

TONBRIDGE & MALLING BOROUGH COUNCIL



EXECUTIVE SERVICES

Chief Executive

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NB - This agenda contains proposals, recommendations and options. These do not represent Council policy or decisions until they have received proper consideration through the full decision making process.

Contact: Committee Services
committee.services@tmbc.gov.uk

17 July 2017

To: MEMBERS OF THE PLANNING AND TRANSPORTATION ADVISORY BOARD

(Copies to all Members of the Council)

Dear Sir/Madam

Your attendance is requested at a meeting of the Planning and Transportation Advisory Board to be held in the Civic Suite, Gibson Building, Kings Hill, West Malling on Tuesday, 25th July, 2017 commencing at 7.30 pm

Yours faithfully

JULIE BEILBY

Chief Executive

A G E N D A

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The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

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Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

MEMBERSHIP

Cllr D A S Davis (Chairman)
Cllr T Edmondston-Low (Vice-Chairman)

Cllr M A C Balfour
Cllr Mrs S M Barker
Cllr P F Bolt
Cllr V M C Branson
Cllr M O Davis
Cllr B T M Elks
Cllr D Keers

Cllr Mrs F A Kemp
Cllr R D Lancaster
Cllr M Parry-Waller
Cllr S C Perry
Cllr R V Roud
Cllr A K Sullivan
Cllr M Taylor

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Apologies for absence

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Declarations of interest

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TONBRIDGE AND MALLING BOROUGH COUNCIL

PLANNING AND TRANSPORTATION ADVISORY BOARD

Tuesday, 7th March, 2017

Present: Cllr D A S Davis (Chairman), Cllr T Edmondston-Low (Vice-Chairman), Cllr M A C Balfour, Cllr Mrs S M Barker, Cllr P F Bolt, Cllr V M C Branson, Cllr M O Davis, Cllr B T M Elks, Cllr Mrs S M Hall, Cllr Mrs F A Kemp, Cllr M Parry-Waller, Cllr S C Perry, Cllr R V Roud, Cllr A K Sullivan and Cllr M Taylor

Councillors Mrs J A Anderson, O C Baldock, R P Betts, M A Coffin, D J Cure, N J Heslop, B J Luker, D Markham, Mrs A S Oakley, H S Rogers and Miss S O Shrubsole were also present pursuant to Council Procedure Rule No 15.21.

An apology for absence was received from Councillor R D Lancaster

PE 17/1 DECLARATIONS OF INTEREST

Councillor M Davis declared an Other Significant Interest in items on the agenda, particularly the Local Plan Update, on the grounds of his status as partner of Warners Solicitors. In accordance with the dispensation granted at Minute GP 16/19 (meeting of 20 October 2016), he remained in the meeting and addressed the Advisory Board but took no further part in the discussion or voting.

In the interests of transparency Councillor M Balfour indicated that he was the Cabinet Member for Environment and Transport at Kent County Council.

PE 17/2 MINUTES

RESOLVED: That the notes of the meeting of the Planning and Transportation Advisory Board held on 15 November 2016 be approved as a correct record and signed by the Chairman; subject to noting that Councillor M Davis was a partner at Warners Solicitors and not Wards as recorded.

MATTERS FOR RECOMMENDATION TO THE CABINET

PE 17/3 NATIONAL POLICY STATEMENT ON AIRPORTS

Decision Notice D170025MEM

The report advised on the publication of the Government's National Policy Statement (NPS) on Airports, drawing on key issues of interest to the Borough.

Members noted concerns that the mitigation measures in respect of Heathrow could be challenging without further intervention by Government, either financially or otherwise. It was also noted that the NPS recognised that the Gatwick option had less overall adverse environmental impact and impacted on fewer people. However, due to the wider economic boost, the benefit to passengers and better connectivity the NPS recommended that the Heathrow Northwest Runway should be the Government's preferred option.

RECOMMENDED: That

- (1) the Borough Council's support for meeting need for additional airport capacity at Heathrow and the Government's preferred option of the northwest runway be reaffirmed; and
- (2) the overall approach towards environmental mitigation measures in respect of the preferred option be supported by the Borough Council but the risks to deliverability as outlined in the report be noted.

PE 17/4 KENT COUNTY COUNCIL FREIGHT ACTION PLAN FOR KENT - CONSULTATION (DRAFT)

Decision Notice D170026MEM

A consultation draft Freight Action Plan for Kent setting out five specific actions on how the County Council and partners planned to reduce the impact of road freight on local communities had been produced by Kent County Council. Views on the draft document were sought by 12 March 2017. It was reported that the Freight Action Plan (FAP) acted as a 'daughter' document to the KCC Local Transport Plan 4.

Consideration was given to a proposed response to the consultation questionnaire, attached as Annex 1 to the report, which was generally supportive of the actions set out.

It was indicated that funding to proceed with the actions identified in the Plan had been agreed, although there was no clear timetable set out.

Concern was expressed regarding a number of issues including air quality/pollution in Kent, the importance of the proposed M25/M26 east facing slips at Sevenoaks, ongoing congestion at junction 4 of the M20, the need for improvements along the A20 to ease traffic related problems and the prospect of an additional junction on the M20. Members were assured that all options continued to be explored and raised as priorities with Kent County Council, Kent Highway Services and Highways England.

Finally, reference was made to a joint project between Kent County Council and Kent Police where local residents were empowered to

record details of large vehicles using unsuitable routes or routing through areas with a weight, height or width restriction. It was suggested that details of this Lorry Watch scheme be shared with the Parish Partnership Panel to promote the initiative.

RECOMMENDED: That

- (1) the content of the report be endorsed; and
- (2) the Borough Council's proposed response to the consultation, as set out in Annex 1 to the report, be endorsed.

[In accordance with Council and Committee Procedure Rule 8.6 of the Constitution Councillor M Taylor asked that his vote against the recommendation to endorse the proposed response be recorded.]

PE 17/5 KENT MINERALS AND WASTE LOCAL PLAN: SAFEGUARDING SUPPLEMENTARY PLANNING DOCUMENT (DRAFT - SEPTEMBER 2016)

Decision Notice D170027MEM

The report sought endorsement of officer-level comments made in response to a draft mineral and waste infrastructure safeguarding Supplementary Planning Document (SPD) consultation held between 5 December 2016 and 30 January 2017. These were set out in Annex 1 to the report.

In addition, the principal Safeguarding Mineral Resources policy in the Kent Minerals and Waste Local Plan (Policy DM7) was set out for information in Annex 2 of the report.

Members were advised that the response underpinned the objective of ensuring that the requirements were reasonable and proportionate in the light of safeguarding policies.

RECOMMENDED: That the officer-level comments made in response to the consultation on the County mineral and waste infrastructure safeguarding Supplementary Planning Document, set out in Annex 1 to the report, be endorsed.

PE 17/6 THE HOUSING WHITE PAPER

Decision Notice D170028MEM

The report summarised the main points arising from the recently published Housing White Paper 'Fixing Our Broken Housing Market' and highlighted those matters which might potentially have significant implications for the Local Plan and housing delivery through the planning

system generally. The report also set out comments that could form the basis for a formal response to the Government which could be made up to 2 May 2017.

Particular reference was made to a number of examples representing those actions and proposals with potentially the most significant impacts on the Local Plan and these were summarised in paragraphs 1.3.4 to 1.3.47 of the report. A full list of the proposals was attached at Annex 1 for information.

The Cabinet Member for Housing recognised that there remained a lot of detail to be understood and clarified, but expressed concerns regarding the deliverability of real affordable housing and the lack of provision for older people.

Members also expressed a number of concerns around the lack of infrastructure funding, which was not addressed as part of the Housing White Paper; the rate of development and potential implications for the Green Belt; insufficient provision of infrastructure for new developments; the increasing and ongoing impact on roads leading to regular congestion and proposals to introduce new standardised methodology to identify housing need, which had potential impacts for the Local Plan going forward. In addition, Members felt that the circumstances prevalent to Kent were not fully recognised as local housing allowance was set at a level that was insufficient to cover housing costs. Private rent in the area was also too high for the majority of local people to afford and affordable rented accommodation at 80% of market value was equally inaccessible for many households.

However, Members welcomed the proposed changes to planning fees which meant that any additional income raised could be reinvested in planning services.

RECOMMENDED: That

- (1) the summary of the Housing White Paper be noted; and
- (2) the comments in respect of the key points set out at paragraph 1.3 of the report form the basis of a response to Government by the consultation deadline of 2 May 2017.

PE 17/7 LOCAL PLAN UPDATE

Decision Notice D170029MEM

The report provided an update on the preparation of the Local Plan, including an overview of the responses to the Regulation 18 consultations that closed in November 2016 and looked forward to the

next stages of Plan making. Potential implications arising from the Housing White Paper were also reported.

A revised timetable for the Local Plan was attached for information and approval at Annex 1 to the report.

Members were advised that 1,300 responses to the consultation had been received so far and any further evidence provided in support of or against any proposed site would be considered as part of the usual assessment process.

RECOMMENDED: That:

- (1) the progress made on the Local Plan be noted; and
- (2) the revised timetable, set out at Annex 1 to the report, be agreed.

MATTERS FOR CONSIDERATION IN PRIVATE

PE 17/8 EXCLUSION OF PRESS AND PUBLIC

There were no matters considered in private.

The meeting ended at 8.55 pm

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TONBRIDGE & MALLING BOROUGH COUNCIL

PLANNING and TRANSPORTATION ADVISORY BOARD

25 July 2017

Report of the Director of Planning, Housing and Environmental Health

Matters for Recommendation to Cabinet - Non-Key Decision (Decision may be taken by the Cabinet Member)

1 LOCAL PLAN UPDATE – REGULATION 18 CONSULTATION RESPONSE

This report provides an update following the consultation exercise carried out last year. It summarises the main issues raised, with responses and sets out the next stages in the Local Plan process. An amended timetable is appended for approval.

1.1 Introduction

- 1.1.1 Between the 30th September and 25th November 2016 the first public consultation exercise on the emerging Local Plan took place resulting in 1,117 responses making 2,482 representations. Initial indications suggested that there were approximately 1,300 responses, but some of these were duplicates, for example, where a hard copy and an e-mail were received from the same respondent. Of the 1,117 responses, 628 were via e-mail or letter, while 489 were in response to the Survey Monkey questionnaire.
- 1.1.2 The main focus of the consultation was the document 'The Way Forward', which set out the purpose of preparing a new Local Plan, highlighted a number of key issues arising from the evidence base and how these could be addressed in the form of a potential development strategy. In addition, the Sustainability Appraisal (Interim Report) was consulted upon. This appraised the strategy options, including reasonable alternatives.
- 1.1.3 This consultation stage is required by Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which state that a Local Planning Authority must notify specified persons or bodies of the subject of a Local Plan, which the Authority proposes to prepare and invite them to make representations about what a Local Plan with that subject ought to contain. Any representations received must be taken into account in preparing the Local Plan.
- 1.1.4 This report summarises the main themes emerging from the responses and suggests how they may be taken into account. A more detailed summary is

appended at Annex 1. Annex 2 sets out a series of pie charts illustrating the Survey Monkey responses.

- 1.1.5 This report also provides an update on progress in respect of the Local Plan evidence base and sets out the next stages for the Local Plan. A revised timetable, taking into account the implications of the snap calling of the General Election in June, is appended at Annex 3 for approval.

1.2 Responses to the consultation

- 1.2.1 The 2,482 representations received have been grouped into 31 themes. Each theme has been broken down into more specific issues (214 in total) and each issue has a suggested response and proposed action.
- 1.2.2 Taken together the proposed strategy attracted a significant number of responses. The strategy in general (119), some of the larger development sites, including; the east bank of the Medway and Aylesford Quarry (107); south Aylesford and Ditton (113); Broadwater Farm (78); Borough Green and Platt (105); and Tonbridge (164) and also the smaller settlements (137) and alternative sites suggested (135).
- 1.2.3 Turning to topic based responses, the three subjects attracting the largest numbers of representations include the green belt (197), housing issues (125) not including affordable housing (26) and economic development (88). Tonbridge Town Centre (60) and traffic and transportation (46) were also significant, in numbers of representation alone.
- 1.2.4 It is worth noting that the representations range significantly in the material they present. On the one hand some are straightforward and relatively brief comments about specific matters or sites. Others put forward a range of technical information that has required consideration. All approaches are material and relevant and the ultimate weight to be placed on them depends on the significance of the planning issues raised and how that affects the main thrust of the local plan.
- 1.2.5 It is worth noting that some of the responses received were supported by signatories, social media comments or on-line petitions. In most cases these simply expressed support for another response and did not provide contact details or explicitly state that they should be formally registered as responses, but they have been acknowledged in the schedule of responses at Annex 1.. These can be summarised as follows:
- West Malling Parish Council's response was supported by 219 local residents;
 - Cllr Markham's proposal for an extension of the green belt boundary to the east as far as Wateringbury Road was supported by a petition of 117 signatories and 53 comments;

- New Allington Action Group (NAAG)'s response was supported by 172 comments and 1,074 signatories.

- 1.2.6 In addition to the expressions of support listed above, 30 individual, identical responses were made by the Friends of Offham Road.
- 1.2.7 Other representations have been received since the consultation closed, which have been noted and taken into consideration. These include a submission on behalf of the Parish Alliance (comprising Borough Green, Platt, Plaxtol, Wrotham and Ightham Parish Councils) in respect of the Borough Green Gardens proposals and a representation from Natural England in respect of the work required to comply with the Habitats Regulations.

The Main Themes in brief

- 1.2.8 As highlighted previously, Annex 1 sets out the main themes. A main theme is defined as an issue that was raised by a significant number of different respondents, or an issue raised by a statutory consultee or key stakeholder, or a point of national policy, regulation or planning practice guidance.
- 1.2.9 The proposed strategy and the larger potential development areas including the East Bank of the Medway, Aylesford/Ditton, Broadwater Farm, Borough Green and Tonbridge have received a range of very similar representations, which in broad terms reflect the comments that were received at the public exhibitions during the consultation exercise.
- 1.2.10 Infrastructure concerns are a common theme certainly in respect of the strategic development sites but also for other smaller sites, including the existing capacity of the highway network, GP surgeries and schools to be able to accommodate any new demands placed upon them by future development. Flood defences or the mitigation of flooding was also mentioned.
- 1.2.11 At the strategic level, concerns were expressed about the distribution of future development sites between the two housing market areas. In addition, concerns were expressed about the coalescence of settlements including urban areas and rural centres and villages.
- 1.2.12 Mitigating the potential impacts of development including those on air quality, character, the loss of agricultural land, countryside and Green Belt also featured.
- 1.2.13 In addition there was a range of specific issues raised which are detailed in Annex 1.
- 1.2.14 The proposed strategy in respect of smaller settlements also received a number of representations along similar lines.
- 1.2.15 There were also over 50 alternative sites suggested for potential development.

- 1.2.16 As would be expected there was a general theme of resistance to development at the various locations identified in the consultation document. Equally, however, there was some expression of support for the proposed strategy and the potential to deliver new infrastructure on the back of new development.
- 1.2.17 As the schedule of responses at Annex 1 shows, many of these issues will be addressed as part of the next stage of plan making and the drafting of policies, informed by further evidence, in particular the Infrastructure Delivery Plan.
- 1.2.18 The topic based themes also attracted a number of representations. Support for the retention of the Green Belt featured strongly, together with expressions of support for the proposed extension in the vicinity of West Malling and representations about larger increases being made. From other quarters objections to any increase in Green Belt were received and some felt there should be more Green Belt releases around Tonbridge, while others insisted all other options for development should be explored first.
- 1.2.19 Housing, economic development, the natural environment and transportation issues also attracted a range of responses, some of which reiterated the more site specific concerns received in respect of the proposed development strategy sites. In other cases there were challenges to the way in which some of the local plan evidence was prepared, for example in respect of establishing the objectively assessed needs for new housing. Some argued the figures are too low, others that they are too high.

The Survey Monkey responses

- 1.2.20 Most of the questions posed in the Survey Monkey received a positive response, in particular for the plan objectives, which 64% of respondents supported. However, there was less support for the proposed development strategy with 32% agreeing compared to 39% disagreeing.
- 1.2.21 In response to question 13, which asked respondents to rank which local features were important, controlling housing densities was the most popular first priority, with accessible public open spaces and providing affordable housing the next most popular.

Considering the Representations

- 1.2.22 The comments made in this report are of a general nature to provide an overall context for Members at this stage of our local plan. Annex 1 shows in more detail the range of the matters raised. In many cases and as indicated in the annex this is helpful in shaping our work, including finalising the evidence, as we move into the next stage. It will hopefully also provide Members with the focus for consideration into the next stages of the Local Plan process (see 1.4 below). That is important because it is apparent that there are some challenging and strategic decisions before the Council that will require careful consideration and should ultimately be based upon our duties in plan preparation supported by evidence

and shaped by the overall response to consultation. As ever with all levels of planning that process will need balance and judgement in a way that ensures we can deliver a sound local plan.

1.3 Local Plan Evidence – Update

Transport modelling – A20 corridor

- 1.3.1 The VISUM modelling of the A20 corridor commissioned with Kent Highways and Amey is now expected to be completed by the end of August. It will provide evidence for the traffic implications of the proposed strategy and the infrastructure improvements.

Transport Assessment

- 1.3.2 A further piece of work will assess the transportation implications of the proposed strategy across the rest of the borough taking account of growth scenarios in neighbouring authorities as well. This will not be as detailed as the VISUM modelling around the A20, but will provide supporting evidence for the other potential major development proposals and the development of policies.

Air Quality Assessment

- 1.3.3 This will be informed in part by the Transport Assessment and so it will follow once the outputs from the aforementioned evidence are available.

Employment Land Review Update

- 1.3.4 The first Employment Land Review was completed in December 2014 and is now in the process of being updated. This will take into consideration any significant changes in the supply of employment land, for example, as a result of permitted development rights allowed for changes of use to residential. It will clarify the objectively assessed needs for additional employment land over the plan period.

Gypsy and Traveller Accommodation Assessment Update

- 1.3.5 The Gypsy and Traveller Accommodation Assessment or GTAA was prepared in 2012/13, prior to the amendments to the Government's national Planning Policy for Traveller Sites, in August 2015 and consequently an update is now required. The consultants Arc4, who have recently prepared a similar update for Sevenoaks District have been appointed for this task.

Infrastructure Delivery Plan

- 1.3.6 The Infrastructure Delivery Plan will be prepared after the proposed strategy is confirmed and the location of the future development sites is known. In the meantime regular dialogue is being maintained between officers and the main infrastructure providers regarding the emerging local plan.

Sustainability Appraisal

- 1.3.7 An appraisal of suitable and deliverable potential development sites will need to be undertaken in addition to an appraisal of the draft policies in the detailed plan.

Habitats Regulations Assessment

- 1.3.8 This is an on-going assessment in accordance with the regulations, looking at the potential impact of the development strategy on the Kent Downs Woodlands which is designated as a Special Area of Conservation.

Green Infrastructure Report

- 1.3.9 This will be an update of the report that informed the Green Infrastructure Network that features in the Council's Managing Development and the Environment DPD.

Open Space

- 1.3.10 This is a piece of evidence that takes stock of existing open space provision in the borough and considers national benchmark guidelines for future provision.

Strategic Flood Risk Assessment (update)

- 1.3.11 The Level 1 report will need to be updated with flood mapping due to be published by the Environment Agency later this year.

Green Belt Study: Stage 2 Report

- 1.3.12 This will need to start with the current study. It will need to take account of the assessed needs for housing and employment land and the need to promote sustainable patterns of development.

Market Delivery Study

- 1.3.13 This will look at the issue of market capacity across the housing market areas, taking account of historical records of delivery and proposed growth levels within the borough and in neighbouring districts.

