

Tonbridge & Malling Borough Council Local Plan Site Selection Topic Paper

1. Introduction

1.1. Purpose

- 1.1.1. The purpose of this Paper is to explain the process that the Council followed for the selection of development sites that feature in the submitted Local Plan.
- 1.1.2. The Spatial Strategy Topic Paper explains the strategic top-down influences that have shaped the scale and broad distribution of the strategy across the borough. This Topic Paper explains why the selected sites that feature in the submitted Plan fit in with the spatial strategy to make a sound Local Plan. As a reminder, the key strategic influences that shaped the broad spatial strategy are:
 - Housing Requirement
 - Housing Pressure affordability ratio
 - Housing Market Areas exerting an influence across the borough
 - Housing Market Capacity (Absorption Rate)
 - Settlement Hierarchy
 - Availability of suitable development sites
 - Employment land need
 - Desire to deliver significant pieces of infrastructure to benefit local communities
 - Sustainability Appraisal
- 1.1.3. In addition to these strategic influences the site selection process was informed by local bottom-up pieces of evidence, including:
 - A20 VISUM Study (March 2018 + Update March 2019)
 - Transport Assessment (June 2018) + Addendum (August 2018)
 - Strategic Land Availability Assessment (March 2018)
- 1.1.4. The Council also took account of responses received during the consultation on the Regulation 18 version of the Local Plan (September) when determining the selection of sites in the submitted Plan.

1.1.5. This Paper does not explain the rationale for the broad spatial strategy nor does it explain the exceptional circumstances for the removal of specific sites from the Green Belt or the alteration to its outer boundary. These are covered in other separate Topic Papers.

2. Site Selection

2.1. Site Selection - Outlined

2.1.1. Set out below is the chronological order of the site selection process, highlighting the key pieces of evidence and influences:



2.1.2. The following sections takes each of these stages in turn, explaining in detail the process that was followed.

2.2. Site Selection - Call for Sites Exercise (April 2014 – September 2015)

2.2.1. This exercise took place between April 2014 and 1st September 2015. The purpose of the 'Call for Sites' exercise was to provide an opportunity for land owners, developers, parish councils and others to promote sites to be assessed for their suitability and deliverability for development. The Government's Planning Practice Guidance (PPG) provided the starting point for how the exercise was undertaken. In response to this exercise the Council received approximately 250 sites.

- 2.2.2. **Constraints** In assessing the submitted sites the Council took account of those issues which are beyond the control of the Council but which preclude or highly restrict development, eg Special Areas of Conservation, Sites of Special Scientific Interest and, for more vulnerable uses such as residential development, areas at high risk of flooding. Those sites wholly covered by these constraints were assessed as unsuitable. Where part of a site was covered by a high-level constraint, this area was discounted from the potential developable area. The assessment of constraints did not take account of those matters that are shaped through the making of the Local Plan, eg the Green Belt.
- 2.2.3. **Suitability** The suitability assessment took account of the proximity of the site to public transport nodes, shops, schools and healthcare facilities.
- 2.2.4. **Availability** This assessment focussed on ownership and whether or not there were any potential barriers to bringing forward the sites during the plan period.
- 2.2.5. **Achievability** This involved an assessment of whether or not there were abnormal costs associated with bringing forward the site for development during the plan period, eg significant remedial work, which may impact on viability and therefore deliverability.
- 2.2.6. **Outcomes** The outcome from this assessment was the following categorisation of the sites:



- 2.2.7. The details of the assessment, including the projected yields and phasing are documented in the Strategic Land Availability Assessment (SLAA) (March 2018) which is explained below. The SLAA is available from the Local Plan Examination Library web page: www.tmbc.gov.uk/lpexamlibrary.
- 2.2.8. Those sites assessed as 'suitable and deliverable' and 'suitable but undeliverable' provided the starting point for the assessment of development strategy options for the Local Plan, including reasonable alternatives. This process and the outcomes are documented in the Interim Sustainability Appraisal Report (September 2016) – see section 2.4 below.

2.3. Site Selection - Desire to Deliver Significant Pieces of Infrastructure to Benefit Communities

- 2.3.1. The Spatial Strategy Topic Paper highlights that in preparing the Local Plan the Council wanted to secure opportunities for the delivery of significant pieces of infrastructure for the benefit of existing as well as new communities and for the local environment, i.e. transformational infrastructure. This objective informed the selection of strategic sites and the policies that were prepared to shape them.
- 2.3.2. For example, the Borough Green Gardens allocation includes as an integral part of the policy (LP29 in the submitted Plan), the requirement for the construction of a relief road. This relief road builds upon a proposed by-pass the need for which has been established for at least 40 years, featuring in several generations of Development Plans and numerous iterations of the Kent Local Transport Plan. This is explained in more detail in the Para.116 Topic Paper.
- 2.3.3. Another example is the proposed allocation north of Kings Hill at Broadwater Farm. This requires, as an integral part of the policy (LP30 in the submitted Plan) the provision for a secondary school (land for and a proportionate contribution to). This was included in response to the Education Commissioning Plan produced by Kent County Council which identified the need for an additional secondary school within the broad area overlapping the border between Tonbridge & Malling Borough Council and Maidstone Borough Council. Given the typical wide catchment area for secondary schools, this significant piece of infrastructure will benefit more than just the immediate community.
- 2.3.4. In response to other pieces of evidence (see below) and in light of local issues such as Air Quality Management Areas the Council also sought solutions to help improve local conditions through the provision of additional highway infrastructure to alleviate pressure points.
- 2.3.5. To ensure these important, significant pieces of infrastructure are delivered, the requirements for their provision are not only detailed within the relevant policies in the Local Plan but also with the Infrastructure Delivery Plan (IDP). The IDP is available from the Examination Library web page: www.tmbc.gov.uk/lpexamlibrary.

2.4. Site Selection - Interim Sustainability Appraisal (September 2016)

2.4.1. The Interim Sustainability Appraisal (SA) Report was prepared to inform the decision-making on the broad development strategy in the Regulation 18

Local Plan. This is available from the Examination Library web page: www.tmbc.gov.uk/lpexamlibrary.

- 2.4.2. The Interim SA Report flowed from the SA Scoping Report (March 2015) which set the context and SA objectives. The Interim SA Report relates to Stage B in the Sustainability Appraisal/Strategic Environmental Assessment of developing and refining options and assessing effects.
- 2.4.3. In terms of reasonable alternatives for the development strategy the Interim SA appraised the following:
 - **Option 1**: Building Blocks + addressing assessed needs adjacent to the principal urban areas of the Medway Gap and Tonbridge;
 - **Option 2**: Building Blocks + addressing assessed needs adjacent to a range of settlements across the borough;
 - **Option 3**: Building Blocks + addressing assessed needs in proximity to commuter and transport hubs; and
 - **Option 4**: Building Blocks + addressing assessed needs in the least constrained parts of the borough.
- 2.4.4. As highlighted in the Spatial Strategy Topic Paper, these options were considered reasonable alternatives because they were shaped by sound planning judgements and because after the discounting of constraints from the potential developable area each option would broadly deliver a quantum of development that at least met in full the housing requirement across the plan period plus varying degrees of flexibility. This was based upon the evidence available at the beginning of the plan-making process at the Regulation 18 stage. The appraisals are documented in the Interim SA Report (September 2016) and feature in Appendix 3 of the SA Environmental Report (September 2018). The SA Addendum report prepared by AECOM (April 2019) confirms these as reasonable alternatives.
- 2.4.5. The appraisal of these options took account of the 'suitable and deliverable' and 'suitable but undeliverable' sites from the Call for Sites exercise (see above). The foundation of each option were the '**building blocks**'. The building blocks are defined as key requirements of national planning policy, i.e. the starting point for a sustainable development strategy in a Local Plan. The three buildings blocks are:

Meeting identified development needs on:

- A. Brownfield land within the built-up confines of settlements
- B. Land safeguarded in the existing Development Plan for future development, including the area of opportunity
- C. Land at low risk of flooding within existing settlements
- 2.4.6. Given that the building blocks on their own would not meet in full the addressed need for housing as highlighted in the Regulation 18 Local Plan and the Green Belt Exceptional Circumstances Topic Paper the Interim SA did not appraise these as a standalone reasonable alternative.
- 2.4.7. With this in mind and the Government's objective of Local Plans to positively seek opportunities to meet the development needs of the local area (NPPF, 2012, para.14), the decision was taken to look at how these building blocks could be built upon, hence the development of the 4 options outlined in para. 2.4.3 of this Paper. The Spatial Strategy Topic Paper explains in more detail why the Council took the decision to meet in full the housing requirement plus some flexibility to adapt to rapid change.
- 2.4.8. Through the appraisal process it was evident that each option, as a standalone option, would not represent the most appropriate and reasonable development strategy for the Local Plan. In order for the Local Plan to secure a sustainable pattern of development that meets the housing requirement and addresses other needs, whilst minimising environmental impacts and providing a mixed portfolio of sites to deliver development in the short, medium and long-term throughout the plan period without over-burdening local infrastructure, a combination of these options was likely to be the best way forward.
- 2.4.9. The conclusion was that a 5th option a hybrid of options 1-4 drawing upon the positive performing elements of each option as assessed against the SA framework of objectives – was likely to be the most appropriate and reasonable development strategy for the Local Plan. This 5th option is interpreted spatially in the developing strategy that features in the Regulation 18 version of the Local Plan that was consulted upon during the Autumn 2016.

