strengthens climate resilience and aligns with national SuDS standards.
- Officers will review and refine the policy and supporting text to respond proportionately to the consultation issues, strengthen environmental resilience, and improve clarity without altering the overall purpose of the policy.

**Question 67 – Is there anything you think is missing from our Housing policies?**

Total Number of responses received: 66			
Yes	No	Not Sure	Not stated
17	13	32	4

Summary of issues raised

A total of 66 responses was received with almost half of them responding not sure and not very much commentary.

Two respondents answered “Yes” without providing additional explanation and the rest of the respondents who indicated “Yes” generally expressed a range of concerns about the housing policy, infrastructure capacity, environmental protection, planning processes, and the impact of development on local communities. The key themes are summarised below:

- One respondent said ‘At what level will planning applications be decided?’.
- One respondent objects to the approach to housing needs set out in Chapter 10. They feel that the plan does not adequately address the requirements of the older generation. They feel that the plan should include more suitable

downsizing options, such as U.S-style retirement communities that allow older people to remain in their local area while freeing up family-sized homes. They also criticise the plan's reliance on rent-to-buy schemes, saying these are costly, insecure, and unsuitable for many households. Overall, they consider the current housing strategy does not meet the needs of all demographics and should be revised to include suitable downsizing options within the community and genuine pathways to home ownership.

- A couple of respondents highlight that Borough Green and its surroundings remain visually and environmentally green, despite reclassification as "Grey Belt, with mature habitats, natural drainage, and a strong rural character. They believe large-scale housing development would cause landscape, environmental, and community harm. They highlight existing congestion on local roads such as the A25, A227, and M26 junction and the absence of confirmed plans for essential infrastructure such as GP capacity, schools, and public transport. They state that the Local Plan must provide cumulative traffic assessment across Borough Green, Platt, and Wrotham, full environmental and flood-risk studies, an infrastructure-first delivery framework, and evidence that all brownfield options have been exhausted. Until those conditions are met, they consider the proposed Grey Belt allocations premature and unsound under national planning principles.
- The respondent questioned how will you ensure that any houses built are available for local people and not bought by investment companies, or other local authorities looking to clear out troublesome tenants?
- One respondent just commented 'Infrastructure'.
- The respondent feels the Local Plan will not solve local housing issues because new developments are unlikely to deliver genuinely affordable homes for local people. They argue that developers prioritise profit, often reducing non-market elements of schemes, and that TMBC must do more to counterbalance this. They question whether current developments are housing local residents, freeing up school places, or easing pressure on healthcare, and suggest that new homes may instead increase demand and traffic. They call for greater honesty and transparency about the real impacts of new development.
- Nobody seems to care what the local people feel. The Government just ride rough shod over any arguments against these schemes, you have to wonder why we bother.
- A respondent referenced Quality Traditional Design Codes with evidence from leading Academics and Architects.
- A respondent feels that planning applications in Hadlow and likely elsewhere in the borough regularly rely on outdated or inaccurate evidence, leading to misrepresentation of the true impacts on traffic, pollution, and already

overstretched local services. They highlight concerns that despite there being an ongoing hosepipe ban, there is apparently no legal requirement to consult the water supply companies. They believe that without enforceable requirements compelling developers to deliver necessary infrastructure and service improvements before new housing is built, the policy will have severe and permanent detrimental effects across the whole area.

- There is concern that housing delivery is not adequately meeting local needs. Evidence suggests a high proportion of new development is investor-led, with insufficient supporting infrastructure. Affordable housing policies should ensure clear local benefit, and accessibility standards should apply universally. Greater oversight of specialist and older persons' housing is also required to prevent long-term affordability issues.
- There is not enough information about plans to boost infrastructure where excessive housing is planned. The plan does not seem complete.
- We are grinding to a halt. Too many houses being built in the South East. Difficult to get a doctor's appointment or a hospital one. Traffic jams, pot holes road closures etc. making life difficult.
- They highlighted that including development in rural areas like Hildenborough in the plan is incorrect as infrastructure is already limited and you plan to sacrifice a lot of green areas very important to local community. Those green areas are supporting environment and wildlife and preserve the character of small villages like this and they do not support changing green belt categories. They have concerns that the policies do not consider the impact on people already living in the area. They feel that this should be especially protected due to environmental changes and needs.

13 respondents answered "No" which generally indicate that they did not believe anything was missing from the Council's housing policies. However only one of the respondents provided additional written comments. The summary of the comment is:

- The respondent feels that while the housing policies cover types and numbers, they lack key strategic elements needed for sustainable and locally appropriate delivery. They argue the plan does not clearly define local need, does not control developer behaviour (such as slow build-out, land banking, and reducing affordable housing), and fails to require infrastructure to be delivered before homes are built. They feel that rural villages lack a coherent strategy and risk inappropriate cumulative growth. They feel affordability standards do not reflect local incomes, and the plan does not provide a meaningful approach to housing for an ageing population. They also highlight weak enforcement mechanisms, insufficient focus on design quality, and a lack of a strong brownfield-first strategy. They feel that what is missing from Tonbridge & Malling's housing policies is not more categories of housing, but a sharper focus on who housing is

actually for, firm control over developer behaviour, Infrastructure-led planning, stronger rural protection and enforceable, monitored standards. Overall, they believe the plan accepts national housing targets without questioning their suitability and risks delivering housing numbers without delivering positive outcomes for local communities.

