

Tonbridge Parish

Regulation 18 Local Plan - Site allocations summary of consultation responses

Respondents

Out of 605 responses, 19 responses were from statutory consultees and other key organisations. Full responses for each draft site allocation can be seen in the comments record.

There were 289 standardised responses. In summary this response expressed strong objection to Policy A1, concerns about the impact of the cumulative development causing unacceptable and irreversible harm to the local environment, landscape and community, loss of Best, Most Versatile (BMV) Agricultural Land, loss of biodiversity and loss of greenbelt and designation as grey belt.

Where site promoter submissions have been made in relation to allocations, these will be considered as part of the next stage of plan making and have not been summarised below.

How do you feel about the site?

Site / Settlement	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Not stated	Total responses
TO1	11	445	1	8	1	34	500
TO2	1	4	1	2	1	2	11
TO5	1	26	1	1	4	5	38
TO6	0	11	1	2	1	0	15
TO7	0	1	1	0	4	2	8
TO8	0	2	0	4	2	0	8
TO9	0	2	0	2	3	0	7
TO10	0	0	0	0	0	0	0
Tonbridge general	2	10	0	0	0	6	18
Tonbridge settlement total	15	501	5	19	16	49	605

Summary of key themes for proposed site allocations in Tonbridge Parish

The following table sets out a summary of key themes from the consultation responses received. All comments made are available to view, alongside any additional information that consultees submitted alongside their consultation responses. Comments and information received will be considered further as we progress the Local Plan.

Site or settlement	Key themes
TO1 - Land north east of Tonbridge	<ul style="list-style-type: none"> • Strongly object to Policy A1 • Traffic and Road capacity • Town centre is already beyond capacity including parking • Increased air pollution • Insufficient infrastructure and services • Inadequate water supply and low water pressure • Drainage infrastructure capacity • Increased flood risk • Loss of Best, Most Versatile agricultural land / farmland • Loss of biodiversity and environmental impacts • Loss of wildlife and habitats • NPPF non-compliance • Loss of Green Belt Land and Designation as Grey Belt • Healthcare at capacity • Schools at capacity • Brownfield sites first • Green Belt protection at Offham Road • Preference for large strategic sites instead • Protect the character and heritage of West Malling • Encroachment and urban sprawl • Protect green corridors • Question the assessment of housing need • The interactive map is not easy to navigate • Allocation is too extensive and density too high • Secure a safe cycling facility between Hadlow, Higham Wood and central Tonbridge • Cumulative effect of the proposed development • An underground oil pipeline runs through Grange Farm, Site 59690 • An alternative suggestion for use of those fields would be to build a reservoir • Suggestion of a park and ride system • The land availability assessment is inconsistently applied • The latest green belt assessment contradicts the 2016 green belt study • Strongly disagree with policies SP7 and SP8 • Strongly disagree with Policies NE8, NE10, INF1, INF2, INF3, INF4

	<ul style="list-style-type: none"> • Strongly disagree with Policies NE1, NE3, NE4, NE5, NE7
TO2 - Coblands Nurseries and Little Trench Farm	<ul style="list-style-type: none"> • Insufficient infrastructure and services • Traffic and Road capacity • Healthcare at capacity • Schools at capacity • Parking concerns • Commuter trains into London at capacity • Flooding and drainage • Loss of green space • Coalescence concerns • Loss of views across the Medway Valley • Environmental concerns • Too many houses and cumulative impact of development • Concerns about social support services
TO5 - Land at south west Tonbridge	<ul style="list-style-type: none"> • Infrastructure capacity • Loss of green belt and impact on air pollution • Traffic congestion and Road capacity • Schools at full capacity • Healthcare at capacity • Inadequate water supply or water treatment facility • Cycling infrastructure upgrades needed • Green belt release justification is questionable • Encroachment and urban sprawl concern • Forms the setting of Haysden Conservation Area • Brownfield first • Contrary to the NPPF • Questions the Green Belt Assessment and grey belt designations • Loss of Productive Agricultural Land • Harm to the local environment, landscape and community • Haysden Groundwater flood risk • Bus services should be considered • Impact on wildlife and biodiversity • Build small cheap starter homes
TO6 - Land behind Vauxhall Gardens	<ul style="list-style-type: none"> • Loss of Greenbelt Land • Site access is unsafe, unsuitable and constrained by a listed building on one side and TPOs on the other side • Road capacity • Unsuitable for high density • Light pollution • Harm to residents amenity • Impact on the character of the area • Impact on existing homes – overlooking and loss of privacy