2.5. Site Selection - Regulation 18 Local Plan (September 2016) Consultation Responses

2.5.1. An important part of the site selection process was the consideration of representations made during the consultation on the Council's Regulation 18

version of the Local Plan. A detailed analysis of the representations received at this stage of plan-making is set out in section 2.5 of the Regulation 22 (1) (c) Consultation Statement (January 2019). This Statement is available from the Examination Library web page: <u>www.tmbc.gov.uk/lpexamlibrary</u>.

- 2.5.2. The overall development strategy attracted the largest proportion of representations during the consultation (39%). One of the main issues raised was the balance of the strategy across the borough. In particular, a view was expressed that a disproportionate amount of development was concentrated in the north-east part of Tonbridge & Malling.
- 2.5.3. In response to these concerns, and being mindful of the need to have sufficient evidence in place to inform the detailed development strategy in the Regulation 19 version of the Local Plan, the Council commissioned additional pieces of evidence that had a bearing on the site selection process:
 - Housing Delivery Study (September 2017)
 - A20 VISUM Study (March 2018)
 - Transport Assessment (May 2018) + Addendum (August 2018)
- 2.5.4. The conclusions of these studies and the effect they had on decision-taking in the site selection process are set out in section 2.6 of this Topic Paper. These pieces of evidence are available from the Local Plan Examination Library web page: www.tmbc.gov.uk/lpexamlibrary.

2.6. Site Selection - Market Capacity and Transport Evidence Published between Regulation 18 and Regulation 19 Stages

Housing Delivery Study

- 2.6.1. In September 2017 the Housing Delivery Study was published. This is available from the Examination Library web page: www.tmbc.gov.uk/lpexamlibrary.
- 2.6.2. This piece of work focussed on market capacity at the local level. It analysed recent performance in terms of delivery and provided an assessment of the potential pace of housing delivery as planned for in the Regulation 18 version of the Local Plan. The purpose of the Study was to help understand what level of housing delivery might realistically be achieved in the borough over the Local Plan period up to 2031.
- 2.6.3. In terms of past performance (2001-16) the average annual growth rate of the dwelling stock in the borough was 1.2%. During the period since the last recessions (2008-16) the growth rate was 1.1%. Table 5 in the Study (see below) puts this growth rate into context, comparing the performance with

other local authorities across the country, with the exception of the London boroughs.

	Annual Rate 2001-16	Annual Rate 2001-08	Annual Rate 2008-16
	CAGR 2001-16	CAGR 2001-08	CAGR 2008-16
Milton Keynes	1.5%	1.7%	1.4%
South Derbyshire	1.5%	2.1%	1.1%
Corby	1.5%	1.4%	1.6%
Uttlesford	1.4%	1.4%	1.5%
Swindon	1.4%	1.9%	1.0%
North Kesteven	1.4%	1.8%	1.0%
Dartford	1.4%	1.5%	1.2%
Kettering	1.3%	1.7%	1.0%
South Cambridgeshire	1.3%	1.6%	1.1%
Ashford	1.3%	1.6%	1.1%
Torridge	1.3%	1.5%	1.1%
East Cambridgeshire	1.3%	1.9%	0.7%
South Norfolk	1.3%	1.2%	1.4%
Fenland	1.3%	1.8%	0.8%
England	0.8%	0.9%	0.7%

Table 1: Average Annual Growth Rates, National Comparison

2.6.4. This is important contextual information for understanding the capacity of the local market to absorb growth.

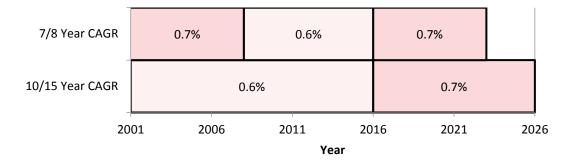
- 2.6.5. The Study also assessed the quantum and distribution of development in the Regulation 18 Plan and what this would equate to in terms of the growth in the dwelling stock. This was assessed across two areas:
 - Area 1: Medway Gap, Kings Hill and Maidstone Borough the Maidstone Housing Market Area (HMA)
 - Area 2: Tonbridge, Borough Green, Sevenoaks and Tunbridge Wells the Sevenoaks/Tonbridge/Tunbridge Wells HMA
- 2.6.6. The Study concluded that across Area 1 for the next 7 year period (up to 2023 from the base date of the Study) the expected compound annual growth of the dwelling stock taking account of the development strategy in the Regulation 18 Plan would be 1.9%. This is considerably higher than the historic growth rate recorded for Area 1 during the period 2001-16 of 1.2%, as highlighted below (Figure 19 in the Study).



Figure 1: Area 1 Historic and Future Compound Annual Growth Rates

- 2.6.7. For the long-term period up until 2031 the Study concluded a 1.5% compound annual growth rate of the dwelling stock based upon the iteration of the development strategy available at the time the Study was produced, .i.e. the Regulation 18 development strategy. The Study considered this to be ambitious but potentially achievable. It is important to note that this is a level of growth that has only been achieved by two districts across England (excluding the London boroughs) during the post-recession period.
- 2.6.8. For Area 2, the Study concluded an average annual growth rate of 0.7% of the dwelling stock for the period up to 2026, factoring in the development strategy in the Regulation 18 Plan. This is similar to the historic compound annual growth rate for Area 2 of 0.6% (see Figure 2 below).
- 2.6.9. It should be noted that the Study reflected the most current available information from Sevenoaks District Council and Tunbridge Wells Borough Council on housing commitments. Given that both of these authorities were at very early stages of plan-making at the time the research was undertaken, the Study took account of housing trajectories from existing development plans. The Study concluded that if the housing need (as assessed at the time of the Study) is met in full for Sevenoaks and Tunbridge Wells and the development strategy in the Regulation 18 version of the Tonbridge and Malling Borough Council's Local Plan is delivered, it would result in a compound annual growth rate of 1.0% between 2016-31. The Study noted that this is above the historic delivery across Area 2 of 0.6% but it is a level that is achievable given the areas strong market characteristics and proximity/links to London.

Figure 2: Area 2 Historic and Future Compound Annual Growth Rates



- 2.6.10. This piece of evidence had a significant influence on the sites selection process because it provided an indication of what is realistically deliverable within the local housing markets. This is important for demonstrating that the Local Plan is deliverable over its period, i.e. effective.
- 2.6.11. The Spatial Strategy Topic Paper highlights that across the borough the development strategy in the Regulation 18 Local Plan, in combination with completions since the base date of the Plan (2011), extant planning permissions and a projected supply from small windfall sites, would result in a compound annual growth rate of the dwelling stock of 1.5%. In light of the evidence highlighted above, and taking account of the current economic context and uncertain outlook, it is questionable whether there can be a high degree of confidence with the full delivery of such a quantum of development within the local housing markets.
- 2.6.12. With this in mind, and taking account of newly published evidence as well as the responses received at the Regulation 18 stage of plan-making, the Council took the decision to rationalise the development strategy that featured in the Regulation 18 stage (circa. 10,000 units). The degree of rationalisation was limited by the need to continue to address in full the housing requirement plus some flexibility to adapt to rapid change. It was also influenced by other pieces of local evidence, including the A20 VISUM Study and the Transport Assessment. The details of the rationalisation and what it meant for the overall quantum of development feature in the Spatial Strategy Topic Paper.

