

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: Democratic Services
committee.services@tmbc.gov.uk

26 March 2026

To: MEMBERS OF THE CABINET
(Copies to all Members of the Council)

Dear Sir/Madam

Your attendance is requested at a meeting of the Cabinet to be held in the Council Chamber, Gibson Drive, Kings Hill on Tuesday, 7th April, 2026 commencing at 7.30 pm.

Members of the Cabinet are required to attend in person. Other Members may attend in person or participate online via MS Teams.

Information on how to observe the meeting will be published on the Council's website.

(NB: Background papers to items referred from Scrutiny Select Committees and Committees have been omitted from printed agenda packs.)

Yours faithfully

DAMIAN ROBERTS

Chief Executive

A G E N D A

1. Guidance for the Conduct of Meetings

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PART 1 - PUBLIC

2. Apologies for absence 11 - 12
3. Declarations of interest 13 - 14

Members are reminded of their obligation under the Council's Code of Conduct to disclose any Disclosable Pecuniary Interests and Other Significant Interests in any matter(s) to be considered or being considered at the meeting. These are explained in the Code of Conduct on the Council's website at [Code of conduct for members – Tonbridge and Malling Borough Council \(tmbc.gov.uk\)](http://tmbc.gov.uk).

Members in any doubt about such declarations are advised to contact Legal or Democratic Services in advance of the meeting.

4. Minutes 15 - 18

To confirm as a correct record the Minutes of the meeting of the Cabinet held on 3 March 2026.

Matters for Recommendation to the Council

5. South West Kent Waste Services Contract Retender 19 - 36

Consideration of the recommendations of the Communities and Environment Scrutiny Select Committee in respect of the Waste Services Contract.

(Note: In accordance with LGA 1972 - Sch 12A Paragraph 3 – Information relating to the financial or business affairs of any particular person (including the authority holding that information) Annex 2 is private.)

Matters in accordance with Part 3 of the Constitution

Executive Non-Key Decisions

6. Public Space Protection Order 37 - 60

Consideration of the recommendations of the Communities and Environment Scrutiny Select Committee in respect of a Public Space Protection Order.

7. Review of Roadside Nature Reserves 61 - 172

Consideration of the recommendations of the Communities and Environment Scrutiny Select Committee in respect of Roadside Nature Reserves.

8. Homelessness Prevention and Rough Sleeping Strategy 2026-2031 173 - 220

Consideration of the recommendations of the Housing and Planning Scrutiny Select Committee in respect of a draft Homelessness Prevention and Rough Sleeping Strategy and action plan.

9. Local Plan Regulation 18 (Stage 2) Consultation - Update 221 - 260

Consideration of the recommendations of the Housing and Planning Scrutiny Select Committee in respect of the Local Plan Regulation 18 (stage) consultation; the Local Plan transport work and the associated financial impacts.

10. Planning Enforcement Plan Review 261 - 290

Consideration of the recommendations of the Housing and Planning Scrutiny Select Committee in respect of proposed changes to the Planning Enforcement Plan and associated activities and options for a pro-active approach.

Matters submitted for Information

11. Minutes of Panels, Boards and Other Groups To Follow

The minutes for meetings of Advisory Panels, Boards and Other Groups are attached:

- Joint Transportation Board of 2 March 2026 – To Follow

Any recommendations arising from these minutes are set out as individual items on this agenda.

12. Decisions taken by Cabinet Members 291 - 292

A record of the decisions taken by portfolio holders since the last meeting of Cabinet are attached.

13. Notice of Forthcoming Key Decisions 293 - 302

The Notice setting out the Key Decisions anticipated to be considered during the period April to June 2026 is attached.

A Notice informing of Key Decisions taken under General Exception Rule 15 is also attached.

14. Urgent Items 303 - 304

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

Matters for consideration in Private

15. Exclusion of Press and Public 305 - 306

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.

PART 2 - PRIVATE

Matters in accordance with Part 3 of the Constitution

Executive Key Decisions

16. Poult Wood Golf Course - Air Source Heat Pumps - Tender Report 307 - 312

(Reason: Part 2 - Private: LGA 1972 - Sch 12A Paragraph 3 - Financial or business affairs of any particular person)

The report sets out the tenders received for the installation of air source heat pumps at Poult Wood Golf Course.

Due to tight timescales following receipt of the tender submissions, a **supplementary report will be circulated in advance of the meeting** detailing the outcome of the tender evaluation.

Executive Non-Key Decisions

17. Tonbridge Town Centre Programme Board - Notes of 6 March 2026 313 - 496

(Reason: Part 2 - Private: LGA 1972 - Sch 12A Paragraph 3 - Financial or business affairs of any particular person)

This report details the notes from the Tonbridge Town Centre Programme Board (TTCPB) meeting on 6 March 2026 as shown at **Appendix 1**, with the accompanying report relating to the replacement Angel Centre – TTCPB 6 March 2026 at **Appendix 2** and supporting Annexes 1-7.

18. Urgent Items 497 - 498

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

Councillor M D Boughton, (Leader)
Councillor R P Betts, (Housing, Environment and Economy)
Councillor M A Coffin, (Finance, Waste and Technical Services)
Councillor D Keers, (Community Services)
Councillor A Mehmet, (Infrastructure and Tonbridge Regeneration)
Councillor M Taylor, (Planning)

Members of the Council who are not members of the executive may attend meetings of the Cabinet. With the agreement of the Leader, any such Member may address the Cabinet on any item on the agenda but may not vote.

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GUIDANCE ON HOW MEETINGS WILL BE CONDUCTED

- (1) Most of the Borough Council meetings are livestreamed, unless there is exempt or confidential business being discussed, giving residents the opportunity to see decision making in action. These can be watched via our YouTube channel. When it is not possible to livestream meetings they are recorded and uploaded as soon as possible:

<https://www.youtube.com/channel/UCPp-IJISNgoF-ugSzxjAPfw/featured>

- (2) There are no fire drills planned during the time a meeting is being held. For the benefit of those in the meeting room, the fire alarm is a long continuous bell and the exits are via the doors used to enter the room. An officer on site will lead any evacuation.
- (3) Should you need this agenda or any of the reports in a different format, or have any other queries concerning the meeting, please contact Democratic Services on committee.services@tmbc.gov.uk in the first instance.

Attendance:

- Members of the Committee are required to attend in person and be present in the meeting room. Only these Members are able to move/ second or amend motions, and vote.
- Other Members of the Council can join via MS Teams and can take part in any discussion and ask questions, when invited to do so by the Chair, but cannot move/ second or amend motions or vote on any matters. Members participating remotely are reminded that this does not count towards their formal committee attendance.
- Occasionally, Members of the Committee are unable to attend in person and may join via MS Teams in the same way as other Members. However, they are unable to move/ second or amend motions or vote on any matters if they are not present in the meeting room. As with other Members joining via MS Teams, this does not count towards their formal committee attendance.
- Officers can participate in person or online.

- Members of the public addressing an Area Planning Committee should attend in person. However, arrangements to participate online can be considered in certain circumstances. Please contact committee.services@tmbc.gov.uk for further information.

Before formal proceedings start there will be a sound check of Members/Officers in the room. This is done as a roll call and confirms attendance of voting Members.

Ground Rules:

The meeting will operate under the following ground rules:

- Members in the Chamber should indicate to speak in the usual way and use the fixed microphones in front of them. These need to be switched on when speaking or comments will not be heard by those participating online. Please switch off microphones when not speaking.
- If there any technical issues the meeting will be adjourned to try and rectify them. If this is not possible there are a number of options that can be taken to enable the meeting to continue. These will be explained if it becomes necessary.

For those Members participating online:

- please request to speak using the 'chat or hand raised function';
- please turn off cameras and microphones when not speaking;
- please do not use the 'chat function' for other matters as comments can be seen by all;
- Members may wish to blur the background on their camera using the facility on Microsoft teams.
- Please avoid distractions and general chat if not addressing the meeting
- Please remember to turn off or silence mobile phones

Voting:

Voting may be undertaken by way of a roll call and each Member should verbally respond For, Against, Abstain. The vote will be noted and announced by the Democratic Services Officer.

Alternatively, votes may be taken by general affirmation if it seems that there is agreement amongst Members. The Chairman will announce the outcome of the vote for those participating and viewing online.

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Apologies for absence

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Declarations of interest

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TONBRIDGE AND MALLING BOROUGH COUNCIL

CABINET

MINUTES

Tuesday, 3rd March, 2026

Present: Cllr M D Boughton (Chair), Cllr R P Betts, Cllr D Keers and Cllr M Taylor

Cllr M R Rhodes* was also present pursuant to Access to Information Rule No 23.

(*attended via MS Teams)

Apologies for absence were received from Councillors M A Coffin and A Mehmet

PART 1 - PUBLIC

CB 26/33 DECLARATIONS OF INTEREST

There were no declarations of interest made in accordance with the Code of Conduct.

CB 26/34 MINUTES

RESOLVED: That the Minutes of the meeting of the Cabinet held on 10 February 2026 be approved as a correct record and signed by the Chairman.

MATTERS IN ACCORDANCE WITH PART 3 OF THE CONSTITUTION

EXECUTIVE KEY DECISIONS

CB 26/35 LEARNING AND DEVELOPMENT RESOURCES

(Decision Notice D260032CAB)

Consideration was given to proposals to strengthen the Borough Council's capacity to deliver its Workforce Development Strategy, to ensure that key programmes were effectively implemented, monitored and evaluated and to provide organisational development support in preparation for Local Government Reorganisation (LGR).

Due regard was given to the financial and value for money considerations, the assessment of risk and legal implications.

In recognition that the additional capacity would support the authority in maintaining an effective and resilient workforce, particularly during the transition associated with LGR, Cllr Boughton proposed, Cllr Keers seconded and Cabinet

RESOLVED: That the funding for a full-time two-year fixed-term Learning and Development Manager from the Local Government Reorganisation Reserve be approved.

MATTERS SUBMITTED FOR INFORMATION

CB 26/36 MINUTES OF PANELS, BOARDS AND OTHER GROUPS

The Minutes of the meetings of the following Advisory Panels and other Groups were received, any recommendations contained therein being incorporated within the decisions of the Cabinet reproduced at the annex to these Minutes.

CB 26/37 DECISIONS TAKEN BY CABINET MEMBERS

Details of the Decisions taken in accordance with the rules for the making of decisions by executive members, as set out in Part 4 of the Constitution, were presented for information.

CB 26/38 NOTICE OF FORTHCOMING KEY DECISIONS

The Notice setting out Key Decisions anticipated to be taken during the period April to May 2026 was noted.

A further Notice explained that, in accordance with Rule 15 of the Access to Information Rules (Part 4 of the Constitution), the Chair of Overview and Scrutiny Committee had been informed that a decision would be taken as a general exception due to the need to implement as soon as possible.

CB 26/39 EXCLUSION OF PRESS AND PUBLIC

It was moved by Cllr Betts, seconded by Cllr Taylor and

RESOLVED: That as public discussion would disclose exempt information, the following matters be considered in private.

PART 2 - PRIVATE**MATTERS IN ACCORDANCE WITH PART 3 OF THE CONSTITUTION****EXECUTIVE KEY DECISIONS****CB 26/40 OPTIONS FOR LOCAL AUTHORITY HOUSING FUND - PURCHASE OF PROPERTY**

(Decision Notice D260033CAB)

(Reasons: Part 2 – Private – LGA 1972 Sch 12A Paragraph 3 – Financial or business affairs of any particular person)

Consideration was given to the proposed purchase of a residential property in Aylesford from Clarion Housing to meet the requirement of the Local Authority Housing Fund (LAHF).

Due regard was given to the financial and value for money considerations, the assessment of risk and the legal implications.

In recognition of improving housing options for local people whilst protecting outdoor areas of importance, increasing options for temporary accommodation, delivering resettlement properties and making best use of LAHF, Cllr Boughton proposed, Cllr Betts seconded and Cabinet

RESOLVED: That the purchase of a residential property in Aylesford, as detailed in the report, be approved.

CB 26/41 INTERNAL AUDIT SERVICE

(Decision Notice D260034CAB)

(Reasons: Part 2 – Private – LGA 1972 Sch 12A Paragraph 3 – Financial or business affairs of any particular person)

Consideration was given to the recommendation of the Audit Committee in respect of the provision of both Internal Audit and Counter Fraud Services. These were currently provided by Kent County Council through the Kent Audit Function and was due to end in September 2026. However, it was recommended that the service continue up to Local Government Reorganisation (LGR).

Due regard was given to the views of the Audit Committee, the financial and value for money considerations, the assessment of risk and the legal implications.

In recognition that the provision of Internal Audit Services was required under LGA 1972 to maintain sufficient governance and control on local

authority operations and to maintain an effective council, Cllr Boughton proposed, Cllr Taylor seconded and Cabinet

RESOLVED: That the recommendation from the Head of Finance (Section 151 Officer) to appoint Kent County Council to provide Internal Audit and Counter Fraud Services from 1 October 2026 to 31 March 2029 be approved.

The meeting ended at 7.41 pm

SOUTH WEST KENT WASTE SERVICES CONTRACT RETENDER

Item CE 26/4 referred from Communities and Environment Scrutiny Select Committee of 4 March 2026

A comprehensive update was provided on the Borough Council's procurement process for the South West Kent Waste Services Contract. Members were reminded that the current contract for refuse, recycling and street cleansing was due to expire at the end of March 2027 and was being retendered on a partnership basis with Tunbridge Wells Borough Council.

The joint report of the Director of Street Scene, Leisure and Technical Services and the Head of Finance provided details of the tender process and an assessment of the tenders received. As previously approved by Members, the tender was for a new contract of 12 years with an option to extend by up to two years subject to mutual agreement of all parties.

The outcome of the evaluation process, including the quality and price scores of the submissions and the overall tender scores, was attached in a restricted Annex 2 due to the inclusion of exempt information relating to the financial or business affairs of any particular person, including the authority holding that information.

In light of the partnership with Tunbridge Wells Borough Council in the procurement for the future delivery of the waste services across both boroughs, due regard had been given to aligning the decision-making processes as closely as possible by both local authorities, seeking to ensure synchronised Council approvals to enable final appointment of the successful contractor.

Additionally, Members were advised that a further report would be presented for consideration of the potential options for financing of vehicles under the new contract and for other discretionary works, such as the cleansing of high speed roads.

Taking into consideration the final tender scores detailed in the restricted Annex 2, Cllr S Hudson (Chair) proposed, Cllr M Rhodes seconded and it was

RECOMMENDED*: That

- (1) Contractor A, identified in the restricted Annex 2 to the report, be awarded the South West Kent Waste Services Contract as detailed in the report; and
- (2) a further report setting out proposals relating to the options for the financing of vehicles deployed on the Contract, costs relating to the cleansing of High Speed Roads, and costs associated with the cleansing of a number of Public Open Spaces, be presented to the next meeting of the Communities and Environment Scrutiny Select Committee for consideration.

***Recommended to Cabinet**

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Communities and Environment Scrutiny Select Committee

04 March 2026

Part 1 - Public

Matters for Cabinet – Council Decision



www.tmbc.gov.uk

Cabinet Member	Cllr Martin Coffin, Cabinet Member for Finance, Waste and Technical Services
Responsible Officer	Director of Street Scene, Leisure and Technical Services and Head of Finance (Section 151 Officer)
Report Author	Darren Lanes, Head of Street Scene and Leisure David Campbell-Lenaghan, South West Kent Waste Partnership Manager

South West Kent Waste Services Contract Retender

1 Summary and Purpose of Report

- 1.1 The current South West Kent Waste Services Contract for refuse, recycling and street cleansing is due to expire at the end of March 2027 and is being retendered on a partnership basis with Tunbridge Wells Borough Council (TWBC). This report outlines the tender process, the evaluation of the tenders received, and makes a recommendation to Cabinet on award of contract, as well as a recommendation to report further to the next meeting of this Committee in May.

2 Corporate Strategy Priority Area

- 2.1 'Efficient & Effective Council' and 'Caring for the Environment'
- 2.2 The Contract is the largest contract commissioned by this Council providing a household waste and recycling collection service to approximately 57,000 homes in the borough. The Contract also includes street cleansing services. The service is high profile, serving all our residents and is currently delivered in partnership with TWBC.
- 2.3 Successful tendering of the Contract Services, smooth mobilisation of the Contract and providing efficient & effective services will assist in delivering Activity 1.2 of the current Annual Service Delivery Plan - "*Finalise a new waste contract that supports our residents to drive up recycling rates through an effective and efficient service*".
- 2.4 The Contract will need to be delivered in accordance with current legislation and guidance, and consider pending legislation including Simpler Recycling, Extended

Producer Responsibility (EPR) and the Deposit Return Scheme (DRS). Consideration will also need to be given to increasing recycling performance and maximising income, including EPR payments, through the delivery of effective and efficient services.

3 Recommendations

3.1 Following consideration by Members, it is recommended that the Committee recommend to Cabinet – for onward recommendation to Council - that:

- 1) Contractor A, as identified in **Annex 2 (Part 2 Private publication)**, be awarded the South West Kent Waste Services Contract as detailed within the report; and
- 2) a further report be brought to the next meeting of the Committee on 20 May, making recommendations relating to the options for the financing of vehicles deployed on the Contract; costs relating to the cleansing of High Speed Roads; and costs associated with the cleansing of a number of Public Open Spaces.

4 Introduction and Background

4.1 Further to previous reports to this Committee and Cabinet, Members will be aware that the Council's Waste Services Contract is due to expire at the end of March 2027, and that Officers are currently working in partnership with Tunbridge Wells Borough Council (TWBC) on the tendering process for the future delivery of these services across both Boroughs.

4.2 The net cost of this Council's existing contract for refuse, recycling and street cleansing services is in the region of £4.9m per annum (£8.8m across the Partnership) and provides a refuse and recycling collection service to over 57,000 households in Tonbridge and Malling, an optional garden waste service, and a street cleansing service across the whole Borough. Whilst the current contract is performing well, the desired outcome for the contract retender is to continue to improve service delivery, meet customer expectations, improve levels of recycling performance, and meet current and forthcoming legislation. Over the length of the current contract there have been significant cost increases in the sector, so one of the aims of the tender process was to try to limit potential increases whilst still delivering a quality service.

4.3 At the 5 February 2025 meeting of this Committee, Members recommended to Cabinet that:

- the Council remains in partnership with Tunbridge Wells Borough Council for the delivery of household waste, recycling & street cleansing services;
- contracting out remains the Council's preferred commissioning model for the delivery of said services;

- a further report be presented to this Committee to allow for consideration of key service specification issues and the proposed procurement process for the delivery of said services.

4.4 These recommendations were subsequently approved by Cabinet on 11 February 2025.

4.5 At the following meeting of this Committee on 5 March 2025, Members recommended to Cabinet that:

- the Competitive Flexible Procedure procurement route and timeline as outlined at Section 5.1 to the report be agreed;
- the proposed contract length be 12 years as outlined at Section 5.2.1;
- joint Delegated Authority be given to the Cabinet Member for Transformation and Infrastructure and the Director of Street Scene, Leisure and Technical Services to agree contract variations following dialogue and negotiation ahead of the contractors' final bids, as outlined at Section 5.1.5;
- the proposed Specification amendment highlighted at Section 5.3 be agreed and reflected in the tender pack;
- the proposed areas of dialogue as highlighted at Section 5.4 be agreed;
- the proposed contract options as highlighted at Sections 5.5 be agreed;
- the approach to vehicle finance options, as highlighted at Sections 5.6 be determined by the Partner Authority Finance lead officers and be reported to the appropriate Committee and Cabinet;
- the proposed method of indexation as highlighted at Section 5.7 be agreed;
- the proposed tender evaluation be progressed in accordance with Section 5.8;
- the proposed approach to decarbonisation as highlighted at Section 12.7 be agreed.

4.6 For ease of reference, the Committee report of 5 March 2025 is attached at **Annex 1** of this report (Link: [Waste, Recycling and Street Cleansing Contract – Report to Communities and Environment Scrutiny Select Committee of 5 March 2025](#)). The recommendations were approved by Cabinet on 1 April 2025.

5 Update on Committee Recommendations of 5 March 2025

5.1 During the procurement process, Officers have been mindful of the agreed recommendations of Cabinet, and these have been considered with the tenderers

in the Dialogue stage of the tender process. The following section of this report provides an update on those recommendations and the outcomes.

- 5.2 *The Competitive Flexible Procedure procurement route and timeline as outlined at Section 5.1 be agreed.*
- 5.2.1 This proposed procurement route was adopted and managed with the assistance & guidance of senior officers from the TMT Procurement Partnership (a partnership between Tonbridge & Malling, Tunbridge Wells & Maidstone Borough Councils). The agreed timeline – although challenging - was largely adhered to and the Councils are on target for the original Contract Award deadline of late April 2026.
- 5.3 *The proposed contract length be 12 years as outlined at Section 5.2.1.*
- 5.3.1 The Contract will be awarded for a period of 12 years (to 31 March 2039) with an option to extend by up to two years if mutually agreeable to all parties.
- 5.4 *Joint Delegated Authority be given to the Cabinet Member for Transformation and Infrastructure and the Director of Street Scene, Leisure and Technical Services to agree contract variations following dialogue and negotiation ahead of the contractors' final bids, as outlined at Section 5.1.5.*
- 5.4.1 During the Dialogue stage of the procurement process, all subjects approved by Members were discussed, and a number will be reflected in the final Contract documents.
- 5.5 *The proposed Specification amendment highlighted at Section 5.3 be agreed and reflected in the tender pack.*
- 5.5.1 The proposal for the suspension of fortnightly garden waste collections for one cycle over the Christmas/New Year period has been included within the new Contract Specification.
- 5.6 *The proposed areas of dialogue as highlighted at Section 5.4 be agreed.*
- 5.6.1 All four issues were discussed at the Dialogue stage with tenderers. The latter included the results of those discussions in their final submissions, and any relevant proposals were considered during evaluation of the Quality sections of their tender. Specifically:
- Implications of pending regulations – all tenderers included their views on such regulations such as Simpler Recycling, Deposit Return Scheme and Extended Producer Responsibility.
 - Efficiencies in Service Delivery – all tenderers addressed potential efficiencies, frequency of collections, value for money, etc., within their submissions.

- Early start times – during Dialogue sessions and in final submissions, some flexibility on start times (standard being 7am for collections) was welcomed by tenderers but generally in occasional circumstances such as adverse weather & roadworks, rather than being the standard practice.
- Street Cleansing Methodology – all tenderers submitted street cleansing proposals that met the Contract Specification's output requirements.

5.7 *The proposed contract options as highlighted at Sections 5.5 be agreed.*

5.7.1 The Councils requested that separate unit costs be provided for a number of discretionary items in the submissions so that assessments can be made as to the costs & frequency of such works, including the cleansing of specific sections of High-Speed Roads, largely dual carriageways. Officers will bring proposals for such works to the May meeting of this Committee for consideration and recommendation to Cabinet.