	<ul style="list-style-type: none"> • Insufficient infrastructure and local services • School capacity issues • Pressure on healthcare services • Traffic, parking and highway safety issues • Loss of biodiversity and environmental impacts • Loss of local wildlife and habitats • Design guidelines • Good quality starter homes - at affordable prices • Non compliance with the NPPF
T07 - Land North of Priory Road	<ul style="list-style-type: none"> • Opportunity to enhance the station area • Improve the community infrastructure of the Priory Rd area • High-density mixed-use development • Parking concerns • Road and pavement needs widening • Footway should be provided along the frontage • Drainage capacity • Pressure on healthcare services • School capacity issues • It has good road links and commuter links • It also is on land previously developed and therefore isn't taking any green space
T08	<ul style="list-style-type: none"> • Increased traffic • Increase on local services, such as GP • Removal of parking areas when there is little enough parking spaces now • Insufficient number of units for this brownfield site • Tonbridge should be looking at a higher density of housing, particularly in the town centre • This should go taller and provide more dwellings at this highly sustainable location • Hopefully, a good quality development can be carried out which enhances this part of the town • It will connect the high street along the river to the new angel centre
T09	<ul style="list-style-type: none"> • Very sustainable site that should be developed at high density • Suggest some ground floor leisure uses • Limited parking for these apartments and encourage a car club • Good use of the land • Help to make the area more attractive • Good for the local economy to have the new angel centre built here • Insufficient number of units for this brownfield site

	<ul style="list-style-type: none"> • A higher density of housing • Loss of car parking spaces - Parking is key to allow the business in the high street to survive • Stop selling off capital assesses within the town for short term gain - Support local shops and businesses
TO10	<ul style="list-style-type: none"> • No comments
Tonbridge general	<ul style="list-style-type: none"> • Infrastructure capacity issues • Traffic and Road capacity • Safety of the local road network • Shortfall in local services - more shops needed • Schools at capacity • Loss of Greenbelt • No houses on floodplains • A proper cycling network of paths • Cumulative impact of overlapping developments • Disagree with the definition of the grey belt • Loss of Class A1 farmland • Flood risk issues • It is not clear where the egress from these developments will be • Water supply issues • Drainage capacity issues • Gas and electricity supply infrastructure would be a challenge • Question the demand for the number of these new homes • Question the definition of "affordable housing" • The whole basis of affordability is unsound • Gibson West Building TMBC offices at Kings Hill should be housing • Impact to wildlife and loss of biodiversity • Healthcare provision at capacity • Irreversibly damage the environmental quality • Loss of landscape character and identity • Cause fragmented green corridor • Surface water issues • Non compliance with national planning policy • Need more reservoir capacity and better, newer drain systems and sewage works • Increased pollution • Loss of green belt

	<ul style="list-style-type: none"> • CPRE Kent • Tonbridge and Malling Green Party 	<ul style="list-style-type: none"> • Unsustainable adverse effects on Tonbridge town centre • Land Availability Assessment that is flawed and inconsistent with other sites • Lack of essential infrastructure improvements and mitigation • Lack of commitment to early delivery of essential infrastructure improvements • Loss of biodiversity, including priority habitats • Presence of a strategic underground oil pipeline • Object to the allocation of this green belt site for residential development • Query grey belt in Table 9 • Environmental risks • Extensive mitigation which adds to uncertainty to the delivery of the site • Queries findings of the latest Green Belt Assessment contradicting the 2016 Green Belt study • NPPF compliance concerns • Loss of agricultural land
TO2 - Coblands Nurseries and Little Trench Farm	<ul style="list-style-type: none"> • Natural England • Tonbridge Angels Football Club 	<ul style="list-style-type: none"> • Any development should take account of potential impacts on ancient woodland. • Consider the impact of the development on the Club and possible loss of land.
TO5 - Land at south west Tonbridge	<ul style="list-style-type: none"> • Environment Agency • Natural England 	<ul style="list-style-type: none"> • Majority of site is FZ1, with remainder in FZ2. Risk in FZ2 will increase with climate change. Those parts of FZ2 likely to become FZ3 • Should have appropriate mitigation to accommodate potential increased flood risk • Landscape mitigation

	<ul style="list-style-type: none"> • Tonbridge and Malling Green Party 	<ul style="list-style-type: none"> • Retain landscaping features and integrate into green infrastructure • Queries findings of the latest Green Belt Assessment contradicting the 2016 Green Belt study • Unacceptable encroachment on the Haysden Conversation Area • Coalescence concerns • A full Conservation Appraisal should be carried out for Haysden Conservation Area • Harm to the setting of the National Landscape • Urban sprawl
TO6 - Land behind Vauxhall Gardens	<ul style="list-style-type: none"> • No comments 	<ul style="list-style-type: none"> • No comments
TO7 - Land North of Priory Road	<ul style="list-style-type: none"> • Environment Agency • Network Rail Property (Southern) • Swann Engineering Group Ltd 	<ul style="list-style-type: none"> • Majority of site is FZ2, with remainder in FZ1. Risk in FZ2 will increase with climate change. Those parts of FZ2 likely to become FZ3 • Should have appropriate mitigation to accommodate potential increased flood risk • NR supports the allocation of the Priory Road site • seek a minimum of three storeys and explore options up to five or six • the allocation yield should be increased • suggests this could deliver approximately 159 to 265 dwellings • Traffic and road capacity • Parking shortage
TO8	<ul style="list-style-type: none"> • No comments 	<ul style="list-style-type: none"> • No comments
TO9	<ul style="list-style-type: none"> • No comments 	<ul style="list-style-type: none"> • No comments
T10	<ul style="list-style-type: none"> • No comments 	<ul style="list-style-type: none"> • No comments
Tonbridge general	<ul style="list-style-type: none"> • Environment Agency 	<ul style="list-style-type: none"> • TO8, 9 and 10 are completely or have a majority of area within Flood Zone 3