A20 VISUM Study (March 2018 + Update March 2019)

2.6.13. This Study focussed on 16 junctions across the A20 corridor from M20 junction 4 in the west to M20 junction 5 in the east. This is available from the Examination Library web page: <u>www.tmbc.gov.uk/lpexamlibrary</u>.The model included forecast capacity assessments for each junction. The Study modelled two future scenarios:

- 2031 Do Minimum, i.e. 2031 without the Local Plan in place
- 2031 Do Something, i.e. 2031 with the development strategy in the Regulation 18 version of the Local Plan implemented.
- 2.6.14. The outputs of the Study included modelled traffic flows, queue lengths and capacity assessments for each of the junctions. The initial Study was updated in March 2019. This update modelled the exact development strategy that featured in the Regulation 19 version of the Local Plan. Tables 2A and 2B in this Topic Paper (see below) set out a summary of the outputs from the March 2019 Update in terms of the 'Practical Reserve Capacity' for each junction. To provide some context, in an ideal situation, the aim would be to maintain junctions operating within a maximum capacity of 85% but this is not a practical reality. The VISUM studies are available from the Examination Library web page: www.tmbc.gov.uk/lpexamlibrary.

Table 2A: A20 VISUM Study (Update March 2019) – AM Peak PracticalReserve Capacity

Ref	Junction	Do Minimum	DS Reg19	% Change from DM
1	A20 /Hermitage Ln/Preston Hall	-62%	-27%	35%
2	A20 / Mills Rd / Hall Rd	-25%	-15%	10%
3	A20 / Station Rd / New Rd, Ditton	-108%	-33%	75%
4	A20 / New Hythe Ln	-42%	-17%	25%
5	A20 / New Rd, East Malling	5%	-4%	-9%
6	A20 / Lunsford Ln	-39%	-32%	7%
7	A20 / Castle Way / Ashton Way	1%	-8%	-9%
8	A228 / Ashton Way	18%	27%	9%
9	A20 / Coldharbour Ln	-28%	4%	32%
10	A20 Poppyfields Roundabout	41%	57%	16%
11	Hermitage Ln / Whitepost Field Link		51%	NA
12	Hermitage Ln / Retail Access	4%	4%	0%
13	Hall Rd / Station Rd	-35%	-72%	-37%
14	High St / Rochester Rd	127%	84%	-43%
15	M20 Junction 4	3%	5%	2%

Ref	Junction	Do Minimum	DS Reg19	% Change from DM
16	M20 Junction 5	7%	2%	-5%

Table 2B: A20 VISUM Study (Update March 2019) – PM Peak PracticalReserve Capacity

Ref	Junction	Do Minimum	DS Reg19	% Change from DM
1	A20 /Hermitage Ln/Preston Hall	-32%	-26%	6%
2	A20 / Mills Rd / Hall Rd	-81%	-17%	64%
3	A20 / Station Rd / New Rd, Ditton	-82%	-38%	44%
4	A20 / New Hythe Ln	-27%	-18%	9%
5	A20 / New Rd, East Malling	-2%	2%	4%
6	A20 / Lunsford Ln	-17%	-10%	7%
7	A20 / Castle Way / Ashton Way	-15%	-9%	6%
8	A228 / Ashton Way	10%	20%	10%
9	A20 / Coldharbour Ln	-58%	7%	65%
10	A20 Poppyfields Roundabout	15%	18%	3%
11	Hermitage Ln / Whitepost Field Link		87%	NA
12	Hermitage Ln / Retail Access	-4%	2%	6%
13	Hall Rd / Station Rd	8%	-35%	-43%
14	High St / Rochester Rd	40%	-12%	-52%
15	M20 Junction 4	9%	11%	2%
16	M20 Junction 5	13%	5%	-8%

2.6.15. As highlighted in para. 4.2.3 in the VISUM Study Update (March 2019), the majority of the assessed junctions within the A20 corridor between M20 junctions 4 and 5 are anticipated to operate better during highway peaks in the DS Reg 19 scenario, i.e. the development strategy in the submitted Plan, when compared with the 2031 Do Minimum Scenario, i.e. no Local Plan in place.

- 2.6.16. This piece of evidence proved useful in the site selection process because it provided context for sizing up the impact of the development strategy on the local highway infrastructure. It identified the pressure points that would be made significantly worse if the Regulation 18 development strategy were to be fully implemented by 2031.
- 2.6.17. For example, the outputs from the March 2018 Study provided evidence to justify the rationalisation of development at south Aylesford, in particular the quantum of development identified at the East Malling Research Station. The A20 VISUM Study (March 2018) is available from the Local Plan Examination Library web page: www.tmbc.gov.uk/lpexamlibrary. At the Regulation 18 stage of plan-making, a development of approximately 1,250 units was assumed on this site, with a link to the Quarry Wood Retail Park to the north. As illustrated by the selected results from the initial VISUM Study (see Table 3 below), this quantum of development would result in the significant worsening of the operation of the junction that leads into the Quarry Wood Retail Park from the A20 (junction 2). This was a concern, not least because this junction lies within an Air Quality Management Area (AQMA). It was also evident from the responses made during the Regulation 18 consultation that there was significant uncertainty over the delivery of a link road from the site to the retail park.

	Ref Junction		Practical Reserve Capacity					
Ref			DS	% change	DM	DS	% change	
		AM	АМ	АМ	РМ	РМ	PM	
1	A20 /Hermitage Ln/Preston Hall	-62%	19%	81%	-32%	8%	40%	
2	A20 / Mills Rd / Hall Rd	-25%	-81%	-56%	-90%	-74%	7%	
15	M20 Junction 4	24%	15%	-9%	-79%	-100%	-21%	

 Table 3: A20 VISUM Study (March 2018) – Practical Reserve Capacity

2.6.18. The initial VISUM Study also prompted the rationalisation of the quantum of development allocated north of Kings Hill, following additional modelling. The initial VISUM model run assumed approximately 1,500 dwellings at this site. As illustrated in Table 3, junction 4 of the M20 north of the site was forecast to operate significantly worse, especially during the PM peak. This result prompted additional modelling work that focused on the functioning of the junction called 'M20 Junction 4 Revised VISUM Capacity Assessment Report' (October 2018) which is also available from the Examination Library

web page: <u>www.tmbc.gov.uk/lpexamlibrary</u>. This modelling factored in a reduced allocation north of Kings Hill (known as Broadwater Farm) of 900 units. The results indicated that with the modifications, the junction is predicted to operate within capacity in the 2031 future year in the 'do something' scenario which includes the Local Plan development strategy with 900 homes developed north of Kings Hill.

- 2.6.19. When reaching the final decision on the rationalisation of the sites in terms of numbers and yields, the Council was also mindful of the conclusions and analysis in other pieces of evidence, eg the Housing Delivery Study and the Strategic Housing Market Assessments, as well as comments made during the consultation on the Regulation 18 Plan.
- 2.6.20. The justification table (see Appendix 1 to this Paper) highlights the influence of the results from the VISUM studies for the assessment of sites.

Transport Assessment (May 2018) and Transport Assessment Addendum (August 2018)

- 2.6.21. For the rest of the borough outside of the A20 Corridor a Transport Assessment was prepared. This focussed on 33 junctions at points across the borough likely to be affected by the development strategy in the Regulation 18 version of the Local Plan. This included 31 existing junctions and two new junctions along the proposed relief road at Borough Green.
- 2.6.22. The Assessment followed a similar approach to the A20 VISUM Study in that it looked at two future scenarios at 2031 (with and without the Local Plan).
- 2.6.23. The initial Assessment identified the need for some junction improvements. The modelling was then run again factoring in the identified mitigation schemes for the junctions. These schemes feature in the Infrastructure Delivery Plan, which is available from the Local Plan Examination Library page: <u>www.tmbc.gov.uk/lpexamlibrary</u>. The outcomes of the second model run feature in the Transport Assessment Addendum (August 2018). Both Assessments are available from the Examination Library web page: <u>www.tmbc.gov.uk/lpexamlibrary</u>.
- 2.6.24. The results from the Transport Assessments proved useful in confirming the selection of sites in the development strategy. For example, it is evident from the main report that junctions within central Borough Green, eg the junction of Borough Green High Street/Wrotham Road/Western Road (junction 28) will benefit from the implementation of the relief road which is an integral part of the development strategy for this part of the borough. For example, east bound traffic on the A25 at the junction with Western Road is forecast to reduce during the PM Peak from 602 passenger carrying units (PCUs) (2031

baseline, without the Local Plan) to 66 PCUs (2031, with the Local Plan, including the relief road). The outcomes of the transport modelling at Borough Green are explained in more detail in the Green Belt Exceptional Circumstances Topic Paper.