5.8 *The approach to vehicle finance options, as highlighted at Sections 5.6 be determined by the Partner Authority Finance lead officers and be reported to the appropriate Committee and Cabinet.*

5.8.1 During the procurement process, options for future funding of vehicles were discussed with tenderers, and indicative cost savings that may be achieved by the Councils funding the required vehicles were provided by tenderers at Stage 2 of the submission process. Following approval of the preferred supplier, officers will continue to discuss the optimal funding options for the Partnership and will report into the May meeting of this Committee.

5.9 *The proposed method of indexation as highlighted at Section 5.7 be agreed.*

5.9.1 Following discussions at Dialogue stage and subsequent submissions, it has been agreed that the annual indexation for the Contract be based on a suite of indicators, to reflect inflationary costs, fuel costs and labour costs. This reflects the initial feedback received during market testing and will be reflected in the final Conditions of Contract.

5.10 *The proposed tender evaluation be progressed in accordance with Section 5.8.*

5.10.1 The tender evaluation weighting was approved as being a Price: Quality weighting of 60:40 respectively. The outcome of this weighting is detailed in **Annex 2** (Part 2 Private publication – Reason LGA 1972 – Sch 12A Paragraph 3 – Information relating to the financial or business affairs of any particular person (including the authority holding that information)).

- 5.11 *The proposed approach to decarbonisation as highlighted at Section 12.7 be agreed.*
- 5.11.1 The tender submissions included proposals for decarbonisation and the Climate Change Officers from the respective Partner Authorities were involved in the evaluation of the final submissions. Members may recall that at the meeting of this Committee on 5 March 2025, a summary of potential options for decarbonising the fleet of vehicles employed on the Waste Contract was presented. It was considered that switching from diesel to Hydrotreated Vegetable Oil (HVO) - or mixing the two in various ratios – was the “*lowest risk, lowest additional cost, and easiest route to operational decarbonisation*”. A risk and mitigation assessment for HVO was included in that report.
- 5.11.2 The current proposals for the start of the new Contract – retaining diesel - reflect the limited infrastructure currently available at either Council’s depots, as well as local fuel suppliers. During the procurement process, tenderers submitted options for switching fuels during the early years of the Contract and these options will be further explored with the preferred contractor during mobilisation in order to drive forward any initiatives for decarbonisation including the use of HVO. There remain further opportunities at the end of the current leases on the majority of the collection fleet (when replaced in Year 5 of the Contract) to explore the use of electric vehicles or any technical innovations that may be available at that time.
- 5.12 During the Dialogue stage, the Councils raised the potential for open-book accounting to drive further efficiencies in the future, such as when exploring funding options for new vehicles. Whilst it was not feasible to build such arrangements into the final tender documents given the complexities of the various permutations of open-book accounting, options will be further explored with the preferred contractor in order to identify any potential efficiencies in future, particularly with regard to future vehicle funding during the term of the Contract.

6 The Retendering Process

- 6.1 At its meeting on 1 April 2025, Cabinet approved the proposal to use the Competitive Flexible Procedure procurement route.
- 6.2 The Competitive Flexible Procedure allows for four stages to be conducted:
- **Stage One – Invitation to Submit Initial Tenders.** Both a tender notice and full tender pack are issued. During this stage, tenderers may ask clarification questions to which the Partners must respond within a set timescale. Once the initial tender period has closed, submissions are assessed and evaluated against a set of mandatory criteria. Any submission passing the mandatory criteria will then be assessed against the scored elements. Other tenders may be disregarded at this stage.

- **Stage Two – Dialogue.** Dialogue meetings will be held with each tenderer through to this stage with the aim of furthering both the tenderer(s) and Partners understanding of the contract requirements, particularly those issues highlighted within the Specification document (see 5.6 above).
- **Stage Three – Negotiation.** Negotiation in this process is defined as *'discussion between the partners and tenderers with a view to improving the content of the tenders'* If [as in this case] the Partners deem this stage to offer no value to the process, they reserve the right to discard this stage, especially as any potential issues may have been dealt with through Dialogue.
- **Stage Four – Invitation to Submit Final Tenders.** This is an opportunity for tenderers to submit their final tenders which will be used for the final Quality & Price assessment. This will identify the tenderer which has submitted the most advantageous tender in accordance with the assessment methodology and award criteria set out in the Tender Notice. Tenders may be disregarded at this stage.

6.3 To advise Members, the original timescale for the procurement and implementation of the new contract was as follows:

- Tender Notice & Document Pack issued – May 2025
- Clarification Questions – ended June 2025
- Stage One Tender Submissions – July 2025
- Stage One Tender Evaluation period – ended September 2025
- Stage Two Dialogue – September/October 2025
- Stage Three Negotiation – not required
- Stage Four Tender Submissions – November 2025
- Stage Four Tender Evaluation period – ended January 2026
- Partners' Approval Process – January-April 2026
- Award of Contract w/c 20 April 2026 (8-day standstill period following latest respective Partner Council meeting – see 1.3 below). There is a 30-day window in which an informal or formal challenge can be submitted by any of the tenderers objecting to the award of the Contract. This window is 30-days from the disclosure of information. Should such a challenge be made, this would potentially delay the process. A 'Plan B' timetable has been developed to identify any key risks to the proposed Contract start date.

- Contract Commencement – 1 April 2027

6.4 It is pleasing to note that, despite what has been a challenging process and timescale, the Councils are currently on track to meet the deadline of late April 2026. However, it should be noted that the decision for Contract Award may be subject to challenge by the unsuccessful tenderers, which may cause a delay to award and mobilisation of the new Contract.

7 Partnership with Tunbridge Wells Borough Council (TWBC)

7.1 TWBC officers have advised that they will report to their Communities, Housing & Environment Committee on 3 March 2026, and subsequently to its Council meeting on 22 April 2026, thus ensuring that both Councils' decision-making processes are aligned as closely as possible. Members will receive a verbal update at this meeting on decisions taken by TWBC, as clearly the successful contractor cannot be appointed until final approval has been granted by both Partner Authorities.

8 Tenders Received

8.1 At Stage One (Initial Tenders), eight tenders were received. Four of the tenderers were excluded on the grounds of not passing the mandatory requirements and as such were not progressed through to Stage Two Dialogue meetings. Exclusion notices were issued to those tenderers with no informal or formal challenge being received.

8.2 At Stage Four (Final Tender), four submissions were received. Two tenders failed to follow the instructions issued in the documents and were deemed non-compliant. In addition to being non-compliant bids, both tenderers had also submitted conditional tenders which the Partner Authorities cannot accept. As such they were not progressed to Stage Four evaluations and exclusion notices were issued to those tenderers.

8.3 Two submissions were then fully evaluated as Stage Four (Final Tender) submissions.

9 Tender Evaluation

9.1 The evaluation criteria for the award of the contract as approved by Cabinet at its meeting on 1 April 2025 were subsequently incorporated within the tender documentation. A price-quality ratio of 60% price: 40% quality was applied as approved by Members.

9.2 In order to manage the evaluation of the tenders efficiently, the first stage of the process (Stage One) included a series of mandatory criteria. Which are pass/fail questions. If the mandatory elements are not met by the tenderers(s), they will be notified and their tender will not be evaluated further. The mandatory questions were set by the Partner Authorities and were set out in the documentation issued

to the market. These mandatory criteria were included to ensure that the Partnership Councils had a process to remove unsuitable contractors at the earliest stage. These criteria included minimum standards for Economic & Financial Standing and Technical & Professional Ability, and other key contract requirements such as insurance. The evaluation of these requirements was carried out by the TMT Procurement Partnership in collaboration with the respective Partner Authorities Waste, Finance & Legal teams.

- 9.3 The final two tenders were evaluated on their Quality submissions in detail by the Evaluation Panel that included Officers from both this Council and TWBC. The panel included Waste Contract Operations, leads, as well as Health & Safety Officers and Climate Change/Sustainability officers.
- 9.4 The matters which were taken into account in respect of the quality submission were:
- contract mobilisation plans;
 - service delivery arrangements for recycling, refuse & street cleansing services;
 - management and staffing structures & levels of staffing resources;
 - planned resources for vehicles, plant & equipment;
 - proposed technologies;
 - business continuity arrangements;
 - performance & quality management frameworks and systems;
 - environment & sustainability;
 - staff training; and
 - added/social value.

The tenderers were made aware that such matters would be taken into account in the Invitation to Tender documentation.

- 9.5 The price was evaluated using the following formula:
- (Lowest Cost Submitted/Cost Submission being assessed) x Weighted Cost Score
 - Tenderers were notified in advance of this methodology for tender

- 9.6 The outcome of the evaluation process is shown within **Annex 2** (Part 2 Private publication) and details both the quality and price scores whilst also providing the overall final tender scores. The Part 2 Annex also shows the Final Tender prices.

Taking into consideration the final tender scores it is proposed that the contract be awarded to Contractor A. The name & details of Contractor A are also included within **Annex 2**.

10 Proposal

- 10.1 The procurement of the new contract has been a major piece of work involving Officers from across the Council working in close partnership with colleagues from Tunbridge Wells Borough Council. Learnings from the current Partnership Contract have been taken on board to minimise the risk of disruption to residents in moving to a new contract, such as not changing collection methodology early on in the new Contract.
- 10.2 As detailed in this report, the recommendations of Members of this Committee and Cabinet have been taken into account throughout the tendering process. Further reports will be presented to Members regarding the potential options for financing of vehicles throughout the life of this Contract and for discretionary works such as frequencies of high-speed road cleansing.
- 10.3 It is important to note, however, that the appointment of the successful contractor as set out in **Annex 2** and above is just another milestone within the delivery of the project, with a significant amount of work now required to ensure the successful mobilisation and implementation of the new arrangements. It has been recognised that good communication with our residents will be essential to the success of the new contract, regardless of whether or not there are any service changes.

11 Other Options

- 11.1 Early on in the tender process Members of this Committee received an options report on the service delivery model to be used. Members considered an in-house operation, establishing a LATCO and contracting out. Having looked at the pros and cons of each model Members recommended to Cabinet contracting out, which was subsequently agreed by Cabinet.
- 11.2 The tender process detailed in this report complies with the requirements of the Procurement Act 2023 and the robust evaluation process adheres to the route selected by Members as set out at section 4.5 above. As such there is no legally compliant option available to award the Contract to an alternative supplier.

12 IT Considerations

- 12.1 In order for the contract to be successfully mobilised, a number of IT-related projects will need to be undertaken prior to contract start. This will need to include updates and improvements to the existing Customer Relationship Management system, and to the Waste Management System proposed to be used by the Contractor, as well as any integration required between the two systems. This will also include a review of the current collection round & cleansing schedules

structures prior to Contract commencement. Previous experience shows that without a significant investment of time and resources in implementing any required changes there are real risks, not only of potential service failures, but also a high chance of public dissatisfaction.

13 Financial and Value for Money Considerations

- 13.1 Following an assessment of market conditions and advice from consultants, the Officers took the active step of increasing the potential cost of the forthcoming contract within the Medium-Term Financial Strategy that was approved by Council in February 2025.
- 13.2 Allowing for inflationary effects and adjustments for any TUPE-related uplifts between tender submission date and the start of the contract - as included within the contract arrangements - the successful tender price is within the budgetary allowance contained within the MTFS.
- 13.3 It should be noted that the award amount does not include additional costs of periodical services such as the cleansing of high speed roads. Service Officers are looking to assess the frequency levels in order not to exceed the budget provision within the MTFS.
- 13.4 Finally, the tender has an allowance for the alternative funding of the contractor fleet, in that the Council could finance the cost at a lower rate than the contractor. This assessment has yet to be fully undertaken, once completed a further report will be made to provide recommendations to members.

14 Risk Assessment

- 14.1 The retender of the contract has been extremely thorough and has been progressed in compliance with the relevant legislation. A project group as referenced earlier in this report has overseen the process and has maintained a risk register throughout.

15 Legal Implications

- 15.1 The Council has a legal duty to provide waste and street cleansing services. The procurement of the new contract has been undertaken in compliance with all current legislation, including the Procurement Act 2023 which came into force in February 2025.
- 15.2 Legal Services at both this authority and Tunbridge Wells Borough Council – together with senior officers from the TMT Procurement Partnership – have been directly involved in advising the Project Team throughout the procurement process, including specific involvement with Conditions of Contract and giving legal advice on the procurement process. Legal advice has also been sought from specialist Solicitors on the procurement process as required during the project.

- 15.3 The results of the tender evaluation stages fully comply with the requirements of the procurement process and of associated legislative requirements under the Procurement Act 2023.

16 Consultation and Communications

- 16.1 Communications –close communication between the partner authorities has been maintained throughout the tender process together with ongoing dialogue with the contractors tendering for the contract.
- 16.2 Community-the waste services contract is the Council's largest contract and impacts on all householders and residents within the borough. The Council keeps residents regularly update via the website particular when any temporary changes are made such as Christmas.
- 16.3 Procurement - as detailed earlier in the report the TMT Procurement Partnership has been fully engaged throughout the tender process ensuring compliance with legislation, the Council's Procurement Strategy and the Council's financial rules and regulations.

17 Contract Implementation/Mobilisation

- 17.1 The contract start and service commencement date is 1 April 2027. There are not anticipated to be any significant changes to service delivery from Contract commencement. It is anticipated that a further review of collection round structure and street cleansing schedules will take place during Contract mobilisation (following formal award of Contract), as the last review and restructuring of rounds took place in 2023. This will allow sufficient capacity on the schedules to take into account actual property growth and additional adopted streets between now and 2027, as well as future capacity for the first few years of the new Contract.
- 17.2 Subject to the award of the contract, it is the intention for Officers to review and further develop the successful Contractor's proposed Mobilisation Plan to ensure the specific requirements of the Contract are met. An essential element of the Plan will be providing clear and continuous communication with residents, and this will be addressed alongside the Council's future Waste Services Marketing Plan, the next version of which will be reported to this Committee's meeting in May. Members will be kept regularly updated on progress of the mobilisation.

18 Cross Cutting Issues

- 18.1 Climate Change and Biodiversity
- 18.1.1 Climate change advice has been sought throughout the tender process, with both Councils' Climate Change Officers being actively involved in the development of the Specification and evaluation stages.

18.2 Equalities and Diversity

18.2.1 Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The decisions recommended through this paper directly impact on end users. The impact has been analysed and does not vary between groups of people. The results of this analysis are set out immediately below.

18.2.2 As there are no significant changes to the current service delivery and policies & procedures, it is not considered that a further Equality Impact Assessment is required for this process. The current EQIA, as approved by Members in 2018, identified three impacts as follows:

- The need for a supported service by those with a protected characteristic or disability who require assisted collections – this remains in the new Contract Specification and it allows for any possible variation in numbers over the duration of the contract. The successful contractor will be required to meet any requests for this assisted service.
- Communicate changes to the service to residents with the protected characteristics of age and disability – this issue has been addressed within the ongoing Waste Services Marketing Plan and its aim will be to reach all residents and all age groups within the Borough as far as it is practicable through a balance of traditional and more innovative forms of marketing/promotion. The next version of the Marketing Plan is scheduled to be reported to this Committee in May.
- Monitor the delivery of the new contract to measure its success in improving levels of service including those with protected characteristics – monitoring & reporting regimes have been built into the Contract Specification & Contract Conditions and were included in all evaluated tender submissions. Performance will formally be monitored by the Partnership Manager and through the Partnership Steering Group meetings. In terms of the EQIA this will include specific reporting of assisted collection performance.

18.3 Other If Relevant

18.3.1 Business Continuity / Resilience

- Tenderers were instructed to submit their own Business Continuity Plans (BCP) relating specifically to this Contract, and these were evaluated as part of the Quality submission scoring process, particularly in terms of alignment with the Partner Authorities own BCPs.

18.3.2 Health and Safety

- Tenderers were instructed to submit their own Health & Safety Policies, including details of Health & Safety considerations relating specifically to the delivery of this the Contract. The Partner Authorities' own Health & Safety Officers took part in the Evaluation Stages, and these were evaluated as part of the Quality submission scoring process.

18.3.3 Data Protection

- Tenderers were instructed to submit their own Data Protection & Data Management Policies, including as they specifically relate to the delivery of this Contract. The Partner Authorities evaluated these as part of the Quality submission scoring process.

Background Papers	None
Annexes	Annex 1 – Waste, Recycling and Street Cleansing Contract – Report to Communities and Environment Scrutiny Select Committee of 5 March 2025 Annex 2 (Part 2 Private publication) – Tender Submission Scoring Matrix

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

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PUBLIC SPACE PROTECTION ORDER

Item CE 26/5 referred from Communities and Environment Scrutiny Select Committee of 4 March 2026

Public Spaces Protection Orders were intended to address particular nuisances or problems in particular areas detrimental to the local community's quality of life by imposing conditions on the use of the area to ensure the law-abiding majority could use and enjoy public spaces, safe from anti-social behaviour. The Borough Council's current Public Space Protection Order (PSPO) was due to end in April 2026 and could be extended for a further three years.

The report of the Chief Executive provided feedback on the responses received on the PSPO consultation and sought approval for the PSPO attached at Annex 1.

A summary of the responses received to the consultation, undertaken between 15 September and 2 November 2025, was set out at Annex 2. The majority of those who had responded were in favour of retaining existing restrictions and supported implementing the new restrictions around the use of catapults and unauthorised camping in Tonbridge Memorial Garden.

The Police and Crime Commissioner had also responded to the consultation and given provisional support to the proposed order across the Borough. Additionally, Kent Police had been consulted and supported the restrictions as proposed in the PSPO.

Furthermore, requests arising from the consultation regarding further restrictions, such as the use of bikes or electric bikes/scooters, possession or misuse of spray paint, and unauthorised use of drones on Parish Council open spaces, were noted. While certain activities were already prohibited under existing laws, Members were reminded that any additional restrictions must satisfy the PSPO threshold test with appropriate evidence support. The challenges associated with enforcing these restrictions were highlighted, with particular reference made to driving or parking vehicles on public open spaces, as a concern shared by Members.

Cllr S Hudson (Chair) proposed, Cllr K Tunstall seconded and it was

RECOMMENDED*: That the proposed Public Space Protection Order, as presented at Annex 1, be approved.

***Recommended to Cabinet**

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Communities and Environment Scrutiny Select Committee

04 March 2026

Part 1 - Public

Matters for Cabinet - Non-key Decision



Cabinet Member

Cllr Des Keers

Responsible Officer

Damian Roberts, Chief Executive

Report Author

Alison Finch, Safer & Stronger Communities Manager

Public Space Protection Order

1 Summary and Purpose of Report

- 1.1 The Anti-social Behaviour, Crime and Policing Act 2014 places a duty on the Council to tackle Anti-social Behaviour (ASB), working co-operatively with the Police, social landlords and other agencies. Public Spaces Protection Orders (PSPOs) are one of a number of tools contained within the Act and are intended to deal with a particular nuisance or problem in a particular area that is detrimental to the local community's quality of life, by imposing conditions on the use of that area which apply to everyone. They are designed to ensure the law-abiding majority can use and enjoy public spaces, safe from anti-social behaviour.
- 1.2 A PSPO has been in place in the borough since April 2017 and was reviewed in 2020 and 2023. The current PSPO is due to end in April 2026, and the Council can extend this for a further three years.
- 1.3 A previous report was brought to the Communities and Environment Scrutiny Select Committee in July 2025 and it was agreed that the proposed PSPO should go out for consultation and that the results of the consultation would be fed back to this meeting.
- 1.4 Members also agreed to include a restriction around the use of catapults, and this has now been included in the proposed PSPO.

2 Corporate Strategy Priority Area

- 2.1 Efficient services for all our residents, maintaining an effective council.
- 2.2 Having a PSPO in place helps to reduce anti-social behaviour, therefore making the borough a safer place for residents.

3 Recommendations

- 3.1 That the proposed Public Space Protection Order, as presented at Annex 1, be agreed.

4 Introduction and Background

4.1 The Council can make a PSPO on any public space in its own area. The definition of a public space is wide and includes any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission, for example a shopping centre. It does not just apply to land owned by the Borough Council but to any open space anywhere in the borough (even land owned by Parish Councils or Kent County Council).

4.2 The test for a PSPO is designed to be broad and focus on the impact anti-social behaviour is having on victims and communities. A PSPO can be made by the council if they are satisfied on reasonable grounds that the activities carried out, or likely to be carried out, in a public space:

- have had, or are likely to have, a detrimental effect on the quality of life of those in the locality; and
- the effect or likely affect of the activities:
 - is, or is likely to be, persistent or continuing in nature;
 - is, or is likely such to make the activities unreasonable; and
 - justifies the restrictions imposed.

4.3 A single PSPO can include multiple restrictions and requirements in one order. It can prohibit certain activities, such as the drinking of alcohol, as well as placing requirements on individuals carrying out certain activities, for instance making sure that people walking their dogs keep them on a lead.

4.4 The maximum duration of a PSPO is three years but they can last for shorter periods where appropriate. At any point before expiry the council can extend a PSPO by up to three years if they consider that it is necessary to prevent the original behaviour from occurring or reoccurring. If a new issue arises in an area where a PSPO is in force the council can vary the terms of the order at any time. This can change the size of the restricted area or the specific requirements or restrictions. As well as varying the PSPO, a council can also seek to discharge it at any time.

4.5 Any restriction of the PSPO needs to be enforceable and Fixed Penalty Notices (FPNs) for breaches of the PSPO can be issued by authorised Borough Council staff and the ASB Enforcement Team (when in post). The Council would not want to include any restrictions within the PSPO which are not going to be enforceable.

Fixed Penalty Notices cannot be issued to anyone under the age of 16. The Borough Council's FPN cost is £100.

- 4.6 It can be difficult to enforce a PSPO as for many of the restrictions it requires an authorised officer to witness the breach (e.g. be present at the time of the offence taking place) and therefore for many of the current restrictions, the amount of FPNs issued has been low.

5 Proposal

- 5.1 TMBC Officers are proposing that the PSPO as attached at Annex 1 is adopted. This contains a number of restrictions which cover both the whole of the Borough and specific geographical areas. This proposed PSPO also contains the two new restrictions which were agreed at the previous Communities and Environment Scrutiny Select Committee, one around the use of catapults and one around unauthorised camping in the Memorial Garden.
- 5.2 From 15 September to 2 November 2025 the Council went out for public consultation on the proposed PSPO. This was an online consultation, but hard copies were available if requested. A summary of the responses can be found at Annex 2. The Council received 47 online responses.
- 5.3 The Police and Crime Commissioner also responded to the consultation and gave his provisional support to the proposed order across the Borough, subject to the outcome of the consultation. Kent Police were also consulted and gave their support to the proposed PSPO restrictions. Kent Police have also been consulted in relation to the wording contained within the proposed PSPO.
- 5.4 A summary of the consultation responses is given below:
- The majority of those who responded were in favour of keeping all the restrictions and in favour of implementing the new restrictions. 46 respondents also agreed with the new restriction around the use of catapults and 43 agreed with the new restriction to prevent unauthorised camping in the Tonbridge Memorial Garden.
 - The restriction with the most comments was in relation to the use of catapults, with most of those responding in favour of this restriction. Some comments related to this needing to be across the borough, and it should be noted that this restriction will apply to all public open spaces across the borough.
 - Other general comments provided by respondents related to the need to enforce the PSPOs, the need for additional police presence and to ensure that the PSPO is enforced across the borough, including the more rural areas.

