

Policy A1: Allocation Sites

Regulation 18 Local Plan - Site allocations summary of consultation responses

Respondents

Out of 351 responses, 15 responses were from statutory consultees and other key organisations. Full responses for each draft site allocation can be seen in the comments record.

There was 1 main standardised response relating to Tonbridge – site TO1 (53 responses of objection). Respondents indicated the same themes: Incorrect Green Belt assessment; loss of BMV agricultural land; traffic delays and pollution; increased flood risks; adverse effects on Tonbridge town centre; flawed Land Availability Assessment; early delivery of essential infrastructure improvements; loss of biodiversity, including priority habitats; and presence of a strategic underground oil pipeline.

Where site promoter submissions have been made in relation to allocations, these will be considered as part of the next stage.

Breakdown of comments by site/settlement/other

Site/parish/other	Total responses
General comments	165
Omission site(s)	39
Unknown site(s)	3
Employment site(s)	4
Aylesford	4
Borough Green	12
East Malling	1
East Peckham	6
Hadlow	2
Hildenborough	13
Inhtham	1
Kings Hill	10

Platt	2
Snodland	7
Tonbridge	70
West Malling	6
Wouldham	2
Out of Borough/Misc	4
TOTAL	351

Summary of key themes for proposed site allocations in Platt Parish

Site or settlement	Key themes
General comments	<ul style="list-style-type: none"> • Not all sites suitable • Loss of identify for rural villages • Settlement hierarchy • Additional sites need to be allocated • Insufficient detail on proposed allocations • Deliverability and over reliance on high potential • Ambitious Local Plan timetable and impact on sound infrastructure planning; • Reliance on sites with known delivery issues • Offer of technical assistance • Landscape, biodiversity and green/blue infrastructure • Allocations should be informed by evidence base • Assess potential effects on heritage assets • Impact of proposed site allocations on health infrastructure • Mitigation will be required for any loss of sport or recreation facilities • Impact on ancient woodland: numerous sites in A1. • Exclude ancient woodland from site red line - 50m buffer zone • Survey of ancient trees and veteran trees (in addition to Ancient Tree Inventory) • Request for location information to assess sites for mineral or waste safeguarding implications • Gap in evidence – minerals/waste assessments • Soft sand potential in Borough Green area