- 2.6.25. Whilst this piece of evidence did not exert as much pressure on the rationalisation of the development strategy as the A20 VISUM Study, it did provide useful indicators for places such as Tonbridge in terms of how much additional growth the highway infrastructure could reasonably expect to accommodate. Junctions in the northern/central parts of Tonbridge including Hadlow Road A227/Cannon Lane A26/Hadlow Road A26 and High Street A227/High Street B2260/Bordyke A227/Lansdowne Road were modelled (see Addendum, August 2018) to be close to operational capacity at 2031 with the implementation of the development strategy in the Reg.18 Local Plan. This is highlighted in the Spatial Strategy Topic Paper, including relevant extracts from the Transport Assessment. The Council was mindful of this, along with the Housing Delivery Study conclusions for Area 2 when it focussed on the sites to be selected for the detailed strategy in the Regulation 19 version of the Local Plan.
- 2.6.26. The justification table (see Appendix 1 to this Paper) highlights the influence of the results from the Transport Assessments on the assessment of sites.

2.7. Site Selection - Strategic Land Availability Assessment (March 2018)

- 2.7.1. The Strategic Land Availability Assessment (SLAA) was prepared to determine the potential supply of sites for housing and economic development during the remainder of the plan period up to 2031. It focussed on existing commitments (extant permissions and unimplemented allocations in the Council's adopted Development Plan) as well as the 'suitable and deliverable' sites identified through the Call for Sites exercise (see Section 3 of this Topic Paper). The SLAA is available from the Examination Library web page: www.tmbc.gov.uk/lpexamlibrary.
- 2.7.2. The SLAA built upon the Call for Sites exercise by applying assumptions on delivery including likely commencement dates and annual delivery rates. These assumptions were informed by local historic records of delivery as well as current contextual information including Nathaniel Lichfield & Partners study entitled: 'Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? (November 2016).
- 2.7.3. The SLAA proved useful to the site selection process because it provided a reasonable assessment of when the 'suitable and deliverable' sites are likely to deliver new homes and at what rate. This information is key to

demonstrating that the Local Plan is 'Effective', i.e. deliverable over the plan period. However, it is important to appreciate that the SLAA did not take account of detailed policy matters and designations that are for the planmaking stage. Furthermore, the outcomes still needed to be checked against other pieces of evidence that emerged since the completion of the SLAA, eg A20 VISUM Study.

2.8. Site Selection - Sustainability Appraisal of Sites (Draft, June 2018)

- 2.8.1. To help inform the decision-taking on the development strategy for the Regulation 19 version of the Local Plan, a Sustainability Appraisal (SA) of sites was undertaken. This SA appraised in full those sites that were concluded as 'suitable and deliverable' and 'suitable but undeliverable' through the Call for Sites and SLAA exercises. This included both sites that had been included and excluded (reasonable alternatives) in the Regulation 18 Plan. The SA is available from the Examination Library web page: www.tmbc.gov.uk/lpexamlibrary.
- 2.8.2. To inform the detailed appraisal process an analysis was undertaken of constraints and opportunities affecting each site. The constraints were:
 - Special Area of Conservation
 - Site of Special Scientific Interest
 - Ancient Woodland
 - Local Sites (eg Local Wildlife Sites)
 - Priority Habitats (2012 Kent Habitat Survey)
 - Biodiversity Opportunity Areas
 - Green Belt
 - Flood risk
 - Areas of Outstanding Natural Beauty
 - Agricultural land
 - Air Quality Management Area
 - Scheduled Ancient Monument
 - Conservation Area
 - Listed Building
 - Historic Parks & Gardens
 - Archaeological Potential
 - Settlement hierarchy
 - Publicly accessible open space
 - Minerals Safeguarding Area
 - Public transport accessibility
 - Education provision

- Healthcare provision
- Previously developed land
- 2.8.3. In applying this piece of work to the site selection process, the Council was mindful that it is very much focussed on individual sites. Whilst this appraisal was important for understanding the suitability and deliverability of sites as measured against a range of SA objectives, the Council was of the view that the outcomes should not be read in isolation of other pieces of evidence nor should strategic thinking on the distribution of the development strategy across the two HMAs and the consequences for sustainable patterns of development be ignored. Please see the Spatial Strategy Topic Paper for an understanding of the strategic matters that have shaped the development strategy.

2.9. Site Selection - Sustainability Appraisal: Environmental Report (September 2018)

- 2.9.1. To help inform the decision on the site selection process for the development strategy in the Regulation 19 Local Plan a detailed SA Environmental Report was prepared. This is available from the Examination Library web page: www.tmbc.gov.uk/lpexamlibrary.
- 2.9.2. This brought together information from earlier stages in the SA process and included an appraisal of all of the draft site allocations and policies contained in the draft Regulation 19 Local Plan. This included individual and cumulative impacts. This process built upon the earlier stages of the SA by taking account of the findings of other pieces of evidence, eg the Transport Assessment.
- 2.9.3. As highlighted above, when reaching the final decision on the selection of sites for the development strategy in the Regulation 19 version of the Local Plan the Council read the results from this exercise alongside other pieces of evidence and within a wider strategic planning context that needed to consider matters of distribution and opportunities for transformational benefits for local communities. The SA Addendum prepared by AECOM (April 2019) confirms that Option 5 (the submission strategy) performs strongly in respect of a number of SA objectives including 'homes', 'health and care' and 'accessibility'. The SA Addendum also confirms that Option 5 will meet the housing requirement in full plus some flexibility to adapt to rapid change, unlike other options (1 and 4) which will not deliver a sufficient supply of homes On this basis, it is the Council's considered view that the spatial strategy in the submitted Local Plan is sound and does not need to change.

2.9.4. As previously mentioned in this Paper, the justification table in Appendix 1 highlights how the various pieces of evidence have influenced the assessment and selection of sites.

3. Conclusions

- 3.1.1. The beginning of this Topic Paper highlighted the strategic top-down influences on the spatial strategy. These are explained in more detail in the Spatial Strategy Topic Paper which concludes that a sound, deliverable strategy has been prepared.
- 3.1.2. This Paper has also detailed the bottom-up pieces of evidence and processes that have informed the selection and rationalisation of sites that fit within the sound spatial strategy.
- 3.1.3. In applying the top-down and bottom up influences a number of sites have been rejected outright. This is highlighted in the justification Table in Appendix 1 to this Paper (see clear cells).
- 3.1.4. Taking these top-down and bottom-up factors into account, it is the view of the Council that the spatial strategy and the sites that have been selected to fit within are robust and effective because:
 - a. **Flexibility** the strategy will meet the housing requirement plus some flexibility to adapt to rapid change at a level of growth that is realistically deliverable (see Table 5 in the Spatial Strategy Topic Paper). It will also respond to the need for employment land reflecting local opportunities and circumstances.
 - b. Even Distribution across the Housing Market Areas the sites selected in the submitted Plan respond to the balance of need across the two Housing Market Areas exerting an influence across the borough (see Table 1 in the Green Belt Exceptional Circumstances Topic Paper), taking account of opportunities and constraints, thereby supporting a sustainable pattern of development.
 - c. **Settlement Hierarchy** the majority (over 85%) of the dwellings will be delivered on sites at or adjacent to settlements located near or at the top of the settlement hierarchy which supports the delivery of a sustainable pattern of development.
 - d. **Mixed Portfolio of Large and Small Sites** the range of sites selected, including strategic and non-strategic sites, means that there is confidence about delivery over the short, medium and long-term (see Table 2 in the Housing Topic Paper as well as the Spatial Strategy Topic Paper). This mixed portfolio will also provide opportunities for smaller housebuilders to be involved with provision in the local housing markets.

Appendix 1: Site Justification Table

Please Note: Grey cells are those sites that featured in the submitted Local Plan.

SLAA Number	Site Name	Conclusions
188	Whitepost Field, Aylesford	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Medway Gap Urban Area.
		Outside of Green Belt.
		No significant on-site constraints.
		Close to Transport Hub (Barming Station and M20 jct 5)
		Opportunity to deliver transformational infrastructure to help address air quality and traffic congestion concerns in the surrounding area by linking Hermitage Lane with the Poppy Fields roundabout.
		Strategic site likely to deliver in the mid to late plan period.
		VISUM (2019) identifies that with this site, junction 1 is forecast to operate better during the peak periods at 2031 than the future baseline without the Local Plan, but beyond capacity. Junction and 10 is forecast to operate with Practical Reserve Capacity (PRC) at 2031.
		Landscape and Visual Appraisal identifies that impact on the setting of the Kent Downs AONB and the wider landscape are not significant.
189	Southways, Staleys Road, Borough Green	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Within the settlement confines of the Rural Service Centre of Borough Green.
		Building block.
		Likely to deliver in the early plan period.
		Transport Assessment Addendum (August 2018) identifies that with this site, and with the relief road, the junctions in Borough Green are forecast to operate with PRC at 2031.
192, 254, 355, 386	North of the Paddock, Hadlow	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Rural Service Centre of Hadlow.
		Green Belt.
		No significant on-site constraints.
		Opportunity to support and sustain rural community.
		Likely to deliver in the early plan period.
		Transport Assessment Addendum (August 2018) identifies that with this site, plus mitigation ¹ , junction 10 will operate with PRC at 2031.