- One area raised through the consultation was around restricting and/or banning the use of bikes or electric bikes/scooters. Whilst the Borough Council could look to include a restriction around this issue, it should be noted that the Fixed Penalty Notices (for a breach of the PSPO) cannot be issued to under 16's. It should also be noted that riding a bike on a pavement is already illegal (under the Highways Act 1835 and Highway Code Rule 64) and the police can already take action (although they may choose to take a discretionary approach if the person riding a bike on the pavement is a child).
- It is also illegal to ride an electric scooter on public roads, pavements, and cycle lanes in the UK. They are classified as motor vehicles, requiring insurance, a license, and tax, which is currently impossible to obtain for private e-scooters. They may only be used on private land with the owner's permission. This does not, of course, stop people from riding them, but the enforcement of this would be down to the police and therefore TMBC Officers would not support adding this restriction into the PSPO.

- 5.5 Parish Councils were also consulted separately. All who replied stated that they were happy with the proposed restrictions. Borough Green Parish Council, however, requested that the Council considered a new restriction on the possession or misuse of spray paint within the Recreation Ground in Borough Green and the public toilets in the Borough Green Village Hall carpark. They are having increasing problems with criminal damage in those areas. In October 2025 three incidents of this nature were reported to the Police (further data is not available).
- 5.6 TMBC officers have considered this request and whilst owning spray paint is not illegal (although it is a criminal offence under the Anti-social Behaviour Act 2003 to sell aerosol spray paint to anyone under the age of 16), using it to mark or deface property without the owner's permission is criminal damage under the Criminal Damage Act 1971. If caught, the Police can issue fixed penalty notices or even fines, and therefore the view of the Officers is that there are already enforcement powers available to the police to tackle this issue and therefore the Council does not need to include this as a restriction in the PSPO.
- 5.7 Hadlow Parish Council have also requested that the restriction around preventing unauthorised drones to be extended to Parish Council open spaces. This is something that Members may wish to consider, however, at present the Borough Council does not have any evidence as to whether this is a persistent issue in Hadlow and the Borough Council would need to consider this before deciding whether this would be something that the Borough Council would want to proceed with. TMBC Officers have also raised concerns about who would 'authorise' the use of the drones and how this would be enforced. However, Members may wish to discuss if they would like to change the wording on this restriction to include public spaces owned by Parish Councils.

6 Other Options

- 6.1 Members may wish to discuss if there are any additional restrictions that they would like to see included in the PSPO (such as the request from Hadlow Parish Council in 5.7 above). This needs to bear in mind the threshold test and also consider how the restriction will be enforced.

7 Financial and Value for Money Considerations

- 7.1 The Chief Executive confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and Policy Framework.

8 Risk Assessment

- 8.1 All appropriate risk assessments will be undertaken as required.
- 8.2 Members should note that resourcing the enforcement of the PSPO is challenging and there are only limited numbers of staff that are authorised to issue Fixed Penalty Notices for breaches of the PSPO. However, having the PSPO restrictions in place does give the Council the powers to take action where it can and to work with police and other partners to help keep the borough safe.

9 Legal Implications

- 9.1 The power to make a PSPO is subject to a number of conditions as set out in the Anti-Social Behaviour, Crime and Policing Act 2014 (see paragraph 4.2 of this report). The Council will continue to review the proposed terms of the PSPO against the conditions set out in the Act to ensure that the order is lawful.
- 9.2 Once the final PSPO measures are agreed the PSPO will need to be published in accordance with the regulations made by the Secretary of State.

10 Consultation and Communications

- 10.1 The Council went out for public consultation from September to November 2025. The Council also consulted the Police and Crime Commissioner and Kent Police. Both agreed to the proposed restrictions in the PSPO.

11 Implementation

- 11.1 Once all the restrictions are agreed then a copy of the Order would need to be published by April 2026 in accordance with regulations made by the Secretary of State.
- 11.2 The Borough Council will then look to update and add signage across the borough to advertise the PSPO restrictions. The location of signs will be carefully considered but will be placed in key locations across the borough.

11.3 Once the new restrictions are agreed then the Borough Council will also look to run refresher training for staff on how to issue Fixed Penalty Notices, so that those staff who are authorised are aware of their roles and responsibilities in helping to enforce the PSPO restrictions.

12 Cross Cutting Issues

12.1 Climate Change and Biodiversity

12.1.1 Limited or low impact on emissions and environment.

12.1.2 Climate change advice has not been sought in the preparation of the options and recommendations in this report.

12.2 Equalities and Diversity

12.2.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

12.3 Other If Relevant

- None

Background Papers	None
Annexes	Annex 1 – The proposed Public Space Protection Order Annex 2 – Results of the PSPO Consultation

The Tonbridge & Malling Borough Council

Public Spaces Protection Order 2026

Pursuant to powers granted to the Council under s.59 of the Anti-social Behaviour, Crime and Policing Act 2014, Tonbridge and Malling Borough Council has made the following Order:

From 1 April 2026 it is an offence for a person without reasonable excuse:

- (a) To do anything that the person is prohibited from doing in this Order, or
- (b) To fail to comply with any requirement to which the person is subject under this Order.

A person guilty of an offence in relation to this Order is liable on summary conviction to a fine not exceeding level 3 on the standard scale (£1,000 as at 28th June 2025).

The Council or a Police Constable may issue a fixed penalty notice to any person he or she has reason to believe has committed an offence in relation to this Order. A fixed penalty notice offers the opportunity to discharge liability for conviction upon payment of a fine of £100.

Measures affecting the whole of the Borough of Tonbridge and Malling

The following measures apply to all areas to which the general public has access within Tonbridge and Malling:

a. Dog Fouling

No person is permitted to leave dog faeces deposited by any dog under their control or ownership in any public place, save in a designated dog faeces bin or general waste bin. Owners and dog-walkers must clean up after dogs under their control, care or ownership.

b. Exclusion of Dogs from Children's Play Areas

No person in control, care or ownership of a dog may allow (whether wilfully or otherwise) those dogs to enter or remain upon any Children's Play Area.

c. Dogs on Leads by Direction

When required by an authorised officer of the Council, any person in control of dogs must place those dogs on a lead.

d. Maximum Numbers of Dogs Under a Person's Control

No person is permitted to have under their individual control more than 6 dogs in a public place.

e. Alcohol Control

No person may drink alcohol in a public place if requested to stop by an authorised officer of the Council or Police Constable.

f. Public Urination/ Defecation

No person may urinate or defecate in any public place, except in a public lavatory.

g. Use of Drones

No person may launch or land a drone from any open space owned by the Borough Council without first obtaining authorisation from the Borough Council.

For the purposes of this measure, “drone” means any remote-controlled pilotless aircraft or Unmanned Aerial Vehicle.

h. Vehicles on public open spaces

No person may park a vehicle on any public open space within the borough, save in a designated vehicle parking space. For the purposes of this provision, ‘public open space’ shall mean any land laid out as a public garden or used for the purposes of public recreation.

i. Nuisance associated with car/motorcycle meetings

No person may attend any unauthorised meeting or gathering within the borough involving a mechanically propelled vehicle as an owner, driver, passenger or spectator where any reasonable person would consider that such activity causes or is likely to cause nuisance or annoyance, harassment, alarm, distress or detrimental impact in the locality.

No person may attend any meeting or gathering within the borough in which the use of a mechanically propelled vehicle is the main focus of attention and any of the following activities are taking place:

- Unnecessary sounding of motor vehicle horns in a manner causing or being likely to cause a nuisance or annoyance to people in the locality.
- Playing amplified music in or near, or powered from, a motor vehicle at an excessive volume causing or likely to cause a nuisance or annoyance to people in the locality.
- Unnecessary revving of a motor vehicle engine to causing or likely to cause, a nuisance or annoyance to people in the locality.
- Causing danger to other road users including pedestrians.
- Causing damage or risk of damage to private property.
- Speeding or racing.
- Performing stunts including, but not limited to, performing donuts, wheel spins, skidding, drifting, handbrake turns or burn outs.
- Using loud and/or threatening and/or using abusive language causing or likely to cause a nuisance or annoyance to people in the locality.
- Causing an obstruction of a public highway or public place whether stationary or moving.
- Attending any meeting of two or more vehicles in a public space either as a vehicle owner, driver, passenger or spectator and engaging in any activity that a reasonable person would consider to be part of a car cruising activity.

- Engage in, encourage, or otherwise assist the above activities which includes spectators of any of the above.

For the purposes of this Order 'Mechanically propelled vehicles' means any vehicles which is powered mechanically (for example, electrically or by an engine) that is intended or adapted for use on roads. This includes but is not limited to, motorcars and motorcycles.

j. Use of Catapults

No person may have in their possession a catapult, slingshot or similar item capable of launching a missile that could cause harm or damage to a person, animal or property. This does not preclude the powers of the police with regard to an item recognised in law as an offensive weapon.

It is an offence if a person fails to surrender any catapult, slingshot or similar item capable of launching a projectile in their possession when requested to do so by an authorised officer.

No person may have in their possession stones, ball bearings, pellets or similar item(s) capable of being launched as a projectile, by a catapult, slingshot or similar item or by manual force, that could cause harm or damage to a person, animal or property.

It is an offence if a person fails to surrender any stones, ball bearings, pellets or similar item(s) capable of being launched as a missile by a catapult, slingshot or similar item when requested to do so by an authorised officer.

2. Area- Specific Measures

In addition to the Borough-wide measures, the following measures apply within the boundaries of these designated areas:

a. Leybourne Lakes Country Park

i. No unauthorised Barbecues

No person may use any barbecue, open fire or other method of cooking or heating food within the Country Park unless specifically authorised in writing by the Council.

ii. No unauthorised swimming, bathing or boating

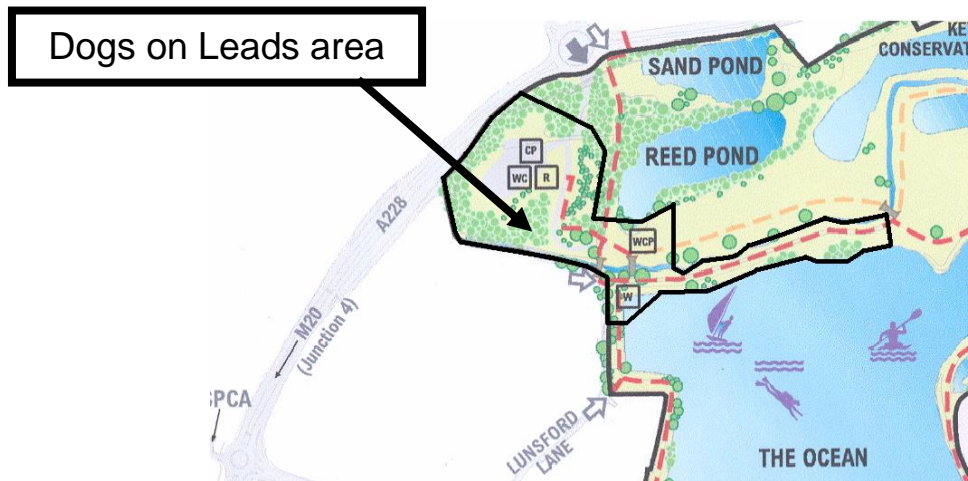
No person may swim, bathe or operate any boat or craft in any lake within the Country Park unless specifically authorised in writing by the Council.

iii. Dogs on Leads at all times in designated areas

Dogs must be kept on leads at all times within the areas shown on the plan below. Broadly, these areas are the car parks and the access road for the Watersports facility.

iv. No unauthorised camping

No person may camp in any place within the Country Park unless specifically authorised in writing by the Council.



b. Tonbridge Memorial Gardens

i. **No wheeled-sports activities**

No wheeled-sports activities may take place within the Tonbridge Memorial Gardens. This includes, but is not limited to: skateboards, BMX, in-line skating and scooters.

ii. **No unauthorised camping**

No person may camp in any place unless specifically authorised in writing by the Council.

c. Tonbridge Moorings

i. **No unauthorised mooring**

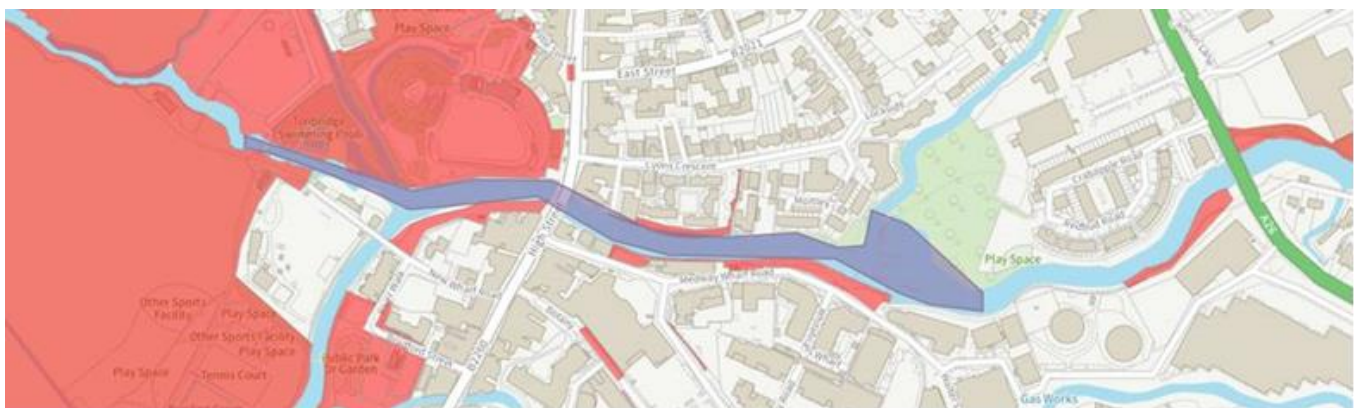
No person is entitled to moor any boat or craft on the moorings unless licenced to do so or otherwise specifically authorised in writing by the Council or Environment Agency.

ii. **No unauthorised camping**

No person may camp in any place unless specifically authorised in writing by the Council.

iii. **No unauthorised swimming or bathing**

No person may swim or bathe within the area shown in purple at any time.



iv. **Anti-social behaviour associated with fishing**

No person may fish as shown within the purple area above.

d. Haysden Country Parki. **No unauthorised Barbecues**

No person may use any barbecue, open fire or other method of cooking or heating food within the Country Park unless specifically authorised in writing by the Council.

ii. **No unauthorised swimming, bathing or boating**

No person may swim, bathe or operate any boat or craft in any lake within the Country Park unless specifically authorised in writing by the Council.

iii. **Dogs on Leads at all times in designated areas**

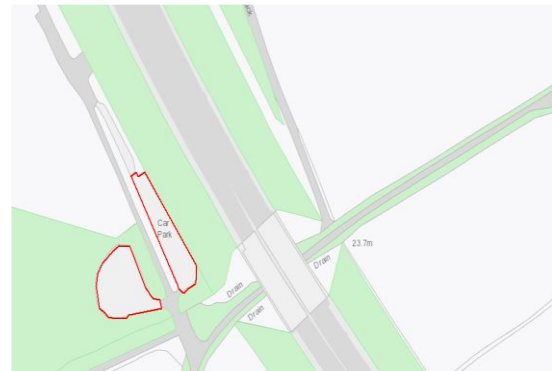
Dogs must be kept on leads at all times within the areas shown on the plans below. Broadly, these areas are the car parks and around the catering unit.

iv. **No unauthorised camping**

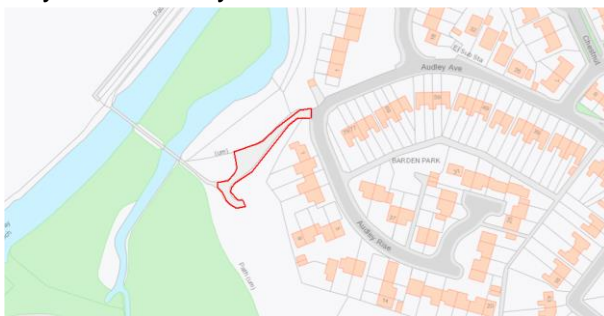
No person may camp in any place within the Country Park unless specifically authorised in writing by the Council.



Map above showing dogs on lead area within main car park and catering area within Haysden Country Park.



Map above showing dogs on lead area within Lower Haysden Lane Car Park.



Map above showing dogs on lead area within Audley Rise Car Park

e. Tonbridge Racecourse Sportsground and Tonbridge Castlei. **No unauthorised Barbecues**

No person may use any barbecue, open fire or other method of cooking or heating food within these areas unless specifically authorised in writing by the Council.

ii. **Dogs on Leads at all times in designated areas**



h. Closed Churchyards at St Peter's and St Paul's Churches

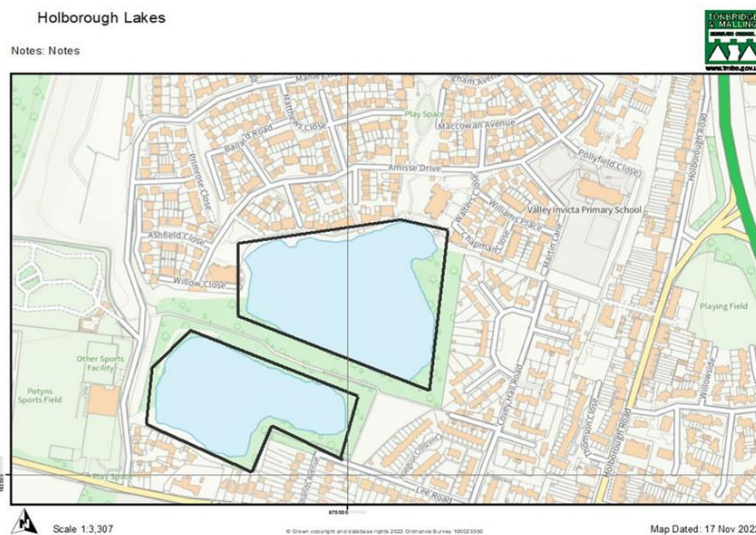
i. **Dogs on leads at all times**

Dogs must be kept on leads at all times within the Churchyards of St Peter's and St Paul's churches.

i. Holborough Lakes, Snodland

(i) **No unauthorised swimming, bathing or boating**

No person may swim, bathe or operate any boat or craft in any lake within Holborough Lakes unless specifically authorised in writing.



Results of the Public Space Protection Order Consultation

The consultation was available online from Monday 15 September to Sunday 2 November. In total there were 47 responses. Of these 43 stated that they were residents of the borough and 9 that they were not residents.

1. Are you responding as:

A resident	34
Someone who works in the borough	2
A local business owner/manager	1
A representative of a Town or Parish Council	5
A representative of a community group/voluntary group	3
Other	3

2. Do you agree with the proposal to continue with a borough wide Public Space Protection Order (PSPO) to deter dog fouling?

Yes	46
No	1
Not sure	0

3. Do you agree with the proposal to continue with a borough wide PSPO to exclude dogs from Borough Council owned and maintained children's play areas?

Yes	43
No	3
Not sure	1

4. Do you agree with the proposal to continue with a borough wide PSPO to ensure dogs are on a lead by direction?

Yes	38
No	8
Not sure	1

5. Do you agree with the continuing PSPO to restrict the number of dogs that one person can take onto a public place to six dogs to ensure that they have full control of these dogs?

Yes	45
No	1
Not sure	1

6. Do you agree with the proposal to continue with a borough wide PSPO for a controlled alcohol zone?

Yes	45
No	2
Not sure	0

7. Do you agree with the proposal to continue with a borough wide PSPO to deter public urination/defecation?

Yes	47
No	0
Not sure	0

8. Do you agree with the proposal to continue with a borough wide PSPO to deter unauthorised drones on any open space owned by Tonbridge & Malling Borough Council?

Yes	43
No	2
Not sure	2

9. Do you agree with the proposal to continue with a borough wide PSPO to prevent unauthorised parking on public open spaces?

Yes	45
No	1
Not sure	1

10. Do you agree with the proposal to continue with a borough wide PSPO to stop nuisance associated with car and/or motorcycle meetings?

Yes	46
No	1
Not sure	0

11. Do you agree with the need to continue the PSPO for Leybourne Lakes Country Park?

Yes	40
No	1
Not sure	6

12. Is there anything else that you would like to see included in the PSPO for Leybourne Lakes Country Park?

Tackle antisocial behaviour including vandalising/interfering with water sports equipment and facilities. (Their safety boat has been sunk several times by young people getting up to no good). Enforce the watersport parking so that those not participating cannot park there.

Endeavour to reduce vandalism on the safety and leisure facilities at the lake.

As a volunteer walk leader we have recently had some near misses regarding electric bike speeding along footpaths at very high speeds, and there should be an enforcement put in place banning any electric bikes or motorcycles in the park. Some considerations should also be given to the use of electric scooters which should also be banned.

Ban electric scooters and speed limit electric bikes to prevent danger to walkers/runners.

Ban the carting of catapults

Multi use of water craft and swim for the public

Not specific to Leybourne as I'm in Medway! There is a need to raise the lack of care and maintenance in Walderslade, particularly in Taddington Valley. Dog fouling is widespread throughout the valley, not limited to a few hotspots, and it is not the responsibility of residents to map out problem areas. This should be the council's job. Despite mentioning several initiatives, the only one I have ever seen in over 20 years of living here was the colourful flag scheme — which was ineffective and simply made the council look out of touch. Meanwhile, enforcement is practically non-existent. Dogs are frequently off lead and nowhere near their owners, who have no idea where their dogs are toileting. With leaves on the ground, it is almost impossible to avoid stepping in dog mess. The current approach is inadequate. Walderslade deserves better. Clear signage, visible enforcement, and fines are needed if the council wants to get this under control. I expect to see a more proactive response and meaningful action from the council going forward.

13. Do you agree with the need to continue with the PSPO for the Tonbridge Memorial Gardens?

Yes	43
No	1
Not sure	3

14. Do you agree with the new proposal to prevent unauthorised camping in the Tonbridge Memorial Gardens?

Yes	43
No	2
Not sure	2

15. Is there anything else that you would like to see included in the PSPO for the Tonbridge Memorial Gardens?

Alcohol consumption banned.

Enforcement of the above!

Yes, the current 'camper' should be dealt with by court action either using relevant eviction notice or via a CPN to the land owner, this approach is using a

sledgehammer to crack a nut. But will address any further encampments. I strongly feel the memorial gardens, surrounding space as well as the green space surrounding River Lawn should be an alcohol free zone, rather than 'being requested to stop'. This will disrupt the entrenched street drinking that occurs here daily, and acknowledges the designation of the memorial gardens and surrounding area as a place for peaceful reflection. In addition to this the many children passing through the area for their local provisions would be less likely to be subjected to the smell of weed and the intimidating behaviour. It's a very unpleasant experience for scouts, beavers, school children, library and nursery users.