Whole Plan Viability

- 1.3.14 The cumulative effects of local standards, eg affordable housing, on the deliverability of the development strategy in the plan will need to be undertaken. This may encompass the viability of introducing the likely replacement for the Community Infrastructure Levy (CIL) which will probably be the Local Infrastructure Tariff (LIT) as recommended by the Government appointed CIL Review Panel. An announcement is expected in the next few months.

Local Plan Position Statement

- 1.3.15 This needs to be updated to reflect the progress made with evidence gathering and plan-making since September 2016.

1.4 Next Steps

- 1.4.1 The purpose of this report has been to provide an opportunity to reflect on the overall response to the first stage of consultation and provide some basis for the next steps in the coming months. Due to the cancellation of the June 6th meeting of this Board, it is proposed that an additional meeting is timetabled before the next scheduled in November. Members will be aware that a provisional date of 21st September was arranged soon after the decision to cancel the June meeting.
- 1.4.2 Over the summer and into the early autumn all Members will be invited to a meeting(s) to consider in more detail the responses to the Regulation 18 consultation and how these are taken into consideration informing the proposed development strategy that will ultimately feature in the local plan. It is envisaged that this will provide a further opportunity for Members to be involved in this important piece of work. Members will be advised of the outcomes of the Sustainability Appraisal process which will help inform the refinement of the strategy. Depending on the timing of these sessions it may be necessary to revise the date of the Advisory Board meeting of 21st September. That meeting and the November meeting of the Advisory Board will receive updates in respect of Members involvement and progress on the evidence base, but the main will focus will be on agreeing the strategy.
- 1.4.3 In the meantime work will continue in respect of the evidence base described at section 1.3 and drafting of the document that will become the Local Plan will begin.
- 1.4.4 It is anticipated that the November meeting will consider the draft Local Plan itself with a recommendation to approve the Plan and any accompanying documents for the purposes of the next major public consultation exercise required by Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012. If agreed the recommendation will be considered by the next meeting of the full Council in February 2018 after which the consultation will begin.
- 1.4.5 As a result of these changes it is necessary to make a further amendment to the Local Plan timetable to take account of the additional Board meeting and seeking full Council approval. A revised version is appended to this report at Annex 3.

1.5 Legal Implications

- 1.5.1 It is important that the Local Authority has an up to date development plan for the purposes of long term future planning and determining planning applications. The Council needs to ensure that it continues to comply with the regulations governing the Sustainability Appraisal process and the Habitats Regulations Assessment.

1.6 Financial and Value for Money Considerations

- 1.6.1 There are costs arising from the preparation and updating of the evidence base using consultants, but these can be met from the Local Plan budget.

1.7 Risk Assessment

- 1.7.1 The risks associated with failing to prepare and keep up to date a robust, sound Local Plan include, loss of local control over development decisions, an increasing number of successful appeals and possible intervention by the Secretary of State.

1.8 Recommendations

- 1.8.1 That the content of the report be **NOTED** and the revised Local Plan timetable at Annex 3 be agreed.

The Director of Planning, Housing and Environmental Health confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and policy Framework.

contact: Ian Bailey
Planning Policy Manager

Steve Humphrey
Director of Planning Housing and Environmental Health

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MAIN ISSUE: STRATEGY - GENERAL

Detailed Issue	TMBC Response	Action
<p>Concerned about the deliverability of some of the sites, especially those in multiple ownership.</p>	<p>During the preparation of the Strategic Land Availability Assessment (SLAA) evidence was sought on availability and only those sites where there is a high degree of confidence about deliverability during the plan-period feature in the Local Plan.</p>	<p>Publish final Strategic Land Availability Assessment (SLAA) report. No action required in respect of the Local Plan.</p>
<p>Concerned that a disproportionate amount of development is concentrated in the north-eastern part of the borough. A better balanced strategy across a range of settlements needs to be considered. Object to unequal distribution of housing across the borough, with too great a weighting on building in the Maidstone area and not in the Tonbridge area. Concerned that only minor areas around the hub of Tonbridge have been identified for development.</p>	<p>The spatial distribution of the sites in the draft development strategy was shaped by many factors including local evidence, the plan objectives, building blocks, the guiding principles, Government policies, constraints and opportunities. In terms of opportunities, these are not just opportunities to deliver homes but also opportunities to deliver significant improvements to infrastructure (schools, highways and healthcare) which could benefit existing as well as new communities. The Council considers that strategically planned development in South Aylesford and Ditton in the north-eastern part of the borough could provide longer-term solutions to transport challenges in the vicinity. In respect of the East Bank of the Medway, this involves bringing forward a site for development that was already identified for this purpose in the Council's existing adopted Development Plan. The concern about the small scale development identified around Tonbridge – compared to the scale of</p>	<p>The Sustainability Appraisal/ Strategic Environmental Assessment (SA/SEA) process will clearly demonstrate the rational for the sites that feature in the Local Plan,</p> <p>Publish and take account of the Local Plan Market Delivery Study during plan-making.</p> <p>Review the balance of the development strategy across the borough in light of the updated SA/SEA, Local Plan Market Delivery Study, other evidence and comments received during the Reg.18 consultation.</p>

MAIN ISSUE: STRATEGY - GENERAL

Detailed Issue	TMBC Response	Action
	development identified elsewhere - is noted and will be taken into account as the development strategy evolves.	
The strategy is dominated by a few strategic sites which brings into question whether the short to medium term housing needs of the borough will be adequately addressed. More smaller sites should be included.	In addition to strategic sites - which offer genuine opportunities to deliver significant improvements to infrastructure provision – half of the sites that feature in the development strategy could yield fewer than 100 units. It is also important to bear in mind that the Council can demonstrate a healthy housing land supply position for the next five years which will contribute significantly to meeting housing needs in the short-term. However, given the Government messages in the Housing White Paper about the need to diversify the housing market and opening it up to smaller house builders, opportunities for including additional smaller sites in the Local Plan will be considered.	Assess and appraise opportunities for including additional smaller sites in the development strategy.
Publication of the settlement hierarchy would be useful to illustrate how the locations were chosen and what services/facilities are available for sustainable development.	The plan objectives, guiding principles and the Sustainability Appraisal of the reasonable alternatives, as well as the Reg.18 document itself, demonstrate how sites were selected. However, it is noted that a settlement hierarchy is not explicitly stated in the Local Plan. Consideration will be given to including this as part of the next stage of plan-making along with a more transparent process for site selection.	Consider including a policy/policies in the Local Plan on the settlement hierarchy that exists in the borough and how this has and will shape the development strategy. The SA/SEA process will clearly demonstrate the rationale for the sites that feature in the Local Plan.

MAIN ISSUE: STRATEGY - GENERAL

Detailed Issue	TMBC Response	Action
Object to certain 'suitable' sites featuring in the Strategy and not others. A clearer site methodology is required to demonstrate why certain sites have been selected and others have not been included	Noted. Consideration will be given to including a clearer site selection methodology as part of the plan-making process.	The SA/SEA process will clearly demonstrate the rationale for the sites that feature in the Local Plan.
There is far too little employment land.	The Call for Sites exercise invited the submission of sites for economic development as well as housing and the draft strategy reflects suitable and deliverable sites for employment that accord with the plan objectives, and guiding principles. However, the concern is noted and the Council is in the process of up-dating the employment land review evidence. The outputs from this exercise will inform the next more detailed stage of plan-making. The Council will aim to respond positively to this evidence, whilst being mindful of the Government's policy in the National Planning Policy Framework that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.	Update the Employment Land Review and consider the outputs during the preparation of the more detailed Local Plan.
The role of rural service centres in delivering development is downplayed.	The development strategy was shaped by the guiding principles which included focussing opportunities adjacent to a range of settlements across the borough to help support and sustain	No action required.

MAIN ISSUE: STRATEGY - GENERAL

Detailed Issue	TMBC Response	Action
	local communities, big and small. The draft Local Plan proposes significant opportunities for development at the rural service centres of Borough Green, Hadlow, East Peckham and West Malling.	
Further consideration should be given to the role that other rural settlements can play in meeting the Council's housing need. It would be advantageous in spatial terms to identify specific deliverable sites at all the second and third tier settlements in the borough.	The site assessment process that features in the Strategic Land Availability Assessment (SLAA) took account of the sustainability credentials of each site. This examined the proximity of the site to public transport nodes (bus stops/train stations), shops, schools and healthcare facilities. Many of the other rural settlements in the borough do not perform well against this set of criteria and for these reasons sites put forward as part of the SLAA process at these locations were more often than not assessed as unsuitable and not taken forward. The Government makes it very clear in the National Planning Policy Framework (NPPF) that policies in Local Plans should be based upon and reflect the presumption in favour of sustainable development.	No action required in response to the issue. The SA/SEA process will clearly demonstrate the rationale for the sites that feature in the Local Plan.
There is no indication at this stage of the quantum of development that is expected to be delivered by each of the sites.	The Local Plan does identify that the draft development strategy, in its entirety, could yield approximately 10,000 units (para.5.9.1). However, it is noted that the potential quantum of development on each strategic component is not estimated. Given the early stage of plan-making,	Include the potential quantum of development for each site in the next more detailed version of the Local Plan. Publish and take account of the Local Plan Market Delivery Study during plan-

Detailed Issue	TMBC Response	Action
	<p>it is challenging to give a clear figure for each site because the detailed requirements in terms of infrastructure will be not known until the strategy is firmed up and the Infrastructure Delivery Plan is fully developed in conjunction with the various infrastructure providers. As the plan-making process advances and more supporting evidence emerges, greater detail on what could be realistically delivered at each site will be forthcoming.</p>	<p>making. Prepare the Infrastructure Delivery Plan.</p>
<p>The potential yield of 10,000 is far in-excess of the net need of 6,000 units. The 10,000 should be reduced by cutting back of development outside of the Green Belt.</p>	<p>The Council considers that at this early stage of plan-making it is wise to propose a development strategy of this size because it builds in some flexibility and choices. As the plan-making process advances, this potential yield may evolve and be refined taking into account the responses to the consultation and key pieces of evidence including the Market Delivery Study and the Infrastructure Delivery Plan. It is also important to bear in mind that the Government expects (see para.47 in the National Planning Policy Framework) that a buffer above the net need for housing needs to be included to ensure choice and competition in the market for land.</p>	<p>Publish and take account of the Local Plan Market Delivery Study during plan-making. Prepare the Infrastructure Delivery Plan.</p>
<p>The sustainability buffers need to be explained and justified.</p>	<p>The sustainability buffers are explained and justified in section 5.8 of The Way Forward Reg 18 consultation document. The Local Plan</p>	<p>No action required.</p>

Detailed Issue	TMBC Response	Action
	<p>stresses that they have only been devised as a guide for focussing on a potential way forward; they are not prescriptive. Given that there are insufficient brownfield sites within settlement confines to meet the need for housing, greenfield sites beyond the existing confines must be considered if the Council is to positively address objectively assessed development requirements. The buffers have been devised to help focus on what could represent a proportionate approach to future development.</p>	
<p>Transport and other supporting infrastructure needs major improvement.</p>	<p>The need to improve infrastructure is a strong theme running through the Local Plan. It features in plan objective 2 and guiding principle 6 and is one of the primary reasons why some of the strategic development sites have been proposed, in particular South Aylesford and Ditton and Borough Green and Platt.</p>	<p>No action required in response to the issue. Prepare the Infrastructure Delivery Plan.</p>

MAIN ISSUE: STRATEGY - THE EAST BANK OF THE MEDWAY

Detailed Issue	TMBC Response	Action
<p>Concern over highways capacity to cope with additional development and the associated congestion.</p>	<p>Through the Local Plan process we would seek to ensure the provision of adequate highways infrastructure to serve new developments and integrate them into existing communities. Kent County Council (KCC) Highways have provided guidance on the highway implications of the potential development strategy on the existing network and potential new infrastructure needed. To further inform this work we are undertaking VISUM modelling of the traffic flows around the A20. This modelling includes both the potential Bushey Wood and Aylesford Quarry sites and will include looking at traffic flows along Bull Lane, Rochester Road, Forstal Road and Aylesford High Street. A borough wide Transport Assessment will also be undertaken.</p>	<p>The Council is in the process of gathering evidence on highway capacity and congestion in the vicinity of the A20. The outputs, along with regular engagement and input from Kent County Council as the highways authority for the Borough, will inform the refinement of the strategy as we move forward and prepare more detailed policies at the next stage of plan making.</p>
<p>Concerns over declining air quality as a result of increased traffic from new developments.</p>	<p>The Local Plan will seek to minimise air pollution by locating development outside of areas of existing poor air quality Air Quality Management Areas (AQMAs), in locations with access to existing transport hubs, as well as planning for a range of sustainable transport modes.</p>	<p>This is a more detailed matter that will be considered at the next stage of plan making in light of existing and emerging evidence.</p>
<p>Concern over pressure on health infrastructure.</p>	<p>Concern noted. The Council will seek to ensure that the necessary supporting infrastructure and services are secured as part of this development to make it acceptable in planning terms. The</p>	<p>Continue to engage with infrastructure providers to understand the infrastructure requirements and secure the additional services and facilities needed to serve</p>

MAIN ISSUE: STRATEGY - THE EAST BANK OF THE MEDWAY

Detailed Issue	TMBC Response	Action
	Council has and will continue to engage with the various infrastructure providers to understand existing capacity issues and the need for additional services. The outputs from this exercise will inform the preparation of the Infrastructure Delivery Plan and detailed policies to manage development of this site.	the new and existing communities in the area. Prepare Infrastructure Delivery Plan.
Concern over detrimental impact on the character of Eccles and countryside.	The Local Plan will seek to promote good design in all new developments in order to reinforce and sustain local distinctiveness of the built and natural environment, including the conservation of the Area of Outstanding Natural Beauty (AONB) and its setting.	This is a more detailed matter that will be considered at the next stage of plan making in light of existing and emerging evidence.
An Area Action Plan should be required.	Noted.	No action required.
Object to residential development at Aylesford Quarry.	Noted.	No action required.
Concern over loss of allotments and football pitch at Eccles which are important community assets.	Through the Local Plan we would seek to ensure there is no net loss of important community facilities.	No action required.
Disproportionate level of development proposed for Eccles village when compared to other villages in the Borough.	Policy CP16 of the adopted Core Strategy identifies an Area of Opportunity in the vicinity of Eccles for residential development post 2021. As	No action required.

MAIN ISSUE: STRATEGY - THE EAST BANK OF THE MEDWAY

Detailed Issue	TMBC Response	Action
	the development potential of the area has already been established, The Way Forward included this within the Building Blocks of the Local Plan. Development at other villages and Rural Service Centres in the Borough, have been included in the Local Plan where constraints allow.	
Loss of separation and identity between settlements on the East Bank.	The Local Plan will seek to promote good design in all new developments in order to reinforce and sustain local distinctiveness of the built and natural environment.	This is a more detailed matter that will be considered at the next stage of plan making in light of existing and emerging evidence.
Dispute that Bushey Wood is brownfield.	Only Building Block A relates to brownfield land. The Area of Opportunity is part of Building Block B and is identified in the current Core Strategy for potential residential development post 2021. The Area of Opportunity is comprised of both brownfield and greenfield land. The developable area proposed in The Way Forward is greenfield but avoids land designated for its nature conservation value and land at risk of flooding. It is also well related to Eccles village and its services.	No action required.
Loss of agricultural land.	The consultation document demonstrates that there are insufficient opportunities on brownfield land within the confines of existing settlements to adequately meet the assessed needs for new	No action required.

MAIN ISSUE: STRATEGY - THE EAST BANK OF THE MEDWAY

Detailed Issue	TMBC Response	Action
	<p>homes in the borough. This means that if the Local Plan is to positively plan to address assessed needs, developing on greenfield land at sustainable locations in the countryside will need to be considered.</p> <p>The Local Plan seeks to avoid development on the best and most versatile agricultural land where possible.</p> <p>When considering agricultural land, it is also important to take into account its economic value and viability as well as the grading, as highlighted in the Government's National Planning Policy Framework.</p>	
<p>Concern over impact on biodiversity and wildlife e.g. designated sites and Biodiversity Action Plan habitats.</p>	<p>The Local Plan will seek to allocate land with the least environmental value, minimise impacts on biodiversity and seek to provide net gains where possible. Protected wildlife sites, international, national and local, have been excluded from the potential developable areas.</p>	<p>No action required.</p>
<p>Concern over impact on Scheduled Ancient Monument</p>	<p>Through the Local Plan we would seek to avoid any substantial harm to, or loss of, designated heritage assets.</p>	<p>No action required.</p>

MAIN ISSUE: STRATEGY - THE EAST BANK OF THE MEDWAY

Detailed Issue	TMBC Response	Action
Road safety concerns, particularly the junction of Bull Lane and Rochester Road.	Through the Local Plan process we would seek to ensure the provision of adequate highways infrastructure to serve new developments and integrate them into existing communities. This includes the consideration of road safety issues.	Advice from KCC highways on appropriate solutions to this junction.
Inadequate car parking in Eccles.	Through the Local Plan process we would seek to ensure the provision of adequate highways infrastructure to serve new developments. This includes car parking for new developments.	This is a more detailed matter that will be considered at the next stage of plan making in light of existing and emerging evidence.
Concern over sewerage capacity.	Through the Local Plan process, we will liaise with water companies to ensure the adequate provision of both potable and wastewater infrastructure to serve new developments. This information will feed into the Infrastructure Delivery Plan which will accompany the Local Plan going forwards.	Input from water companies on where new water treatments facilities and other infrastructure may be required.
Concern regarding the impacts of development on traffic on the A228 and on the services and facilities at nearby Cuxton and Halling	The Council is mindful of the duty to cooperate with neighbouring authorities and is engaged on a regular basis with neighbouring planning authorities on Local Plan matters. This will continue in a constructive manner as plan-making at each of the authorities progresses.	Continue with constructive duty-to-cooperate meetings with neighbouring planning authorities as plan-making advances.

MAIN ISSUE: STRATEGY - SOUTH AYLESFORD AND DITTON

Detailed Issue	TMBC Response	Action
Support for development provided the road infrastructure is in place prior to the construction/ occupation of the new housing	Support noted.	No action required.
Impact of development on air quality in the surrounding area and further afield (at Waterringbury) will be unacceptable.	The Local Plan will seek to minimise air pollution by locating development outside of areas of existing poor air quality (AQMA) in locations with access to existing transport hubs, as well as planning for a range of sustainable transport modes.	This is a more detailed matter that will be considered at the next stage of plan making in light of existing and emerging evidence.
Loss of separation between Maidstone and TMBC. A “green wedge” should be incorporated.	Noted. The Local Plan will seek to promote good design in all new developments in order to reinforce and sustain local distinctiveness of the built and natural environment.	This is a more detailed matter that will be considered at the next stage of plan making in light of existing and emerging evidence.
Traffic congestion in the area is already at unacceptable levels and the existing road network will not cope with additional homes.	These concerns are noted.	The Council is in the process of gathering evidence on highway capacity and congestion in the vicinity of the A20. The outputs, along with regular engagement and input from Kent County Council as the highways authority for the Borough, will inform the refinement of the

MAIN ISSUE: STRATEGY - SOUTH AYLESFORD AND DITTON

Detailed Issue	TMBC Response	Action
		strategy as we move forward and prepare more detailed policies at the next stage of plan making.
Public transport links are inadequate to support additional development.	The planning policy for the area will address these issues in detail. It will be essential that the new development will enable improvements to public transport (including Barming Station) and cycle routes and pedestrian links. Public transport operators, TMBC and KCC work together closely to ensure that public transport is linked in to new developments. New measures are often introduced into existing areas (e.g. bus lanes) to improve public transport in the wider area too.	Continue to liaise with key stakeholders on this issue to deliver improvements across the local network. These more detailed matters will be considered at the next stage of plan making in light of existing and emerging evidence.
Barming train station should be improved along with links to it as part of the development proposals.	The planning policy for the area will address these issues. It will be essential that the new development will enable improvements to public transport and cycle routes and pedestrian links. The critical mass of new homes in the area will present Network Rail with the opportunity to review and improve Barming station and its facilities and links.	Continue to liaise with key stakeholders on this issue to deliver improvements across the local network. These more detailed matters will be considered at the next stage of plan making in light of existing and emerging evidence.
Cycle routes in and around the area should be provided and existing routes improved and enhanced.	The planning policy for the area will address these issues in detail. It will be essential for new development to enable improvements to cycle routes.	Continue to take opportunities to influence and inform the County's Cycling Strategy and support funding bids to expand and improve the network.