	<ul style="list-style-type: none"> • Infrastructure concerns <ul style="list-style-type: none"> – Roads, traffic, congestion, parking, public transport, schools, GP/dental/health services, utilities (water supply, sewage capacity, energy). – Strong expectation that <i>infrastructure must come first</i> before any new housing. • Green Belt / countryside protection <ul style="list-style-type: none"> – Opposition to building on Green Belt, AONB, agricultural land, wildlife habitats, biodiversity corridors. – Objection to “Grey Belt” reclassification. • Environmental impacts <ul style="list-style-type: none"> – Concerns about loss of nature, woodland, habitats, farmland, views, landscape character. – Flood risk, surface water management, sewage overflow, climate resilience. • Scale and distribution of development <ul style="list-style-type: none"> – Developments perceived as <i>disproportionate</i>, especially in specific villages (Hildenborough, Borough Green, Snodland, East Malling, Tonbridge). – Calls for a more even spread across the borough or creation of new settlements. • Brownfield-first preference <ul style="list-style-type: none"> – Strong view that brownfield has not been properly tested/explored before greenfield release. • Settlement identity & community character <ul style="list-style-type: none"> – Fear of villages merging, loss of rural character, urban sprawl, harm to heritage and local distinctiveness. • Housing numbers & government targets <ul style="list-style-type: none"> – Many see the housing requirement as unrealistic, imposed, and excessive. – Concerns about deliverability and whether homes are needed/affordable/for local people. • Plan evidence base & soundness criticisms <ul style="list-style-type: none"> – Claims that assessments (GB, transport, flooding, capacity) are flawed, incomplete, or inconsistent. – Challenges regarding deliverability, cumulative impacts, and fragmented land ownership. • Traffic and transport-specific issues <ul style="list-style-type: none"> – Single access roads, narrow/rural lanes, rat-running, unsafe junctions, increasing air/noise pollution. • Water supply and drainage <ul style="list-style-type: none"> – Persistent hosepipe bans, leaks, undersized treatment works, inadequate drainage cited repeatedly. • Community facilities & quality of life <ul style="list-style-type: none"> – Fear of overloading shops, libraries, parks, recreation,
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	<p>pharmacies.</p> <ul style="list-style-type: none"> – Concern about declining wellbeing, noise/light pollution. • Wildlife & ecology <ul style="list-style-type: none"> – Loss of habitats, species decline, ancient woodland, hedgerows, protected sites (SSSI). • Fairness and transparency <ul style="list-style-type: none"> – Concerns about lack of consultation, unclear methodology, perception that decisions are predetermined. • Supportive views (minority but present) <ul style="list-style-type: none"> – Some say allocations are reasonable, necessary, follow government requirements, or protect other areas. – Support for brownfield-first, good design, concentrating development in sustainable locations. • Site-specific objections <ul style="list-style-type: none"> – Repeated strong opposition to: <ul style="list-style-type: none"> • Hildenborough sites (HI1/HI2/TO3/TO4) • Borough Green large allocations • Holborough / Snodland / Eccles • East Malling • Higham Lane / Cuckoo Lane (Tonbridge) • Kingfisher Lakes • North Downs areas near AONB • Alternative solutions proposed <ul style="list-style-type: none"> – New towns, CLTs, brownfield intensification, higher density near stations, repurposing vacant properties
Omission site(s)	<p>Omission sites referred to:</p> <ul style="list-style-type: none"> • Drayhorse Meadow Fields, Wateringbury • Land South of Noble Tree Road • Basted Lane, Crouch • Land South Of Borough Green Road (A25) And East Of Dark Hill Road, Borough Green • Land at West Malling Golf Club • Site off Hermitage Court, west of Hermitage Lane • land West of Chapel Street • Land East of Hale Street, East Peckham • Land at Teston Road, Kings Hill • Land at Maidstone Road, Hadlow • Land South of Lower Haysden Lane, Tonbridge • Land north of Wrotham Bypass at Ivy Hall Farm, Wrotham • Land at Station Approach, West Malling • Land at Frogbridge Wood, Tonbridge • Land at Former Quarry House, 81 Quarry Hill Road, Borough Green Kent (Millbourne Place)

	<ul style="list-style-type: none"> • Land east of Borough Green Road, Wrotham • Ivy Farm, East Malling • Paris Farm, East Malling • Site 58541: 31a Lavender road and Catlyn Close Garages, East Malling • Land South of Fosse Bank School • Land at West Malling (Site Reference 59699) • Site at Tannery Road, Tonbridge • BWY site, Kings Hill • Site Reference 59716 • Oast Park, Birling (LAA Ref: 68458) • Larkfield & New Hythe FC (LAA Ref:59718) • Site 75061: Land at Mabledon, South of A21, Tonbridge • Site 68425: Dark Hill Farm • Former Marley Tiles • Site 68387: Park Drive, Wrotham TN15 7BZ • 68458 - land off Sandy Lane" (also known as Oast Park • Land North of East Park Road Site • Capel Morris Community Centre • Land off Hall Road, Royal British Legion Industries • Royal British Veterans Enterprise Staff Car Park • Eastern Parcel (land south of East Park Road and north of London Road) Site 6: London Road (2 semi-detached properties)
Unknown site(s)	<ul style="list-style-type: none"> • Reference to PDF • Site not referenced
Aylesford	<ul style="list-style-type: none"> • Welcome use of brownfield sites • Impact on North Downs National Landscape • Loss of agricultural land • Impact on rural settlement character and pattern ME20 • Impact on highways network • Impact on health infrastructure
Employment site(s)	<p>E1</p> <ul style="list-style-type: none"> • Impact on surrounding villages • Impact on highway <p>E5</p> <ul style="list-style-type: none"> • Traffic impact;
Borough Green	<p>Site 59830 & 59843</p> <ul style="list-style-type: none"> • Relief road • Impact of water infrastructure (sewage) • Impact on Green Belt • Green Belt assessment flawed