No rollerskating.

16. Do you agree with the need to continue with the PSPO for Tonbridge Moorings/Town Lock?

Yes	41
No	1
Not sure	5

17. Is there anything else that you would like to see included in the PSPO for Tonbridge Moorings/Tonbridge Lock?

Clear signage to indicate swimming/jumping into the water near the lock is not allowed.

18. Do you agree with the need to continue with the PSPO for Haysden Country Park?

Yes	42
No	1
Not sure	4

19. Is there anything else that you would like to see included in the PSPO for Haysden Country Park?

Please start enforcing the PSPO!

Permit parking through out Barden especially in Audley avenue.

Electric bicycles and motorbikes using the park in the day and often at night too. The Audley Rise car park is often used in the evenings for motorbikes and cars to meet. There is a gate at the car park entrance that could easily be locked to help deter these issues. There has also been a number of issues with catapults being fired at the birds, as well as a number of BBQs around the park.

Multi use of lakes one that all public can access with different water craft and open swim.

20. Do you agree with the need to continue with the PSPO for Tonbridge Racecourse Sports Ground and Tonbridge Castle?

Yes	42
No	1
Not sure	4

21. Is there anything else that you would like to see included in the PSPO for Tonbridge Racecourse Sports Ground and Tonbridge Castle?

Please start enforcing the PSPO

As above, an alcohol free zone in River Lawn and memorial gardens to incorporate both scout huts, the library and the memorial gardens and surrounding area. so people can travel through avoiding the high street without intimidation.

Got to take a very hard line on aggressive out of control dogs. Very dangerous and fear for safety of young children.

More access for water sports

22. Do you agree with the need to continue with the PSPO for Tonbridge Farm Sports Ground?

Yes	38
No	2
Not sure	7

23. Is there anything else that you would like to see included in the PSPO for Tonbridge Farm Sports Ground?

Start enforcing it!

24. Do you agree with the need to continue with the PSPO for Tonbridge Cemetery?

Yes	38
No	2
Not sure	7

25. Is there anything else that you would like to see included in the PSPO for Tonbridge Cemetery?

Alcohol consumption banned.

26. Do you agree with the need to continue with the PSPO for the closed Churchyards of St Peters' and St Paul's and St Stephen's in Tonbridge?

Yes	39
No	2
Not sure	6

27. Is there anything else that you would like to see included in the PSPO for the closed Churchyards of St Peters' and St Paul's and St Stephen's in Tonbridge?

Alcohol consumption banned.

This should be extended to include all closed churchyards within the Borough.

28. Do you agree with the need to continue with the PSPO for Holborough Lakes?

Yes	35
No	1
Not sure	11

29. Is there anything else that you would like to see included in the PSPO for Holborough Lakes?

Same restrictions as Leybourne Lakes.

30. Do you agree to the new proposal to prevent the unauthorised use of catapults in the borough?

Yes	46
No	1
Not sure	0

31. Do you have any comments to add on this proposal?

Also the carrying of ammunition for catapults.

I cannot think of any legitimate reason to use catapult in public open space where property, people or animals can be attacked.

This is very important throughout Tonbridge and Malling not just on TMBC land. Police action is vital.

Borough-wide and not just for the town of Tonbridge itself.

This is very important and should apply to all areas / villages in the borough.

this is a good addition and should be effective for all villages and parts of the borough.

The number of occasions needs to be highlighted.

There I'd absolutely need for anyone to have a catapult, beyond those used to fire bait out into the water for fishing. Any see being carried around should be ceased and destroyed. Anyone found using them to harm/threaten people, pets or wildlife, should not only have them ceased, but should be charged, fined and given

community service. If it's a minor, they should still be doing unpaid community service, and restitution needs to be made for any damage.

Sensible addition.

More policing of this is needed in Walderslade.

32. Are there any other restrictions you would like us to consider within the PSPO?

I think Max number of dogs with one person should be less than six. You can't control 6 big dogs.

More enforcement.

Restriction on the use of electric scooters and bikes, for example to restrict their use on pavements.

Please include all villages.

To police the use of electric bike/scooter by underaged children along public roads and footpaths.

Dealing effectively with those smoking weed, groups hanging around play areas etc who are acting in an intimidating manner. Dog fouling is an issue on pathways and public spaces, with the special bins not being used by some owners. Too many smokers still don't think that throwing down their cigarette butts is littering - can something be done to encourage proper disposal?

Much more aggressive enforcement and deterrence against dangerous dogs. To prevent people using them to intimidate families etc.

Regarding question 8. Hadlow Parish Council would like a PSPO to prevent unauthorised drones to be extended to Parish Council open spaces. We are responsible for Williams Field playing field, skate park and play area; Signpost Field in Golden Green play area and field; Hadlow Cemetery, Hadlow Church closed churchyard; Hadlow Allotments and Hadlow Cricket Field.

Restrictions on the use of motorbikes and gangs of electric bike users (wearing balaclavas) on the cycle and public footpaths.

Can we consult on a PSPO at River Lawn to control alcohol?

More action in Walderslade.

33. If you have any further comments, please leave them here:

There is an antisocial behaviour issue with teenagers in the area. They frequently trespass on private property especially around cannon lane (blossom bank). They never been using catapults and have been drinking and using drugs in private

spaces such as children's play areas belonging to housing estates. More community officer or police presence in town should help with this.

Stop the motor cycle racing down East Peckham bypass every Thursday evening.

Please consider the alcohol free zone in the area entrenched with street drinkers in river lawn. With the hostel on River Lawn Road there will consistently be new faces in the area who may drink alcohol and this will disrupt this behaviour.

It great to have orders in place, it's the enforcement that is the issue. Villages are very low priority.

Having read your questionnaire, it's clear from the content that the feedback you are highlighting relates almost entirely to the Tunbridge side of the borough, rather than the Medway end. I live in Walderslade — an area that used to be lovely — but it has been increasingly neglected by Tonbridge & Malling Borough Council in recent years. We have several beautiful woodland walks and green spaces that could be hugely beneficial to local residents, yet they are not being properly maintained. Taddington Valley is a perfect example: during winter it is almost impossible to walk safely along the path, yet money has been spent installing three benches that will likely be used once a year at best. I strongly suggest that you issue a similar questionnaire specifically to residents in Walderslade and the Medway side of your borough. I believe the responses you receive will be very different — less of a pat on the back and far more honest about the current lack of care and maintenance.

REVIEW OF ROADSIDE NATURE RESERVES

Item CE 26/7 referred from Communities and Environment Scrutiny Select Committee of 4 March 2026

The report of the Director of Street Scene, Leisure and Technical Services provided a review of the Borough Council's Roadside Nature Reserves (RNRs) following ecological monitoring undertaken by the Medway Valley Countryside Partnership between April and September 2025.

Members were advised that Roadside Nature Reserves were introduced in 2022 and that the monitoring work had identified a wide range of plant species and invertebrates across the sites. It was reported that the RNRs were functioning as wildlife corridors, contributing positively to biodiversity and climate resilience.

A number of management recommendations were proposed with the aim of further enhancing biodiversity, including changes to mowing regimes, the sowing of seed mixes at selected locations, the provision of signage, the expansion of certain existing RNRs and the creation of new sites. It was noted that, subject to approval, the proposals would be implemented through a variation to the Grounds Maintenance contract.

During discussion, Members supported the principle of Roadside Nature Reserves and the wider objectives of enhancing biodiversity across the Borough. However, specific concerns were raised in relation to River Lawn in Tonbridge, with Members highlighting its established use as an amenity space by local residents and its status as the subject of an ongoing Village Green application. An amendment was therefore proposed by Cllr S Pilgrim and seconded by Cllr F Hoskins that River Lawn be removed from the Roadside Nature Reserves programme and returned to a normal mowing regime. The motion was supported by the Committee.

The Committee then considered the remaining recommendations within the report and agreed to support them as set out. Cllr S Hudson (Chair) proposed, Cllr M Rhodes seconded and it was

RECOMMENDED*: That

- (1) Priority 1 and 2 recommendations within the Medway Valley Countryside Partnership report, attached in Annex 1, be progressed;
- (2) Existing Roadside Nature Reserves, shown in Annex 2, be expanded, subject to the exclusion of River Lawn in Tonbridge from the Roadside Nature Reserves programme; and
- (3) New Roadside Nature Reserves, as shown in Annex 3, be created.

***Recommended to Cabinet**

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Communities and Environment Scrutiny Select Committee

04 March 2026

Part 1 - Public

Matters for Cabinet - Non-key Decision



www.tmbc.gov.uk

Cabinet Member	Councillor Des Keers, Cabinet Member for Community Services Councillor Robin Betts, Cabinet Member for Housing, Environment and Economy
Responsible Officer	Robert Styles, Director of Street Scene, Leisure & Technical Services
Report Author	James Fay, Leisure Services Manager (Outdoors)

Review of Roadside Nature Reserves

1 Summary and Purpose of Report

- 1.1 This report presents a review of Roadside Nature Reserves (RNRs) following the monitoring of existing sites by the Medway Valley Countryside Partnership. The report brings forward proposals on future management, the expansion of existing sites and the creation of new RNRs for Members consideration.

2 Corporate Strategy Priority Area

- 2.1 Sustaining a borough which cares for the environment.
- 2.2 Roadside Nature Reserves can provide significant ecological and community value by acting as vital corridors that connect fragmented landscapes, helping species move and survive, supporting diverse wildlife - including pollinators and species that depend on undisturbed grasslands - and protecting rare and threatened habitats. They also serve as refuges for rare plants and animals, contribute to wider habitat restoration through seed sources, and strengthen climate resilience by maintaining species-rich grasslands.

3 Recommendations

- 3.1 It is **RECOMMENDED** to Cabinet that:
- 1) Priority 1 and 2 recommendations within the Medway Valley Countryside Partnership report be progressed.
 - 2) Existing RNRs listed at **Annex 2** are expanded as proposed.

- 3) New RNRs are created as shown at **Annex 3**.

4 Introduction and Background

- 4.1 At the meeting of the Communities and Housing Advisory Board on the 15 February 2022, Members first approved the creation of 10 RNRs. Since that date the number has increased and today there are 22 RNRs spread across 12 locations. Current locations are listed on pages 2 and 3 within the Medway Valley Countryside Partnership report shown at **Annex 1**.
- 4.2 The current cutting regime for RNR sites involves cutting the area twice, once in March and once in October and cutting buffers adjacent to hard surface areas 12 times.
- 4.3 In 2025, as part of the Councils Climate Change Action Plan, Officers commissioned Medway Valley Countryside Partnership to undertake monthly surveys of existing RNRs to identify the range of species present and provide recommendations on future management to further support and enhance biodiversity.
- 4.4 Members will also be aware that the public open space at River Lawn was nominated for Village Green Status by the Council in 2025. This process remains in progress, and the resulting outcome and its implications for future management will be considered in due course.

5 Proposal

- 5.1 Medway Valley Countryside Partnership conducted monthly botanical surveys of all existing RNRs from April 2025 to September 2025 using quadrats to record plant species and their abundance. Each site included at least 10 quadrats, with larger sites containing up to 30 where multiple RNRs were present. Quadrats were arranged in sets of ten along a W-shaped transect. In addition to plants, any invertebrates observed were identified and recorded using field guides and verified with digital tools to ensure accuracy.
- 5.2 The full report received from Medway Valley Countryside Partnership can be found at **Annex 1**. The report gives a detailed position statement on each site and the success of these RNRs are highlighted by the positive range of species identified. The report also brings forward proposed future, prioritised, management and survey recommendations. Recommendations for all sites are summarised in the table on page 58 and 59 of **Annex 1**.
- 5.3 Consideration has been given to the recommendations, and it is proposed that Members consider progression of Priority 1 and 2 recommendations from March 2026 in order to further improve the biodiversity at each site. With regard to Priority 3 recommendations, consideration could be given to increasing internal staffing skills and knowledge in order to undertake such surveys in-house.

5.4 The recommendations also include the proposal for expansion of selected existing RNRs and the creation of new RNR sites. As such, Officers have brought forward proposals, for Members consideration, in relation to these specific recommendations. **Annex 2** shows proposed expansion of existing RNRs and **Annex 3** brings forward proposals for new sites.

6 Other Options

6.1 Members do not adopt the recommendations made within the Medway Valley Countryside Partnership report at **Annex 1**, and RNRs continue to be maintained to the current specification.

7 Financial and Value for Money Considerations

7.1 The Director of Street Scene, Leisure and Technical Services confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and Policy Framework.

7.2 The costs of supply and installation of site signage will be met by 2026/2027 Revenue Budgets.

8 Risk Assessment

8.1 No perceived risks.

9 Legal Implications

9.1 None.

10 Consultation and Communications

10.1 The recommendations within the Medway Valley Countryside Partnership report include proposals for enhanced site signage.

11 Implementation

11.1 If approved, the recommendations will be implemented through a variation order to the Council's Grounds Maintenance Contract during the growing season, which commences in March 2026.

12 Cross Cutting Issues

12.1 Climate Change and Biodiversity

12.1.1 Some impact on reducing emissions in support of carbon neutral by 2030 or enhancing the natural environment.

12.1.2 Climate change advice has been sought in the preparation of the options and recommendations in this report.

12.1.3 Roadside Nature Reserves help boost climate resilience by protecting species-rich grasslands that support stable, healthy ecosystems. These diverse plant communities improve soil structure, limit erosion, and regulate water runoff, which in turn strengthens the landscape’s ability to cope with climate-related pressures such as increased flooding and drought.

12.2 Equalities and Diversity

12.2.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

12.3 Other If Relevant

- None.

Background Papers	None
Annexes	Annex 1 – Medway Valley Countryside Partnership Report Annex 2 – Plans of proposed extensions to existing RNRs Annex 3 – Plans of proposed additional RNRs

TMBC Roadside Nature Reserves botanical survey report 2025

Introduction

In 2025 Medway Valley Countryside Partnership (MVCP) was commissioned to carry out monthly botanical surveys of all Tonbridge and Malling Borough Council (TMBC) Roadside Nature Reserves (RNRs) from April to September. TMBC first designated 10 RNR sites in 2022 as part of its commitment to tackling climate change by enhancing biodiversity. These reserves allow grass to grow longer, creating habitats that support wildlife. Today, there are 22 RNRs spread across 12 locations.

Roadside Nature Reserves act as vital wildlife corridors, connecting fragmented habitats and helping species move across the landscape. These small areas play an important role in sustaining local wildlife populations.

Surveys were conducted using quadrats to record plant species and their abundance. Each site included at least 10 quadrats, with larger sites containing up to 30 where multiple RNRs were present. Quadrats were arranged in sets of ten along a W-shaped transect. In addition to plants, any invertebrates observed were identified and recorded using field guides and verified with digital tools to ensure accuracy. While the focus was on wildflowers, some invertebrates may have been missed, and weather conditions—such as heat or rain—can reduce activity, particularly for species like bumblebees.

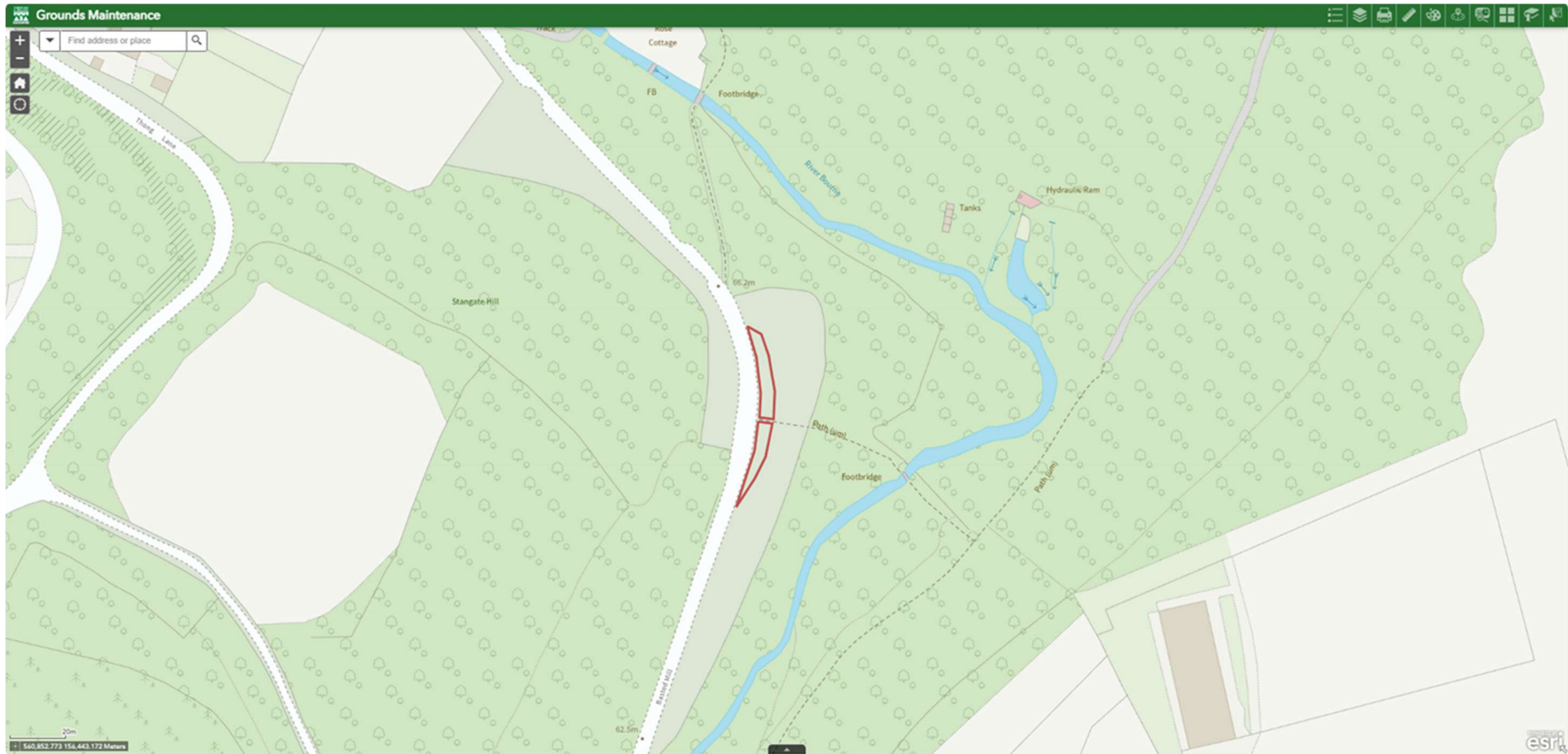
The April surveys were led by Mark Gallant, Senior Partnership Officer at Northwest Kent Countryside Partnership, with subsequent surveys from May to September conducted by Alexander Hodges, Countryside Officer at MVCP.

Table showing the address, post code, grid reference and what 3 words designations for each of TMBC Roadside Nature Reserves

Name	Address	Post code	Grid reference(s)	what 3 words designations	Notes
Basted Mill RNR	Borough Green	TN15 8LP	TQ607563	///incomes.dash.safety	Basted Mill open space, near Borough Green
Brook Street RNR	Tonbridge	TN9 2PN TN9 2QN	TQ 581456 TQ 580455 TQ 577455	///shades.link.zebra ///claims.dating.heat	Land off Brook Street and Upper Haysden Lane, Tonbridge, near to the junctions with Shakespeare Road and Masefield Way
Carnation Crescent RNR	East Malling	ME19 6EP	TQ698580	///hurray.manage.carpentry	Part of Carnation Green, East Malling
Darenth Avenue RNR	Tonbridge	TN10 3HZ	TQ590481	///power.hidden.slang	The first RNR introduced by TMBC.
Gibson Building RNR	Kings Hill	ME19 4LB	TQ669554	///roughest.thus.latches	Located outside the TMBC Council Offices in Kings Hill
Hazel Shaw RNR	Tonbridge	TN10 3QD	TQ596490	///lock.pump.easy	The area between Shipbourne Road and Hazel Shaw, Tonbridge
Lillieburn RNR	Leybourne	ME19 5HF	TQ688586	///eggs.fuel.homeward	Land off Lillieburn, Leybourne
Lime Crescent RNR	East Malling	ME19 6DN	TQ700757	///ants.emotional.peroxide	An extension to the existing unmown area at the New Road/Lime Crescent junction, East Malling

River Lawn RNR	Tonbridge	TN9 1EP	TQ588462 TQ588462 TQ588462	///diner.global.pink	River Lawn in Tonbridge town centre
Shipbourne Road RNR	Tonbridge	TN10 3EH	TQ593481 TQ593482	///crate.repay.image	Land east of Shipbourne Road, Tonbridge, between the junctions of The Ridgeway and Cage Green Road
Tudeley Lane RNR	Tonbridge	TN9 2EX	TQ595453	///sank.statue.pumps	Part of the verge north of Tudeley Lane, Tonbridge, by Weald of Kent Grammar School
Waveney Road RNR	Tonbridge	TN10 3JY	TQ589484	///fingernails.sample.sober	Land west of Waveney Road, Tonbridge

Survey Results - Basted Mill RNR:



The RNR at Basted Mill was one of the better sites regarding the wildlife present. This was due to being next to the Nature reserve, its greater isolation, and the longer vegetation; this is especially relevant to the Harvest mice' nests recorded on site, which need long tussocky grasses. On one of the survey days, the knapweed was in flower, and we recorded five bee and four butterfly species. In total, we recorded 29 plant species and twelve non-plant species within the Roadside Nature Reserve at Basted Mill. Basted Mill had ten quadrats for the wildflower

survey. In terms of the habitat conditions, the grass was long throughout the year; however, the tall grasses were dominating the other plant species to the extent that you could see a higher herb cover in those areas that had been cut at Basted Mill.

Management recommendations

We recommend implementing an annual cut-and-collect in September to help reduce soil fertility and control grass cover. When surveying, a Harvest mouse nest was found and could be disturbed; this would need to be considered before cutting. If feasible with the cut vegetation, from the site we could recommend creating a habitat pile near the edge of the site as it will provide nesting habitat for many species. The flowering species diversity at Basted Mill is generally good at the site and does not need to be sown with extra flora species despite having the lowest species diversity of the RNRs; however, the site could benefit from yellow rattle seeding, to control grass cover. In addition, if there is a local meadow site with higher biodiversity, green haying could be an option to increase flora diversity. Also, to help improve the site's Biodiversity, we would recommend increasing the area for the RNR to include more of the amenity grass area. To balance use cases, you can cut pathways through the grass, so that people still have access to the amenity grassland. In addition to this, there could be a one-meter buffer around the site's edge for longer grasses and vegetation. Creating these areas of long tussocky grass will benefit wildlife like Carder bees and Harvest mice, as they use these grasses to weave their nests. These management changes will result in a mosaic of habitats that enhance the site for wildlife while preserving public accessibility. If the expansion of the RNR is not feasible then, increasing the cutting height of the surrounding grassland as it will allow the lower lying wildflowers to flower in addition it would make it more resistant to drought. In addition to the habitat management recommendations, we would suggest signage to inform the public of the roadside nature reserves.