MAIN ISSUE: STRATEGY - SOUTH AYLESFORD AND DITTON

Detailed Issue	TMBC Response	Action
		These more detailed matters will be considered at the next stage of plan making in light of existing and emerging evidence.
Loss of trees and wildlife habitats is a concern.	The Local Plan will seek to allocate land with the least environmental value, minimise impacts on biodiversity and seek to provide net gains where possible.	This is a more detailed matter that will be considered at the next stage of plan making in light of existing and emerging evidence.
Scale of development proposed is disproportionate.	The Council is required to have a range of site sizes allocated for housing within the local plan. A strategic site in this location provides the opportunity to address a number of issues that would only be exacerbated if small sites were allocated here. Similarly, there is concern that the existing situation regarding both traffic congestion and air quality are already at unacceptable levels. Strategic development in this location is the only option that will realistically improve the current situation.	The Council is in the process of gathering evidence on highway capacity and congestion in the vicinity of the A20. The outputs, along with regular engagement and input from Kent County Council as the highways authority for the Borough, will inform the refinement of the strategy as we move forward and prepare more detailed policies at the next stage of plan making.
The proposals are contrary to Guiding Principle 6.	Objection noted, but do not agree. The existing situation will not be improved without the investment in infrastructure, services and facilities that will only result from a strategic development.	No action required.
Access to Maidstone Hospital (for emergency vehicles) is already	Additional development of a strategic nature provides the opportunity to make significant	Continue to engage with appropriate stakeholders to ensure access to

MAIN ISSUE: STRATEGY - SOUTH AYLESFORD AND DITTON

Detailed Issue	TMBC Response	Action
<p>compromised and additional development will make this worse.</p>	<p>improvements to the infrastructure, services and facilities in the area.</p>	<p>Maidstone Hospital is not compromised.</p> <p>The Council is in the process of gathering evidence on highway capacity and congestion in the vicinity of the A20. The outputs, along with regular engagement and input from Kent County Council as the highways authority for the Borough, will inform the refinement of the strategy as we move forward and prepare more detailed policies at the next stage of plan making.</p>
<p>Existing services and facilities (doctor surgeries, dentists, schools etc.) are already at or above capacity, this situation will be made worse with additional development.</p>	<p>Concerns noted. The Council will seek to ensure that the necessary supporting infrastructure and services are secured as part of this development to make it acceptable in planning terms. The Council has and will continue to engage with the various infrastructure providers to understand existing capacity issues and the need for additional services. The outputs from this exercise will inform the preparation of the Infrastructure Delivery Plan and detailed policies to manage development of this site.</p> <p>Additional development of a strategic nature provides the opportunity to make significant improvements to the infrastructure, services and facilities in the area. A quantum of development is needed to secure additional services and</p>	<p>Continue to engage with appropriate stakeholders to understand the infrastructure requirements and secure the additional services and facilities needed to serve the new and existing communities in the area.</p> <p>Prepare the Infrastructure Delivery Plan.</p>

MAIN ISSUE: STRATEGY - SOUTH AYLESFORD AND DITTON

Detailed Issue	TMBC Response	Action
	facilities.	
The housing market is saturated in this area due to the amount of new homes already being built.	Concerns noted. The emerging Local Plan Market Delivery Study will address the ability of the housing market to deliver new homes. This will inform the next stage of plan making.	This is a more detailed matter that needs to be considered at the next stage of plan making in light of existing and emerging evidence.
Loss of agricultural land is unacceptable.	<p>The Way Forward Reg 18 consultation document demonstrates that there are insufficient opportunities on brownfield land within the confines of existing settlements to adequately meet the assessed needs for new homes in the borough. This means that if the Local Plan is to positively plan to address assessed needs, developing on greenfield land at sustainable locations in the countryside will need to be considered.</p> <p>The Local Plan seeks to avoid development on the best and most versatile agricultural land where possible.</p> <p>When considering agricultural land, it is also important to take into account its economic value and viability as well as the grading, as highlighted in the Government's National Planning Policy Framework.</p>	No action required.
Support development in this location as it reduces the pressure for Green Belt land	Support noted. The Council is seeking to facilitate sustainable patterns of development,	No action required.

MAIN ISSUE: STRATEGY - SOUTH AYLESFORD AND DITTON

Detailed Issue	TMBC Response	Action
releases and is less constrained than other parts of the Borough.	providing the housing in the areas where it is needed.	
Support proposals as it provides opportunities for homes, jobs and infrastructure.	Noted.	No action required.
Concerns re. deliverability due to the number of different landowners and the potential for piecemeal development to take place, resulting in the cumulative impacts not being properly addressed.	It is the intention of the Council to take a holistic approach to the development of this area through the Local Plan, including the delivery of the infrastructure requirements.	This is a more detailed matter that needs to be considered at the next stage of plan making in light of existing and emerging evidence.
Open spaces should be provided as part of any development here.	This will be addressed in the Reg 19 Local Plan in light of the Open Space evidence.	This is a more detailed matter that needs to be considered at the next stage of plan making in light of existing and emerging evidence.
Concerned about the loss of high value amenity green space at site 212 (Land off Oakapple Lane), it should be kept as open space for the housing being built on the adjacent site in Maidstone Borough.	Amenity open space provision will be a matter for the planning application. Open space standards will be set out in the Reg 19 Local Plan and in the Maidstone Borough Local Plan for the site adjacent.	This is a more detailed matter that needs to be considered at the next stage of plan making in light of existing and emerging evidence.

MAIN ISSUE: STRATEGY – BROADWATER FARM

Detailed Issue	TMBC Response	Action
<p>Potential coalescence of Kings Hill with nearby settlements including East Malling and West Malling, resulting in the loss of their separate identities.</p>	<p>It is important to appreciate that the broad area indicated in the consultation document does not necessarily represent the extent of land that will be developed. Important matters such as highway capacity and access and designations such as Conservation Areas will be taken into account as the development strategy is refined and more detailed technical evidence is forthcoming. The concern about the potential risk to the separate identity of local settlements and hamlets in the vicinity is noted and will be taken into account as the more detailed policies are drafted for consultation.</p>	<p>Be mindful of concerns about the impact on the separate identities of settlements in the vicinity of Broadwater Farm as the relevant detailed policies are drafted for consultation.</p>
<p>The growth of Kings Hill should be contained within the existing boundaries.</p>	<p>The decision on the current extent of Kings Hill should not be taken out of context. The original extent of Kings Hill was defined by opportunities, constraints and the level of need at that time. Time has moved on and new, current evidence, in particular the need for homes, means that opportunities for the sustainable growth of Kings Hill now need to be considered, alongside other options across the borough.</p>	<p>No action required.</p>
<p>Potential loss of agricultural land, countryside and quiet lanes.</p>	<p>The Way Forward Reg 18 consultation document demonstrates that there are insufficient opportunities on brownfield land within the confines of existing settlements to adequately</p>	<p>Be mindful of the network of quiet lanes during the preparation of more detailed policies at the next stage of plan-making.</p>

	<p>meet the assessed needs for new homes in the borough. This means that if the Local Plan is to positively plan to address assessed needs, developing on greenfield land at sustainable locations in the countryside will need to be considered.</p> <p>The Local Plan seeks to avoid development on the best and most versatile agricultural land where possible.</p> <p>When considering agricultural land, it is also important to take into account its economic value and viability as well as the grading, as highlighted in the Government's National Planning Policy Framework.</p> <p>The issue of the potential impact on the network of quiet lanes is noted.</p>	
<p>Traffic congestion.</p>	<p>The Council is in the process of gathering evidence on highway capacity and congestion in the vicinity of the A20 which includes the Broadwater Farm location. The outputs, along with regular engagement and input from Kent County Council as the highways' authority for the borough, will inform the refinement of the strategy as we move forward and prepare more detailed policies at the next stage of plan-making.</p>	<p>The Council is in the process of gathering evidence on highway capacity and congestion in the vicinity of the A20. The outputs, along with regular engagement and input from Kent County Council as the highways authority for the Borough, will inform the refinement of the strategy as we move forward and prepare more detailed policies at the next stage of plan making.</p>

MAIN ISSUE: STRATEGY – BOROUGH GREEN AND PLATT

Detailed Issue	TMBC Response	Action
Traffic impacts and the capacity of the road network to cope with a development of this scale.	Effective planning for the whole site provides significant opportunities to address and find solutions to issues of traffic congestion	Be mindful of the issue of traffic impacts during the preparation of more detailed policies at the next stage of plan-making.
Insufficient local services and infrastructure to support a development of this scale.	Concerns noted. The Council will seek to ensure that the necessary supporting infrastructure and services are secured as part of this development to make it acceptable in planning terms. The Council has and will continue to engage with the various infrastructure providers to understand existing capacity issues and the need for additional services. The outputs from this exercise will inform the preparation of the Infrastructure Delivery Plan and detailed policies to manage the development of this site.	Continue engagement with infrastructure providers to understand the infrastructure requirements to support this development and its impact on local communities. Prepare Infrastructure Delivery Plan.
Air pollution concerns.	The Local Plan will seek to minimise air pollution by locating development outside of areas of existing poor quality (AQMA), in locations with access to existing transport hubs, as well as planning for a range of sustainable transport modes.	This is a more detailed matter that will be considered at the next stage of plan making in light of existing and emerging evidence.
Potential to impact on the Area of Outstanding Natural Beauty (AONB), including the setting of the Kent Downs AONB as well as the direct impact of the	The alignment of the link road in the consultation document is indicative. It is duly noted that this alignment does fall within the Kent Downs AONB and options for re-routing certain stretches of this	Investigate options for re-routing stretches of the proposed link road so that it minimises/avoids impacts on the

proposed link road.	highway so that it totally lies outside the AONB will be investigated.	AONB.
Loss of Green Belt.	<p>The Government's National Planning Policy Framework (NPPF) makes it very clear that Green Belt boundaries can be assessed and altered, in exceptional circumstances, during the preparation of a Local Plan.</p> <p>The Local Plan seeks to meet the Objectively Assessed Need (OAN) of the Borough over the plan period. The Building Blocks alone do not yield sufficient site to meet the OAN. Therefore other sites need to be identified.</p>	No action required.
Loss of countryside.	The Way Forward Reg 18 consultation document demonstrates that there are insufficient opportunities on brownfield land within the confines of existing settlements to adequately meet the assessed needs for new homes in the borough. This means that if the Local Plan is to positively plan to address assessed needs, developing on greenfield land at sustainable locations in the countryside will need to be considered.	No action required.
Deliverability of the development within	The issue of deliverability is essentially informed by availability and viability. These matters are	Secure a phasing plan for the whole site that is realistically deliverable and feed

<p>the Local Plan period.</p>	<p>best understood by land owners and developers. The strategic site north of Borough Green was promoted by a consortium of local land owners who have demonstrated a commitment and willingness to development an area of land north of the settlement during the plan-period. It is for the Council to ensure a realistic phasing planned is secured through the master-planning of the whole site in order to demonstrate how much housing will take place, and when, over the plan period.</p>	<p>this into the detailed policies that will be prepared at the next stage of plan-making.</p>
<p>Harm to the character of Borough Green.</p>	<p>The concerns about the impacts of the development on the character of Borough Green are noted. The Council considers that this issue can be effectively addressed through sensitive master-planning of the whole site, addressing issues including the location, scale, massing and design of development and including the location of open spaces and the circulation of traffic and people.</p>	<p>Consider the impacts on the character of Borough Green during the master-planning of the strategic site north of the settlement.</p>

MAIN ISSUE: STRATEGY - TONBRIDGE

Detailed Issue	TMBC Response	Action
The area is subject to flooding.	The Local Plan will seek to minimise risk of flooding by locating development outside of areas of high risk of flooding. High-level constraints, including areas a high risk of flooding (as identified in the Strategic Flood Risk Assessment (SFRA)), were excluded from the developable areas as illustrated in The Way Forward.	No action required.
Congestion along Brook Street.	Through the Local Plan process we would seek to ensure the provision of adequate highways infrastructure to serve new developments and integrate them into existing communities. KCC Highways have provided guidance on the highway implications of the potential development strategy on the existing network and potential new infrastructure needed. The Local Plan seeks to locate new development in locations with access to existing transport hubs, as well as planning for a range of sustainable transport modes.	This is a more detailed matter that needs to be considered at the next stage of plan making in light of existing and emerging evidence.
Lack of school places	Concerns noted. The Council will seek to ensure that the necessary supporting infrastructure and services are secured as part of this development to make it acceptable in planning terms. The Council has and will continue to engage with the various infrastructure providers to understand existing capacity issues and the need for additional services. The outputs from this	Continue to engage with appropriate stakeholders to understand the infrastructure requirements and secure the additional services and facilities needed to serve the new and existing communities in the area.

Detailed Issue	TMBC Response	Action
	exercise will inform the preparation of the Infrastructure Delivery Plan and detailed policies to manage development of this site.	Prepare the Infrastructure Delivery Plan.
Impact on GP services.	Concerns noted. The Council will seek to ensure that the necessary supporting infrastructure and services are secured as part of this development to make it acceptable in planning terms. The Council has and will continue to engage with the various infrastructure providers to understand existing capacity issues and the need for additional services. The outputs from this exercise will inform the preparation of the Infrastructure Delivery Plan and detailed policies to manage development of this site.	Continue to engage with appropriate stakeholders to understand the infrastructure requirements and secure the additional services and facilities needed to serve the new and existing communities in the area. Prepare the Infrastructure Delivery Plan.
Loss of countryside and impact on wildlife.	The Way Forward Reg 18 consultation document demonstrates that there are insufficient opportunities on brownfield land within the confines of existing settlements to adequately meet the assessed needs for new homes in the borough. This means that if the Local Plan is to positively plan to address assessed needs, developing on greenfield land at sustainable locations in the countryside will need to be	This is a more detailed matter that needs to be considered at the next stage of plan making in light of existing and emerging evidence.

Detailed Issue	TMBC Response	Action
	<p>considered.</p> <p>The Local Plan will seek to minimise impacts on biodiversity and seek to provide net gains where possible. Protected wildlife sites, international, national and local, have been excluded from the potential developable areas.</p>	
Brownfield land should be built on first.	<p>The Building Blocks include brownfield land within sustainable locations as a foundation for the Reg. 18 Local Plan development strategy. However the building blocks, either individually or in combination, would not yield sufficient land to meet our Objectively Assessed Need. Therefore sites beyond the existing settlement confines need to be considered, this includes land in the Green Belt in close proximity to existing settlements.</p>	No action required.
Loss of Green Belt.	<p>The Government’s National Planning Policy Framework makes it very clear that Green Belt boundaries can be assessed and altered, in exceptional circumstances, during the preparation of a Local Plan.</p> <p>The Local Plan seeks to meet the Objectively Assessed Need of the Borough over the plan period. The Building Blocks alone do not yield sufficient site to meet the OAN. Therefore other sites need to be identified. Due to the extensive</p>	No action required.

Detailed Issue	TMBC Response	Action
	Green Belt coverage across the Borough, and in order to meet the needs for both Housing Market Areas, the Council has proposed that land be taken out of the Green Belt at this location to meet development requirements.	
Surface water flooding issues	The 2016 SFRA identifies that part of the site is subject to surface water flooding. In consultation with the Lead Local Flood Authority (KCC) we would require the site specific flood risk assessment to demonstrate how any surface water run off issue will be managed.	No action required.
The speed of traffic and congestion along Stocks Green Road and Leigh Road are a safety concern.	The Local Plan process will seek to ensure the provision of adequate highways infrastructure to serve new developments and integrate them into existing communities. This includes the consideration of road safety issues.	No action required.

MAIN ISSUE: STRATEGY - SMALLER SETTLEMENTS

Detailed Issue	TMBC Response	Action
<p>East Peckham:</p> <ul style="list-style-type: none"> • Sites should be small scale • East Peckham does not have a train station and has limited facilities, development here is a poor choice. • Development should be within the village confines only • Flooding is an issue for sites in this location • More development should be proposed here as East Peckham is a Rural Service Centre. • Local infrastructure will not be able to cope with the demands of new development • Narrow country lanes, character and local services will all be impacted upon negatively if development takes place. • Mergence of Snoll Hatch and East Peckham • Lack of suitable access options • Objects to sites in East Peckham as they cannot be accessed safely and potentially flood. 	<p>The Local Plan should contain a mixed portfolio of housing sites for the plan period to ensure a sustainable pattern of development and this includes the need for both smaller sites in sustainable locations such as this site in East Peckham.</p> <p>The smaller sites are located at settlements with a range of services and facilities. At East Peckham, the opportunities to allocate land only within the village confines is not viable due to the high risk of flooding.</p> <p>Flooding information has been provided by the Environment Agency. <i>No sites on land at risk of flooding have been proposed for housing as identified in Building Block C in the Regulation 18 document 'The Way Forward'</i></p> <p>Close consultation is ongoing with infrastructure providers and with the highways authority to ensure that any impacts of new development are mitigated.</p> <p>The Local Plan will seek to promote good design in all new developments in order to reinforce and sustain local distinctiveness of the built and natural environment.</p>	<p>Traffic and transport issues will be considered at the next stage of plan making in light of existing and emerging evidence</p> <p>The outputs, along with regular engagement and input from Kent County Council as the highways authority for the Borough, will inform the refinement of the strategy as we move forward and prepare more detailed policies at the next stage of plan making.</p>

MAIN ISSUE: STRATEGY - SMALLER SETTLEMENTS

Detailed Issue	TMBC Response	Action
	There are a number of potential options for access. New housing is needed in sustainable locations such as East Peckham.	
<p>West Malling:</p> <ul style="list-style-type: none"> • Support for the strategy for West Malling • Objections to the strategy for West Malling due to highway infrastructure, impact on heritage assets, lack of amenities and loss of green space. Strategy for West Malling should only be for smaller scale development • Strategy should be more sites closer to the village centre • Strategy should be for affordable housing only and community uses. 	The Local Plan should contain a mixed portfolio of housing sites for the plan period to ensure a sustainable pattern of development and this includes the need for both smaller sites in sustainable locations such as West Malling.	<p>Traffic and transport issues will be considered at the next stage of plan making in light of existing and emerging evidence</p> <p>The outputs, along with regular engagement and input from Kent County Council as the highways authority for the Borough, will inform the refinement of the strategy as we move forward and prepare more detailed policies at the next stage of plan making.</p>
<p>Hadlow:</p> <ul style="list-style-type: none"> • The road network will not cope with the number of planned residential units. • The number of planned units should be reduced to minimise 	The Local Plan should contain a mixed portfolio of housing sites for the plan period to ensure a sustainable pattern of development and this includes the need for both smaller sites in sustainable locations such as these site in Hadlow	<p>Traffic and transport issues will be considered at the next stage of plan making in light of existing and emerging evidence</p> <p>The outputs, along with regular engagement and input from Kent County</p>

MAIN ISSUE: STRATEGY - SMALLER SETTLEMENTS

Detailed Issue	TMBC Response	Action
<p>the impact on the form and character of the settlement</p> <ul style="list-style-type: none"> • The strategy for Hadlow will have a detrimental impact on traffic, pollution, residential amenity, heritage assets, form and character of the settlement • . • Flooding issues • Support for more housing allocations around Hadlow (and smaller settlements generally) 	<p>The highways authority has been involved in the process of selecting suitable sites for the emerging local plan. In many cases, access and highways can be mitigated. In the case of the sites on Court Lane, the highways authority does not consider this to be the case and it is proposed that the extent of the proposals in this vicinity be reduced.</p> <p>Flooding information has been provided by the Environment Agency. No sites on land at risk of flooding have been proposed for housing.</p>	<p>Council as the highways authority for the Borough, will inform the refinement of the strategy as we move forward and prepare more detailed policies at the next stage of plan making.</p>
<p>General:</p> <ul style="list-style-type: none"> • Support for sites identified in Borough Green, Wrotham and Offham • Wrotham would be a better location than East Peckham or Hadlow for development as it has excellent public transport services and road links. • Supports a strategy for more development around smaller settlements, especially at Offham. 	<p>Noted.</p>	<p>Traffic and transport issues will be considered at the next stage of plan making in light of existing and emerging evidence</p> <p>The outputs, along with regular engagement and input from Kent County Council as the highways authority for the Borough, will inform the refinement of the strategy as we move forward and prepare more detailed policies at the next stage of plan making.</p>

MAIN ISSUE: STRATEGY – ALTERNATIVE SITES

Detailed Issue	TMBC Response	Action
Gracelands site, Ightham (Call for Sites ref: 230 & 296)	Both of these sites fall wholly within the Kent Downs Area of Outstanding Natural Beauty. In line with para. 17 of the NPPF, land for development should prefer land of lesser environmental value and as such these sites are not considered suitable for development.	No action required.
Aylesford Newsprint (Call for Sites ref: 431)	<p>This site was not promoted by the landowner for development as part of the SLAA, as a result there is uncertainty as to the availability of the site. Therefore the site is not considered available for development.</p> <p>Update: Since the publication of the SLAA a planning application for mixed use development has been received that includes 450 homes. The Council has concerns about the suitability of the site for housing due to flooding, contamination, air pollution, noise and odours, lack of community facilities and road infrastructure.</p> <p>The site is wholly allocated as Employment Land in the current Development Plan.</p>	No action required.
Grange Farm, Tonbridge (Call for Sites ref: 275)	Green Belt but no other major constraints on site.	This will be subject to further assessment through the SA/SEA process.
Hermitage Farm, Winterfield Lane, East Malling (Call for Sites ref: 268)	Outside of the confines of the urban area, there are no other major constraints on site.	This will be subject to further assessment through the SA/SEA process.