	<ul style="list-style-type: none"> • Impact on National Landscape • Impact on ancient woodland • Impact on health infrastructure • Construction noise • Impact on air quality during construction • Impact on public transport infrastructure • Settlement hierarchy and settlement boundaries • Impact on highway network
East Malling	<p>EM1</p> <ul style="list-style-type: none"> • Site located in green gap Site 59824 • Planning permission granted for 150 homes
East Peckham	<ul style="list-style-type: none"> • Impact of allocations on rural settlement pattern; loss of identity; amalgamation of settlements; impact on character • Significant constraints – flooding and flood risk; highways; settlement strategy; social infrastructure; design; geotechnical feasibility; utilities provision; land ownership; loss of biodiversity and habitats; extent of mitigation measures • Question deliverability of allocations • Local Plan – flood sequential testing • Investigate land not for sale/available for development • Remove East Peckham site allocations in absence of further investigation • Sequential testing and exceptions test • Query whether all non-Green Belt land allocated for development and prioritised • Test a re-distribution option that reduces EP2/HS1 • Watlington, West Peckham and Mereworth sites supported over East Peckham • Call for publication of AI models used and associated information on processes used for the Regulation 18 consultation • Concern about the use of AI in analysing R18 comments
Hadlow	<p>Site 59811</p> <ul style="list-style-type: none"> • Green Belt Loss, Landscape Harm & Infrastructure Failure • Impact on landscape and settlement character • Unsustainable transport position • Flooding and drainage concerns <p>Site 59806</p> <ul style="list-style-type: none"> • Overdevelopment • Access constraints

	<ul style="list-style-type: none"> • Infrastructure deficit • Sites are unsound; unjustified; ineffective; inconsistent with national policy and not legally compliant
Hildenborough	<ul style="list-style-type: none"> • Excessive and disproportionate housing numbers for a Primary Village, • Impact on Hildenborough's character and causing urban sprawl. • Green Belt loss and countryside harm • No evidence of exceptional circumstances • Inadequate landscape/biodiversity assessment. • Severe infrastructure constraints (roads, schools, healthcare, utilities) with no clear delivery plans or modelling for cumulative impacts. • Significant flood risk, especially at HI2, with inadequate mitigation, incomplete testing, and existing local flooding already documented. • Allocations seen as poorly justified and premature, lacking full evidence, wrongly classified in settlement hierarchy, and overlooking brownfield alternatives.
Inhtham	<p>IG1</p> <ul style="list-style-type: none"> • Impact on Listed Buildings • Site access • Highway safety (pedestrians) • Existing use • SA is flawed • Impact on local transport infrastructure
Kings Hill	<ul style="list-style-type: none"> • Object to site allocations KH1-KH7
Platt	<ul style="list-style-type: none"> • Impact on infrastructure • Need for speed cameras • Impact on highways network – reroute HGVs/bypass • Impact on health infrastructure
Ryarsh	<p>RY1</p> <ul style="list-style-type: none"> • impact on school place at Ryarsh Primary School
Snodland	<p>SN1</p> <ul style="list-style-type: none"> • SN1 - Mitigation with appropriate infrastructure • Impact on local services • Impact on local highway network • Anti-social behaviour • Impact on health infrastructure • Impact on green space • Impact on North Downs National Landscape • Impact on public rights of way

Tonbridge	<p>TO1</p> <ul style="list-style-type: none"> • Incorrect Green Belt assessment • loss of BMV agricultural land • traffic delays and pollution; increased flood risks • adverse effects on Tonbridge town centre • flawed Land Availability Assessment • early delivery of essential infrastructure improvements • loss of biodiversity, including priority habitats • presence of a strategic underground oil pipeline Tonbridge • loss of parking for housing • impact on infrastructure <p>TO3</p> <ul style="list-style-type: none"> • Impact on oak trees • Impact on biodiversity • Impact on public footpath • Loss of agricultural land • Site access • Highways safety and traffic management
West Malling	<p>Land off Offham Road</p> <ul style="list-style-type: none"> • Support the non-allocation of site • Support prioritising brownfield land • Support Green Belt protection • Preference for large strategic sites • Protection of local heritage assets • Protection of green assets and corridors • Support protection of biodiversity West Malling • Impact on local infrastructure – education; health • Impact on parking capacity • Impact on local road network
Wouldham	<p>WO1</p> <ul style="list-style-type: none"> • Impact on local road network • Impact on local parking
Out of Borough/Misc	<p>Comments relating to</p> <ul style="list-style-type: none"> • Edenbridge • Birling

Responses from statutory consultees and other key organisations

The following organisations provided a response to draft employment allocations. These will be considered in further work to progress the Local Plan.