Survey recommendations

- Bumblebee Surveys (Beewalk, Once a month between March and September)
- Wildflower Surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))
- Butterfly transects (UKBMS, Weekly 1st April and 29th September)

These three surveys will help monitor the health of site over the year and identify new species for the sites. These surveys can be conducted by Medway Valley Countryside Partnership.

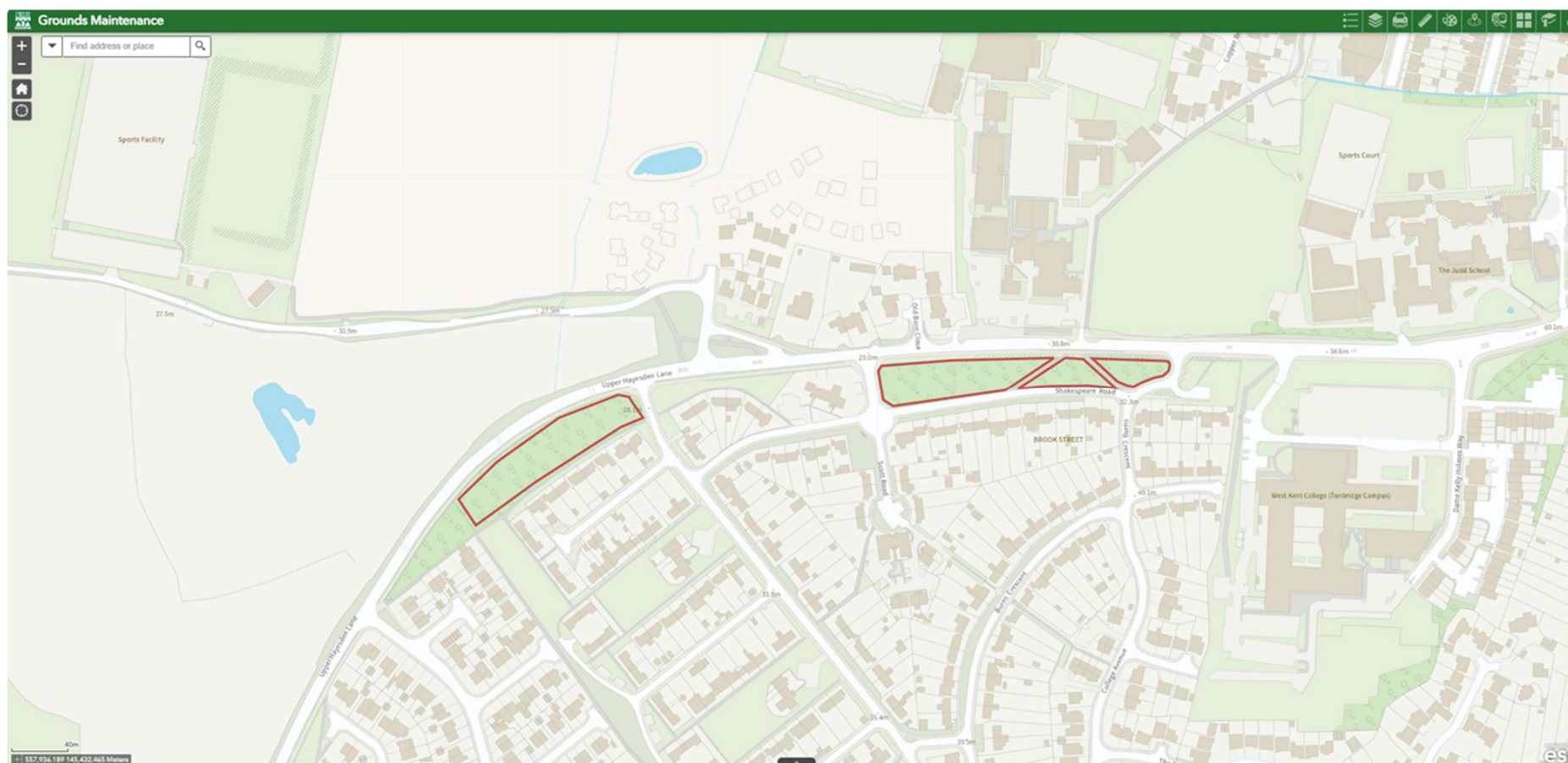
Plant List	Number of times plant species have been recorded	Number of plant species	Latin names	Average of Percentage cover
Bird's-foot trefoil	1	1	<i>Lotus corniculatus</i>	0.25%
Common vetch	2	2	<i>Vicia sativa</i>	0.17%

Cow parsley	3	3	<i>Anthriscus sylvestris</i>	0.33%
Creeping buttercup	26	4	<i>Ranunculus repens</i>	4.58%
Cuckoo flower	1	5	<i>Cardamine pratensis</i>	0.00%
Curled dock	4	6	<i>Rumex crispus</i>	2.42%
Daisy	1	7	<i>Bellis perennis</i>	0.08%
Dandelion sp.	36	8	<i>Taraxacum officinale</i>	10.83%
English cinquefoil	8	9	<i>Potentilla anglica</i>	2.50%
Field speedwell	4	10	<i>Veronica persica</i>	0.67%
Germander speedwell	2	11	<i>Veronica chamaedrys</i>	0.17%
Grass sp.	49	12	<i>Poaceae spp.</i>	66.25%
Ground ivy	3	13	<i>Glechoma hederacea</i>	0.08%
Hogweed	13	14	<i>Heracleum sphondylium</i>	4.50%
Knapweed	8	15	<i>Centaurea nigra</i>	4.17%
Lesser celandine	1	16	<i>Ficaria verna</i>	0.00%
Lords-and-ladies	1	17	<i>Arum maculatum</i>	0.00%
Meadow buttercup	3	18	<i>Ranunculus acris</i>	1.17%
Oxeye daisy	1	19	<i>Leucanthemum vulgare</i>	0.00%
Ragwort	1	20	<i>Jacobaea vulgaris</i>	0.00%
Rough hawks-beard	2	21	<i>Crepis biennis</i>	0.67%
Ryegrass	1	22	<i>Lolium perenne</i>	0.00%
Sessile oak	1	23	<i>Quercus petraea</i>	0.00%
Spiked sedge	1	24	<i>Carex spicata</i>	0.00%
Stinging nettle	1	25	<i>Urtica dioica</i>	0.00%
Tall fescue	1	26	<i>Festuca arundinacea</i>	0.00%
Timothy	1	27	<i>Phleum pratense</i>	0.00%

White clover	6	28	<i>Trifolium repens</i>	0.92%
Wild carrot	1	29	<i>Daucus carota</i>	0.00%
Yarrow	1	30	<i>Achillea millefolium</i>	0.25%
Grand Total	184	29		

Other non-plant species	Latin names
American Pekin	<i>Anas platyrhynchos domesticus</i>
Buff tail Bumblebee	<i>Bombus terrestris</i>
Common Blue Butterfly	<i>Polyommatus icarus</i>
Common red soldier beetle	<i>Rhagonycha fulva</i>
Gatekeeper Butterfly	<i>Pyronia Tithonus</i>
Harvest mouse nest	<i>Micromys minutus</i>
Large White Butterfly	<i>Pieris brassicae</i>
Meadow brown butterfly	<i>Maniola jurtina</i>
Pantaloony bee	<i>Dasypoda hirtipes</i>
Red Tail Bumblebee	<i>Bombus lapidaries</i>
Southern cuckoo bumblebee	<i>Bombus vestalis</i>
Tree bumblebee	<i>Bombus hypnorum</i>

Survey Results - Brook Street RNR



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The RNR at Brook Street has the highest number of species, with 71 plant and 8 non-plant species recorded. The site is split into two separate sections, one next to Shakespeare Road and the other next to Masefield Way. Brook Street RNR has good access to other green spaces like the farmland over the road and Haysden Country Park, accessible through wildlife corridors. This may be why we have a high number of invertebrates recorded. Brook Street RNR has twenty quadrats over two sites for the wildflower survey. In terms of the habitat conditions, both sites were among the better sites in terms of the diversity of plant species.

Management recommendations

In terms of management, we suggest an annual cut-and-collect in September. However, in both areas at Brook Street, there were samplings/suckers growing from the hedgerow, which could hinder or damage the cut and collect machine however this is unlikely. This is something to be mindful of when cutting and collecting. Regarding, species diversity, if feasible the site could benefit green haying from a local meadow site to further increase flora diversity. Another improvement could be to expand the area of the RNR, as these are thin areas and could only support a limited number of invertebrates and small mammals. This could be done by widening the areas by a meter or two. In addition to this, when cutting the areas adjacent to the RNR, reduce the number of times that it is cut and increase the cutting height to allow for the flowers to come up. In addition to the habitat management recommendations, we would suggest signage to inform the public of the roadside nature reserves.

Survey recommendations

- Bumblebee Surveys (Beewalk, Once a month between March and September)
- Wildflower Surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))
- Butterfly transects (UKBMS, Weekly 1st April and 29th September)

These three surveys will help monitor the health of site over the year and identify new species for the sites. These surveys can be carried out by Medway Valley Countryside Partnership.

Plant List	Number of times plant species have been recorded	Number of plant species	Latin names	Average of Percentage cover
Ash	1	1	<i>Fraxinus excelsior</i>	0.00%
Autumn hawkbit	3	2	<i>Scorzoneroides autumnalis</i>	0.33%
Bare ground	2	3		0.33%
Birds-foot trefoil	9	4	<i>Lotus corniculatus</i>	2.21%
Black locust	1	5	<i>Robinia pseudoacacia</i>	0.00%
Blackthorn	4	6	<i>Prunus spinosa</i>	0.38%
Broad-leaved dock	3	7	<i>Rumex obtusifolius</i>	0.21%

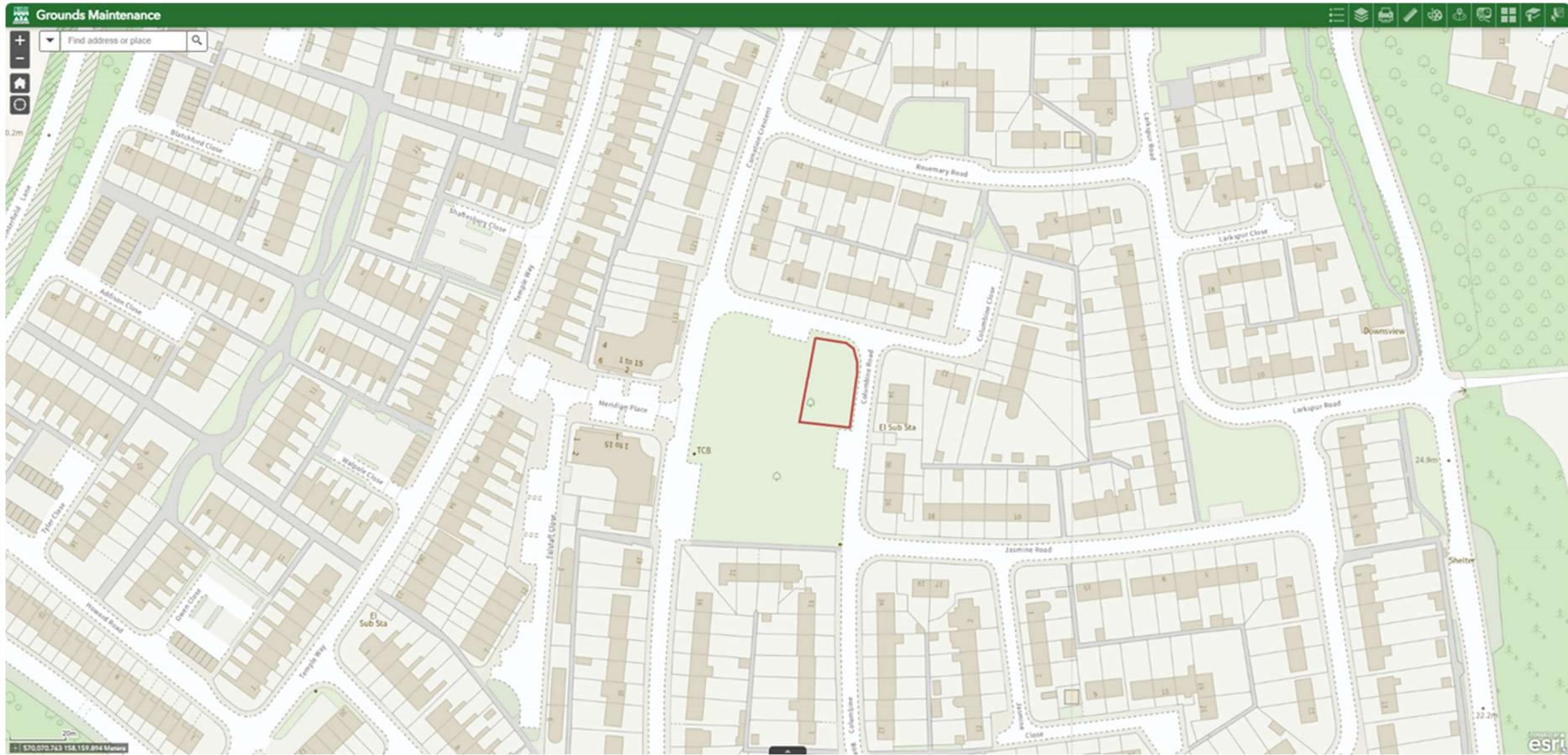
Bushgrass	1	8	<i>Calamagrostis epigejos</i>	0.00%
Cleavers	2	9	<i>Galium aparine</i>	0.00%
Common bent	1	10	<i>Agrostis capillaris</i>	0.00%
Common cat's ear	3	11	<i>Hypochaeris radicata</i>	0.21%
Common knapweed	1	12	<i>Centaurea nigra</i>	0.17%
Common sorrel	9	13	<i>Rumex acetosa</i>	1.04%
Cow parsley	2	14	<i>Anthriscus sylvestris</i>	0.00%
Crab apple	1	15	<i>Malus sylvestris</i>	0.00%
Creeping buttercup	23	16	<i>Ranunculus repens</i>	2.79%
Creeping cinquefoil	1	17	<i>Potentilla reptans</i>	0.00%
Crested dogs tail	1	18	<i>Cynosurus cristatus</i>	0.00%
Cuckoo flower	3	19	<i>Cardamine pratensis</i>	0.08%
Curled dock	2	20	<i>Rumex crispus</i>	0.00%
Daisy	13	21	<i>Bellis perennis</i>	0.71%
Dandelion sp.	38	22	<i>Taraxacum officinale</i>	2.46%
Dove's-foot crane's-bill	2	23	<i>Geranium molle</i>	0.08%
English cinquefoil	1	24	<i>Potentilla anglica</i>	0.50%
Field bindweed	1	25	<i>Convolvulus arvensis</i>	0.04%
Field speedwell	1	26	<i>Veronica persica</i>	0.00%
Germander speedwell	2	27	<i>Veronica chamaedrys</i>	0.00%
Grass sp.	119	28	<i>Poaceae</i>	59.17%
Greater birds-foot trefoil	3	29	<i>Lotus pedunculatus</i>	0.38%
Greater plantain	4	30	<i>Plantago major</i>	0.17%
Hairy bittercress	1	31	<i>Cardamine hirsuta</i>	0.00%
Hawthorn	1	32	<i>Crataegus monogyna</i>	0.00%
Hazel	1	33	<i>Corylus avellana</i>	0.00%
Hoary cress	1	34	<i>Lepidium draba</i>	0.13%

Horse chestnut	1	35	<i>Aesculus hippocastanum</i>	0.00%
Knapweed	15	36	<i>Centaurea spp.</i>	4.92%
Knotgrass	1	37	<i>Polygonum aviculare</i>	0.04%
Lesser celandine	2	38	<i>Ficaria verna</i>	0.00%
Lesser hawkbit	20	39	<i>Leontodon saxatilis</i>	1.96%
Lesser stitchwort	8	40	<i>Stellaria graminea</i>	0.33%
Lords-and-ladies	1	41	<i>Arum maculatum</i>	0.00%
Meadow buttercup	14	42	<i>Ranunculus acris</i>	0.00%
Meadow cranesbill	1	43	<i>Geranium pratense</i>	0.63%
Moss sp.	4	44	<i>Bryophyta</i>	0.88%
Mountain ash	1	45	<i>Sorbus aucuparia</i>	0.00%
Mouse eared chickweed	6	46	<i>Cerastium fontanum</i>	0.25%
Narrow leaf ash	1	47	<i>Fraxinus angustifolia</i>	0.00%
Norway maple	1	48	<i>Acer platanoides</i>	0.00%
Orchard grass	1	49	<i>Dactylis glomerata</i>	0.00%
Ox eye daisy	1	50	<i>Leucanthemum vulgare</i>	0.13%
Ragwort	6	51	<i>Jacobaea vulgaris</i>	0.08%
Red clover	7	52	<i>Trifolium pratense</i>	1.00%
Red deadnettle	2	53	<i>Lamium purpureum</i>	0.00%
Red oak	2	54	<i>Quercus rubra</i>	0.04%
Ribwort plantain	21	55	<i>Plantago lanceolata</i>	1.46%
Rough hawksbit	2	56	<i>Leontodon hispidus</i>	0.21%
Round-leaved cranesbill	1	57	<i>Geranium rotundifolium</i>	0.00%
Ryegrass	1	58	<i>Lolium perenne</i>	0.00%
Selfheal	12	59	<i>Prunella vulgaris</i>	0.88%
Sessile oak	1	60	<i>Quercus petraea</i>	0.00%
Smooth cat's ear	5	61	<i>Hypochaeris glabra</i>	0.38%

Smooth hawk's beard	1	62	<i>Crepis capillaris</i>	0.00%
Smooth meadow grass	1	63	<i>Poa pratensis</i>	0.00%
Spear thistle	1	64	<i>Cirsium vulgare</i>	0.00%
Spring sedge	1	65	<i>Carex caryophylla</i>	0.00%
Staghorn plantain	2	66	<i>Plantago coronopus</i>	0.04%
Wall barley	1	67	<i>Hordeum murinum</i>	0.00%
White clover	66	68	<i>Trifolium repens</i>	8.58%
Wild carrot	1	69	<i>Daucus carota</i>	0.04%
Wild cherry	2	70	<i>Prunus avium</i>	0.17%
Wood avens	2	71	<i>Geum urbanum</i>	0.00%
Yarrow	38	72	<i>Achillea millefolium</i>	6.63%
Yorkshire fog	1	73	<i>Holcus lanatus</i>	0.00%
Grand Total	516	71		

Other non-plant species	Latin names
Mabel white (Marbled White)	<i>Melanargia galathea</i>
Gatekeeper	<i>Pyronia tithonus</i>
7 spot ladybird	<i>Coccinella septempunctata</i>
Large white butterfly	<i>Pieris brassicae</i>
Red-tailed bumblebee	<i>Bombus lapidarius</i>
Common Wasp	<i>Vespula vulgaris</i>
Honeybee	<i>Apis mellifera</i>
Buff-tailed bumblebee	<i>Bombus terrestris</i>

Survey Results - Carnation Crescent RNR:



The RNR at Carnation Green was among the poorer sites in terms of floral diversity. This could be due to the soil's high fertility or to most of the site being overshadowed by the trees (sweet chestnut). Also, it is one of the more isolated sites, being in the middle of a housing estate with limited green space and connectivity around the site. Trying to improve the site's connectivity would be an effective way of increasing the amount of wildlife that can use the site. In total, we recorded 39 plant species and two non-plant species within Carnation Green RNR, and this site had 10 quadrats. In terms of the habitat conditions, Carnation Green was one of the sites that needs management the most due to the

lower plant species recorded. Grasses accounted for a higher percentage of the area, and flowering plants accounted for a lower percentage cover than at other sites.

Management recommendations

To improve floral biodiversity on the site, we suggest a cut-and-collect once a year in September. In addition to the existing cut-and-collect, we suggest sowing wildflower seed on the site. In terms of seed mixes, we would suggest the EM3 mix from Emorsgate Seeds (<https://wildseed.co.uk/product/mixtures/complete-mixtures/general-purpose-meadow-mixtures/special-general-purpose-meadow-mixture/>) and additional yellow rattle. Other improvements could be to expand the area of the Carnation Green RNR area, to support a wider variety of invertebrates. In addition to this, when cutting the areas adjacent to the RNR, you could reduce the cutting of the grassland and increase the cutting height to allow for the flowers to come up. In addition to the habitat management recommendations, we would suggest signage to inform the public of the roadside nature reserves.