MAIN ISSUE: STRATEGY – ALTERNATIVE SITES

Detailed Issue	TMBC Response	Action
West of Coldharbour Lane, Aylesford (Call for Sites ref: 193)	The SLAA submission suggested that this site was not available until the end of the plan period and as such was not included in The Way Forward.	This will be subject to further assessment through the SA/SEA process.
North of RBLI warehouse, Aylesford (Call for Sites ref: 419)	No major constraints on site.	This will be subject to further assessment through the SA/SEA process.
Dark Hill Farm, Borough Green (Call for Sites ref: 256)	This site falls wholly within the Kent Downs Area of Outstanding Natural Beauty. In line with para. 17 of the NPPF, land for development should prefer land of lesser environmental value and as such this site is not considered suitable for development.	No action required.
Wings of the Morning Field, Wrotham (for industrial)	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
School Field, Back Lane, Shipbourne (Call for Sites ref: 347)	SLAA assessment concluded this site was unsuitable for development.	No action required.
Plaxtol Allotments (Call for Sites ref: 333)	Green Belt. Unsustainable location with poor access to services, and not large enough to deliver infrastructure improvements.	This will be subject to further assessment through the SA/SEA process.
Land rear of London Road and Town Hill, West Malling (Call for Sites ref: 350 and	These form part of Brickfields (along with site 433). The sites were not promoted by the	This will be subject to further assessment through the SA/SEA process.

MAIN ISSUE: STRATEGY – ALTERNATIVE SITES

Detailed Issue	TMBC Response	Action
396)	<p>landowner for development as part of the SLAA, as a result there is uncertainty as to the availability of the site.</p> <p>There is now a current planning application on site 396 (the eastern half of the site) and although this does not prove availability, it does demonstrate a willingness to bring this site forward subject to the SA/SEA process. Therefore the sites are not considered available for development.</p>	
Brickfields, West Malling (Call for Sites ref: 433)	<p>These form part of Brickfields (along with site 433). The sites were not promoted by the landowner for development as part of the SLAA, as a result there is uncertainty as to the availability of the site.</p> <p>There is now a current planning application on site 396 (the eastern half of the site) and although this does not prove availability, it does demonstrate a willingness to bring this site forward subject to the SA/SEA process. Therefore the sites are not considered available for development.</p>	This will be subject to further assessment through the SA/SEA process.
Land at Teston Road, West Malling (Call for Sites ref: 220)	SLAA assessment concluded this site was unsuitable for development.	No action required.

MAIN ISSUE: STRATEGY – ALTERNATIVE SITES

Detailed Issue	TMBC Response	Action
Land at Crouch Lane, Borough Green (Call for Sites ref: 300)	Green Belt but no other major constraints on site.	This will be subject to further assessment through the SA/SEA process.
Land off Fields Lane, Wateringbury (Call for Sites ref: 303)	The site falls wholly within Grade 1 Agricultural Land. In line with para. 112 of the NPPF, local planning authorities should seek to use areas of poorer quality land in preference to that of a high quality. Therefore this site is not considered suitable for development.	No action required.
Land North of Tonbridge Road, Hildenborough (Call for Sites ref: 421)	This site was not promoted for the landowner for development as part of the SLAA, as a result there is uncertainty as to the availability of the site. Therefore the site was not considered available for development. Subsequently, the landowners have confirmed the site is available.	This will be subject to further assessment through the SA/SEA process.
Bell Lane, Burham (Call for Sites ref: 270)	No major constraints on site, but limited services in close proximity.	This will be subject to further assessment through the SA/SEA process.
Peters Village, northern extension (Call for Sites ref: 271)	SLAA assessment concluded this site was unsuitable for development.	No action required.
Peters Village, southern extension (Call for Sites ref: 272)	SLAA assessment concluded this site was unsuitable for development.	No action required.
Land at Wouldham Allotments,	No major constraints on site, but limited services	This will be subject to further assessment

MAIN ISSUE: STRATEGY – ALTERNATIVE SITES

Detailed Issue	TMBC Response	Action
Wouldham (Call for Sites ref: 273)	in close proximity.	through the SA/SEA process.
Land north-east of Oakhill House, Hildenborough	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
North of Hadlow Park (Call for Sites ref: 366)	Green Belt and significant areas of TPOs on site. In line with para. 17 of the NPPF, land for development should prefer land of lesser environmental value and as such these sites are not considered suitable for development.	No action required.
Land at South Lodge, Corio Farm, East Malling (Call for Sites ref: 253)	SLAA assessment concluded this site was unsuitable for development.	No action required.
Spiders Hall Field (Call for Sites ref: 218) for commercial led mixed use	Green Belt and remote from settlement confines. This remoteness may be an issue for residential uses but may not be so much of an issue as it is promoted for commercial led mixed use.	This will be subject to further assessment through the SA/SEA process.
Postern Park Quarry, Tonbridge, TN9 1PD. Leisure and recreational facilities, with opportunities to provide a marina and holiday accommodation	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
Little Trench Farm, north Tonbridge (Call for Sites ref: 422)	This site is already included in the Strategy.	No action required.

MAIN ISSUE: STRATEGY – ALTERNATIVE SITES

Detailed Issue	TMBC Response	Action
Land north and East of Hadlow.	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
Land between Hildenborough and Leigh.	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
Land to the south of the Tesco Depot in Snodland	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
Land at Church Lane East Peckham (Call for Sites ref: 427)	This site was not promoted by the landowner for development as part of the SLAA, as a result there is uncertainty as to the availability of the site. Therefore the site is not considered available for development.	No action required.
North of Maidstone Road, Platt (Call for Sites ref: 235)	Green Belt with currently poor access to services.	This will be subject to further assessment through the SA/SEA process.
Land adjacent to Kemsing Road and Borough Green Road	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
Land at Adpine Antiques	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.

MAIN ISSUE: STRATEGY – ALTERNATIVE SITES

Detailed Issue	TMBC Response	Action
The Redland site	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
LondonMetric Saturn Ltd retail park	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
Call for Sites ref: 213	SLAA assessment concluded this site was unsuitable for development.	No action required.
Higham Lane/Barchester Way area, north Tonbridge	Locations comprised of Call for Sites ref 275, 346, 424 and 276. SLAA assessment concluded that site s424 and 276 were unsuitable for development. Sites 275 and 346 are within the Green Belt but with no other major constraints on site.	Sites 275 and 346 will be subject to further assessment through the SA/SEA process.
Former SCA site, Larkfield	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
Drylands Road site, Borough Green (Call for Sites ref: 316)	Green Belt but no other major constraints on site	This will be subject to further assessment through the SA/SEA process.
Land south of Hermitage Court (Call for Sites ref: 239)	In the Strategy already.	No action required.

MAIN ISSUE: STRATEGY – ALTERNATIVE SITES

Detailed Issue	TMBC Response	Action
Site which fronts on to Vauxhall Lane is an appropriate location for a new modern up-to-date office building	Site 334 is already in the strategy. SLAA assessment concluded that Site 335 was unsuitable for development.	No action required.
Medway Cement Works, Snodland	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
Land at St Vincents Lane, ME19 5BW	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
West of Fatherwell Avenue, West Malling (Call for Sites ref: 325)	SLAA assessment concluded this site was unsuitable for development.	No action required.
North of Offham Road, West Malling (Call for Sites ref: 326)	Green Belt and the majority of the site falls within Grade 1 Agricultural Land. In line with para. 112 of the NPPF, local planning authorities should seek to use areas of poorer quality land in preference to that of a high quality. Therefore the majority of this site is considered unsuitable for development. However there may be some limited potential in the east of the site.	This will be subject to further assessment through the SA/SEA process.
West of West Malling (Call for Sites ref: 327)	Green Belt and the majority of the site falls within Grade 1 Agricultural Land. In line with para. 112 of the NPPF, local planning authorities should seek to use areas of poorer quality land in	This will be subject to further assessment through the SA/SEA process.

MAIN ISSUE: STRATEGY – ALTERNATIVE SITES

Detailed Issue	TMBC Response	Action
	preference to that of a high quality. Therefore the majority of this site is considered unsuitable for development. However there may be some limited potential in the east of the site.	
Site at Westbank, 64 Sevenoaks Road, Borough Green	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
The old Colas site	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan. However, it is an existing employment site within the urban confines of Tonbridge	No action required.
Village Hall, Norman Road, West Malling (Call for Sites ref: 379)	SLAA assessment concluded this site was unsuitable for development.	No action required.
Green Lane, Trottiscliffe (Call for Sites ref: 258)	This site falls wholly within the Kent Downs Area of Outstanding Natural Beauty. In line with para. 17 of the NPPF, land for development should prefer land of lesser environmental value and as such this site is not considered suitable for development.	No action required.
Land off Hermitage Lane (Call for Sites ref: 294)	SLAA assessment concluded this site was unsuitable for development.	No action required.

MAIN ISSUE: STRATEGY – ALTERNATIVE SITES

Detailed Issue	TMBC Response	Action
Hadlow College campus should be removed from the Green Belt so that the college can make better use of the site.	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
West of The Orpines, Watringbury (Call for Sites ref: 353)	The site falls wholly within Grade 1 Agricultural Land. In line with para. 112 of the NPPF, local planning authorities should seek to use areas of poorer quality land in preference to that of a high quality. Therefore this site is not considered suitable for development.	No action required.
Pelican Court, Watringbury (Call for Sites ref: 429)	This site was not promoted for the landowner for development as part of the SLAA, as a result there is uncertainty as to the availability of the site. Therefore the site is not considered available for development.	No action required.
Volvo garage site, Tonbridge Road, Hildenborough. The garage could relocate to Cannon Lane, Tonbridge and houses could be built on the site.	This site was not submitted under the 'Call for Sites' exercise and is therefore not considered for this local plan.	No action required.
East of Church Road, Offham (Call for Sites ref: 323)	SLAA assessment concluded this site was unsuitable for development.	No action required.

MAIN ISSUE: TONBRIDGE TOWN CENTRE

Detailed Issue	TMBC Response	Action
Character and charm of Tonbridge should be maintained and enhanced through new development and design	Noted. These are more detailed matters that need to be considered at the next stage of plan making in light of existing and emerging evidence.	No action required.
The Council should take a holistic and flexible approach to the development of the town centre and its uses. Balance of all appropriate uses is needed (including retail, cultural uses, health, housing and education)	Noted. These are more detailed matters that need to be considered at the next stage of plan making in light of existing and emerging evidence.	No action required.
Traffic congestion – consideration needs to be given to traffic relief by means of diversions and principally by-passes.	Noted.	Traffic and transport issues will be considered at the next stage of plan making in light of existing and emerging evidence The outputs, along with regular engagement and input from Kent County Council as the highways authority for the Borough, will inform the refinement of the strategy as we move forward and prepare more detailed policies at the next stage of plan making.
Concerns over the impacts of retail development outside of the town centre	There needs to be a balance struck between meeting the needs of retailers and shoppers and protecting and enhancing the offer and	These are more detailed matters that need to be considered at the next stage of plan making in light of existing and

MAIN ISSUE: TONBRIDGE TOWN CENTRE

Detailed Issue	TMBC Response	Action
	environment of the town centre.	emerging evidence.
Investment in flood management (i.e. Leigh barrier) is essential to protect the town from flooding	Funds are available to improve defences at Leigh. Further funding could be generated through S106 monies as a result of development in the area. Investing in and improving flood management remains a priority for the Borough.	No action required as any proposals will be required by regulations to submit flood risk assessments.
Support for measures that revitalise the economy and enhance the town centre.	Noted.	No action required.

MAIN ISSUE: STRATEGY - PLAN OBJECTIVES

Detailed Issue	TMBC Response	Action
<p>Objective 1 – remove ‘as far as possible’ because the NPPF is clear that the Objectively Assessed Needs (OANs) should be met and housing supply should be boosted.</p>	<p>The NPPF is clear (para.14) that, in terms of plan-making, the OAN should be met unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in the Framework indicate development should be restricted. With this in mind and given the early stage of plan-making, it would be premature to remove ‘as far as possible’.</p>	<p>No action required.</p>
<p>Objective 1 – Should be amended to: To contribute to the delivery of sustainable communities by directing growth to the most sustainable locations, where there is the best available access to jobs, services and community facilities.</p>	<p>The focus of objective 1 is on addressing the assessed needs for homes and jobs which is a key expectation of Local Plans as made clear in the Government’s National Planning Policy Framework (NPPF). Objective 2 focuses on the need to support and sustain local communities. It is considered that the set of draft objectives adequately address the issues raised.</p>	<p>No action required.</p>
<p>Objective 2 could be improved as follows: To promote a well-balanced housing market in the borough by planning to provide high quality housing to meet local needs (including for market, affordable and supported housing) in appropriate and sustainable locations.</p>	<p>The suggested wording is noted but it is considered that the primary objective of supporting and sustaining local communities would be weakened if the wording is changed.</p>	<p>No action required.</p>

MAIN ISSUE: STRATEGY - PLAN OBJECTIVES

Detailed Issue	TMBC Response	Action
<p>Objective 3 – Should be amended to read ‘<u>restore</u>, protect and enhance natural and heritage assets’. All wildlife assets should enjoy protection, not just high value ones.</p>	<p>There is no reference in para. 114 in the NPPF to restoration. The para. makes reference to protection and enhancement and these feature in objective 3 in the draft Local Plan. The Local Plan objectives are strategic in nature and reflect the emphasis placed in the NPPF (see para.113) on giving the greatest protection to those assets with the highest-level designations. Matters relating to different types of assets are for the more detailed development management policies that will be prepared as plan-making progresses. It is important to be mindful of the fact that the Local Plan should not be simply reiterating policies and objectives in the NPPF.</p>	<p>No action required in response to this issue.</p> <p>Consider wildlife asset protection and enhancement, including the connectivity of green infrastructure networks, during the preparation of development management policies at the more detailed stage of plan-making.</p>
<p>Objective 3 should be amended as follows: To ensure that the character and distinctiveness (including historic character) of valued landscapes, and historic settlements, buildings and farmsteads are protected through careful location and management of development.</p>	<p>The suggested rewording is noted but it is considered that it is less focused and does not add any significant value to the existing wording. It is important to be mindful of the fact that these objectives are strategic in nature.</p>	<p>No action required.</p>
<p>Objective 4 should be amended as follows: To support sustainable transport for new and existing residents and ensuring that new development is</p>	<p>The focus of objective 4 is on sustainable growth which, by its very nature, addresses the need for sustainable transport and ensuring that new development is accessible by a wide range of</p>	<p>No action required.</p>

MAIN ISSUE: STRATEGY - PLAN OBJECTIVES

Detailed Issue	TMBC Response	Action
accessible to public transport and provides opportunities for walking, cycling to employment and services.	transport modes.	
New Objective – To support and strengthen the role of Green Infrastructure in the borough to protect and enhance biodiversity, improve the connectivity of habitats and ecosystem functioning, improve the wellbeing and health of local people and support sustainable land and water management.	The objectives are over-arching and strategic in nature and objective 3 provides for the protection of important natural assets. Matters relating to different types of natural assets and their role in the connectivity of green infrastructure are for the more detailed development management policies that will be prepared as plan-making evolves.	No action required in response to this issue. Consider habitat protection and enhancement, the enhancement of biodiversity, including the connectivity of green infrastructure networks, during the preparation of development management policies at the more detailed stage of plan-making.
New Objective – To prioritise the use of previously developed land where it is not of high environmental or historic asset.	Addressing development needs on brownfield land within the built-up confines of settlements is one of the building blocks for the Local Plan. Plan objective 3 seeks the protection of natural and heritage assets.	No action required.
New Objective - Protecting the Green Belt and maintaining the separation and individual identity of settlements.	The National Planning Policy Framework (NPPF) includes policies protecting the Green Belt. The Government’s Planning Practice Guidance makes it clear that the Local Plan should not reiterate policies that are already set out in the NPPF. Maintaining the separate identity of settlements is a matter for consideration at the more detailed stage of plan-making, taking account of the need	No action required in response to this issue. Consider the matter of maintaining the separate identity of settlements at the more detailed stage of plan-making, taking account of the need to meet assessed development requirements.