¹ Transport mitigation as set out in the Infrastructure Deliver Plan (August 2018)

SLAA Number	Site Name	Conclusions
194	West of Whitepost Wood Lane,	Maidstone HMA. The site could help to meet the needs in this particular HMA.
	Aylesford	Adjacent to the Medway Gap Urban Area.
		Outside of Green Belt.
		Any development would result in a loss of Publically Accessible Open Space.
		Close to Transport Hub (Barming Station and M20 jct 5)
		Part of the East Malling Research Station Area of Opportunity to be considered beyond the plan period, subject to highways solutions. VISUM (2018) identifies that with development west of Hermitage Lane, even with mitigation and a link west of Hermitage Lane to Quarry Wood, junctions 2 and 3 will operate significantly over capacity at 2031.
195	North of Lower Haysden Lane,	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
	Tonbridge	Adjacent to the Tonbridge Urban Area.
		Outside of Green Belt.
		Building Block.
		Part of the South West Tonbridge Strategic site and Masterplan area. Likely to deliver in the mid plan period.
		Transport Assessment Addendum (August 2018) identifies that with this site, and with mitigation, junction 21 will operate with a small PRC at 2031, therefore limiting potential for significant additional development in the area.
		Landscape and Visual Appraisal identifies that the impact on the High Weald AONB and its setting are not significant.
196	North of Dryhill Park Road, Tonbridge	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Tonbridge Urban Area,
		Outside of Green Belt.
		Building Block.
		Likely to deliver in the early plan period.
		Transport Assessment Addendum (August 2018) identifies that with this site the junctions in northern Tonbridge, with mitigation at some junctions, will operate with PRC at 2031.
197	Carpenters Lane, Hadlow	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Rural Service Centre of Hadlow.
		Outside of Green Belt.
		Building Block.
		Likely to deliver in the early plan period.

SLAA Number	Site Name	Conclusions
		Transport Assessment Addendum (August 2018) identifies that with this site, plus mitigation, junction 10 will operate with PRC at 2031.
198	Land at Howlands Allotments	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Wrotham.
		Outside of Green Belt.
		Within the Kent Downs AONB.
		Building Block.
		Likely to deliver in the early plan period.
		Transport Assessment Addendum (August 2018) identifies that with this site, and mitigation, junction 31 will operate with PRC at 2031.
199	Bushey Wood	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Eccles.
		Opportunity to support and sustain rural community.
		Outside of Green Belt.
		Range of on-site constraints which should be avoided. Regard should be had to the setting of the Kent Downs AONB.
		The majority of the site is identified as an Area of Opportunity in the adopted development plan for residential development post 2021.
		Building Block.
		Strategic site likely to deliver later in the plan period. Part of the Bushey Wood Masterplan area.
		Transport Assessment Addendum (August 2018) identifies that with this site, and mitigation, junction 1 will operate with significant PRC at 2031.
		Landscape and Visual Appraisal identifies that impact on Kent Downs AONB and its setting is moderate, and that a number of strategic landscape opportunities exist to mitigate the effect of the development.
200	Rear of Robin Hood Lane, Blue Bell Hill	Medway Towns HMA ² . The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Blue Bell Hill.
		Outside of Green Belt.
		Some on-site constraints which should be avoided.
		Close to Transport Hub (M2 jct 3)

² A best fit approach was adopted and the single ward identified as falling within the Medway Towns HMA was not separated out from the borough but included within the assessment for the Maidstone HMA.

SLAA Number	Site Name	Conclusions
		Likely to deliver early in the plan period. No highways concerns identified.
206	North of Pratling Street, Aylesford	Promoted for employment use. The site could help to meet the employment need.
		Adjacent to the Aylesford Urban Area and existing employment area.
		Outside of Green Belt.
		Some on-site constraints which should be avoided. Regard should be had to the setting of a Kent Downs AONB and the sites visibility in the landscape. Development to the north of Pratling Street would intrude into the countryside.
207	Rear of Greenview Crescent,	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
	Hildenborough	Adjacent to the Tonbridge (Hilden Park) Urban Area.
		Part in Green Belt, part within settlement confines.
		Substantial on-site flood risk over part of the site, including the only ingress/egress route.
		No highways concerns identified.
212	Land off Oakapple Lane, Barming	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Maidstone Urban Area (Maidstone Borough Council).
		Outside of Green Belt.
		No significant on-site constraints.
		The site is immediately adjacent to land allocated for residential development in the adopted Maidstone Local Plan (Policy H1(4)), though which access would need to be provided in order to access this site. A coordinated approach would need to be taken by TMBC and MBC.
		Likely to deliver in the early plan period.
		VISUM (2019) identifies that with this site, junction 1 is forecast to operate better during the peak periods, but beyond capacity. Junction 2 is forecast to operate with Practical Reserve Capacity (PRC) at 2031.
218	Land at Birling Road, Leybourne	Promoted for employment use. The site could help to meet the employment need.
		Remote from settlement confines and existing employment areas. Therefore in an unsustainable location.
		Green Belt.
		No significant on-site constraints but potential for noise and air quality implications due to its proximity to the M20.
		Close to Transport Hub (M20 jct 4)

SLAA Number	Site Name	Conclusions
223	Land off Cobtree Close, Fairseat	Promoted for employment use. The site could help to meet the employment need.
		Remote from settlement confines and existing employment areas. Therefore in an unsustainable location.
		Green Belt.
		No significant on-site constraints but access to the site is of restricted width (single carriageway).
227	Chequers Farm, Hildenborough	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Outside of settlement confines, but in close proximity to the Rural Service Centre of Hildenborough.
		Green Belt.
		Significant on-site heritage constraints, part in a Conservation Area and wholly within a Historic Park and Garden. Tonbridge Road forms a boundary which confines development to the north of this road. Development to the south, would intrude into the countryside.
		No highways concerns identified.
230, 296	Dark Hill Farm, Ightham	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Ightham.
		Green Belt.
		Located within the Kent Downs AONB. The scale of the site would be considered to be major development within a protected landscape.
231	Rear of Platt Mill Close, Platt	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Platt.
		Green Belt.
		No significant on-site constraints but access to site is of restricted width and requires land in third party ownership, the availability of which is unconfirmed.
		No highways concerns identified.
233	South of Church Lane, East Peckham	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Hale Street.
		Green Belt.
		No significant on-site constraints, but some areas of flood risk which should be avoided.
		Opportunity to support and sustain rural community.
		Likely to deliver early in the plan period.

SLAA Number	Site Name	Conclusions
		No highways concerns identified.
235	North of Maidstone Rd, Platt	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other rural Settlement of Platt.
		Green Belt.
		No significant on-site constraints.
		Part of this site is currently a receptor site for translocated protected species including Great Crested Newts. Such sites are not common in the borough and development may negatively impact on protected species.
		No highways concerns identified.
236	Land off Cobdown Close, Ditton	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Within the settlement confines of the Medway Gap Urban Area.
		Building Block.
		Likely to deliver early in the plan period.
		VISUM (2019) identifies that with this site, junction 3 is forecast to operate better at 2031 than the future baseline without the Local Plan, but beyond capacity.
237, 402	Land at Stocks Green Road, Hildenborough	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to Tonbridge (Hilden Park) Urban Area.
		Green Belt.
		No significant on-site constraints.
		Likely to deliver early in the plan period.
		No highways concerns identified.
238	Westbrook Farm, East Malling	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		A small portion of the site is within the settlement confines of the Other rural Settlement of East Malling. However the majority of the site lies outside, but adjacent to this settlement.
		Outside of Green Belt but within the proposed Green Belt extension. Development in this location would therefore conflict with other elements Local Plan strategy.
		No significant on-site constraints. However highways concerns over narrow width of Stickens Lane, and potential for congestion through Mill Street.
239	Land south of Hermitage Court,	Promoted for employment use. The site could help to meet the employment need.
	Hermitage Lane	Remote from settlement confines but adjacent to existing employment area.