Survey recommendations

- Bumblebee Surveys (Beewalk, Once a month between March and September)
- Wildflower Surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))
- Butterfly transects (UKBMS, Weekly 1st April and 29th September)

These three surveys will help monitor the health of site over the year and identify new species for the sites. These surveys can be carried out by Medway Valley Countryside Partnership

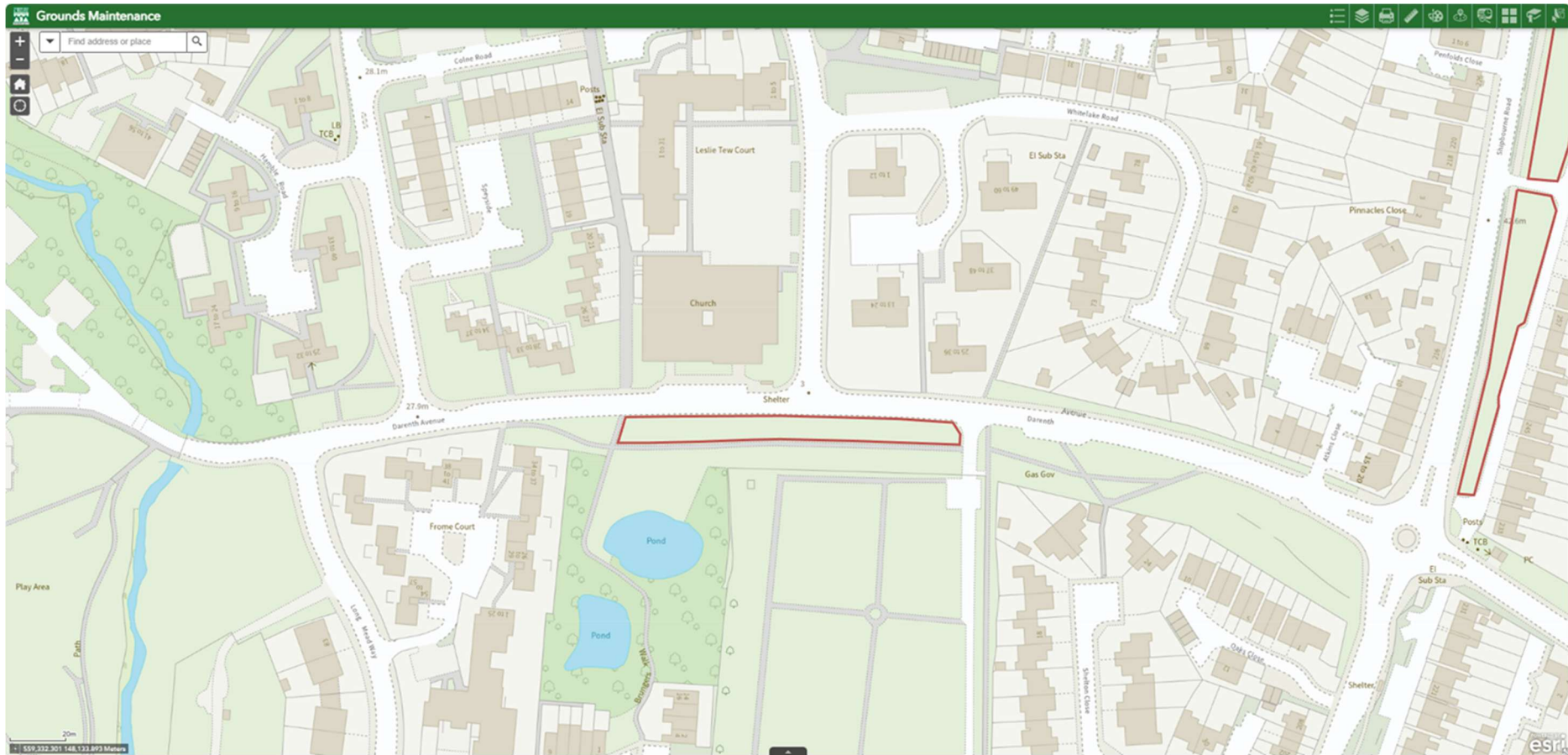
Plant list	Number of times plant species have been recorded	Number of plant species	Latin names	Average of Percentage cover
Autumn hawkbit	5	1	<i>Scorzoneroides autumnalis</i>	2.00%
Cheatgrass	1	2	<i>Bromus tectorum</i>	0.00%
Cleavers	3	3	<i>Galium aparine</i>	0.35%
Cocksfoot grass	1	4	<i>Dactylis glomerata</i>	0.00%
Common bent	1	5	<i>Agrostis capillaris</i>	0.00%
Common mallow	1	6	<i>Malva sylvestris</i>	0.00%
Common sorrel	1	7	<i>Rumex acetosa</i>	0.25%

Cow parsley	1	8	<i>Anthriscus sylvestris</i>	0.00%
Creeping bent	1	9	<i>Agrostis stolonifera</i>	0.00%
Creeping buttercup	1	10	<i>Ranunculus repens</i>	0.08%
Curled dock	3	11	<i>Rumex crispus</i>	0.00%
Cut-leaved cranesbill	2	12	<i>Geranium dissectum</i>	0.08%
Daisy	1	13	<i>Bellis perennis</i>	0.00%
Dandelion sp.	23	14	<i>Taraxacum spp.</i>	4.17%
Dove's foot cranesbill	2	15	<i>Geranium molle</i>	0.08%
Foxtail barley	1	16	<i>Hordeum jubatum</i>	0.00%
Grass sp.	60	17	<i>Poaceae spp.</i>	78.73%
Greater plantain	1	18	<i>Plantago major</i>	0.00%
Hedge cranesbill	1	19	<i>Geranium pyrenaicum</i>	0.00%
Knotgrass	2	20	<i>Polygonum aviculare</i>	0.00%
Lesser celandine	6	21	<i>Ficaria verna</i>	1.33%
Meadow buttercup	2	22	<i>Ranunculus acris</i>	0.17%
Mouse-ear chickweed	1	23	<i>Cerastium fontanum</i>	0.00%
Oxeye daisy	1	24	<i>Leucanthemum vulgare</i>	0.00%
Perennial ryegrass	1	25	<i>Lolium perenne</i>	0.00%
Ragwort	1	26	<i>Jacobaea vulgaris</i>	0.00%
Red deadnettle	1	27	<i>Lamium purpureum</i>	0.00%
Ribwort plantain	12	28	<i>Plantago lanceolata</i>	3.17%
Rough hawk's-beard	2	29	<i>Crepis biennis</i>	0.50%
Rough meadow-grass	1	30	<i>Poa trivialis</i>	0.00%
Round-leaved bedstraw	1	31	<i>Galium rotundifolium</i>	0.17%
Smooth cat's ear	5	32	<i>Hypochaeris glabra</i>	0.25%
Spotted medick	1	33	<i>Medicago arabica</i>	0.00%
Stork's-bill	1	34	<i>Erodium cicutarium</i>	0.00%
Sweet chestnut	1	35	<i>Castanea sativa</i>	0.00%

Tall ryegrass	1	36	<i>Lolium arundinaceum</i>	0.00%
Timothy	1	37	<i>Phleum pratense</i>	0.00%
White clover	8	38	<i>Trifolium repens</i>	1.00%
Wild carrot	1	39	<i>Daucus carota</i>	0.33%
Yarrow	13	40	<i>Achillea millefolium</i>	7.33%
Grand total	173	39		100.00%

Other Non-Plant Species	Latin names
Buff-tailed bumblebee	<i>Bombus terrestris</i>
Honeybee	<i>Apis mellifera</i>

Survey Results - Darenth Avenue RNR



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The RNR at Darenth Avenue is well located, next to many green spaces, which makes it more valuable for its floral diversity, as wildlife from the surrounding green spaces can use them, such as the Brunges ponds and the Tonbridge Cemetery. This could explain the relatively high invertebrate diversity of the site compared to the plant diversity. Therefore, improving this site will benefit local wildlife. It also had a good variety of invertebrate records. In total, we recorded 35 plant species and eight non-plant species within Darenth Avenue RNR, and this site had 10

quadrats. In terms of habitat conditions, Darenth Avenue had one of the lowest numbers of plant species recorded; however, most of the plant species present were more abundant and occurred more often in the quadrats than in some of the other sites with similar plant numbers.

Management recommendations

We suggest a cut-and-collect in September. This allows for tall the flowering plants to flower and set seed. In addition to this, when cutting the areas adjacent to the RNR, you could reduce the cutting of the grassland and increase the cutting height to allow for the wildflowers to flower. In addition to the cut-and-collect, another improvement could be to expand the Darenth Avenue RNR to include more of the grassy verges along Darenth Avenue and Waveney Road, connecting Darenth Avenue RNR, Waveney Road RNR and Shipbourne Road RNR. With the expansion of the RNR, a buffer might be needed to separate the pathways from the RNR, we suggest having a regular cut of a 1m buffer around the RNR flowing in the pathways. This will help define the RNR. This expansion would increase habitat connectivity. In addition to the habitat management recommendations, we would suggest signage to inform the public of the roadside nature reserves.

Survey recommendations

- Bumblebee Surveys (Beewalk, Once a month between March and September)
- Wildflower Surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))
- Butterfly transects (UKBMS, Weekly 1st April and 29th September)

These three surveys will help monitor the health of site over the year and identify new species for the sites. These surveys can be carried out by Medway Valley Countryside Partnership

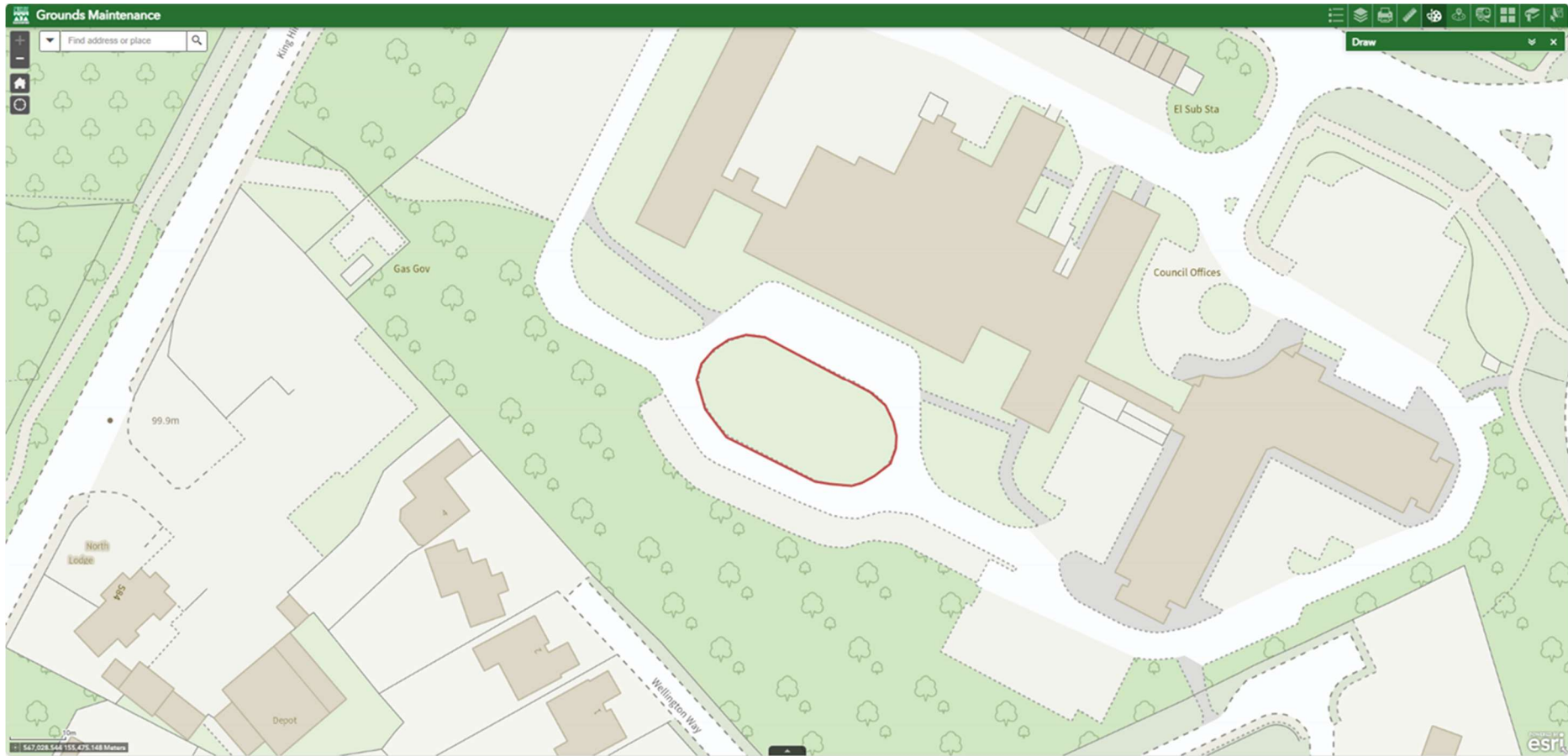
Plant List	Number of times plant species have been recorded	Number of plant species	Latin names	Average of Percentage cover
Autumn hawkbit	5	1	<i>Scorzoneroides autumnalis</i>	0.55%
Bare ground	8	2		1.58%
Bermudagrass	1	3	<i>Cynodon dactylon</i>	0.00%
Broad-leaved dock	4	4	<i>Rumex obtusifolius</i>	1.08%
Common bent	1	5	<i>Agrostis capillaris</i>	0.00%
Common sorrel	1	6	<i>Rumex acetosa</i>	0.00%
Cow parsley	2	7	<i>Anthriscus sylvestris</i>	0.00%

Creeping buttercup	17	8	<i>Ranunculus repens</i>	3.58%
Cuckoo flower	1	9	<i>Cardamine pratensis</i>	0.00%
Curled dock	1	10	<i>Rumex crispus</i>	0.00%
Daisy	1	11	<i>Bellis perennis</i>	0.00%
Dandelion sp.	13	12	<i>Taraxacum officinale</i>	2.50%
English cinquefoil	3	13	<i>Potentilla anglica</i>	0.25%
Grass sp.	60	14	<i>Poaceae</i>	68.67%
Greater plantain	3	15	<i>Plantago major</i>	0.17%
Hairy plantain	1	16	<i>Plantago media</i>	0.08%
Knapweed	6	17	<i>Centaurea nigra</i>	1.50%
Knotgrass	1	18	<i>Polygonum aviculare</i>	0.08%
Meadow barely	1	19	<i>Hordeum secalinum</i>	0.00%
Meadow buttercup	7	20	<i>Ranunculus acris</i>	1.25%
Meadow fox tail	1	21	<i>Alopecurus pratensis</i>	0.00%
Mouse eared chickweed	5	22	<i>Cerastium fontanum</i>	0.50%
Orchard grass	1	23	<i>Dactylis glomerata</i>	0.00%
Ragwort	3	24	<i>Jacobaea vulgaris</i>	0.50%
Ribwort plantain	13	25	<i>Plantago lanceolata</i>	2.23%
Round-leaved cranesbill	1	26	<i>Geranium rotundifolium</i>	0.00%
Ryegrass	1	27	<i>Lolium perenne</i>	0.00%
Sessile oak	1	28	<i>Quercus petraea</i>	0.00%
Smooth cat's ear	4	29	<i>Hypochaeris glabra</i>	0.33%
Spotted medick	3	30	<i>Medicago arabica</i>	1.83%
White beam	1	31	<i>Sorbus aria</i>	0.00%
White clover	35	32	<i>Trifolium repens</i>	12.92%
Wild cherry	2	33	<i>Prunus avium</i>	0.08%
Wood avens	1	34	<i>Geum urbanum</i>	0.00%

Yarrow	4	35	<i>Achillea millefolium</i>	0.30%
Yorkshire fog	1	36	<i>Holcus lanatus</i>	0.00%
Grand Total	214	35		100.00%

Other non-plant species	Latin name
7-spot ladybird	<i>Coccinella septempunctata</i>
Buff-tailed bumblebee	<i>Bombus terrestris</i>
Common carder bee	<i>Bombus pascuorum</i>
Early bumblebee	<i>Bombus pratorum</i>
Gatekeeper butterfly	<i>Pyronia tithonus</i>
Large white butterfly	<i>Pieris brassicae</i>
Red-tailed bumblebee	<i>Bombus lapidaries</i>
Speckled wood butterfly	<i>Pararge aegeria</i>

Survey Results - Gibson building



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The RNR at Gibson building was one of the most diverse sites in terms of the number of species within the quadrat, and with grass under 50% of the area, this suggests that it has a high herb cover, and it is reflected in the invertebrate species found on site. It also has a large amount of green space around it and good connectivity to other sites, which makes it more valuable, for its floral diversity, as wildlife from the surrounding green spaces can use it like at Kings Hill solar farm and the surrounding woodland. In total, we recorded 44 plant species and 10 non-plant species within Gibson building RNR, and this site had 10 quadrats. In terms of the habitat conditions Gibson building was one of the better sites

for plant species recorded, both in terms of the number, and most of the plant species present were in higher numbers and turned up more often in the quadrats.

Management recommendations

In terms of management of the site to improve the floral biodiversity, we would suggest an annual cut and collect in September; however, there were plenty of saplings/suckers from the surrounding trees. To keep it as a meadow habitat, these saplings need to be monitored. In addition to the habitat management recommendations, we would suggest signage to inform the public of the roadside nature reserves.

Survey recommendations

- Bumblebee Surveys (Beewalk, Once a month between March and September)
- Wildflower Surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))
- Butterfly transects (UKBMS, Weekly 1st April and 29th September)

These three surveys will help monitor the health of site over the year and identify new species for the sites. These surveys can be carried out by Medway Valley Countryside Partnership

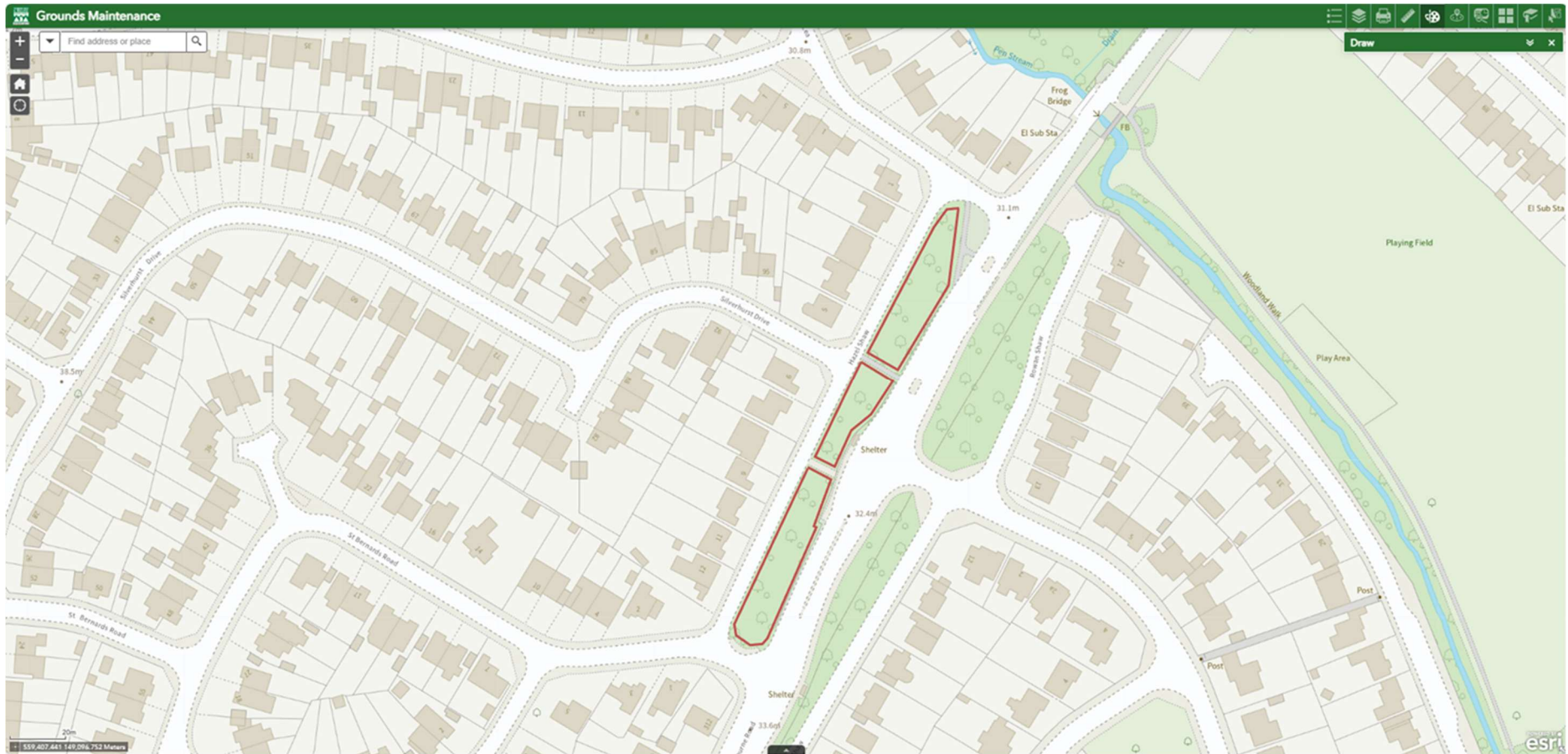
Plant List	Number of times plant species have been recorded	Number of plant species	Latin names	Average of Percentage cover
Autumn hawkbit	2	1	<i>Scorzoneroides autumnalis</i>	0.25%
Bare ground	3	2		0.92%
Bird's-foot trefoil	34	3	<i>Lotus corniculatus</i>	10.75%
Cocksfoot grass	2	4	<i>Dactylis glomerata</i>	0.17%
Common bent	1	5	<i>Agrostis capillaris</i>	0.00%
Common field sorrel	3	6	<i>Rumex acetosa</i>	0.17%
Common field speedwell	18	7	<i>Veronica persica</i>	1.67%
Common knotgrass	1	8	<i>Polygonum aviculare</i>	0.00%
Creeping buttercup	5	9	<i>Ranunculus repens</i>	0.50%

Daisy	4	10	<i>Bellis perennis</i>	0.58%
Dandelion sp.	2	11	<i>Taraxacum officinale</i>	0.08%
Dove's-foot crane's-bill	2	12	<i>Geranium molle</i>	0.08%
Field scabious	5	13	<i>Knautia arvensis</i>	0.58%
Field wood-rush	4	14	<i>Luzula campestris</i>	0.42%
French oat-grass	1	15	<i>Arrhenatherum elatius</i>	0.00%
Germander speedwell	9	16	<i>Veronica chamaedrys</i>	1.17%
Grass sp.	59	17	<i>Poaceae family</i>	49.83%
Greater bird's foot trefoil	2	18	<i>Lotus pedunculatus</i>	1.25%
Greater plantain	1	19	<i>Plantago major</i>	0.00%
Hairy bittercress	1	20	<i>Cardamine hirsuta</i>	0.00%
Hairy hawkbit	2	21	<i>Leontodon hispidus</i>	0.25%
Hairy plantain	1	22	<i>Plantago media</i>	0.08%
Ivy	1	23	<i>Hedera helix</i>	0.00%
Lady's bedstraw	4	24	<i>Galium verum</i>	0.67%
Lesser stitchwort	9	25	<i>Stellaria graminea</i>	0.75%
Lesser trefoil	1	26	<i>Trifolium dubium</i>	0.08%
Meadow buttercup	17	27	<i>Ranunculus acris</i>	4.42%
Mouse-ear chickweed	3	28	<i>Cerastium fontanum</i>	0.17%
Mouse-ear-hawkweed	17	29	<i>Pilosella officinarum</i>	3.48%
Ragwort	2	30	<i>Jacobaea vulgaris</i>	0.25%
Ribwort plantain	15	31	<i>Plantago lanceolata</i>	2.33%
Selfheal	7	32	<i>Prunella vulgaris</i>	0.67%
Sessile oak	6	33	<i>Quercus petraea</i>	0.67%
Smooth cat's ear	2	34	<i>Hypochaeris glabra</i>	0.00%
Sphagnum moss	8	35	<i>Sphagnum spp.</i>	1.92%
Spring sedge	6	36	<i>Carex caryophyllea</i>	0.73%
Sweet vernal grass	3	37	<i>Anthoxanthum odoratum</i>	0.00%

Tall ryegrass	1	38	<i>Lolium arundinaceum</i>	0.00%
Thinleaf false-brome	1	39	<i>Brachypodium sylvaticum</i>	0.00%
Timothy	2	40	<i>Phleum pratense</i>	0.08%
Wall lettuce	1	41	<i>Mycelis muralis</i>	0.00%
White clover	28	42	<i>Trifolium repens</i>	2.92%
Wild cherry	10	43	<i>Prunus avium</i>	2.08%
Wood avens	2	44	<i>Geum urbanum</i>	0.17%
Yarrow	42	45	<i>Achillea millefolium</i>	9.87%
Yorkshire fog	1	46	<i>Holcus lanatus</i>	0.00%
Grand total	351	44		100.00%

Other non-plant species	Latin names
Blue-tailed damselfly	<i>Ischnura elegans</i>
Buff-tailed bumblebee	<i>Bombus terrestris</i>
Meadow brown butterfly	<i>Maniola jurtina</i>
Common froghopper	<i>Philaenus spumarius</i>
Grey wagtail	<i>Motacilla cinerea</i>
Azure damselfly	<i>Coenagrion puella</i>
Common blue butterfly	<i>Polyommatus icarus</i>
Common carder bee	<i>Bombus pascuorum</i>
7 spot lady bird	<i>Coccinella septempunctata</i>
Common blue damselfly	<i>Enallagma cyathigerum</i>

Survey Results - Hazel Shaw RNR



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The RNR at Hazel Shaw is the site with the second-highest number of species. The site is split into three separate sections, split by pathways. This was one of the sites that suffered the most from high temperatures and a lack of rain this year. From July, the effects of the summer their started to increase bare ground cover by the dry and dying vegetation. However, this site benefits from the mosaic habitat created by the trees and hedgerows, increasing the number of plant species present. This is like the effect on Brook Street. It is also on the edge of Tonbridge town, so it has access to the green spaces just outside Tonbridge, providing good connectivity and making it more accessible to wildlife. In total, we

recorded 68 plant species and 9 non-plant species within Hazel Shaw RNR, and this site had 30 quadrats. In terms of habitat conditions, Hazel Shaw is one of the better sites for plant species diversity. Hazel Shaw has a good seed bank and does not need to be sown.