MAIN ISSUE: STRATEGY - PLAN OBJECTIVES

Detailed Issue	TMBC Response	Action
	to meet assessed development requirements.	
<p>New Objective - To manage resources in the borough prudently, by ensuring that development does not have an adverse impact on the best and most versatile agricultural land, and is located in a way that minimises pollution, reduces carbon emissions and responds to the impacts of climate change.</p>	<p>The majority of these objectives are the restating of national policies from the Government's NPPF. The Government's Planning Practice Guidance makes it clear that the Local Plan should not reiterate policies that are already set out in the NPPF. On the matter of agricultural land, the NPPF is clear that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land.</p>	<p>No action required.</p>

MAIN ISSUE: STRATEGY - BUILDING BLOCKS

Detailed Issue	TMBC Response	Action
Block A should be broadened to consider all brownfield land and not just that in settlements.	When considering building block A it is important that the sustainability of the location is taken into account, i.e. proximity of services, public transport schools etc, hence the focus on brownfield land within the confines of existing settlements.	No action required.
The contribution of previously developed land within settlement confines should be increased substantially. The Council should undertake a thorough study of urban capacity.	The Council undertook a comprehensive 'Call for Sites' exercise to feed into the plan-making process that included previously developed land within settlements confines.	No action required.
Building Block B - Consideration needs to be given to the extent and size of the development and the infrastructure for the benefit of the whole community at the Area of Opportunity at Bushey Wood.	Noted. The Area of Opportunity identified in the Council's adopted Development Plan is the starting point. As plan-making progresses detailed consideration will be given to the extent and size of the development, taking into account designations and constraints. The Council will engage with infrastructure providers to understand what is required to make the development acceptable for the new and existing communities.	No action required.
Building Block C - There should be greater emphasis on general management of flood risk and Sustainable Drainage Systems (SuDS).	The building blocks are broad and strategic in nature reflecting key objectives of Government policy. Management of flood risk and SuDS are matters for consideration at the more advanced plan-making stages when detailed development	No action required. Consider the issues of flood risk management and SuDS during the preparation of development management policies at the detailed stage of plan-

MAIN ISSUE: STRATEGY - BUILDING BLOCKS

Detailed Issue	TMBC Response	Action
	management policies are drafted.	making.
Building blocks only make a small contribution to overall housing needs.	This observation is noted. The building blocks are the starting point for the strategy. It is important that the Council highlights in a transparent way what the potential is from these sources because this process demonstrates the necessity of including greenfield sites in the development strategy.	No action required.
While it is important to ensure that development is not harmful to heritage assets, biodiversity assets, designated landscapes etc, care needs to be taken not to discount land from the developable area unnecessarily.	Section 5.4 of the Local Plan outlines that important designations that need to be protected are discounted from the potential developable area, reflecting policies in the Government's National Planning Policy Framework (NPPF).	No action required.
Additional building block required of 'land with least environmental value'.	The suggested building block is not an actual building block because it is not a starting point but the outcome of a process, i.e. it involves the elimination of land with some environment value. In any event, it could result in the identification of greenfield sites outside of settlements which should not be the starting point for meeting assessed needs for development. Furthermore, there may be some parcels of land with least environmental value that are at medium or high risk of flooding.	No action required.

MAIN ISSUE: STRATEGY - BUILDING BLOCKS

Detailed Issue	TMBC Response	Action
Sites with extant permission should be included.	The purpose of the building blocks is to provide a starting point for the selection of additional sites to form part of the development strategy. Extant permissions have been taken into account as part of existing commitments to understand what the net need is for additional development land.	No action required.

MAIN ISSUE: STRATEGY - GUIDING PRINCIPLES

Detailed Issue	TMBC Response	Action
Guiding Principle 2 – Object. It cannot be applied across the board because it will lead to the merging of settlements.	Disagree. Focussing opportunities adjacent to a range of settlements across the borough to help support and sustain local communities, big and small, does not automatically mean that settlements will merge. The Borough Council will have regard to the identity and character of individual settlements in preparing the detailed development strategy.	No action required in response to this issue. Take account of the identity and character of individual settlements when preparing the detailed development strategy.
Guiding Principle 4 - Development should also be directed away from sites that would impact on the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB).	The guiding principles are strategic in nature and guiding principle 4 aims to protect designated areas such as the Kent Downs Area of Outstanding Natural Beauty (AONB) from development. The issue of the impact on the setting of the AONB is a more detailed matter for the next stage of plan-making. The Council will be mindful of national policy and management plans for AONBs covering Tonbridge and Malling as specific development sites are identified.	No action required in response to this issue. Be mindful of the need to take account of the setting of Areas of Outstanding Beauty when identifying specific sites in the development strategy.
Guiding Principle 4 - Landscape, biodiversity and access to nature should be drawn into Principle 4.	Guiding principle 4 is focused on avoiding constrained areas in the borough, which will include avoiding designated natural assets. It is important to bear in mind that the guiding principles are strategic in nature. Matters of landscape, biodiversity and access to nature are more detailed considerations for development management policies that will be prepared at the	No action required in response to this issue. Be mindful of matters of landscape, biodiversity and access to nature when formulating development management policies at the next stage of plan-making.

MAIN ISSUE: STRATEGY - GUIDING PRINCIPLES

Detailed Issue	TMBC Response	Action
	next stage of plan-making. The Council needs to be mindful of the expectation of the Government that Local Plans should not simply reiterate national policies.	
General: Settlement Hierarchy - The Council should establish a clear settlement hierarchy to indicate which settlements in the borough are most sustainable and (in broad terms) the proportion of development that should be directed to them.	The guiding principles, to an extent, reflect the existing settlement hierarchy in the Council's adopted Development Plan, with the first principle focussing development at the urban areas of the Medway Gap and Tonbridge. The settlement hierarchy is set out in policies CP11, 12 and 13 in the Council's Core Strategy. The importance of having an explicit settlement hierarchy stated in the Local Plan is noted and this will be considered at the next stage of plan-making.	Consider the inclusion of a suite of policies in the Local Plan reflecting the hierarchy of settlements across the borough and the amount of development that is deemed acceptable at each tier of the hierarchy.
General: Management of surface water run-off and the creation of open space or natural green space should be included.	The guiding principles are strategic in nature and are focused on guiding where development could potentially take place. Matters such as surface-water run-off and open space creation are detailed issues to be considered during the preparation of detailed development management policies at the next stage of plan-making.	No action required in response to this issue. Be mindful of matters of surface water run-off and open space creation when formulating development management policies at the next stage of plan-making.
General: Infrastructure - Suggest further engagement with key infrastructure providers such as Kent County Council and NHS Property Services	Noted. As the plan evolves the Borough will engage with the various infrastructure providers to understand existing capacity and what is needed and is acceptable to support the emerging	Engage with Kent County Council, NHS Property Services and other infrastructure providers during plan-making, to ensure adequate supporting

MAIN ISSUE: STRATEGY - GUIDING PRINCIPLES

Detailed Issue	TMBC Response	Action
	development strategy.	infrastructure is provided.
General: Rural Economy - There is no specific reference to the rural economy and this is a significant part of the overall economy based upon use of natural resources and the availability of infrastructure.	The guiding principles are strategic in nature and have been devised to help guide decision-making on which opportunities should be considered in more detail, i.e. they are focussed on geography as opposed to economy. It is also important to bear in mind that they are all under-pinned by the need to pursue sustainable development, which means the Council needs to consider the pattern and distribution of development and how this relates to services, transport nodes etc. The Council recognises the significance of the rural economy in the borough and this is a matter that will be considered during the preparation of detailed policies at the next stage of plan-making.	No action required in response to this issue. Be mindful of the significance of the rural economy in the borough when formulating detailed policies at the next stage of plan-making.
General – There is a contradiction within these principles.	The guiding principles are not intended to be mutually exclusive. They can complement each other to help achieve an outcome that addresses the various needs, opportunities and constraints across the borough.	No action required.

MAIN ISSUE: GREEN BELT ISSUES

Detailed Issue	TMBC Response	Action
<p>The proposed amendment to the Green Belt boundary around the east of West Malling:</p> <ul style="list-style-type: none"> • should not be altered as this extension cannot be justified • does not go far enough (alternatives boundaries suggested) • is supported 	<p>It is important that the Green Belt boundaries that feature in the new plan are strategically defensible and can endure for the life of the plan. The extension of the Green Belt proposed at West Malling provides a reliable and defensible boundary, following the physical line of the bypass that has been completed since the adoption of the Core Strategy. The land within this proposed extension would contribute positively to the purposes of the Green Belt and is in line with the advice set out in para 85 of the NPPF on defining Green Belt boundaries.</p>	<p>The extent of the boundary needs to be agreed and justified within the context of the NPPF.</p> <p>This means that the additional land included within the Green Belt must meet the five tests in para 80 and the boundary must be able to be permanent and be based on a clearly defined physical feature</p>
<p>There should be more releases of Green Belt land to accommodate housing development:</p> <ul style="list-style-type: none"> • around Tonbridge • around smaller settlements to support a polycentric development strategy • at specified locations/ sites 	<p>As the Borough is covered by two Housing Market Areas (HMAs) the strategy is to provide roughly half of the OAN within each HMA. This approach results in a sustainable pattern of development for the Borough.</p> <p>There may be opportunities for a little refinement of Green Belt boundaries on a localised scale and this will be set out in the Stage II Green Belt Study that will form part of the evidence for the next stage of plan making.</p>	<p>No action required.</p>
<p>Release of Green Belt land should not be considered unless there is no unconstrained land available.</p>	<p>There is not enough unconstrained land to meet the development needs of the Borough in a sustainable way. Therefore, the release of Green Belt land is justified as exceptional circumstances</p>	<p>No action required.</p>

MAIN ISSUE: GREEN BELT ISSUES

Detailed Issue	TMBC Response	Action
	to provide land for housing. Focussing all the housing development on the least constrained part of the Borough would not result in a sustainable pattern of development given the two HMAs in the Borough and this would be contrary to the NPPF.	

MAIN ISSUE: HOUSING ISSUES (HOUSING MARKET AREAS, NEED, DENSITIES ETC)

Detailed Issue	TMBC Response	Action
<p>Housing Market Areas (HMAs): Unbalanced split between HMAs. Too much development identified in Maidstone HMA. Site allocations should be split fairly evenly across the two HMAs. Significantly more housing planned for the Maidstone HMA than the Sevenoaks /Tonbridge / Tunbridge Wells HMA.</p>	<p>The spatial distribution of the sites in the draft development strategy was shaped by many factors including local evidence, the plan objectives, building blocks, the guiding principles, Government policies, constraints and opportunities. In terms of opportunities, these are not just opportunities to deliver homes but also opportunities to deliver significant improvements to infrastructure (schools, highways and healthcare) which could benefit existing as well as new communities. The Council considers that strategically planned development in South Aylesford and Ditton in the north-eastern part of the borough could provide longer-term solutions to transport challenges in the vicinity. In respect of the East Bank of the Medway, this involves bringing forward a site for development that was already identified for this purpose in the Council's existing adopted Development Plan. However, the concern about the balance of the strategy between the two HMAs is noted and will be taken into account as the development strategy evolves.</p>	<p>The SA/SEA process will clearly demonstrate the rationale for the sites that feature in the Local Plan.</p> <p>Publish and take account of the Local Plan Market Delivery Study.</p> <p>Review the balance of the development strategy across the borough in light of the updated SA/SEA, Local Plan Market Delivery Study, other evidence and comments received during the Reg.18 consultation.</p>
<p>Housing Need: The Objectively Assessed Need (OAN) is too low.</p>	<p>The starting point for the OAN is the most current set of Sub-National Population Projections (SNPP) and Household Projections (2014-based), as required by Government policy and practice guidance. Market signals, including housing</p>	<p>No action required in response to this issue.</p> <p>Publish and take account of the Local Plan Market Delivery Study during plan-</p>

MAIN ISSUE: HOUSING ISSUES (HOUSING MARKET AREAS, NEED, DENSITIES ETC)

Detailed Issue	TMBC Response	Action
	<p>affordability, have been taken into account and the outputs have been subject to a sensitivity analysis which considered how changing migration from London could influence housing need in Tonbridge and Malling. The Strategic Housing Market Assessment (SHMA) concluded that in light of these factors an affordability uplift of 12.5% is reasonable. This would improve affordability and would exceed the housing need figure identified in the London migration sensitivity scenario. The OAN is therefore considered to be a reasonable assessment of need, in light of national policy and practice guidance and local evidence.</p> <p>It is also important to bear in mind that the local market has a finite capacity that limits how much housing can be delivered. To help the Council's understanding of this capacity a market delivery study has been commissioned that will form part of the evidence base for the Local Plan.</p>	<p>making.</p>
<p>Housing Need: The OAN is too high.</p>	<p>The starting point for the OAN is the most current set of Sub-National Population Projections (SNPP) and Household Projections (2014-based), as required by Government policy and practice guidance. Market signals, including housing affordability, have been taken into account and the outputs have been subject to a sensitivity</p>	<p>No action required in response to this issue.</p> <p>Publish and take account of the Local Plan Market Delivery Study during plan-making.</p>

MAIN ISSUE: HOUSING ISSUES (HOUSING MARKET AREAS, NEED, DENSITIES ETC)

Detailed Issue	TMBC Response	Action
	<p>analysis which considered how changing migration from London could influence housing need in Tonbridge and Malling. The Strategic Housing Market Assessment (SHMA) concluded that in light of these factors an affordability uplift of 12.5% is reasonable. This would improve affordability and would exceed the housing need figure identified in the London migration sensitivity scenario. The OAN is therefore considered to be a reasonable assessment of need, in light of national policy and practice guidance and local evidence.</p>	
<p>Housing Need: The OAN needs to be uplifted by 20%.</p>	<p>The Government makes it clear in para.47 in the National Planning Policy Framework (NPPF) that a buffer of 20% (as opposed to 5%) is only required if there has been a record of persistent under-delivery. On this matter the Planning Practice Guidance states: <i>'The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle.'</i> The Reg.18 document reflects this practice guidance and illustrates (see para.4.2.8 and Figure 3) that since the base date of the adopted Development Plan (2006/07) cumulative housing completions have consistently exceeded the cumulative requirements. This demonstrates that the Council does not have a</p>	<p>No action required in response to this issue.</p> <p>Publish and take account of the Local Plan Market Delivery Study during plan-making.</p>

MAIN ISSUE: HOUSING ISSUES (HOUSING MARKET AREAS, NEED, DENSITIES ETC)

Detailed Issue	TMBC Response	Action
	<p>record of persistent under delivery and therefore does not need to apply a 20% buffer. Furthermore, the draft development strategy could potentially deliver a number of homes that exceeds the net need (+a 5% buffer).</p>	
<p>Housing Need: Concerned that the Council is forced to plan for net inward migration from elsewhere in the UK. Housing need should not address internal migration.</p>	<p>Population change has and will continually include an element of people moving to Tonbridge and Malling from other areas, including London. This is understandable because the borough is a very desirable place to live. It is also unavoidable, particularly for market housing, because people have the freedom to choose where they live in the UK, subject to affordability.</p> <p>If the Council attempted to constrain the housing supply so that it only responded to the natural change occurring amongst the existing resident population (births and deaths), this would only have the harmful effect of freezing out many local people from the housing market.</p> <p>This is because people from outside of the borough will continue to desire a home in Tonbridge & Malling and they will, in many cases, be able to compete and outbid local people for properties because of their financial means. This is an undesirable outcome. To give local people a reasonable chance of accessing the housing market we need to plan sensibly for a housing</p>	<p>No action required.</p>

MAIN ISSUE: HOUSING ISSUES (HOUSING MARKET AREAS, NEED, DENSITIES ETC)

Detailed Issue	TMBC Response	Action
	<p>need that not only addresses natural change occurring locally but also takes account of movement from other areas. Indeed this is required by the Government in National Policy.</p> <p>Furthermore, if internal migration is discounted from the calculation of need, the Council would be required to explain where this population would be moving to because the balance sheet for internal migration across the UK needs to be zero, i.e. there can be no movement of people unaccounted for. This would be very challenging to address because it would require the cooperation of other authorities in the South East to plan not just for their projected population change (including an element from internal migration) but for an additional amount of people rejected by Tonbridge & Malling Borough Council. This would not be possible to achieve.</p>	
<p>Housing Need: There is a need for a mix of housing, including affordable housing.</p>	<p>Noted. The Strategic Housing Market Assessment (SHMA) does assess the need for affordable housing, residential care, the need for different sizes of homes and the needs of particular groups including older persons and people with disabilities. This is an important piece of evidence that will be taken into account as the more detailed policies in the Local Plan are formulated.</p>	<p>Respond to the evidence in the SHMA on assessed need for affordable housing during the formulation of detailed policies in the Local Plan. Subject the options to viability testing.</p>

MAIN ISSUE: HOUSING ISSUES (HOUSING MARKET AREAS, NEED, DENSITIES ETC)

Detailed Issue	TMBC Response	Action
<p>Housing Need: Housing needs of an aging population should be considered. No reference is made to smaller single storey dwellings suitable for elderly people who are willing to downsize and free up larger housing stock.</p>	<p>Noted. The Strategic Housing Market Assessment (SHMA) does assess the need of particular groups including older persons and people with disabilities. This is an important piece of evidence that will be taken into account as the more detailed policies in the Local Plan are formulated.</p>	<p>Assess the options for responding to the evidence in the SHMA on assessed need for older persons during the preparation of detailed policies in the Local Plan. Subject the options to viability testing.</p>
<p>Housing Need: No allowance for larger windfall sites.</p>	<p>One of the key soundness tests in the Government's NPPF is that a Local Plan should be deliverable over its plan period (para.182). With this in mind, the Council considers that the development strategy should reduce dependency on windfalls in the supply projection. A modest windfall projection from small sites (fewer than five units in capacity) of 44 units per annum is included and this is considered reasonable and sufficient. There is uncertainty over the supply of larger windfall sites and it is subject to factors beyond the control of the Council including the wider economy and future Government policy. The Council considers that risks to the delivery of the development strategy should be kept to a minimum. In any event, the Call for Sites exercise was an opportunity to effectively identify future development sites over the course of the plan period.</p>	<p>No action required.</p>

MAIN ISSUE: HOUSING ISSUES (HOUSING MARKET AREAS, NEED, DENSITIES ETC)

Detailed Issue	TMBC Response	Action
<p>Housing Need: The Council should be aware that its housing numbers may increase under duty-to-cooperate and the unmet need from Sevenoaks and Tunbridge Wells.</p>	<p>The Council is mindful of this duty and is engaged on a regular basis with neighbouring planning authorities on Local Plan matters. This will continue in a constructive manner as plan-making at each of the authorities progresses.</p>	<p>Continue with constructive duty-to-cooperate meetings with neighbouring planning authorities as plan-making advances.</p>
<p>Housing Need: The Council makes reference to providing a mixed portfolio of sites for residential development, but no specific mention is made of the need to provide specifically for elderly persons needs and in particular more specialist C2 style accommodation during the plan period.</p>	<p>The Strategic Housing Market Assessment (SHMA) sets out the housing need for different groups, including the elderly and residential care (C2). The Council will need to be mindful of this evidence when it prepares more detailed policies at the next stage of plan-making.</p>	<p>Consider options for responding to the evidence of housing need for the elderly, including residential care, at the next more detailed stage of plan-making in light of existing and emerging evidence.</p>
<p>Housing Total: The development strategy figure of 10,000 is excessive in light of the net need of 6,000 homes.</p>	<p>The Council considers that at this early stage of plan-making it is wise to propose a development strategy of this size because it builds in some flexibility and choices. As the plan-making process advances, this potential yield may evolve and be refined taking into account the responses to the consultation and key pieces of evidence including the Market Delivery Study and the Infrastructure Delivery Plan. It is also important to bear in mind that the Government expects (see para.47 in the National Planning Policy Framework) that a buffer above the net need for housing needs to be included to ensure choice</p>	<p>Publish and take account of the Local Plan Market Delivery Study during plan-making. Prepare the Infrastructure Delivery Plan.</p>

MAIN ISSUE: HOUSING ISSUES (HOUSING MARKET AREAS, NEED, DENSITIES ETC)

Detailed Issue	TMBC Response	Action
	and competition in the market for land.	
Housing Total: Concerned about whether the OAN target is deliverable.	The NPPF is very clear that Local Plans should be deliverable over the plan period and the Council took this on-board during the Call-for-Sites exercise when this issue was identified and investigated. Other factors that have and will inform deliverability include the historical record in Tonbridge & Malling as well as the Local Plan Market Delivery Study.	Publish and take account of the Local Plan Market Delivery Study during plan-making.
Housing Total: The Council is not able to demonstrate a five year supply of housing land.	Para. 4.2.10 and Table 1 in the Reg.18 consultation document highlight that the Council can demonstrate 5.3 years' worth of housing land supply. This is measured against the current OAN of 696 dwellings per annum, plus a 5% buffer. The phasing of extant planning permissions took account of historical records of supply as well as feedback from the house builders of the larger sites. There is no need to apply a 20% buffer because the Council does not have a record of persistent under delivery, with cumulative completions since the base-date of the current adopted Development Plan (2006/07) consistently exceeding cumulative requirements.	No action required.
Internal Space Standards: The implementation of nationally described space standards can reduce developer's	Noted. The issue of viability will be explored as part of plan-making to provide transparent evidence of the impact of local policy	Undertake viability testing of draft local policy requirements on the deliverability

MAIN ISSUE: HOUSING ISSUES (HOUSING MARKET AREAS, NEED, DENSITIES ETC)

Detailed Issue	TMBC Response	Action
flexibility during the design process and therefore have an adverse effect on affordability and viability of the scheme.	requirements such as internal space standards on the deliverability of the development strategy.	of the development strategy.
Internal Space: The Council should maintain a high standard of space and design. The nationally described internal space standards should be assessed.	Noted. The Council will investigate the impact of nationally described internal space standards on the deliverability of the development strategy.	Undertake viability testing of draft local policy requirements on the deliverability of the development strategy.
Internal Space: Consideration should be given to exceeding the nationally described standards.	The Council considers that local policy requirements need to be evidenced and reasonable. The Council considers that there are no exceptional circumstances locally to justify exceeding the nationally described internal space standards. As it is, the described standards need to be subject to viability testing, alongside other local policy requirements, to understand their potential impact on the deliverability of the development strategy.	Undertake viability testing of draft local policy requirements on the deliverability of the development strategy.
Housing Densities: Need to consider higher densities to reduce the take of greenfield land for development.	This viewpoint is noted. As plan-making progresses detailed consideration will be given to the issue of density at each of the potential allocation sites. The Council needs to be mindful of the fact that density can affect the quality and therefore enjoyment of developments and places. In addition, the issue of density may have a bearing on the viability and therefore deliverability	Undertake viability testing of draft local policy requirements on the deliverability of the development strategy.