SLAA Number	Site Name	Conclusions
		Outside of Green Belt.
		No significant on-site constraints.
		VISUM (2018) identifies that with this site, and mitigation, junction 3 is forecast to operate over capacity. VISUM (2019) identifies that with this site, junction 1 is forecast to operate better during the peak periods at 2031 than the future baseline without the Local Plan, but beyond capacity.
242	North of London Road, Ditton	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Within the settlement confines of the Medway Gap Urban Area.
		Building Block
		Some on-site heritage constraints and part of the site falls within an Air Quality Management Area. These areas should be avoided.
		Likely to deliver early in the plan period.
		VISUM (2019) identifies that with this site, junction 3 is forecast to operate better at 2031 than the future baseline without the Local Plan, but beyond capacity.
243	Station Road, Ditton	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Within the settlement confines of the Medway Gap Urban Area.
		Building Block.
		Some on-site risk of flooding. These areas should be avoided.
		Likely to deliver early in the plan period.
		VISUM (2019) identifies that with this site, junction 3 is forecast to operate better at 2031 than the future baseline without the Local Plan, but beyond capacity.
247	Land at Tile Barn Corner, Tonbridge	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Tonbridge Urban Area.
		Green Belt.
		Limited benefits to justify exceptional circumstances.
		Some on-site risk of flooding. These areas should be avoided. Adjacent to Local Wildlife Site. Regard should be had to potential impacts on adjacent natural assets.
248	Drayton Road Industrial Estate, Tonbridge	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
	Tonbhuge	Within the settlement confines of the Tonbridge Urban Area. Previously developed land.
		Building Block.

SLAA Number	Site Name	Conclusions
		No significant on-site constraints.
		Likely to deliver early in the plan period.
		Transport Assessment (May 2018) identifies that with this site, junction 18 is forecast to operate with PRC at 2031.
251	Land off Court Lane, Hadlow	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the settlement confines of the Rural Service Centre of Hadlow.
		Opportunity to support and sustain rural community.
		Green Belt.
		No significant on-site constraints.
		Likely to deliver early in the plan period.
		Transport Assessment (May 2018) identifies that with this site, junction 9 is forecast to operate with PRC at 2031.
256	Dark Hill Farm, Borough Green	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Rural Service Centre of Borough Green.
		Green Belt.
		Located within the Kent Downs AONB. The scale of the site would be considered to be major development within a protected landscape.
259	Munday Works, Tonbridge	Promoted for employment use. The site could help to meet the employment need.
		Within the settlement confines of the Tonbridge Urban Area.
		The site wholly falls in an area at risk of flooding but this does not impact on the potential of this site to deliver employment uses.
		No highways concerns identified.
262	Detling Field, Hermitage Lane,	Maidstone HMA. The site could help to meet the needs in this particular HMA.
	Aylesford	Adjacent to the Medway Gap Urban Area.
		Outside of Green Belt.
		No significant on-site constraints. Some ancient woodland on- site. These areas should be avoided.
		Close to Transport Hub (Barming Station and M20 jct 5)
		Part of the East Malling Research Station Area of Opportunity to be considered beyond the plan period, subject to highways solutions. VISUM (2018) identifies that with development west of Hermitage Lane, even with mitigation and a link west of Hermitage Lane to Quarry Wood, junctions 2 and 3 will operate over capacity at 2031.

264Court Lane Nurseries, HadlowSevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA. Adjacent to the Rural Service Centre of Hadlow. Opportunity to support and sustain rural community. Green Belt. No significant on-site constraints. Likely to deliver early in the plan period. Transport Assessment (May 2018) identifies that with this site junction 9 is forecast to operate with PRC at 2031.266Fishponds Farm, Lower Haysden Lane, TonbridgeSevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.266Fishponds Farm, Lower Haysden Lane, TonbridgeSevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA. Adjacent to the Tonbridge Urban Area. Green Belt.
Hadlowcould help to meet the needs in this particular HMA. Adjacent to the Rural Service Centre of Hadlow. Opportunity to support and sustain rural community. Green Belt. No significant on-site constraints. Likely to deliver early in the plan period. Transport Assessment (May 2018) identifies that with this site junction 9 is forecast to operate with PRC at 2031.266Fishponds Farm, Lower Haysden Lane, TonbridgeSevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
266Fishponds Farm, Lower Haysden Lane, TonbridgeSevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA. Adjacent to the Tonbridge Urban Area.
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Likely to deliver early in the plan period.Transport Assessment (May 2018) identifies that with this site junction 9 is forecast to operate with PRC at 2031.266Fishponds Farm, Lower Haysden Lane, TonbridgeSevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA. Adjacent to the Tonbridge Urban Area.
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266Fishponds Farm, Lower Haysden Lane, TonbridgeSevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA. Adjacent to the Tonbridge Urban Area.
Lower Haysden Lane, Tonbridgecould help to meet the needs in this particular HMA. Adjacent to the Tonbridge Urban Area.
Adjacent to the Tonbridge Orban Area.
Green Belt.
No significant on-site constraints.
Part of the South West Tonbridge Strategic site and Masterplan area. Likely to deliver in the mid plan period.
Transport Assessment Addendum (August 2018) identifies that with this site, and with mitigation, junction 21 will operate with a small PRC at 2031, therefore limiting potential for significant additional development in the area.
267 Branbridges Wharf, East Peckham Promoted for employment use. The site could help to meet the employment need.
Within the settlement confines of the Rural Service Centre of East Peckham.
The site wholly falls in an area at risk of flooding but this does not impact on the potential of this site to deliver employment uses.
No highways concerns identified.
268 Hermitage Farm, Winterfield Lane, East Maidstone HMA. The site could help to meet the needs in thi particular HMA.
Malling Adjacent to the Medway Gap Urban Area.
Outside of Green Belt but within the proposed Green Belt extension. Development in this location would therefore conflict with other elements Local Plan strategy.
No significant on-site constraints but has potential to impact adjacent heritage assets.
269 Bull Lane, Eccles Maidstone HMA. The site could help to meet the needs in thi particular HMA.
Adjacent to the Other Rural Settlement of Eccles.

SLAA Number	Site Name	Conclusions
		Opportunity to support and sustain rural community.
		Outside of Green Belt.
		No significant on-site constraints.
		Part of the Bushey Wood Strategic site and Masterplan area. Likely to deliver later in the plan period.
		Transport Assessment Addendum (August 2018) identifies that with this site, and mitigation, junction 1 will operate with significant PRC at 2031.
270	Bell Lane, Burham	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Burham.
		Opportunity to support and sustain rural community.
		Outside of Green Belt.
		No significant on-site constraints. Regard should be had to the setting of a Kent Downs AONB and the sites visibility in the landscape.
		Likely to deliver in the mid plan period.
		Transport Assessment Addendum (August 2018) identifies that with this site, and mitigation, junction 1 will operate with significant PRC at 2031.
273	Wouldham Allotments	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Wouldham.
		Outside of Green Belt.
		Loss of community facility (allotments).
		No significant on-site constraints. Regard should be had to the setting of a Kent Downs AONB and the sites visibility in the landscape.
		Highways concerns over access to the site due to the restricted width of Oldfield Drive and limited visibility onto the High Street.
		No highways concerns identified.
274	North of Postern Lane, Tonbridge	Proposed for marina use. No identified need for this particular land use.
		Adjacent to the Tonbridge Urban Area.
		Green Belt.
		The site wholly falls in an area at risk of flooding but this does not impact on the potential of this site to deliver a marina.
		Highways concerns over the lack of connection to the public highway.
275	Grange Farm, Tonbridge	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.

SLAA Number	Site Name	Conclusions
		Adjacent to the Tonbridge Urban Area.
		Green Belt. No significant on-site constraints. Some areas at risk of
		flooding. These areas should be avoided.
		Although this site is located in a sustainable location, adjacent to the Tonbridge urban area, it is some distance from the town centre services, facilities and transport hub.
		Concern over the impact of such a strategic scale site on local infrastructure, particularly the town centre highway network and the resultant impact on an existing AQMA.
		Transport Assessment Addendum (August 2018) identifies that without this site, some of the junctions in northern Tonbridge are forecast to operate close to full capacity at 2031 i.e. very limited PRC.
278	Aylesford Quarry, Aylesford	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Aylesford.
		Outside of Green Belt.
		Range of on-site constraints which should be avoided. Regard should be had to the setting of the Kent Downs AONB.
		There remains some uncertainty over existing minerals permissions and operations on part of the site and the compatibility with residential uses.
		VISUM (2019) identifies that without this site, junction 14 is forecast to operate over capacity at 2031. In the wider highway network, junction 13 is forecast to operate significantly over capacity at 2031.
280	Little Postern, Postern Lane,	Promoted for employment use. The site could help to meet the employment need.
	Tonbridge	Adjacent to the Tonbridge Urban Area.
		No on-site constraints.
		No highways concerns.
281, 369	Paris Farm, Rocks Road, East Malling	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of East Malling.
		Outside of Green Belt.
		No on-site constrains, but adjacent to Conservation Area. Regard should be had to potential impacts on this heritage asset.
		Highways concerns over the site access as it is from a privately maintained section of road and situated on a tight bend with restricted visibility.