The majority of respondents chose “Not sure” and they generally expressed uncertainty about whether anything is missing from the housing policies. Their comments are summarised as:

- The respondent expresses strong concern about the impact of additional housing on school capacity, local roads, and essential infrastructure around Hildenborough. They argue that the B245 is already heavily used for school travel, public transport, and utility works, and regularly experiences congestion and closures. They believe new development would increase traffic, place pressure on overstretched primary and secondary schools, and create risks for emergency access. They highlight that many local children already cannot attend nearby schools and must travel further by car or bus, which affects their wellbeing, social opportunities, and education. They conclude that without improvements to the road network that feeds the B245 and A21 as well as the A225 junction to Sevenoaks, further development in this area would be unsustainable.
- Shared Housing models such as at Marmalade Lane, Cambridge, or the Older Women's Housing Collective be included.
- The government's view on parking spaces for properties is ridiculous and more parking provisions when designing developments should be made. Too many dangerously overcrowded residential streets, damaged pavements and roads blocked.
- The respondent questioned Will the safeguards against extensions be adequately controlled ?

A total of four respondents did not provide any response to whether they felt anything was missing but then provided comments on what they thought is missing. These included:

- Housing density and need to increase this at the expense of urban sprawl. The Council really doesn't seem to be doing enough to concentrate housing, particularly in the town centres.
- One respondent said they would like to see more council owned housing for rent.
- The respondent felt that the policy to build rented affordable accommodation will be managed by a management company. Their preference is for an old-style council accommodation to be built because they are wary of those private companies.

- The respondent expressed concern that the council will not enforce developers to provide enough genuinely affordable housing, provide facilities and amenities and enforce environmental protections.

#### Summary of feedback from Statutory Consultees

- There were no comments from Statutory Consultees.

#### Summary of feedback from District / Boroughs

- There were no comments from District / Boroughs.

#### Summary of feedback from Parish Councils

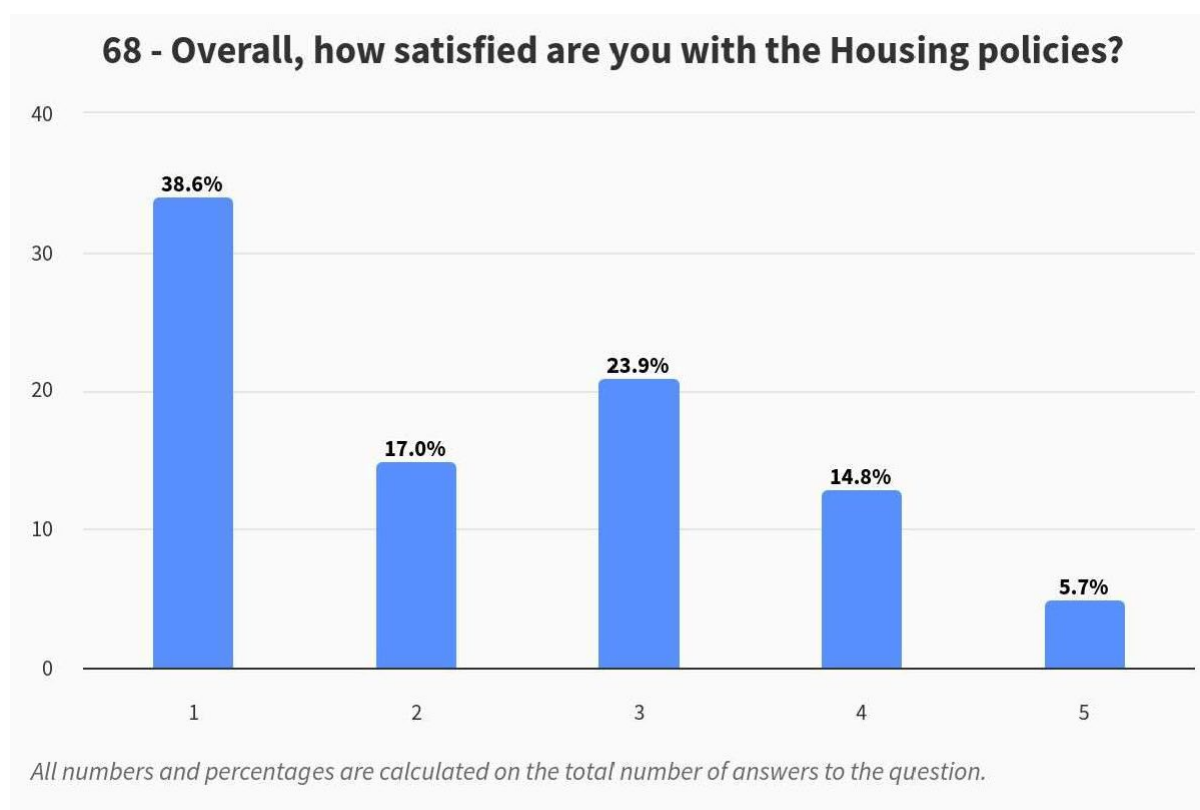
- **West Malling Parish Council** feels that there are 2 important elements that appear under-represented. They are:
  - Stronger guidance on small site infill development is needed. Policies would benefit from clearer criteria ensuring such schemes respect settlement pattern and historic fine grain and local character and green spaces and infrastructure capacity.
  - The role of Neighbourhood Plans in refining housing mix and design. West Malling is developing a Neighbourhood Plan that will include local design codes and area-specific guidance. A clearer link to neighbourhood-led evidence would ensure that local distinctiveness is fully reflected.

#### Officers response to the consultation feedback

The respondents covered themes including infrastructure capacity, environmental concerns, developer accountability, affordability challenges, and uncertainty about policy clarity.

Officers have noted these points and several areas overlap with previous comments made on the housing policies which will be reviewed and refined to ensure policies are robust.

**Question 68 – Overall, how satisfied are you with the Housing policies?**



**Officer response to the consultation feedback**

Of the 88 respondents to question 68, the majority indicated a score of not at all satisfied with the policies. Proposed amendments to individual policies and supporting text have been set out under respective question responses.