MAIN ISSUE: HOUSING ISSUES (HOUSING MARKET AREAS, NEED, DENSITIES ETC)

Detailed Issue	TMBC Response	Action
	of schemes, which will need to be investigated.	
Housing Densities: Housing densities in themselves are not important. Density is an outcome of an appropriate mix of dwellings and good urban design taking into account the context of any particular site.	The Council supports good urban design but disputes that housing densities are not important in themselves because they may have some bearing on the viability and therefore deliverability of developments.	Undertake viability testing of draft local policy requirements on the deliverability of the development strategy.

MAIN ISSUE: ECONOMIC DEVELOPMENT

Detailed Issue	TMBC Response	Action
Protect light industrial sites within villages and support mixed use developments on the periphery of residential areas	There are no proposals to reduce the amount of existing employment sites in any location. New sites are proposed next to or near existing sites	No action required.
Provide more car parking on industrial estates.	Noted. Parking standards will be a matter for the Reg 19 Local Plan.	No action required.
Focus more employment land in Tonbridge	Noted. Tonbridge remains a key focus for employment land.	No action required.
There needs to be more provision in rural areas such as around Invicta Park, Wrotham.	Additional sites will be identified as the evidence on the quantity of additional floor space needs is identified and set out in the Reg 19 Local Plan	This is a more detailed matter that needs to be considered at the next stage of plan making in light of existing and emerging evidence.
The Council does not appear to have tested whether 33 ha of employment land could be provided within or by the expansion of the listed employment sites. The Council should consider a wider employment land strategy that provides for new employment land allocations.	An update of the Employment Land Review is underway to give a narrower range of additional floor space needed for the plan period.	This is a more detailed matter that needs to be considered at the next stage of plan making in light of existing and emerging evidence.
Medway Council welcomes further discussions regarding target growth sectors in the local economy to form a collaborative approach between the two authorities.	The Council is mindful of the duty and is engaged on a regular basis with neighbouring planning authorities on Local Plan matters. This will continue in a constructive manner as plan-making at each of the authorities progresses.	Continue with constructive duty-to-cooperate meetings with neighbouring planning authorities as plan-making advances.

MAIN ISSUE: AFFORDABLE HOUSING

Detailed Issue	TMBC Response	Action
Affordable housing needs to be provided, especially homes for social rent.	Noted. The SHMA provides evidence of affordable housing need. The Council will need to be mindful of this evidence when it prepares more detailed policies at the next stage of plan-making.	Consider and viability test the options for responding to the evidence of affordable housing need at the next more detailed stage of plan-making in light of existing and emerging evidence.

MAIN ISSUE: NATURAL ENVIRONMENT

Detailed Issue	TMBC Response	Action
Support farm diversification.	Noted.	This is a more detailed matter that needs to be considered at the next stage of plan making in light of existing and emerging evidence.
Local Wildlife should be given consideration when taking a view on development potential.	Noted.	The SA/SEA process will consider potential impacts on Local Sites.
Sites have been proposed without reference to a Landscape character Assessment or Landscape Sensitivity Assessment.	<p>The Local Plan will seek to conserve and enhance landscapes across the borough. The NPPF and NPPG support the preparation of Landscape Character Assessments and Landscape Sensitivity Assessments where appropriate to compliment Natural England's National Character Areas (NCA), and for areas where major expansion is being considered.</p> <p>A number of Landscape Character Assessments (LCAs) have been prepared for parts of the Borough by partner organisations. Regard will be had to these along with National Character Assessments where appropriate.</p>	This is a more detailed matter that needs to be considered at the next stage of plan making in light of existing and emerging evidence.

MAIN ISSUE: TRAFFIC AND TRANSPORT

Detailed Issue	TMBC Response	Action
<p>Parking – Need clarity on standards; consideration should be given to minimum standards for residential development including adequate off-street parking; concerned about the size of garages, need to consider parking requirements of small businesses on industrial estates.</p>	<p>In considering the options for parking, the Council needs to be mindful of the Government’s policy. In 2011, the Government abolished national maximum parking standards. In 2015, a Written Ministerial Statement to Parliament introduced the following text as national planning policy: ‘...<i>Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network...</i>’. Clearly national policy imposes restrictions on what can be pursued. However, the issue of parking standards has been identified as a main issue so the Council will investigate, along with Kent County Council (KCC) as the highways’ authority for the borough, options for the most effective and policy-compliant way of addressing the concerns raised.</p>	<p>This is a more detailed matter that needs to be considered at the next stage of plan making in light of existing and emerging evidence.</p> <p>Investigate policy options, in conjunction with KCC, for addressing the issue of parking provision in new residential and commercial developments at the more detailed stage of plan-making.</p>
<p>Traffic: Hermitage Lane area – Concerned about congestion and air quality, given the significant amount of development that is taking place in Maidstone coupled with the proposed strategic development site of South Aylesford that features in the Local Plan.</p>	<p>These concerns are noted. The Council is in the process of gathering evidence to understand better the issues of highway capacity, congestion and air quality in this part of the borough. The outcomes will feed into the refinement of the development strategy.</p>	<p>The Council is in the process of gathering evidence on highway capacity and congestion in the vicinity of the A20. The outputs, along with regular engagement and input from Kent County Council as the highways authority for the Borough, will inform the refinement of the strategy as we move forward and</p>

MAIN ISSUE: TRAFFIC AND TRANSPORT

Detailed Issue	TMBC Response	Action
		prepare more detailed policies at the next stage of plan making.
<p>Traffic: A20 through the Medway Gap - Traffic congestion on the A20, New Hythe Lane, Lunsford Lane and Leybourne Way has reached severe levels.</p>	<p>These concerns are noted. The Council is in the process of gathering evidence to understand better the issues of highway capacity, congestion and air quality in this part of the borough. The outcomes will feed into the refinement of the development strategy.</p>	<p>The Council is in the process of gathering evidence on highway capacity and congestion in the vicinity of the A20. The outputs, along with regular engagement and input from Kent County Council as the highways authority for the Borough, will inform the refinement of the strategy as we move forward and prepare more detailed policies at the next stage of plan making.</p>
<p>Medway Council would like to collaborate with TMBC in sharing information to inform the modelling and analysis of the Strategic Transport Assessment.</p> <p>There is no acknowledgement in the emerging Local Plan of the potential impact of the proposed Lower Thames Crossing and the effect this may have on traffic flows towards the M20 motorway and to the south along the A228 and A229.</p>	<p>The Council is mindful of the duty and is engaged on a regular basis with neighbouring planning authorities on Local Plan matters. This will continue in a constructive manner as plan-making at each of the authorities progresses.</p> <p>At the time the Reg 18 document was produced, the Lower Thames Crossing project had not been announced but the Council is working closely with Highways England on these matters.</p>	<p>Continue with constructive duty-to-cooperate meetings with neighbouring planning authorities as plan-making advances.</p> <p>Continue to work with Highways England re. Lower Thames Crossing.</p>

MAIN ISSUE: DUTY TO COOPERATE

Detailed Issue	TMBC Response	Action
TWBC and SDC may not be able to meet their OAN and some may need to be accommodated within adjoining authority areas.	The Council is mindful of the duty and is engaged on a regular basis with neighbouring planning authorities on Local Plan matters. This will continue in a constructive manner as plan-making at each of the authorities progresses.	Continue with constructive duty-to-cooperate meetings with neighbouring planning authorities as plan-making advances.
MBC and TMBC need to work closely regarding the future planning and highways network around the Hermitage Lane area.	The Council is mindful of the duty and is engaged on a regular basis with neighbouring planning authorities on Local Plan matters. This will continue in a constructive manner as plan-making at each of the authorities progresses.	Continue with constructive duty-to-cooperate meetings with neighbouring planning authorities as plan-making advances.
Lack of evidence of how the Duty has been met in The Way Forward.	The Council is mindful of the duty and is engaged on a regular basis with neighbouring planning authorities on Local Plan matters. This will continue in a constructive manner as plan-making at each of the authorities progresses. This evidence will be provided to the Inspector prior to the Examination as it is an on-going process.	Continue with constructive duty-to-cooperate meetings with neighbouring planning authorities as plan-making advances.
Should Medway Council find through the process of preparing its new Local Plan that there is not capacity to meet our Borough's housing needs within our boundary, we would wish to participate in Duty to Cooperate discussions to assess if there is potential for a collaborative	The Council is mindful of the duty and is engaged on a regular basis with neighbouring planning authorities on Local Plan matters. This will continue in a constructive manner as plan-making at each of the authorities progresses.	Continue with constructive duty-to-cooperate meetings with neighbouring planning authorities as plan-making advances. Publish and take account of the Local Plan Market Delivery Study during plan-

MAIN ISSUE: DUTY TO COOPERATE

Detailed Issue	TMBC Response	Action
approach between our two authorities to meet development needs.		making and Duty to Co-operate activities.

MAIN ISSUE: SUSTAINABILITY APPRAISAL

Detailed Issue	TMBC Response	Action
<p>No assessment of proposals that fall outside of designated areas but have the potential to impact on them.</p>	<p>Agree. Reference should be included to the potential impact on <i>the setting</i> of AONBs in the comments section, where applicable.</p>	<p>Amend SA/SEA to reflect those options which impact on have the potential to impact on <i>the setting</i>. Include reference to potential impact on <i>the setting</i> in site assessments, where applicable.</p>
<p>SLAA sites do not appear to have been subject to SA/SEA, which is a statutory element of plan-making and an essential part of consideration of 'alternatives'.</p>	<p>SA/SEA is not required for all SLAA sites, only reasonable alternatives. The Planning Advisory Service (PAS) acknowledge that it is not possible, or necessary, to compare every SLAA site against each other. Instead potential sites, identified through the SLAA, should be progressively filtered until a short-list of reasonable alternate sites is generated. This short list of reasonable alternatives will then be subject to SA/SEA. The Reg. 18 document was strategic in nature, and as such was accompanied by a SA/SEA of the strategic options for the Local Plan in line the PPG which says that SA <i>"does not need to be done in any more detail . . . than is considered to be appropriate for the content and level of detail in the Local Plan"</i>.</p> <p>The sites contained within the most sustainable option (Option 5) could provide a yield in excess of our OAN allowing choice between individual sites within this strategy. Once the strategy has been refined as a result of the consultation process, those sites falling within it will be subject</p>	<p>The SA/SEA process will clearly demonstrate the rational for the sites that feature in the Local Plan.</p>

MAIN ISSUE: SUSTAINABILITY APPRAISAL

Detailed Issue	TMBC Response	Action
	to SA/SEA. SA/SEA is an iterative process undertaken throughout the plan making process.	
No SA of sites produced which is a key component in choosing which sites go forward and not possible to identify whether the most sustainable sites have been chosen.	There is no formal requirement to consult on SA/SEA at Reg. 18 stage, although it is considered best practice and it is an iterative process. The PPG states that SA <i>“does not need to be done in any more detail . . . than is considered to be appropriate for the content and level of detail in the Local Plan”</i> . The Way Forward was a strategic level document and as such the accompanying SA/SEA was strategic in nature.	The SA/SEA process will clearly demonstrate the rational for the sites that feature in the Local Plan.

MAIN ISSUE: HABITATS REGULATIONS

Detailed Issue	TMBC Response	Action
Impact from traffic along the A249 needs to be included in the HRA Screening Report for the North Downs Woodland SAC.	Agree.	Amend HRA Screening Report to include reference to the A249. Send to NE for comment.
Post Reg 18 consultation, NE has also brought to our attention the recent Wealden judgment (CO/3943/2016 Wealden District Council v Secretary Of State For Communities And Local Government http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html). This judgment has implications for the screening of air quality impacts on European Sites under the Habitats Regulations.	Noted.	Further work is required to assess the implications of this judgement.
Does not adequately show consideration of potential impacts arising from traffic on the A228. The new crossing on the Medway facilitates movement on the A228 from developments on the east bank of the river that could in combination, contribute to impacts on the North Downs SAC.	There is no requirement to screen the A228 as there are no Special Area of Conservation SACs, RAMSARs or Special Protection Areas within 200 metres of this road.	No action required.

MAIN ISSUE: RETAIL

Detailed Issue	TMBC Response	Action
<p>Support flexible approach but a retail needs study should be carried out to identify the need and location for additional retail floor space.</p>	<p>Evidence should be proportionate. The preparation of a retail needs study for the Borough would not represent good value for money. This is because all the retail centres in the Borough (with the exception of Tonbridge) look towards main town centres outside of the Borough (e.g. Maidstone, Chatham, Gravesend and Sevenoaks). Any potential investment in the retail offer in Tonbridge would generally be welcomed by the Council. There are a number of sites in the town centre and on the periphery that may be suitable for redevelopment for town centre uses and the strategy and policies in the Reg 19 Local Plan will seek to provide a framework to bring these sites forward. The market will decide the most viable uses and proposals will be assessed within the context of the NPPF and the local position at that time.</p>	<p>Specifically allocating sites for retail development runs the risk of restricting investment in the town centre. This approach would not provide the flexibility needed to maintain and enhance the vitality and viability of Tonbridge town centre.</p>
<p>Support for taking a balanced approach to the town centre, including support for a variety of appropriate town centre uses.</p>	<p>Noted.</p>	<p>No action required.</p>

MAIN ISSUE: WATER- EFFICIENCY

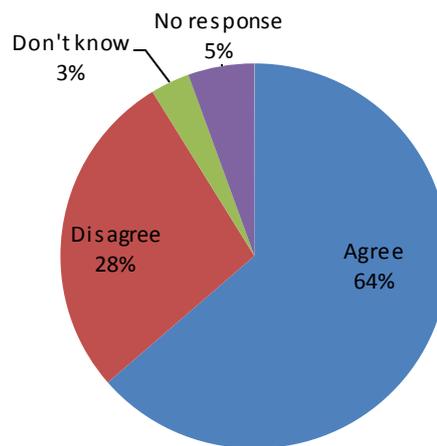
Detailed Issue	TMBC Response	Action
Exceedance of minimum water efficiency standards in new developments.	The points raised for and against exceeding the minimum water efficiency standards in new developments as prescribed by the Building Regulations are noted. The Council will consider assessing the viability of exceeding the minimum statutory requirements as part of the evidence for development management policies in the Local Plan. The Council needs to be mindful of the policy in the Government's National Planning Policy Framework that the cumulative impact of local standards and policies should not put implementation of the plan at serious risk.	Consider assessing the viability of exceeding the minimum statutory requirements for water efficiency in new developments, alongside other local standards, as part of the evidence for development management policies in the Local Plan.

MAIN ISSUE: OTHER ISSUES

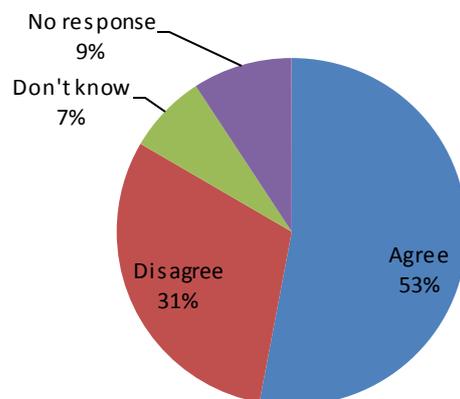
Detailed Issue	TMBC Response	Action
Absence of a Vision.	The Council recognises that the Plan is an important place-shaping tool and agrees that the Vision is important for understanding what the Local Plan is trying to achieve in terms of addressing needs, protecting valued assets and sustaining communities. A Vision will feature at the more detailed stage of plan-making for consultation.	Develop a Vision for consultation at the next stage of plan-making focussed on addressing needs, protecting valued assets and sustaining communities.

Regulation 18: Issues and Options Survey Monkey Analysis

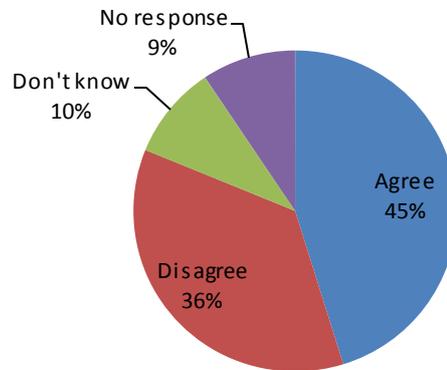
Q1. Do you agree or disagree with the set of Plan objectives?



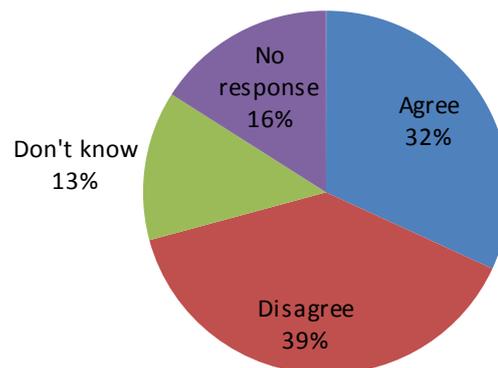
Q2. Do you agree or disagree with this set of building blocks for the Local Plan Strategy?



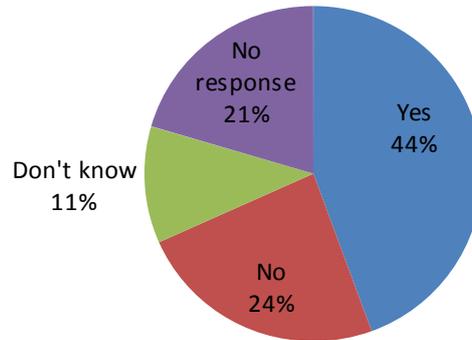
Q3. Do you agree or disagree with this set of guiding principles?