SLAA Number	Site Name	Conclusions
282	North of Norman Road, West Malling	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Rural Service Centre of West Malling.
		Green Belt.
		Norman Road forms a boundary which confines development to the south of this road. Development to the north, would intrude into the countryside.
		No significant on-site constraints. However the site is Grade 1 agricultural land, and development should be directed to areas of poorer land quality.
		Highways concerns that due to the limited width of Norman Road, development could not easily be accommodated on this site.
299	East of Offham Road, West Malling	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Rural Service Centre of West Malling.
		Green Belt.
		No on-site constrains, but adjacent to Conservation Area. Regard should be had to potential impacts on this heritage asset.
		Highways concerns regarding the impact of traffic from this site on Offham Road and West Street, which are of restricted width which limits the capacity of the site.
		Likely to deliver early in the plan period.
300	Crouch Lane, Borough Green	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Rural Service Centre of Borough Green.
		Green Belt.
		No significant on-site constraints but regard should be had to the potential to impact on the setting of the Kent Downs AONB.
		The scale of the site could place significant pressure on existing services without providing any new facilities.
		Highways concerns regarding access from Crouch Lane due to topography in this location.
302	Goblands Farm, Court Lane, Hadlow	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Rural Service Centre of Hadlow.
		Green Belt.
		No significant on-site constraints.
		Highways concerns about the potential impact of this quantum of development, in conjunction with development south of

SLAA Number	Site Name	Conclusions
		Court Lane, on the junction of Court Lane and the A26 due to its limited width.
303	off Fields Lane, Wateringbury	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Wateringbury.
		Green Belt.
		The whole site is Grade 1 agricultural land, and development should be directed to areas of poorer land quality.
		Development in this location is likely to generate additional traffic flows through an AQMA which has recorded the worst air quality in the borough.
304	East Malling Research Station	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Medway Gap Urban Area and the Other Rural Settlement of East Malling.
		Outside of Green Belt.
		There are a range of on-site constraints in some areas of the site and these should be avoided.
		Close to transport hub (Barming Station and M20 jct 5).
		Highways concerns over the impact of the potential quantum of development on the A20 corridor.
		VISUM (2018) identifies that with development west of Hermitage Lane, even with mitigation and a link west of Hermitage Lane to Quarry Wood, junctions 2 and 3 will operate over capacity at 2031. This resulted in a rationalisation of the site, and the promotion of a number of smaller parcels that are likely to deliver early in the plan period.
		Part of the East Malling Research Station Area of Opportunity to be considered beyond the plan period, subject to highways solutions.
310	Barfield House, Teston Rd, Offham	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		The majority of the sites lies within settlement confines of the Other Rural Settlement of Offham.
		Part Green Belt.
		Building block (that part within settlement confines).
		Likely to deliver in the early plan period.
		No highways concerns identified.
311	North of Fairfield Rd, Borough Green	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA. Adjacent to the Rural Service Centre of Borough Green. Green Belt.

SLAA Number	Site Name	Conclusions
		No on-site constraints.
		Close to transport hub (Borough Green Station).
		Likely to deliver early in the plan period.
		Transport Assessment Addendum (August 2018) identifies that with this site, and with the relief road, the junctions in Borough Green are forecast to operate with PRC at 2031.
316	off Drylands Road, Borough Green	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Rural Service Centre of Borough Green.
		Green Belt.
		No significant on-site constraints but regard should be had to the potential to impact on the setting of the Kent Downs AONB.
		The scale of the site could place significant pressure on existing services without providing any new facilities.
		Highways concerns over the potential access from Dryland Road due restricted width and extensive on-street parking.
317	Bells Wood Yard, Kings Hill	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Kings Hill Urban Area.
		Green Belt.
		Some on-site constraints. Any development should avoid the area of Ancient Woodland.
		Highways concerns regarding the narrow width and alignment of the A228 Kent Street as well as safety concerns about the Kent Street crossroads junction.
325	West of Fatherwell Avenue, West Malling	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Rural Service Centre of West Malling.
		Green Belt.
		The majority of the site is Grade 1 agricultural land, and development should be directed to areas of poorer land quality.
		Highways concerns regarding the impact of traffic from this site on Offham Road and West Street, which are of restricted width which limits the capacity of the site.
326	North of Offham Road, West Malling	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Rural Service Centre of West Malling. Green Belt.

SLAA Number	Site Name	Conclusions
		The majority of the site is Grade 1 agricultural land, and development should be directed to areas of poorer land quality.
		Highways concerns regarding the impact of traffic from this site on Offham Road and West Street, which are of restricted width which limits the capacity of the site.
327	West of West Malling	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Rural Service Centre of West Malling.
		Green Belt.
		The majority of the site is Grade 1 agricultural land, and development should be directed to areas of poorer land quality.
		Highways concerns regarding the impact of traffic from this site on Offham Road and West Street, which are of restricted width which limits the capacity of the site.
		Concern over the impact of such a comparatively large site on local infrastructure
333	Plaxtol Allotments	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Plaxtol.
		Green Belt.
		Limited benefits to justify exceptional circumstances.
		Located within the Kent Downs AONB.
		Loss of community facility (allotments).
		No highways concerns identified.
334	South of Vauxhall Gardens. Tonbridge	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Tonbridge Urban Area. Green Belt.
		No significant on-site constraints.
		Good access A21.
		Transport Assessment (May 2018) identifies that with this site, junction 18 is forecast to operate with PRC at 2031.
346	North of Barchester Way	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Tonbridge Urban Area.
		Green Belt.
		No on-site constraints.

SLAA Number	Site Name	Conclusions
		Although this site is located in a sustainable location, adjacent to the Tonbridge urban area, it is some distance from the town centre services, facilities and transport hub.
		The size of the site is unlikely to deliver any new services and may place significant pressure on existing facilities.
		Transport Assessment (May 2018) identifies that without this site, some of the junctions in northern Tonbridge are forecast to operate close to full capacity at 2031 i.e. very limited PRC.
353	West of The Orpines, Wateringbury	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Waterinbury.
		Green Belt.
		The whole site is Grade 1 agricultural land, and development should be directed to areas of poorer land quality.
		Highways concerns regarding congestion and air quality around the junction of the A26 / B2015 and the existing AQMA.
		Development in this location is likely to generate additional traffic flows through an AQMA which has recorded the worst air quality in the borough.
358	North of Kings Hill	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Kings Hill Urban Area.
		Outside of Green Belt, but partially within the proposed extension to the Green Belt.
		There are on-site heritage assets (Conservation Area) that should be avoided. There are also potential to impact on adjacent heritage assets (Conservation Areas and Listed Buildings).
		Close to transport hub (West Malling Station).
		M20 Junction 4 Revised VISUM Capacity Assessment Report (October 2018) examined the operation of the junction with a rationalised scale of development and forecast that the junction would operate with a small PRC at 2031. This resulted in a rationalisation of the site from c.1400 units at Reg 18, to c900 units at Reg 19.
		Opportunity to deliver a new secondary school to meet the needs in the north-east of the borough as identified in the Infrastructure Deliver Plan.
		Strategic site likely to deliver later in the plan period.
366	North of Hadlow Park	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA. Adjacent to the Rural Service Centre of Hadlow. Green Belt.