	<ul style="list-style-type: none"> • Tunbridge Wells Borough Council • High Weald National Landscape 	<ul style="list-style-type: none"> • The Flood Risk Assessment must demonstrate full compliance with the Exception Test • Pedestrian access routes should be designed to maximise the ability of future residents • Emergency services, to access/exit the Sovereign Way North 68471 TO9 Housing 122 61% FZ3, 26% FZ2 The River Centre 58846 T10 Housing 118 97% FZ3a developments safely during flood events, to a place within the wider community of lower flood risk • The transport evidence provides little information on the mitigation for roads and junctions close to Paddock Wood • More consideration to be given to mitigation of cumulative highway impacts from development in Tunbridge Wells borough and Tonbridge and Malling district • Note that there are no site-specific policies in the Reg 18 draft Local Plan • Potential adverse impacts of two of the proposed three site allocations in the setting of the High Weald National Landscape • Advise that site-specific policies should be included in the next iteration of the draft Local Plan, for those sites within the setting of the HWNL • TO6 (68419) Land adj to Vauxhall Gardens and the Vauxhall Inn, Vauxhall Lane, Tonbridge (75 dwellings). Residential development on this site is considered unlikely to affect the setting of the HWNL. A site-specific policy should address external lighting and should require the retention and protection of the
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	<ul style="list-style-type: none"> • Tonbridge Historical Society 	<p>existing wooded boundary to the south.</p> <ul style="list-style-type: none"> • E8 (68414) land at Sanderson Way and Little Postern, Tonbridge 10,179sqm B2/B8 employment. Light industrial development on this site is considered in principle unlikely to adversely affect the setting of the HWNL. A site- specific policy should address matters of overall scape of development, the building height of commercial buildings, and of external lighting. • TO5 (59756 & 68456) Land to south west, Tonbridge 423 dwellings. The principle of residential development on this site is considered unlikely to have significant adverse effects on the setting of the HWNL It is not clear whether the proposed 423 dwellings for this allocation represents the small/medium scale of development (in terms of density defined on p3 of the LVA) that the LVA considers there may be potential for, or the large scale development that the LVA considers would be harmful to the HWNL. Clarity needed on quantum and location of development and where strategic buffer planting should be. <ul style="list-style-type: none"> • Lack of previous excavations should not be taken as evidence of low archaeological value • A number of the proposed development locations are in close proximity to known documented research and archaeological finds • Need to find innovative solutions to address the enhanced traffic flow caused by new development • Mitigating and improving the impact of the additional demands on the towns services
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	<ul style="list-style-type: none"> • Tonbridge and Malling Green Party 	<ul style="list-style-type: none"> • Tonbridge developments cumulative impact will cause unacceptable and irreversible harm to the local environment, landscape and community • Conflicts with Policy NE8 and the NPPF • Fails to define a vision • Objection to the wider impacts of the spatial strategy • Cumulative impact of development. • Housing target does not reflect actual need • Primary school at capacity • Road network at capacity • Parking issues • Increased traffic • Significant negative impact on the character of the town • Incapable of adequately servicing the needs of new and existing residents • Water and sewage systems at capacity • Community or shopping facilities are needed • The area is poorly served by public transport • KCC admits that the North Farm Transfer Station will be at capacity within 5 years • Poor active travel route • Increased pollution • Flood risk • Loss of Biodiversity • Loss of agricultural land
	<ul style="list-style-type: none"> • Member of Parliament for Tonbridge 	<ul style="list-style-type: none"> • Loss of highly valued agricultural land • Clarity needed on agricultural classification of some parcels of land and how this has been applied by TMBC

		<ul style="list-style-type: none">• Green belt concerns and Grey belt assessment• Local road network at capacity• Traffic issues• Water and sewage systems at capacity• Surface water drainage issues• Underground oil pipeline of national importance which runs through Grange Farm• Primary education in south Tonbridge at capacity• Flooding issues• Assess in detail the impact of this development on Trench Road• Need for a safe access on to A227 Shipbourne Road• Infrastructure concerns• Healthcare facilities at capacity
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