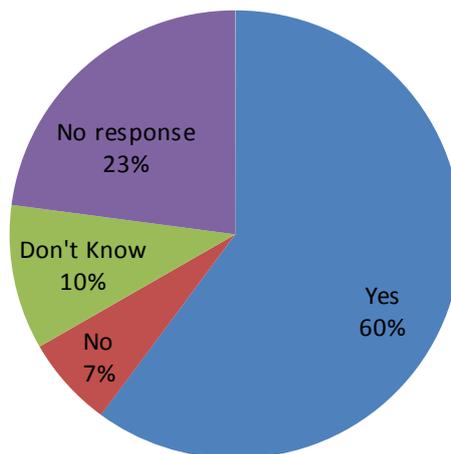
Q.4 Do you agree or disagree that this potential approach to a development strategy could provide a sound direction for the new Local Plan to take?



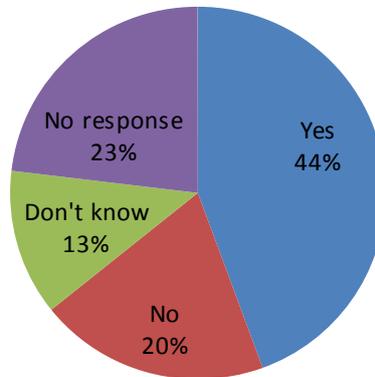
5. Should the new Local Plan continue to support and focus new economic development at and around existing economic hubs such as the Tonbridge Industrial Estate, New Hythe Lane, Kings Hill, Hermitage Lane and Quarry Wood or should an alternative strategy



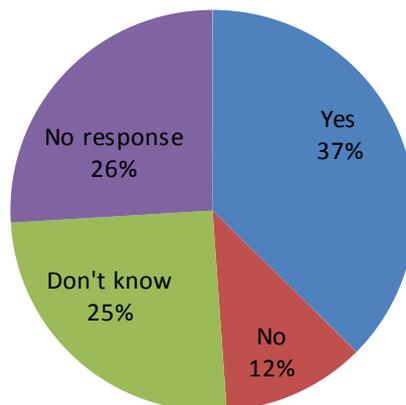
6. Should we consider a wide range of employment generating uses within existing economic hubs in the borough?



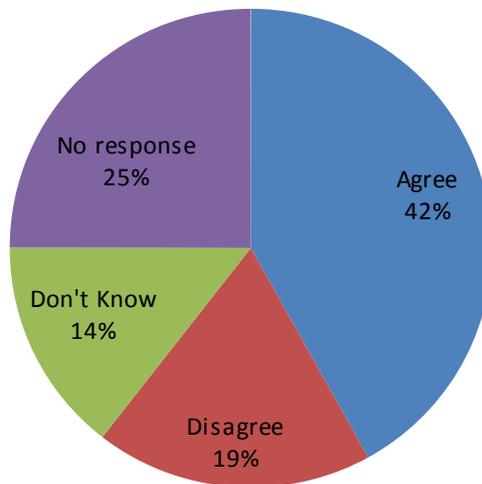
7. Should the Local Plan be supportive of more mixed-use developments, including start-up units within residential schemes?



9. Should the Local Plan include a more flexible policy framework for Tonbridge to allow the Town to respond to future market investment opportunities for a range of land uses and developments?

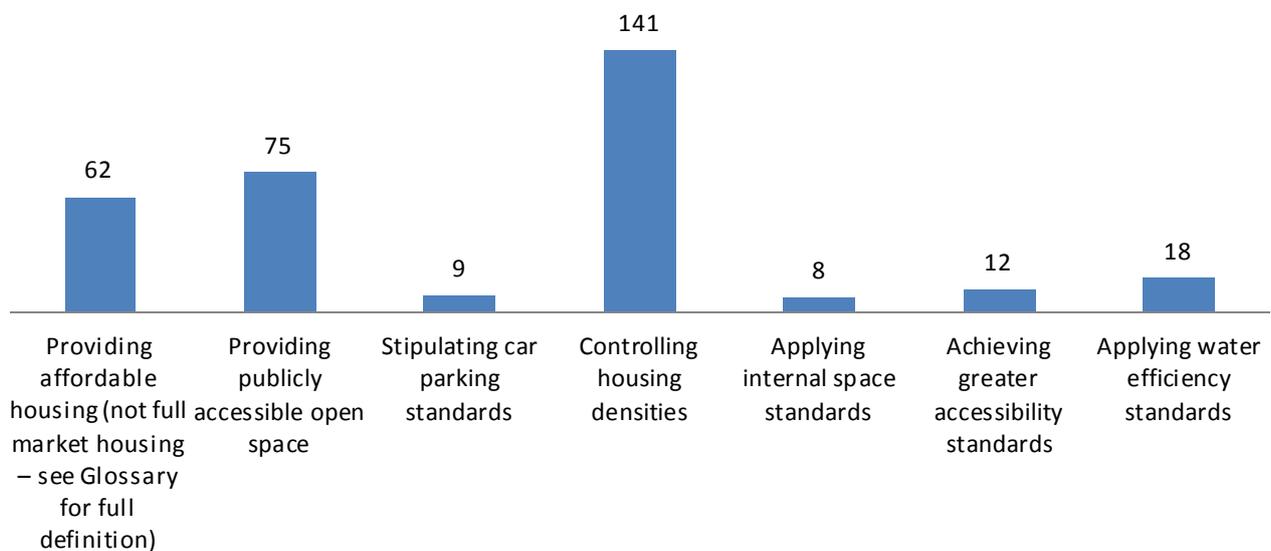


11. Do you agree or disagree that the Local Plan should put land into the Green Belt east of West Malling?

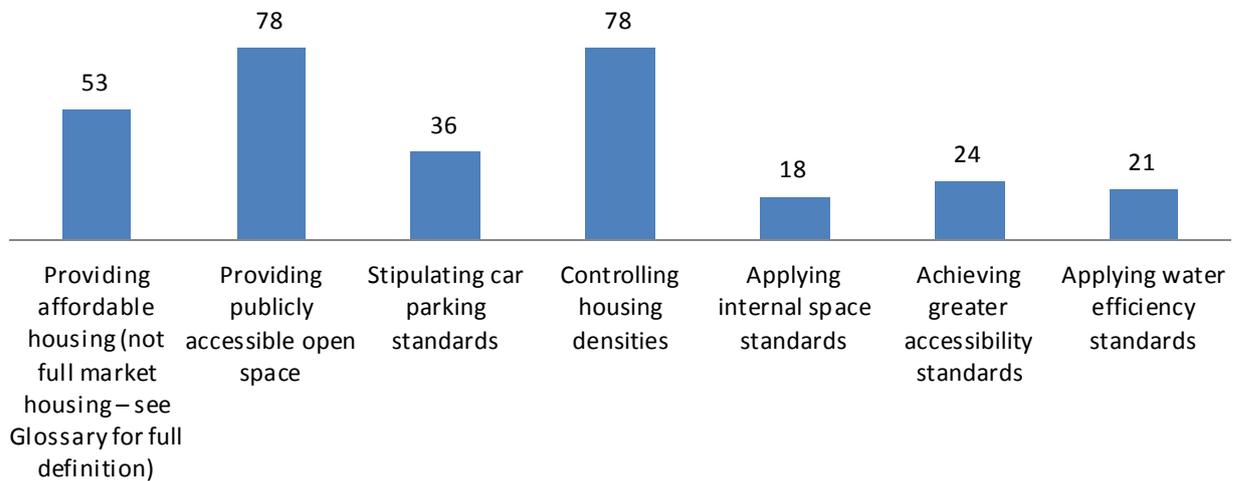


Q13. In delivering new development, what features are important to you locally? Please can you rank the following in order of importance, giving 1 for the most important down to 7 for the least important

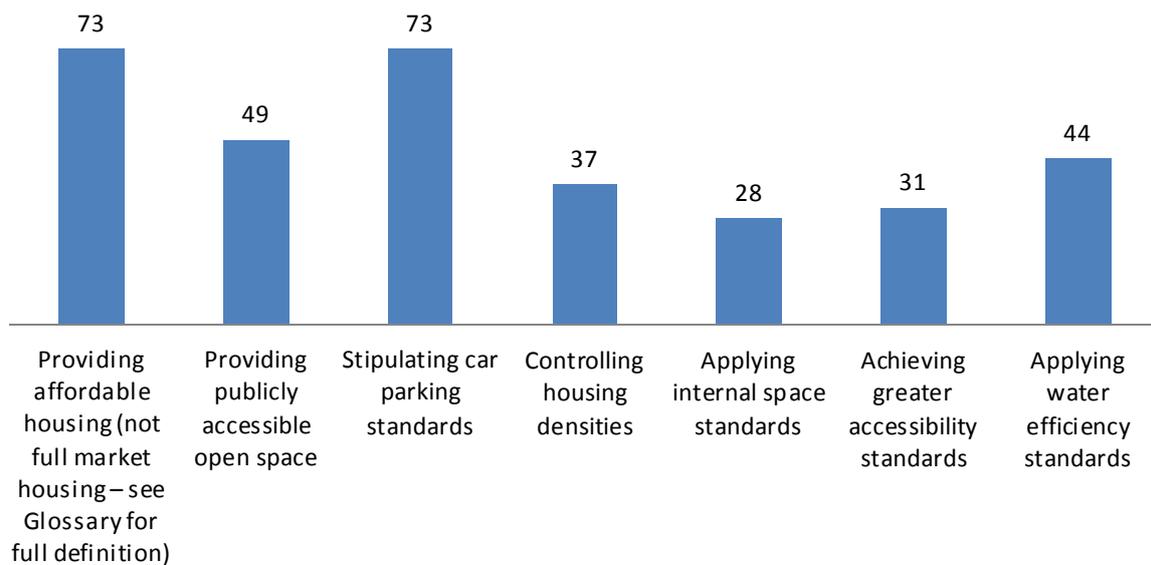
Local Development Features ranked as No. 1 Priority



Local Development Features ranked as No. 2 Priority

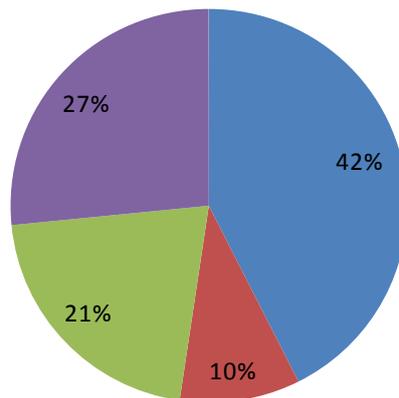


Local Development Features ranked as No. 3 Priority



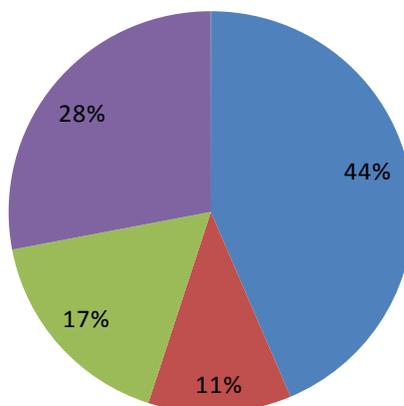
14. Do you think the Borough Council should assess the viability of including the nationally described space standards in the new Local Plan?

■ Yes ■ No ■ Don't know ■ No response



15. Do you think the Borough Council should assess the viability of exceeding the minimum standards required by Building Regulations in respect of access and water?

■ Yes ■ No ■ Don't know ■ No response



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Timetable for the Local Plan to form the basis of a new Local Development Scheme (Revised July 2017)

ANNEX 3

Year	2016					2017					2018				
------	------	--	--	--	--	------	--	--	--	--	------	--	--	--	--

Stage	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	
Evidence Base	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y														
Issues & Options Reg 18						R	R	R	C	R	R	R	R	R	R	R	R	R	R	R																	
Draft Plan Reg19/20																																					
Submission Exam Report																																					

Page 109

Notes: C = Consultations, S = Submission, P = Pre-examination meeting, E = Examination, R = Inspector’s Report received, A = Adoption

(Please note: the month in which the letter appears is when that event is expected to happen, eg the Draft Plan (Re.19/20) public consultation is anticipated to start in February 2018)

Timetable for the Local Plan to form the basis of a new Local Development Scheme (Revised July 2017)

Year	2019					2020					2021				
------	------	--	--	--	--	------	--	--	--	--	------	--	--	--	--

Stage	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D		
Adoption				A																																		

Notes: C = Consultations, S = Submission, P = Pre-examination meeting, E = Examination, R = Inspector’s Report received, A = Adoption

(Please note: the month in which the letter appears is when that event is expected to happen, eg the Draft Plan (Re.19/20) public consultation is anticipated to start in February 2018)

TONBRIDGE & MALLING BOROUGH COUNCIL

PLANNING and TRANSPORTATION ADVISORY BOARD

25 July 2017

Report of the Director of Planning, Housing and Environmental Health

Part 1- Public

Matters for Recommendation to Cabinet - Non-Key Decision (Decision may be taken by the Cabinet Member)

1 DUTY TO CO-OPERATE

This report provides an update of progress made in respect of exercising the Duty to Co-operate with neighbouring Local Authorities and other relevant bodies and also seeks endorsement of officer level comments in respect of the recent Regulation 18 public consultations for the emerging Tunbridge Wells Local Plan.

1.1 Introduction

- 1.1.1 Members will recall that the Duty to Cooperate (DtC) was introduced by the Localism Act 2011. Previous reports to this Board have set out examples of cross boundary collaboration within the context of preparing the Local Plan and this report provides a further update.
- 1.1.2 National Planning Practice Guidance describes the DtC as placing a legal duty on Local Planning Authorities, County Councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
- 1.1.3 It is not a duty to agree, but Local Planning Authorities should make every effort to secure the necessary cooperation on strategic boundary matters before they submit their plans for examination. Local Planning Authorities must demonstrate how they have complied with the duty at the examination. Failure to do so will mean that the examination goes no further.

1.2 Tunbridge Wells Borough Council Local Plan – Issues and Options (Regulation 18) consultations

- 1.2.1 Tunbridge Wells Borough Council is a neighbouring Local Planning Authority to our south and forms part of a natural grouping of west Kent authorities together with Sevenoaks District to the west. Both neighbouring authorities share part of

the west Kent housing market area with the south western part of Tonbridge and Malling.

- 1.2.2 Tunbridge Wells is also preparing a new Local Plan and have recently carried out their first public consultation exercise as required by Regulation 18 of the Town Planning Regulations, inviting comments up to the 12th June. Officer level comments were submitted by the deadline and can found appended to this report for endorsement.
- 1.2.3 The consultation set out the issues arising from the evidence gathering stage, such as the challenge of meeting an objectively assessed need for new housing of 648 new dwellings per year over a twenty year Plan period (2013-33), which is similar to the approach taken in our own consultation document, “The Way Forward”.
- 1.2.4 However, the Tunbridge Wells approach is different in that it does not specify how much development could be met from the five growth options proposed. One of the officer comments highlighted this arguing that in the absence of estimating yield, the most productive option may be inadvertently discarded at this early stage potentially resulting in a greater unmet need that will have to be addressed.
- 1.2.5 The five growth options are:
- Option 1 - Focused growth – similar to existing core strategy with new development located in and around the main settlements.
 - Option 2 - Semi- dispersed growth – as before, but with some of the larger villages taking more growth.
 - Option 3 - Dispersed growth – development distributed more evenly across all of the Borough’s settlements.
 - Option 4 - Growth Corridor-led growth – growth to be focused along the A21 between Tunbridge Wells and Pembury.
 - Option 5 - New settlement – A new free standing ‘Garden Village’ development – no location proposed. Views are sought on the principle only.
- 1.2.6 Related to the yield point, was the absence of any phasing of the growth scenarios. For example, option 5 involves the establishment of a new settlement, although the location is not specified. While a new settlement could potentially deliver a significant amount of new housing over the long term, it will take many years before new housing begins to be delivered and may then only deliver a maximum of around 200 units a year. The most likely strategy to deliver housing consistently and at the magnitude sufficient to meet objectively assessed needs is to have a portfolio of different sized sites including small, medium options that can

deliver housing relatively quickly at the front end of the Plan period and help contribute to the 5 year housing land supply.

- 1.2.7 Tunbridge Wells is facing a number of challenges in preparing its new Local Plan. The Borough shares many of the same constraints that Tonbridge and Malling have in terms of the extent of Green Belt and Areas of Outstanding Natural Beauty designations, areas prone to flooding and highway capacity.
- 1.2.8 The objectively assessed need for housing, although similar to that for Tonbridge and Malling (648 per year compared to 696) is double the figure in the previous development plan (12,960 (OAN) 2013-33 compared with 6,000 (Adopted Core Strategy 2010) 2006-26) and historically Tunbridge Wells have not delivered as much housing as Tonbridge and Malling, averaging 283 net new dwellings a year over the last decade compared to 606 in Tonbridge and Malling.
- 1.2.9 The consultation documents recognise that these challenges may result in the Local Planning Authority being unable to fully meet its objectively assessed needs for housing and states that:
- ‘..the Council will continue to communicate and engage with neighbouring local authorities both in Kent and East Sussex, as part of the duty to cooperate. Such engagement will include discussion as necessary of the ability of other neighbouring authorities to accept any unmet need from Tunbridge Wells borough, recognising that the duty to cooperate is not a duty to agree.’
- 1.2.10 The officer comments acknowledged the on-going and positive cross boundary liaison meetings, but also reiterated the fact that Tonbridge and Malling in preparing its own Local Plan is striving to meet locally identified needs where they arise and in doing so, particularly for the West Kent Housing Market Area that we share with Tunbridge Wells, are addressing similar constraints and challenges.

1.3 Sevenoaks District Council Local Plan – Issues and Options (Regulation 18) consultations

- 1.3.1 Sevenoaks is slightly behind Tunbridge Wells in preparing their Local Plan, but intend to launch their consultation in August, subject to Cabinet approval of the reports considered by their Planning Committee on 22nd June. Sevenoaks is also part of the west Kent housing market area.
- 1.3.2 The objectively assessed needs for housing are similar to those for Tunbridge Wells and Tonbridge and Malling at 12,400 over a 20 year period or 625 per year. Average delivery over the past decade is 234 per year. 93% of the District is Green Belt. Sevenoaks face many of the same challenges as Tunbridge Wells in planning to meet their future needs. The report to the Planning Committee notes that potential yield on identified sites could deliver up to 6,500 new homes over the 20 year plan period. There could be an additional 1,400 dwellings on sites which would have to demonstrate exceptional circumstances (i.e to remove the

sites from the Green Belt). This equates to a potential shortfall of between 4,000 to 5,400, or 200-270 per year.

- 1.3.3 It is likely that Sevenoaks District, like Tunbridge Wells, will also have ultimately have unmet housing need, which will a matter for further discussion through the DtC and that will be a matter on which we will wish to submit representations during the formal consultation stage.

1.4 Other Neighbouring Local Authority Local Plan Progress

- 1.4.1 Tonbridge and Malling also share boundaries with Maidstone and Gravesham Boroughs and Medway Unitary Council. Officers have and continue to liaise with counterparts in each of these authorities over Local Plan progress and cross boundary issues. Current status can be summarised as follows:

Maidstone

- 1.4.2 The Local Plan hearing closed on 24th January 2017. Further consultations have been held in respect of recommended modifications to the Local Plan made by the Inspector and the Council expect the Local Plan to be adopted later this year.
- 1.4.3 It is worth noting that the Plan will have a plan period to 2021, by which time the plan is expected to be revised, so a review will begin almost immediately.