Site/Parish Other	Consultee	Key matters raised
General	APC	<ul style="list-style-type: none"> • Not all sites suitable • Loss of identify for rural villages
SN1 – Snodland RY1 – Ryarsh E5 – Spiders Hall	Birling Parish Council	<ul style="list-style-type: none"> • SN1 - Mitigation with appropriate infrastructure • RY1 – impact on school place at Ryarsh Primary School • E5 -traffic impact;
59830 Borough Green 49843 Crouch Lane	Borough Green Parish Council	<ul style="list-style-type: none"> • Relief road • Impact of water infrastructure (sewage) • Impact on Green Belt • Green Belt assessment flawed • Impact on National Landscape
General	CPRE Kent	<ul style="list-style-type: none"> • Insufficient detail on proposed allocations • Ambitious Local Plan timetable and impact on sound infrastructure planning;
East Peckham site allocations	East Peckham Parish Council	<ul style="list-style-type: none"> • Impact of allocations on rural settlement pattern; loss of identify; amalgamation of settlements; impact on character • Significant constraints – flooding and flood risk; highways; settlement strategy; social infrastructure; design; geotechnical feasibility; utilities provision; land ownership; loss of biodiversity and habitats; extent of mitigation measures • Question deliverability of allocations • Local Plan – flood sequential testing • Investigate land not for sale/available for development

		<ul style="list-style-type: none"> • Remove East Peckham site allocations in absence of further investigation • Sequential testing and exceptions test • Query whether all non-Green Belt land allocated for development and prioritised • Test a re-distribution option that reduces EP2/HS1 • Watringbury, West Peckham and Mereworth sites supported over East Peckham • Call for publication of AI models used and associated information on processes used for the Regulation 18 consultation • Concern about the use of AI in analysing R18 comments
General	Environment Agency	<ul style="list-style-type: none"> • Offer of technical assistance • Landscape, biodiversity and green/blue infrastructure
General	Historic England	<ul style="list-style-type: none"> • Allocations should be informed by evidence base • Assess potential effects on heritage assets
General	Kent County Council	<ul style="list-style-type: none"> • Request for location information to assess sites for mineral or waste safeguarding implications • Gap in evidence – minerals/waste assessments • Soft sand potential in Borough Green area
Kings Hill	Kings Hill Parish Council	<ul style="list-style-type: none"> • Object to site allocations KH1-KH7
General	Maidstone Borough Council	<ul style="list-style-type: none"> • Reference to Council response to specific sites
General	NHS Kent and Medway Integrated Carre Board	<ul style="list-style-type: none"> • Impact of proposed site allocations on health infrastructure
General	Sport England	<ul style="list-style-type: none"> • No comment on specific sites • Mitigation will be required for any loss of sport or recreation facilities

General	Southern Water	<ul style="list-style-type: none"> • Longer term planning horizons should be provided in cases where major development is likely to require strategic asset investment, for example expanding wastewater treatment works (WTW). • Comments on specific sites in relation to: <ul style="list-style-type: none"> ▪ AY1 - 500m of a strategic operational wastewater treatment works (WTW) ▪ AY1 - safeguarding of strategic utilities sites ▪ Source Protection Zones: AY1, AY3, BG1, BG2, EM1, E1, E2, E9, IG1, IG2, MG3, MG4, TO7, TO8, TO10. ▪ Critical sewers and assets that a developer cannot divert or build over: AY1, AY2, E5, E7, EP1, HS1, MG3 ▪ 10 metres of operational pumping stations – E4, KH1, MG3, TO6
General	The Woodland Trust	<ul style="list-style-type: none"> • Impact on ancient woodland: numerous sites in A1. • Exclude ancient woodland from site red line • 50m buffer zone • Survey of ancient trees and veteran trees (in addition to Ancient Tree Inventory)
75061 Mabledon, Tonbridge	Tunbridge Wells Borough Council	<ul style="list-style-type: none"> • Omission site • Call to acknowledge and support TWBC adopted allocation in TMBC Local Plan