SLAA Number	Site Name	Conclusions
		A significant part of the site is covered by Tree Preservation Orders. If the remainder of the site were developed, this would result in a development remote from settlement confines and isolated from the existing community.
372	Banky Meadow, West Malling	Maidstone HMA. The site could help to meet the needs in this particular HMA. Adjacent to the Rural Service Centre of West Malling. Outside of Green Belt, but within the proposed extension to the Green Belt. Significant on-site heritage constraints as the site is located
378	Appledene Farm, Norman Road, West Malling	 within a Conservation Area. Maidstone HMA. The site could help to meet the needs in this particular HMA. Adjacent to the Rural Service Centre of West Malling. Green Belt. Norman Road forms a boundary which confines development to the south of this road. Development to the north, would intrude into the countryside. No significant on-site constraints. However the site is Grade 1 agricultural land, and development should be directed to areas of poorer land quality. Highways concerns that due to the limited width of Norman Road, development could not easily accommodated on this site.
381	Bunyards Farm, Allington	 Maidstone HMA. The site could help to meet the needs in this particular HMA. Adjacent to the Maidstone Urban Area (Maidstone Borough Council). Outside of Green Belt. No on-site constraints. Close to transport hub (M20 jct 5). VISUM (2019) identifies that with this site, junction 10 is forecast to operate with PRC at 2031. Junction 16 will operate with marginal PRC at 2031.
384	The Paddock Common Road, Ightham	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA. Remote from settlement confines, and therefore in an unsustainable location. Green Belt. No on-site constraints but regard should be had to the potential impact on the setting of the Kent Downs AONB. No highways concerns identified.

SLAA Number	Site Name	Conclusions
385	Depot, Upper Haysden Lane, Tonbridge	Promoted for employment use. The site could help to meet the employment need. Adjacent to the Tonbridge Urban Area. No on-site constraints but regard should be had to the potential impact on the setting of the High Weald AONB.
389	North of M20 Junction 5, Coldharbour Lane	 Promoted for employment use. Outside of settlement confines but adjacent to existing employment area. Some ancient woodland on-site. Development should avoid this. Close to transport hub (M20 jct. 5) VISUM (2019) identifies that with this site, junction 16 is forecast to operate with marginal PRC at 2031.
390	Winterfield House, Larkfield	Maidstone HMA. The site could help to meet the needs in this particular HMA. Adjacent to the Medway Gap Urban Area. Outside of Green Belt but within the proposed Green Belt extension. Development in this location would therefore conflict with other elements Local Plan strategy. No on-site constraints. Potential yield may fall below 5 units, therefore the site is too small to be allocated in the Local Plan.
391	East of Aylesford Priory	Maidstone HMA. The site could help to meet the needs in this particular HMA. Remote from settlement confines, and therefore in an unsustainable location. Outside of Green Belt. Significant on-site heritage constraints as the site is located within a Conservation Area and a Historic Park and Garden.
392	Barming Depot, Hermitage Lane	 Maidstone HMA. The site could help to meet the needs in this particular HMA. Adjacent to the Medway Gap Urban Area. Outside of Green Belt. No significant on-site constraints. Close to Transport Hub (Barming Station and M20 jct 5) Part of the South Aylesford strategic site and Masterplan area. Likely to deliver in the mid to late plan period. VISUM (2019) identifies that with this site, junction 1 is forecast to operate better during the peak periods than the future baseline without the Local Plan, but beyond capacity. Junction 10 is forecast to operate with Practical Reserve Capacity (PRC) at 2031.

SLAA Number	Site Name	Conclusions
393	Manor Farm, Upper Haysden Lane	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Tonbridge Urban Area.
		Green Belt.
		No significant on-site constraints.
		Part of the South West Tonbridge Strategic site and Masterplan area. Likely to deliver in the mid plan period.
		Transport Assessment Addendum (August 2018) identifies that with this site, and with mitigation, junction 21 will operate with a small PRC at 2031, therefore limiting potential for significant additional development in the area.
396	Rear of London Road, West Malling	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Rural Service Centre of West Malling.
		Green Belt.
		No on-site constraints.
		Since the publication of the SLAA Call for Sites exercise, the availability of the site has been confirmed, thereby making the site Suitable and Deliverable.
		Likely to deliver in the early plan period.
		Transport Assessment Addendum (August 2018) identifies that with this site, junction 15 is forecast to operate with a small amount of PRC.
403	Sportsman's Farm, Teston Road, West	Maidstone HMA. The site could help to meet the needs in this particular HMA.
	Malling	Adjacent to the Kings Hill Urban Area, but separated from it by the A228 Ashton Way bypass.
		Outside of Green Belt but within the proposed Green Belt extension. Development in this location would therefore conflict with other elements Local Plan strategy.
		No on-site constraints.
408 (inc. Sites 283	North of Borough Green and Platt	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
and 312)		Adjacent to the Rural Service Centre of Borough Green.
		Green Belt.
		Various on-site constraints in certain parts of the site. Part of the site falls within the Kent Downs AONB. Development should avoid these areas. Regard should also be had to the potential impact on the setting of the Kent Downs AONB
		Close to transport hub (Borough Green Station and M20 jct 2a.)
		Transport Assessment Addendum (August 2018) identifies that with this site, and with the relief road, the junctions in

SLAA Number	Site Name	Conclusions
		Borough Green are forecast to operate with significantly greater PRC at 2031 than the future baseline without the Local Plan and relief road. M26 Junction 2a Diverge/Merge Assessment (2019) concludes that junction 23 of the Transport Assessment can operate satisfactorily.
		Opportunity to deliver transformational infrastructure to help alleviate air quality and traffic congestion issues along the A25 by providing a relief road which has been a long standing commitment in previous development plans.
		Landscape and Visual Appraisal has identified that there is potential to impact on the Kent Downs AONB and its setting, but that mitigation measures can be delivered to assist in mitigating the impact.
		Strategic site likely to deliver in the late plan period and beyond.
		Since the publication of the SLAA Call for Sites exercise, the availability of the site has been confirmed, thereby making the site Suitable and Deliverable.
410	East of Hermitage Lane	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Maidstone Urban Area (Maidstone Borough Council).
		Outside of Green Belt.
		No on-site constraints.
		This area maintains a separation between the Medway Gap urban area and Maidstone. Development in this location may result in coalescence of settlements and communities.
		VISUM (2018) identifies that without this development, and even with a link west of Hermitage Lane to Quarry Wood, junction 3 is forecast to operate significantly over capacity at 2031.
417	Coblands Nursery, Trench Road, Tonbridge	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Tonbridge Urban Area.
		Green Belt.
		Some areas at risk of flooding, and these should be avoided.
		Likely to deliver in the early to mid-plan period.
		Transport Assessment Addendum (August 2018) identifies that with this site, junctions in northern Tonbridge are forecast to operate with PRC at 2031, although for some junctions the PRC is very small.
419	North of RBLI Warehouse, Aylesford	Promoted for employment use. The site could help to meet the employment need.
		Adjacent to the Medway Gap Urban Area.
		Outside of Green Belt.

SLAA Number	Site Name	Conclusions
		No on-site constraints.
		Close to transport hub (M20 jct. 5).
		Transport Assessment Addendum (August 2018) identifies that with this site, junctions in the vicinity are forecast to operate better at 2031 than the future baseline without the Local Plan with the exception of junction 16 which is forecast to operate marginally worse, albeit still with some small PRC.
422	Tonbridge and Little Trench Farm	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Tonbridge Urban Area.
		Green Belt.
		Some areas at risk of flooding and the majority of the site is publically accessible open space. Development should avoid these areas.
		Likely to deliver in the early to mid-plan period.
		Transport Assessment Addendum (August 2018) identifies that with this site, junctions in northern Tonbridge are forecast to operate with PRC at 2031, although for some junctions the PRC is very small.
423	Frogbridge Wood, Tonbridge	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Tonbridge Urban Area.
		Green Belt.
		A significant part of the site is covered by Tree Preservation Orders and Ancient Woodland. If the remainder of the site were developed, this would result in a development remote from settlement confines and isolated from the existing community.
427	Church Lane, East Peckham	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Other Rural Settlement of Hale Street.
		Green Belt.
		No significant on-site constraints, but some areas of flood risk which should be avoided.
		Opportunity to support and sustain rural community.
		Likely to deliver early in the plan period.
		No highways concerns identified.
435	Dog Kennel Wood, Aylesford	Maidstone HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Medway Gap Urban Area.
		Outside of Green Belt.

SLAA Number	Site Name	Conclusions
		Any development would result in a loss of Publically Accessible Open Space.
		Close to Transport Hub (Barming Station and M20 jct 5)
		Part of the East Malling Research Station Area of Opportunity to be considered beyond the plan period, subject to highways solutions. VISUM (2018) identifies that with development west of Hermitage Lane, even with mitigation and a link west of Hermitage Lane to Quarry Wood, junction 2 will operate over capacity at 2031.
447	Latter's Farm, Tonbridge	Sevenoaks, Tonbridge and Tonbridge Wells HMA. The site could help to meet the needs in this particular HMA.
		Adjacent to the Tonbridge Urban Area.
		Green Belt.
		Some TPOs on site, but no significant constraints.
		Highways concerns regarding the potential impact on Hill View Road and Hilden Avenue.