Gravesham

Gravesham adopted a Local Plan Core Strategy in 2014, subject to an early review. The Council is currently preparing a site allocations and development management policies document which will be the subject of public consultations this summer.

Medway

- 1.4.4 Medway's Local Plan is at a similar stage to Tonbridge and Malling (Regulation 18 consultation) with an anticipated Regulation 19 public consultation for a draft plan in January 2018.

It is worth noting that Medway's proposed strategy options include the site at Lodge Hill (the former Chattenden Barracks). The site is a SSSI and received in excess of 10,000 objections during the last consultation exercise that closed in May. There will be a public inquiry into a current application for 5,000 dwellings in March 2018 after which the status of the site will be confirmed.

1.5 Summary of other recent and on-going examples of cross-boundary working

- 1.5.1 In addition to the ongoing DtC arrangements with neighbouring Local Planning Authorities, there have been a number of examples of cross boundary working including:

Working closely with Kent County Council

- 1.5.2 Kent Highways and their retained consultants Amey have been assisting with the transport modelling work around the A20 corridor, which will feed into the Local Plan. They have also been providing comments in respect of other elements of the transport evidence base and the proposed strategy.
- 1.5.3 Kent Highways have also been working closely with Tonbridge and Malling and Maidstone Borough Councils in implementing Local Growth Area funding and developer contributions to improve junction 5 of the M20, the Coldharbour Roundabout and the northern part of Hermitage Lane.
- 1.5.4 We continue to work closely with Kent Education regarding the implications of future growth on school places and this will feed into the Infrastructure Delivery Plan when the proposed strategy is finalised.
- 1.5.5 Working with Medway Council - Rochester Airport and Business Enterprise Zone
- 1.5.6 Officers continue to work closely with colleagues in Medway regarding the Council's redevelopment of the airport through the planning application process and also in respect of a potential Local Development Order for the Enterprise Zone (the effect of an LDO is to effectively grant outline planning permission for certain uses, in this case business use).
- 1.5.7 The London Plan and the Wider South East
- 1.5.8 London is the UK's largest city and has a wide ranging effect on the wider south east region. Although Tonbridge and Malling does not physically share a boundary with the Greater London Authority, the London Plan will have significant impacts on the wider south east and has to be taken into consideration as part of our own plan making.
- 1.5.9 The current London Plan dates from 2011 although there were alterations published in 2015/16. A full review of the Plan is underway with a Draft London Plan consultation planned for autumn 2017. This will be followed by an Examination in Public Summer 2018 and Adoption anticipated in autumn 2019.
- 1.5.10 Tonbridge and Malling is represented at the South East England Councils (SEEC), which together with an East of England equivalent represents the collective voice of the wider south east. There is regular dialogue with the Mayor and GLA in accordance with the Duty to Inform (the Greater London Act equivalent to the Duty to Cooperate) and progress towards the review of the London Plan carefully monitored.
- 1.5.11 Further updates and responses as necessary will be provided to this Board as the London Plan progresses.

1.6 Conclusion

- 1.6.1 This report provides an update in respect of current and ongoing cross boundary working in accordance with the Duty to Cooperate, which in due course will form part of the evidence base for the Local Plan to show compliance. Endorsement is also sought for the officer level comments in respect of the recent consultation in respect of the Tunbridge Wells Local Plan at Annex 1.
- 1.6.2 The Housing White Paper published in February (the subject of a report to this Board in March) proposed a number of further planning reforms, one of which was to introduce a new Statement of Common Ground to demonstrate that the Duty has been met. The White Paper stated that this would be subject to further consultation before being included in a revised National Planning Policy Framework this autumn.
- 1.6.3 To date there has been no further consultations, so it is unclear if and when the Statements will be introduced. However, it is a clear indication from the Government that Local Planning Authorities will have to demonstrate clearly how they have worked with their neighbours in addressing cross boundary issues in future. This could be a significant factor for all three of the west Kent Authorities, particularly in respect of meeting future housing needs.
- 1.6.4 In due course there will be a need for further strategic discussions with our neighbours in west Kent in order to consider the appropriate approaches each planning authority might adopt moving forward into the key decision making time for local plans.

1.7 Legal Implications

- 1.7.1 While there are no direct legal implications arising from this report, failure to meet the legal test for the Duty to Cooperate when the Local Plan is submitted to the Secretary of State would result in the Plan going no further in the process.

1.8 Financial and Value for Money Considerations

- 1.8.1 Failure to maintain an up to date Local Plan could have financial implications for the Council in terms of an increasing number of planning appeals and the award of costs.

1.9 Risk Assessment

In addition to the inherent risks associated with sections 1.7 and 1.8 above, the absence of an up to date Local Plan could result in a lack of local control over development decisions and risk intervention by the Secretary of State.

1.10 Recommendation

- 1.10.1 That the update in respect of the Duty to Cooperate be **NOTED** and that the officer level comments in respect of the Issues and Options consultations for the emerging Tunbridge Wells Local Plan at Annex 1 be agreed.

The Director of Planning, Housing and Environmental Health confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and policy Framework.

Background papers:

Nil

contact: Ian Bailey
Planning Policy Manager

Steve Humphrey

Director of Planning, Housing and Environmental Health

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Annex 1: Officer Level Comments in Respect of Tunbridge Wells Borough Council Local Plan (Issues and Options) Consultation (sent 12th June 2017)

Dear Planning Policy Team,

Please find below some officer level comments on the above consultation on behalf of Tunbridge and Malling Borough Council. These will be subject to Member endorsement in due course.

These comments are of a more general nature than the specific set questions laid out in the response form. Therefore unless indicated otherwise, please assume they relate to Question 19 in the main.

Since there are no potential yields for each of the proposed development strategies going forward, it is difficult to provide a view on a preferred option or combination of options. The document is heavily caveated in respect of the challenges of fully meeting the objectively assessed needs over the Plan period, suggesting that none of the options will be sufficient, but the consultee has no indication whether one option or combination of options will meet more or less of the need than the others.

Whilst acknowledging that there is a second round of Call for Sites running in parallel to the current consultation and therefore it may be premature to include sites at this stage, it does beg the question whether a second round of consultation will be necessary when the sites are known. If this is required, then the current timetable may need to be extended.

Clearly from a neighbouring Local Planning Authority's point of view, located within the same housing market area, the options that could deliver more of the identified need would be preferable to those that will deliver less. There is a risk in carrying out the consultation without the benefit of potential yields could result in the most productive options being rejected before they have been fully considered.

Notwithstanding the overall capacity issues of the proposed options, there is also the matter of maintaining a five year supply of housing land. As there is no assessment of the phasing of each of the options, again preferences expressed at this stage could undermine the ability of a future strategy to deliver sufficient housing numbers across the Plan period. For example, while a new settlement may provide a significant proportion of the total need and therefore be an attractive option on the face of it, it will inevitably take some years before such a site could deliver housing and even then only provide 1-200 units a year. An approach more likely to succeed would be to have a mixed portfolio of small to large sites. This has also been supported in the Housing White Paper.

Those options promoting a northern extension to the Limits to Built Development north of Tunbridge Wells itself and option 4 which explores a development corridor approach along the A21 would clearly have cross boundary impacts on the local highway network, community infrastructure and air quality. Should these options be

taken forward we would welcome the opportunity to work closely with TWBC as TMBC also brings forward future development proposals in the vicinity of south Tonbridge.

The references to the Duty to Cooperate are acknowledged and we welcome the recognition of the positive cross-boundary liaison on strategic planning matters so far and the opportunity to continue to do so. As noted in those meetings, Tonbridge and Malling in preparing its own Local Plan is striving to meet locally identified needs where they arise and in doing so, particularly for the West Kent Housing Market Area that we share with Tunbridge Wells, are addressing similar constraints and challenges.

I hope these brief comments are of assistance. I will confirm when our Members have endorsed these views and any additional comments they may wish to add.

Yours Sincerely,

Ian Bailey

Planning Policy Manager

TMBC

TONBRIDGE & MALLING BOROUGH COUNCIL

PLANNING and TRANSPORTATION ADVISORY BOARD

25 July 2017

Report of the Director of Planning, Housing and Environmental Health

Part 1- Public

Matters for Recommendation to Cabinet - Non-Key Decision (Decision may be taken by the Cabinet Member)

1 TRANSPORTATION ISSUES

This report provides an update on a number of transportation issues that are relevant to the Borough and seeks endorsement of officer level comments made in respect of the recent South Eastern Rail Franchise consultation.

1.1 Introduction

1.1.1 This Board regularly receives updates on a number of transportation issues, the most recent examples being in relation to National Airport Policy, Kent County Council's Freight Action Plan and Local Transport Plan (version 4).

1.1.2 This report focuses on the South Eastern Rail Franchise consultation, an update on the proposals for a Lower Thames Crossing, planned improvements to Tonbridge Station forecourt and cycle links and highway improvements to the A20/Hermitage Lane.

1.2 Updates

South Eastern Rail Franchise consultation and response

1.2.1 The Department for Transport launched a public consultation in March this year in advance of renewing the contract for the train service on the South Eastern rail network in December 2018. The consultation was due to end on 23rd May, but was extended to 30th June due to the calling of the General Election on 8th June.

1.2.2 The purpose of the consultation was to seek views on the new franchise and provide an opportunity to shape what the next operator will deliver. The Department for Transport's ambition is that the franchise will:

- Create more capacity by running longer trains and upgrading older rolling stock;

- Increase reliability, by ensuring that the new franchisee works closer with Network Rail;
- Introduce a simpler, automated compensation scheme;
- Introduce smart payment systems, including using mobile phones; and
- Improve customer service.

- 1.2.3 The options for improvements, which are set out in more detail in the consultation document, reflect by and large the priorities in the Tonbridge and Malling Rail Manifesto prepared in 2014. In particular, there is recognition for the Ashford-Tonbridge-Redhill-Reading line forming a potential fast and frequent London orbital service. It is recognised that this is currently slow and underused and operated under different franchises. This has been supported if it brings the Tonbridge Gatwick service back into the South Eastern franchise and frequent services restored.
- 1.2.4 Some of the other proposals to increase capacity and speed on peak services, for example removing first class seating and fewer stops at smaller stations, will depend on the views of users and therefore only qualified support has been suggested.
- 1.2.5 Transport for London will now consider the responses received before carrying out a tendering exercise between September and January. The new contract will be issued in August 2018 and the new franchise will start on 9th December 2018.
- 1.2.6 The officer level response to the consultation is attached at Annex 1 for endorsement. A copy of our manifesto was also sent with the response.

Lower Thames Crossing

- 1.2.7 Following a major public consultation exercise in 2016 that generated 47,000 responses, the Government announced on 12th April a preferred route (see Annex 2) and the project has now entered the development phase.
- 1.2.8 The next stages will involve further design work, environmental surveys, more detailed air quality and noise impact assessments and further traffic modelling, particularly at junctions. Land owners close to the route will be contacted to help them understand potential impacts, their options and rights and there will be further opportunities for the public to comment on the proposals.
- 1.2.9 Tonbridge Station improvements
- 1.2.10 Kent County Council (KCC) has secured £500,000 of Local Growth Funding from the South East Local Enterprise Partnership to improve the area outside Tonbridge Station. The aim is to improve the space available for customers at the station, provide more room for pedestrian movements and to link the design to the

recently improved High Street. KCC carried out a public consultation exercise between 31st October and 11th December 2016 and this has been the subject of a report to the Joint Transportation Board in March. The proposed improvements received a strong expression of support from those responding, with almost 80% wishing to see more space directly outside the station by relocating the bus stop.

- 1.2.11 Concern was expressed through the consultation and by Members at the Joint Transportation Board in March about the location of bus stops and their use by 'idling' buses. This will be addressed during the design stage and through further consultation with the bus companies.
- 1.2.12 The project is now at the detailed design stage with implementation expected during the 2018/19 financial year.
- 1.2.13 In addition to the funding for improvements to the main entrance to the station, South Eastern has recently been successful in securing funding for improvements to the cycling facilities, which will be located at the Barden Road entrance. This along with secured funding for improvements to cycle paths in Tonbridge could encourage more people to access the station by bicycle and potentially reduce the number of cars travelling at peak times. It may also be a way to achieve some more general improvements to the Barden Road entrance to compliment the other works planned for next year and continue the sustained investment in the public realm within the town centre.

Programmed improvements for A20 Corridor/Hermitage Lane

- 1.2.14 Kent Highways are completing the design for an improvement scheme that will create extra lane capacity at the junction with the McDonalds drive through and Aldi at the northern end of Hermitage Lane to alleviate some of the congestion that has arisen as a result of the popularity of customers wishing to access the site.
- 1.2.15 There will be a targeted engagement process conducted by Kent Highways once the detailed designs are finalised and works are expected to begin by September.
- 1.2.16 The A 20 Corridor is currently the subject of a traffic model commissioned jointly by the Borough Council and KCC in order to enable more informed assessments to be made of potential development arising from the Local Plan work.
- 1.2.17 KCC are also advanced on the implementation of some traffic management improvements along the A20 and are also examining potential improvements at key junctions. These have been the subject of some initial discussion with local Members and Parish Councils.

1.3 Legal Implications

- 1.3.1 There are no legal implications arising from this report.

1.4 Financial and Value for Money Considerations

- 1.4.1 External funding has been secured for the highway improvements to Hermitage Lane, the Tonbridge Station enhancements with no financial implications on the Council.

1.5 Risk Assessment

- 1.5.1 The endorsement of the officer level comments appended to this report will confirm the views of the Council in respect of the recent consultation. If these comments are not endorsed there is a risk that they will carry less weight in expressing the views of the borough council.

1.6 Equality Impact Assessment

- 1.6.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act.

1.7 Recommendations

- 1.7.1 That the content of this report be NOTED and that the officer level comments in response to the South Eastern Franchise consultation at Annex 1 be agreed.

The Director of Planning, Housing and Environmental Health confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and policy Framework.

Background papers:

Nil

contact: Ian Bailey
Planning Policy Manager

Steve Humphrey

Director of Planning, Housing and Environmental Health

Annex 1 – Officer Response to South Eastern Rail Franchise Consultation

Dear Sir/Madam,

Thank you for the opportunity to respond to the consultation, extended to 30th June 2017. Please accept these comments as officer level responses on behalf of Tonbridge and Malling Borough Council. These will be considered by Members of the Planning and Transportation Advisory Board on 25th July.

In broad terms the Government's priorities reflect those set out in the Tonbridge and Malling Rail Manifesto published in September 2014 (copy attached for information). One of the priorities has been achieved, that the HS1 service stops at Snodland Station. The remainder are pertinent to the current consultation and are as follows:

- A fairer deal for passengers when fare increases are set;
- The new franchise must include peak and inter-peak Thameslink services from Maidstone East through Blackfriars and stations beyond. In addition, we would wish to see the inclusion of a true peak service to Cannon Street;
- Whilst acknowledging that it may not be practical to operate a service from Ashford we would still urge the restoration of the direct rail connections between Tonbridge and Gatwick and two an hour service during off-peak times;
- Extension of the services to large population bases in Kent, and also to the Medway Towns along the Medway Valley Line;
- The Tonbridge to Redhill and Gatwick line reintegrated into the Kent Franchise;
- Monitoring and performance separated from the classic service from the HS1 service.

The consultation document at 6.14 uses the Ashford-Tonbridge-Redhill-Reading route, currently operated under various operators as an example of a new route that ‘..could form part of a fast and frequent London orbital service..’ . If this could see the reinstatement of the Tonbridge to Gatwick service, with improved frequency as part of the new franchise, this would be welcomed.

The potential to improve Thameslink services and link into new routes, such as the Elizabeth Line in 2018 would also align well with the manifesto, subject to there being a reinstatement of services on this line to the City, to address problems associated with rail heading.

Proposed improvements to station facilities, particularly car and cycle parking, customer service and communication, simpler and fair ticketing would also be welcomed in line with the manifesto.

Proposals to increase capacity on existing services by removing first class seating and introducing fewer stops at smaller stations on some peak services could potentially improve some customer's experience, but to the detriment of others.

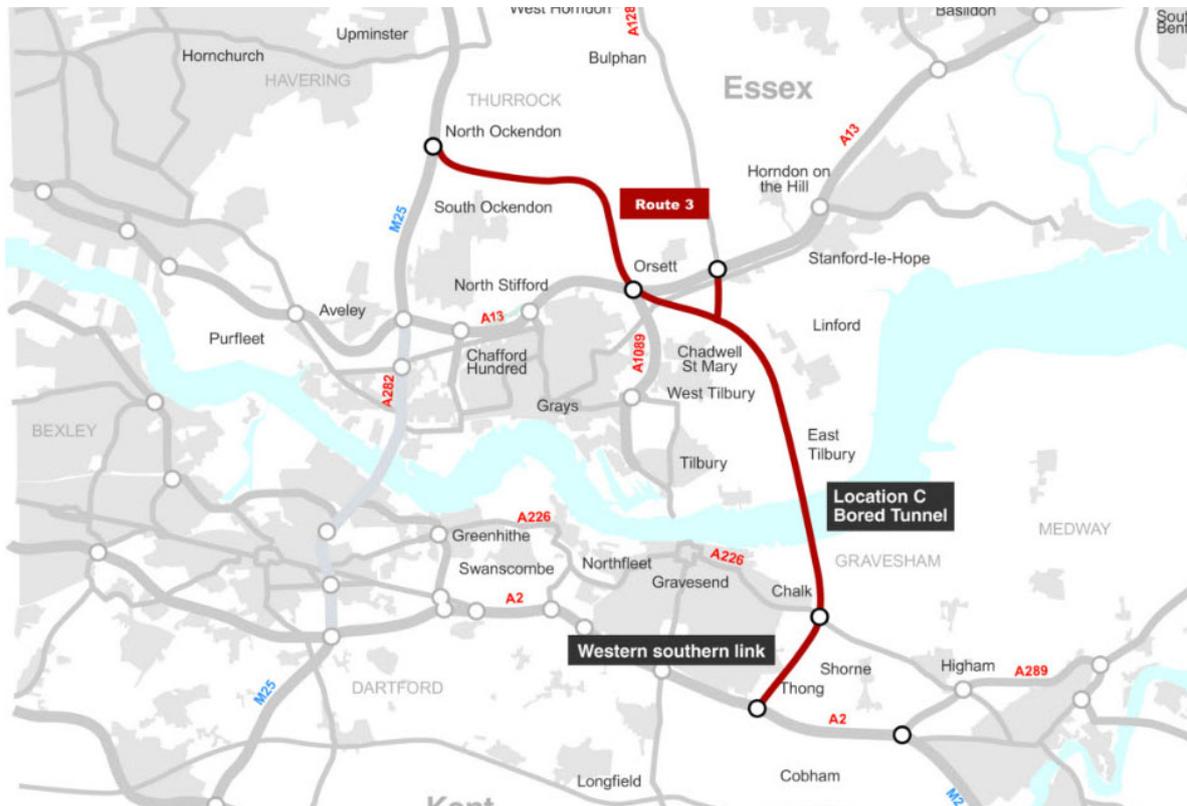
If you have any further queries please do not hesitate to contact me in the first instance. Please acknowledge receipt.

Yours Faithfully,

Ian Bailey

Planning Policy Manager
Tonbridge and Malling Borough Council

Annex 2 – Lower Thames Crossing Preferred Route (April 2017)



Source: <https://www.gov.uk/government/news/new-lower-thames-crossings-to-cut-congestion-and-create-thousands-of-jobs>

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Agenda Item 7

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

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Agenda Item 8

The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

**ANY REPORTS APPEARING AFTER THIS PAGE CONTAIN EXEMPT
INFORMATION**

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Agenda Item 9

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

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