Management recommendations

In terms of management, we suggest a cut and collect once a year in September. In addition to the cut and collect, we suggest having a regular cut of a 1m buffer around the RNR flowing in the roadside and footpaths. This will help improve access to the site and focus foot fall. We would also recommend expanding the RNR to include the triangle piece of land at the end of the site (TQ 59631 49101). In addition to the habitat management recommendations, we would suggest signage to inform the public of the roadside nature reserves.

Survey recommendations

- Bumblebee Surveys (Beewalk, Once a month between March and September)
- Wildflower Surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))
- Butterfly transects (UKBMS, Weekly 1st April and 29th September)

These three surveys will help monitor the health of site over the year and identify new species for the sites. These surveys can be carried out by Medway Valley Countryside Partnership

Plant List	Number of times plant species have been recorded	Number of plant species	Latin names	Average of Percentage cover
Ash	1	1	<i>Fraxinus excelsior</i>	0.00%
Autumn hawkbit	6	2	<i>Scorzoneroides autumnalis</i>	0.17%
Bare ground	124	3		24.56%
Bird's-foot-trefoil	4	4	<i>Lotus corniculatus</i>	0.28%
Black medick	10	5	<i>Medicago lupulina</i>	1.33%
Bluebell	3	6	<i>Hyacinthoides non-scripta</i>	0.03%
Bramble	3	7	<i>Rubus fruticosus agg.</i>	0.00%
Bugle	3	8	<i>Ajuga reptans</i>	0.03%
Cleavers	2	9	<i>Galium aparine</i>	0.00%

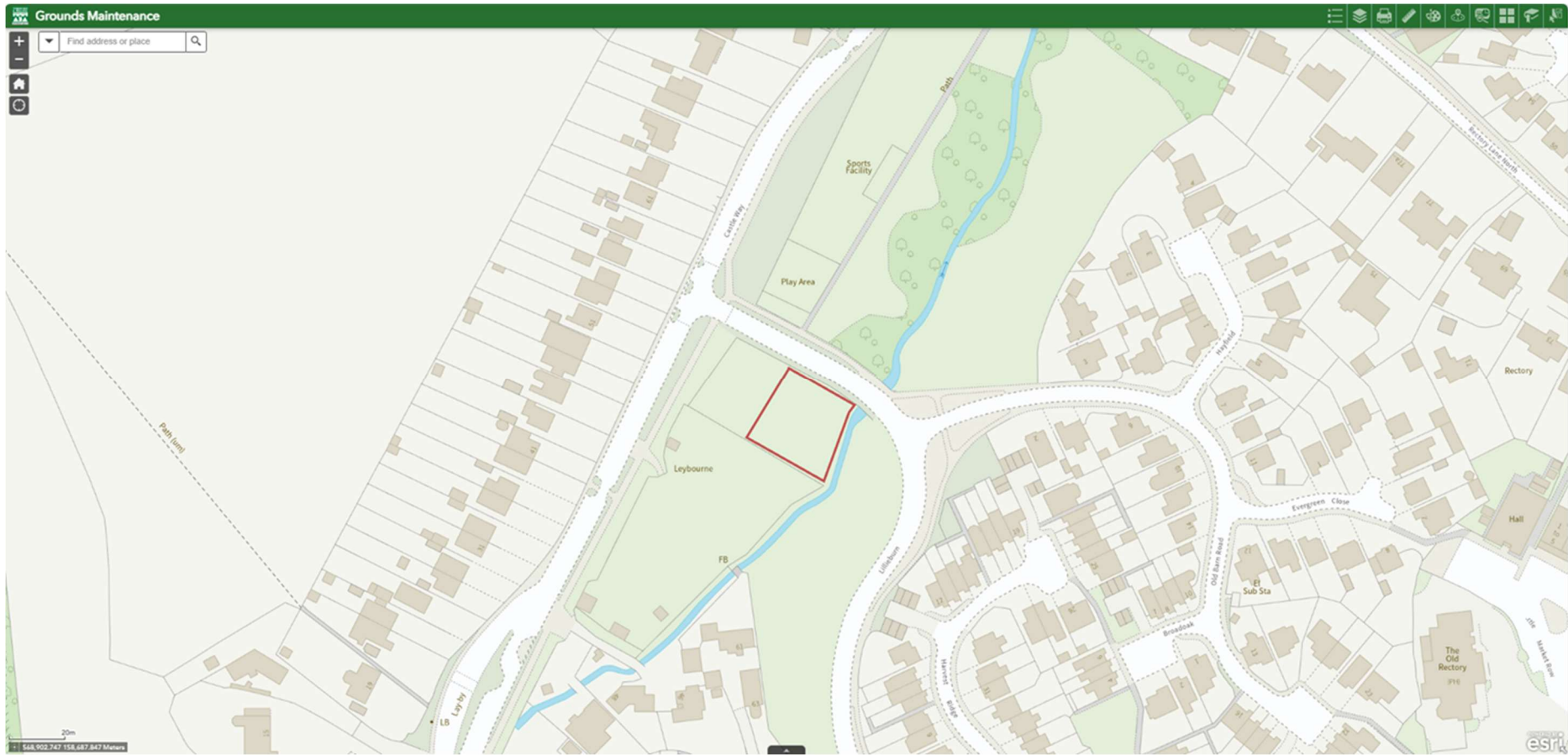
Cocks foot	2	10	<i>Dactylis glomerata</i>	0.03%
Common cat's ear	4	11	<i>Hypochaeris radicata</i>	0.14%
Common dogs' violet	7	12	<i>Viola riviniana</i>	0.14%
Common sorrel	1	13	<i>Rumex acetosa</i>	0.00%
Common vetch	2	14	<i>Vicia sativa</i>	0.08%
Cow parsley	5	15	<i>Anthriscus sylvestris</i>	0.08%
Creeping bent	1	16	<i>Agrostis stolonifera</i>	0.00%
Creeping buttercup	12	17	<i>Ranunculus repens</i>	0.44%
Curled dock	9	18	<i>Rumex crispus</i>	0.22%
Daisy	33	19	<i>Bellis perennis</i>	1.44%
Dandelion sp.	70	20	<i>Taraxacum officinale</i> agg.	2.61%
Dove's-foot crane's-bill	2	21	<i>Geranium molle</i>	0.17%
Field speedwell	3	22	<i>Veronica persica</i>	0.39%
Germander speedwell	13	23	<i>Veronica chamaedrys</i>	0.75%
Grape hyacinth	1	24	<i>Muscari armeniacum</i>	0.00%
Grass sp.	171	25	<i>Poaceae spp.</i>	45.31%
Greater plantain	33	26	<i>Plantago major</i>	1.56%
Greater stitchwort	1	27	<i>Stellaria holostea</i>	0.00%
Hawthorn	5	28	<i>Crataegus monogyna</i>	0.14%
Hazel	2	29	<i>Corylus avellana</i>	0.00%
Herb robert	1	30	<i>Geranium robertianum</i>	0.00%
Hop trefoil	3	31	<i>Trifolium campestre</i>	0.11%
Hory ragwort	1	32	<i>Jacobaea erucifolia</i>	0.00%
Knot grass	3	33	<i>Polygonum aviculare</i>	0.11%
Lesser celandine	7	34	<i>Ficaria verna</i>	0.17%
Lesser hawkbit	4	35	<i>Leontodon saxatilis</i>	0.31%
Lords-and-ladies	3	36	<i>Arum maculatum</i>	0.03%
Meadow buttercup	12	37	<i>Ranunculus acris</i>	0.28%

Mouse-ear chickweed	4	38	<i>Cerastium fontanum</i>	0.03%
Narrow-leaved everlasting-pea	2	39	<i>Lathyrus sylvestris</i>	0.08%
Orchard grass	1	40	<i>Dactylis glomerata</i>	0.00%
Ox-eye daisy	1	41	<i>Leucanthemum vulgare</i>	0.00%
Poison ivy	15	42	<i>Toxicodendron radicans</i>	0.64%
Prickly sow-thistle	1	43	<i>Sonchus asper</i>	0.00%
Primrose	4	44	<i>Primula vulgaris</i>	0.08%
Ragwort	16	45	<i>Jacobaea vulgaris</i>	0.78%
Ribwort plantain	39	46	<i>Plantago lanceolata</i>	1.64%
Ryegrass	1	47	<i>Lolium perenne</i>	0.00%
Selfheal	6	48	<i>Prunella vulgaris</i>	0.22%
Sessile oak	8	49	<i>Quercus petraea</i>	0.28%
Smooth cat's ear	4	50	<i>Hypochaeris glabra</i>	0.17%
Smooth sow-thistle	1	51	<i>Sonchus oleraceus</i>	0.00%
Soft-brome	1	52	<i>Bromus hordeaceus</i>	0.00%
Spear thistle	2	53	<i>Cirsium vulgare</i>	0.11%
Sphagnum moss	10	54	<i>Sphagnum spp.</i>	2.28%
Spotted medick	1	55	<i>Medicago arabica</i>	0.06%
Spring sedge	3	56	<i>Carex caryophyllea</i>	0.03%
Sweet chestnut	1	57	<i>Castanea sativa</i>	0.00%
Tall fleabane	1	58	<i>Pulicaria dysenterica</i>	0.06%
Thyme-leaved speedwell	2	59	<i>Veronica serpyllifolia</i>	0.06%
Turkey oak	1	60	<i>Quercus cerris</i>	0.00%
Upright hedge parsley	1	61	<i>Torilis japonica</i>	0.03%
Violet helleborine	1	62	<i>Epipactis purpurata</i>	0.00%
White clover	100	63	<i>Trifolium repens</i>	12.19%
Wild carrot	1	64	<i>Daucus carota</i>	0.03%

Wild cherry	1	65	<i>Prunus avium</i>	0.03%
Wild garlic	1	66	<i>Allium ursinum</i>	0.00%
Wild strawberry	3	67	<i>Fragaria vesca</i>	0.03%
Wood avens	4	68	<i>Geum urbanum</i>	0.03%
Yarrow	5	69	<i>Achillea millefolium</i>	0.25%
Yorkshire fog	2	70	<i>Holcus lanatus</i>	0.03%
Grand total	811	68		100.00%

Other non-plant species	Latin names
Tree bumblebee	<i>Bombus hypnorum</i>
Large white butterfly	<i>Pieris brassicae</i>
Meadow brown butterfly	<i>Maniola jurtina</i>
Red-tailed bumblebee	<i>Bombus lapidarius</i>
Ivy mining bee	<i>Colletes hederæ</i>
Batman hoverfly	<i>Myathropa florea</i>
Social wasp	<i>Vespula vulgaris</i>
Honeybee	<i>Apis mellifera</i>
Red admiral butterfly	<i>Vanessa atalanta</i>

Survey Results - Lillieburn RNR



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The RNR at Lillieburn is a good site with one of the highest vegetation heights; however, as with the vegetation at Basted Mill RNR, the long grasses tended to dominate the wildflowers. However, it was not as bad as the Basted Mill RNR, as some of the flowers were able to flower. In total, we recorded 49 plant species and six non-plant species within Lillieburn RNR, and this site had 10 quadrats. Lillieburn has a good seed bank and does not need to be sown with new wildflowers.

Management recommendations

In terms of management, we suggest a cut-and-collect once a year in September. However, in the ditch alongside Lillieburn, there is Himalayan balsam, which would need to be removed as it is an invasive species. It is hard to reach and might require brush cutters to access. We would suggest pulling the balsam next year, in the summer. Due to the nature of the site, the cut vegetation could be left in a habitat pile in the corner of the site near the ditch as it will provide good nesting habitat for wildlife. In addition to the habitat management recommendations, we would suggest signage to inform the public of the roadside nature reserves.

Survey recommendations

- Bumblebee Surveys (Beewalk, Once a month between March and September)
- Wildflower Surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))
- Butterfly transects (UKBMS, Weekly 1st April and 29th September)

These three surveys will help monitor the health of site over the year and identify new species for the sites. These surveys can be carried out by Medway Valley Countryside Partnership

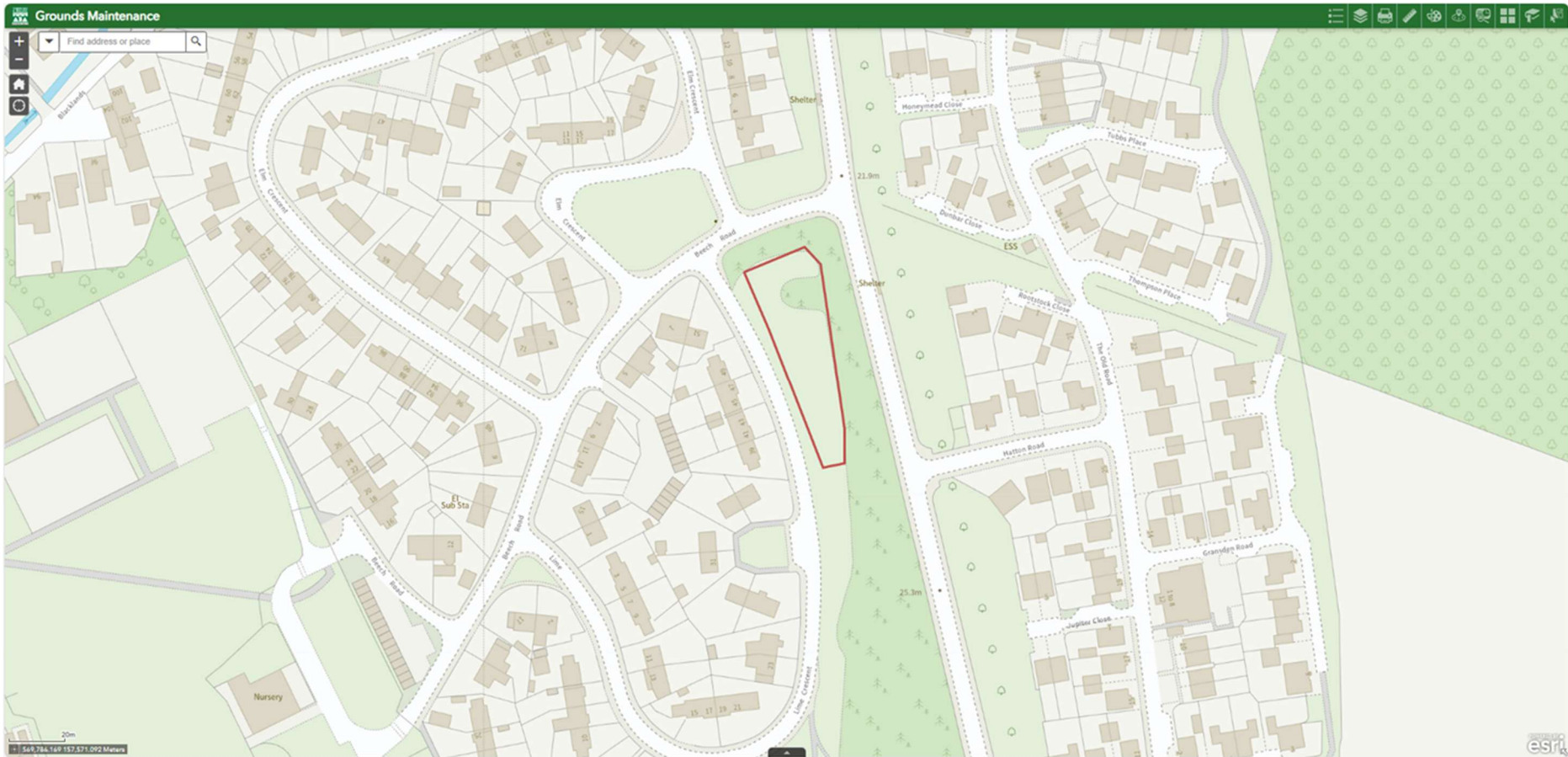
Plant List	Number of times plant species have been recorded	Number of plant species	Latin names	Average of Percentage cover
Autumn hawkbit	3	1	<i>Scorzoneroides autumnalis</i>	0.50%
Bare ground	3	2		1.08%
Bramble	1	3	<i>Rubus fruticosus</i>	0.00%
Bush grass	1	4	<i>Calamagrostis epigejos</i>	0.00%
Cleavers	1	5	<i>Galium aparine</i>	0.00%
Cock's-foot	1	6	<i>Dactylis glomerata</i>	0.00%
Common bent	1	7	<i>Agrostis capillaris</i>	0.00%
Common mallow	1	8	<i>Malva sylvestris</i>	0.50%
Common sorrel	4	9	<i>Rumex acetosa</i>	0.58%
Couch grass	1	10	<i>Elymus repens</i>	0.00%
Cow parsley	1	11	<i>Anthriscus sylvestris</i>	0.00%

Creeping buttercup	9	12	<i>Ranunculus repens</i>	0.75%
Creeping cinquefoil	1	13	<i>Potentilla reptans</i>	0.00%
Curled dock	3	14	<i>Rumex crispus</i>	0.67%
Cut-leaved cranesbill	5	15	<i>Geranium dissectum</i>	0.33%
Daffodil	1	16	<i>Narcissus pseudonarcissus</i>	0.00%
Daisy	5	17	<i>Bellis perennis</i>	0.25%
Dandelion sp.	7	18	<i>Taraxacum officinale</i>	0.92%
Dove's-foot crane's-bill	7	19	<i>Geranium molle</i>	0.58%
Field bindweed	3	20	<i>Convolvulus arvensis</i>	0.25%
Field speedwell	10	21	<i>Veronica persica</i>	1.25%
Germander speedwell	6	22	<i>Veronica chamaedrys</i>	1.42%
Grass sp.	59	23	<i>Poaceae spp.</i>	60.92%
Greater plantain	1	24	<i>Plantago major</i>	0.00%
Ground ivy	3	25	<i>Glechoma hederacea</i>	0.25%
Hairy cat's ear	1	26	<i>Hypochaeris radicata</i>	0.00%
Hawthorn	1	27	<i>Crataegus monogyna</i>	0.08%
Himalayan balsam	1	28	<i>Impatiens glandulifera</i>	0.00%
Lesser stitchwort	7	29	<i>Stellaria graminea</i>	0.50%
Lords-and-ladies	1	30	<i>Arum maculatum</i>	0.00%
Meadow buttercup	6	31	<i>Ranunculus acris</i>	0.75%
Mouse-ear chickweed	5	32	<i>Cerastium fontanum</i>	0.33%
Perennial rye grass	1	33	<i>Lolium perenne</i>	0.00%
Ragwort	4	34	<i>Jacobaea vulgaris</i>	0.42%
Red deadnettle	1	35	<i>Lamium purpureum</i>	0.00%
Ribwort plantain	23	36	<i>Plantago lanceolata</i>	4.75%
Round-leaved cranesbill	1	37	<i>Geranium rotundifolium</i>	0.00%
Selfheal	2	38	<i>Prunella vulgaris</i>	0.17%

Smooth cats ear	1	39	<i>Hypochaeris glabra</i>	0.00%
Smooth hawk's beard	5	40	<i>Crepis capillaris</i>	1.00%
Soft brome	1	41	<i>Bromus hordeaceus</i>	0.00%
Spear thistle	1	42	<i>Cirsium vulgare</i>	1.00%
Spotted medick	1	43	<i>Medicago arabica</i>	0.00%
Stinging nettle	1	44	<i>Urtica dioica</i>	0.00%
Timothy	1	45	<i>Phleum pratense</i>	0.00%
Wall barley	1	46	<i>Hordeum murinum</i>	0.00%
White clover	21	47	<i>Trifolium repens</i>	3.83%
Wild carrot	1	48	<i>Daucus carota</i>	0.17%
Wood avens	2	49	<i>Geum urbanum</i>	0.17%
Yarrow	31	50	<i>Achillea millefolium</i>	16.58%
Yorkshire fog	1	51	<i>Holcus lanatus</i>	0.00%
Grand total	260	49		100.00%

Other non-plant species	Latin names
Gatekeeper Butterfly	<i>Pyronia tithonus</i>
Meadow brown butterfly	<i>Maniola jurtina</i>
Common carder bee	<i>Bombus pascuorum</i>
Small mammal nest	<i>Unknow</i>
Red tailed bumble	<i>Bombus lapidarius</i>
Honeybee	<i>Apis mellifera</i>

Survey Results - Lime Crescent



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The RNR at Lime Crescent is a good site with a good number of species present. Lime Crescent has a lot of green spaces around it compared to Carnation Green, even though it is less than 1 mile away; however, this could be why limited invertebrate species were recorded there, as there may be better pollination resources in the other green spaces, such as East Malling Research. In total, we recorded 45 plant species and one non-plant species within Lime Crescent RNR, and this site had 10 quadrats.

Management recommendations

Lime Crescent RNR has a good seed bank and does not need to be sown with new wildflowers. For future management, we suggest a cut-and-collect once a year in September. Other improvement, could be to expand the area of the RNR to cover the more of the area next to lime crescent, to still allow public access a 1 meter buffer could be created between the RNR and the road/hedgerow and cut more regularly than RNR, therefore the RNR looks deliberate and is less likely to get complaints, alternatively you could reduce the cutting regime around the RNR and increase the cutting height to allow for the flowers to come up. In addition to the habitat management recommendations, we would suggest signage to inform the public of the roadside nature reserves.

Survey recommendations

- Bumblebee Surveys (Beewalk, Once a month between March and September)
- Wildflower Surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))
- Butterfly transects (UKBMS, Weekly 1st April and 29th September)

These three surveys will help monitor the health of site over the year and identify new species for the sites. These surveys can be carried out by Medway Valley Countryside Partnership

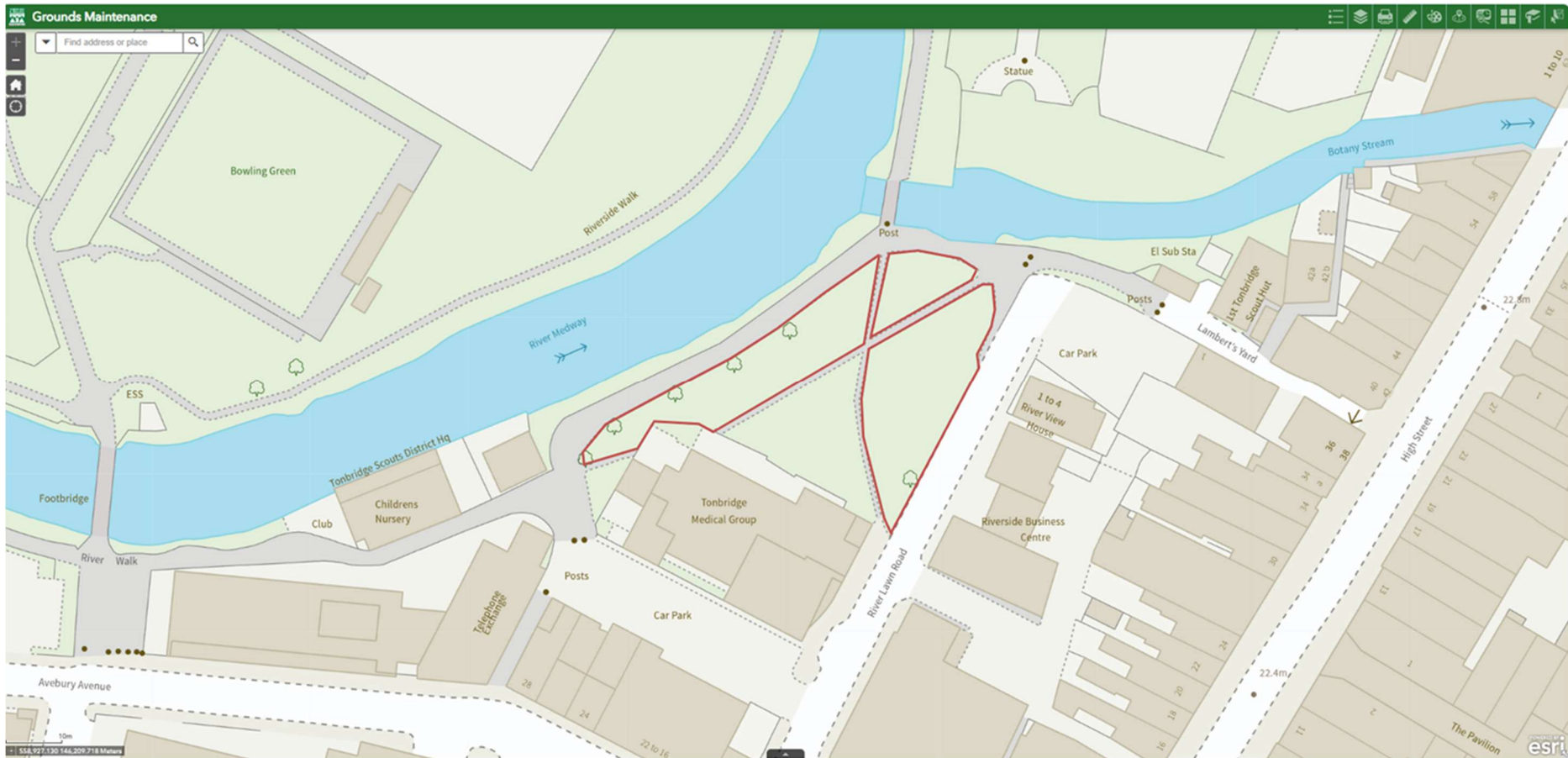
Plant List	Number of times plant species have been recorded	Number of plant species	Latin names	Average of Percentage cover
Ash	1	1	<i>Fraxinus excelsior</i>	0.00%
Autumn hawkbit	4	2	<i>Scorzoneroides autumnalis</i>	0.58%
Bare ground	4	3		2.17%
Beech	1	4	<i>Fagus sylvatica</i>	0.00%
Bird's-foot trefoil	1	5	<i>Lotus corniculatus</i>	0.17%
Black medick	7	6	<i>Medicago lupulina</i>	0.58%
Cocks foot	2	7	<i>Dactylis glomerata</i>	0.00%
Common bent	1	8	<i>Agrostis capillaris</i>	0.00%
Common chickweed	1	9	<i>Stellaria media</i>	0.00%

Cow parsley	5	10	<i>Anthriscus sylvestris</i>	0.77%
Creeping buttercup	1	11	<i>Ranunculus repens</i>	0.33%
Crested dog's-tail	1	12	<i>Cynosurus cristatus</i>	0.00%
Curled dock	2	13	<i>Rumex crispus</i>	0.08%
Cut-leaved cranesbill	1	14	<i>Geranium dissectum</i>	0.08%
Daisy	14	15	<i>Bellis perennis</i>	3.23%
Dandelion sp.	26	16	<i>Taraxacum officinale</i> agg.	5.17%
Dove's-foot crane's-bill	2	17	<i>Geranium molle</i>	0.58%
Elder	2	18	<i>Sambucus nigra</i>	0.00%
English oak	2	19	<i>Quercus robur</i>	0.08%
Field speedwell	3	20	<i>Veronica agrestis</i>	0.50%
Fox tail barely	1	21	<i>Hordeum jubatum</i>	0.00%
Germander speedwell	1	22	<i>Veronica chamaedrys</i>	0.08%
Grass sp.	58	23	Generic	57.47%
Greater plantain	5	24	<i>Plantago major</i>	1.08%
Hedge bindweed	1	25	<i>Calystegia sepium</i>	0.58%
Ivy	2	26	<i>Hedera helix</i>	0.00%
Large leaf lime	1	27	<i>Tilia platyphyllos</i>	0.00%
Lesser celandine	2	28	<i>Ficaria verna</i>	0.00%
Lesser hawkbit	1	29	<i>Leontodon saxatilis</i>	0.08%
Lesser stitchwort	2	30	<i>Stellaria graminea</i>	0.02%
Meadow buttercup	2	31	<i>Ranunculus acris</i>	0.00%
Mouse-ear chickweed	4	32	<i>Cerastium fontanum</i>	0.10%
Perennial ryegrass	1	33	<i>Lolium perenne</i>	0.00%
Ragwort	6	34	<i>Jacobaea vulgaris</i>	0.67%
Red deadnettle	1	35	<i>Lamium purpureum</i>	0.00%

Ribwort plantain	36	36	<i>Plantago lanceolata</i>	5.75%
Round-leaved crane's-bill	1	37	<i>Geranium rotundifolium</i>	0.00%
Smooth cats ear	4	38	<i>Hypochaeris glabra</i>	0.50%
Soft brome	1	39	<i>Bromus hordeaceus</i>	0.00%
Spotted medick	1	40	<i>Medicago arabica</i>	0.00%
Timothy	1	41	<i>Phleum pratense</i>	0.00%
Tyme speedwell	1	42	<i>Veronica serpyllifolia</i>	0.08%
Wall barely	1	43	<i>Hordeum murinum</i>	0.00%
White clover	53	44	<i>Trifolium repens</i>	18.42%
Wild carrot	3	45	<i>Daucus carota</i>	0.08%
Wild cherry	1	46	<i>Prunus avium</i>	0.00%
Yarrow	4	47	<i>Achillea millefolium</i>	0.75%
Grand total	276	45		100.00%

Other non-plant species	Latin names
Large White Butterfly	<i>Pieris brassicae</i>

Survey Results - River Lawn



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The RNR at River Lawn has one of the highest percentages of herb cover and the lowest grass cover of all the sites. Also, the River lawn has good connectivity and access to other green spaces like the river and Racecourse Park, which could lead to a wider variety of species accessing the site. However, it is one of the higher-traffic areas, with people accessing or walking through the site, which could discourage wildlife from using it. During the June survey the RNR was cut more regularly by an unknown third party and didn't allow some of the wildflowers to flower. In total, we recorded 36 plant species and two non-plant species within River Lawn RNR, and this site had 10 quadrats.

Management recommendations

River lawn RNR has a good seed bank and does not need to be sown with new wildflowers, however when surveying it seemed like it was cut and left in June, therefore for future management we suggest a cut-and-collect once a year in September, to allow the wildflowers increase and flower, however it is a high traffic area and if the vegetation needs to be low for access then alternatively, the centre of the RNR could be left and have a cut and collect in September, but a cut and collect with a buffer of 1 meter more regularly. Managing it this way would make the RNR look deliberate; therefore, it is less likely to get complaints. Another improvement could be to expand the area of the RNR to cover the final triangle in the river lawn area. In addition to the habitat management recommendations, we would suggest signage to inform the public of the roadside nature reserves.

Survey recommendations

- Bumblebee Surveys (Beewalk, Once a month between March and September)
- Wildflower Surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))
- Butterfly transects (UKBMS, Weekly 1st April and 29th September)

These three surveys will help monitor the health of site over the year and identify new species for the sites. These surveys can be carried out by Medway Valley Countryside Partnership

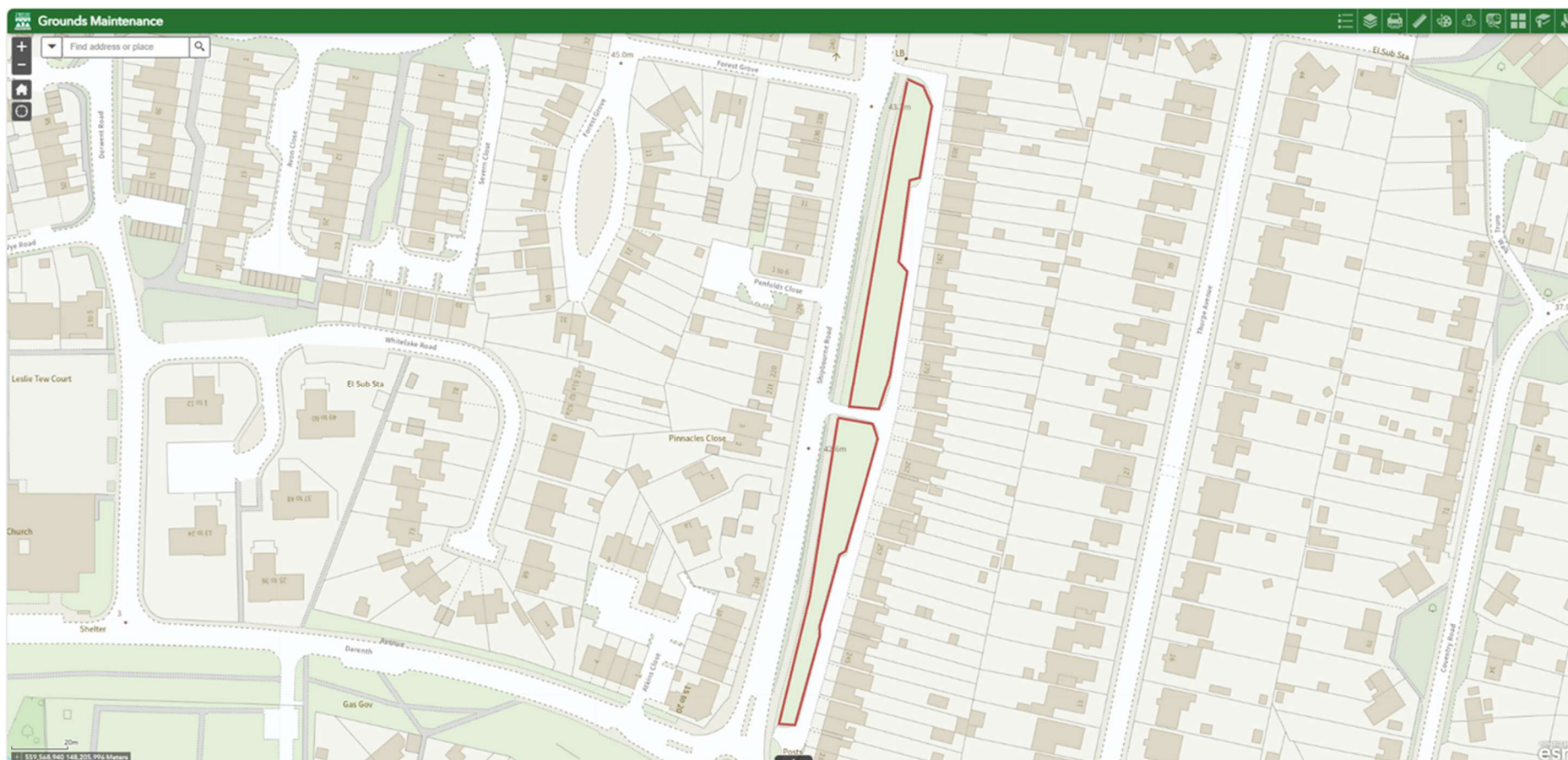
Plant list	Number of times Plant species have been recorded	Number of plant species	Latin names	Average of Percentage cover
Bare ground	23	1		11.33%
Black medick	2	2	<i>Medicago lupulina</i>	0.42%
Bristly ox-tongue	4	3	<i>Helminthotheca echioides</i>	0.75%
Broad-leaved dock	13	4	<i>Rumex obtusifolius</i>	2.33%
Cleavers	1	5	<i>Galium aparine</i>	0.00%
Common mallow	6	6	<i>Malva sylvestris</i>	2.25%
Common ragwort	1	7	<i>Jacobaea vulgaris</i>	0.00%
Common sorrel	4	8	<i>Rumex acetosa</i>	0.92%

Creeping buttercup	16	9	<i>Ranunculus repens</i>	2.92%
Creeping wood sorrel	1	10	<i>Oxalis corniculata</i>	0.08%
Cyclamen hederifolium	2	11	<i>Cyclamen hederifolium</i>	0.00%
Daisy	2	12	<i>Bellis perennis</i>	0.17%
Dandelion sp.	30	13	<i>Taraxacum officinale</i> agg.	4.42%
Dove's-foot crane's-bill	1	14	<i>Geranium molle</i>	0.08%
English cinquefoil	1	15	<i>Potentilla anglica</i>	0.00%
English oak	1	16	<i>Quercus robur</i>	0.00%
Field bindweed	1	17	<i>Convolvulus arvensis</i>	0.50%
Field speedwell	1	18	<i>Veronica persica</i>	0.00%
Grass sp.	58	19	<i>Poaceae spp.</i>	41.50%
Greater plantain	19	20	<i>Plantago major</i>	2.58%
Green alkanet	1	21	<i>Pentaglottis sempervirens</i>	0.00%
Knotgrass	3	22	<i>Polygonum aviculare</i>	0.17%
Large leaf lime	1	23	<i>Tilia platyphyllos</i>	0.00%
Lesser celandine	2	24	<i>Ficaria verna</i>	0.17%
Meadow buttercup	1	25	<i>Ranunculus acris</i>	0.00%
Ribwort plantain	1	26	<i>Plantago lanceolata</i>	0.08%
Narrow-leaved bird's-foot-trefoil	1	27	<i>Lotus tenuis</i>	0.08%
Norway maple	1	28	<i>Acer platanoides</i>	0.00%
Smooth sow thistle	3	29	<i>Sonchus oleraceus</i>	0.17%
Spanish bluebell	1	30	<i>Hyacinthoides hispanica</i>	0.00%
Spear thistle	2	31	<i>Cirsium vulgare</i>	0.25%
Spotted medick	2	32	<i>Medicago arabica</i>	0.50%

Stinging nettle	3	33	<i>Urtica dioica</i>	0.50%
Variegated ivy	1	34	<i>Hedera helix</i> (variegated)	0.00%
White clover	40	35	<i>Trifolium repens</i>	25.67%
White deadnettle	1	36	<i>Lamium album</i>	0.00%
Wood avens	1	37	<i>Geum urbanum</i>	0.00%
Yarrow	3	38	<i>Achillea millefolium</i>	2.17%
Grand total	255	36		1

Other non-plant species	Latin names
Common Wasp	<i>Vespula vulgaris</i>
Brown hawker Dragonfly	<i>Aeshna grandis</i>

Survey Results - Shipbourne Road



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The RNR at Shipbourne Road is a good site with a diverse number of species present. However, in some areas, it has a large proportion of bare ground, which was focused around the areas near the road and where people park their cars/campervans on the grass. In addition to this, whilst surveying, surveyors notice that the path next to the RNR and the main road are high traffic areas, which could cause disturbance to the wildlife. Shipbourne Road has the potential to improve connectivity, for example, Darent Avenue is close and could be connected via the

expansion of the RNRs. In total, we recorded 42 plant species and one non-plant species within Shipbourne Road RNR, and this site had 20 quadrats.

Management recommendations

Shipbourne Road RNR, has a good seed bank however it could be improved by sowing wildflowers seed. In terms of seed mixes, we would suggest the EM3 mix from Emorsgate Seeds (<https://wildseed.co.uk/product/mixtures/complete-mixtures/general-purpose-meadow-mixtures/special-general-purpose-meadow-mixture/>). Vehicles were parked on the grass which meant that the vegetation level was quite low throughout the year, therefore we would recommend a cut-and-collect once a year in September to allow the wildflowers increase and flower, Another improvement to the RNR could be to expand the area of the RNR to cover the other green space next to Shipbourne Road RNR on the other side of the roundabout between the addresses 151 Shipbourne Road and 231 Shipbourne Road. In addition to this, there could be an expansion to Darenth Avenue as stated above, which would help link the two sites. In addition to the habitat management recommendations, we would suggest signage to inform the public of the roadside nature reserves.

Survey recommendations

- Bumblebee Surveys (Beewalk, Once a month between March and September)
- Wildflower Surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))
- Butterfly transects (UKBMS, Weekly 1st April and 29th September)

These three surveys will help monitor the health of site over the year and identify new species for the sites. These surveys can be carried out by Medway Valley Countryside Partnership

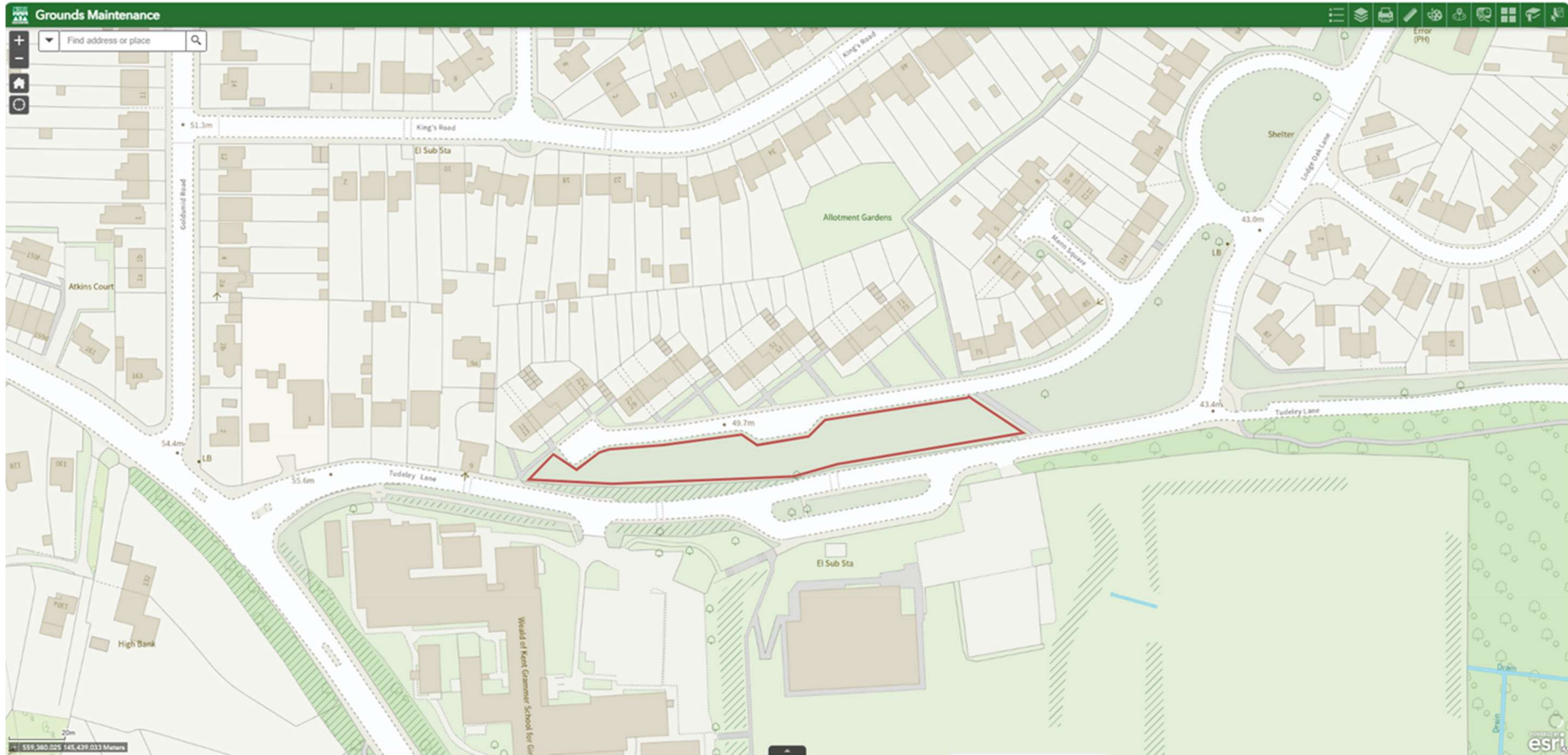
Plant list	Number of times Plant species have been recorded	Number of plant species	Latin names	Average of Percentage cover
Ash	1	1	<i>Fraxinus excelsior</i>	0.00%
Autumn hawkbit	3	2	<i>Scorzoneroides autumnalis</i>	0.41%
Bare ground	35	3		15.55%
Beech	1	4	<i>Fagus sylvatica</i>	0.00%
Bird's-foot trefoil	1	5	<i>Lotus corniculatus</i>	0.14%

Bluebell	1	6	<i>Hyacinthoides non-scripta</i>	0.00%
Broad leaf lime	1	7	<i>Tilia platyphyllos</i>	0.00%
Cleavers	2	8	<i>Galium aparine</i>	0.00%
Common sorrel	1	9	<i>Rumex acetosa</i>	0.05%
Creeping bent	1	10	<i>Agrostis stolonifera</i>	0.00%
Creeping buttercup	7	11	<i>Ranunculus repens</i>	0.50%
Creeping cinquefoil	1	12	<i>Potentilla reptans</i>	0.00%
Curled dock	2	13	<i>Rumex crispus</i>	0.14%
Daisy	8	14	<i>Bellis perennis</i>	0.36%
Dandelion sp.	40	15	<i>Taraxacum officinale</i>	2.86%
English cinquefoil	7	16	<i>Potentilla anglica</i>	1.09%
Field maple	1	17	<i>Acer campestre</i>	0.00%
Field speedwell	2	18	<i>Veronica persica</i>	0.00%
Germander speedwell	3	19	<i>Veronica chamaedrys</i>	0.14%
Grass sp.	102	20	<i>Poaceae</i>	58.91%
Greater plantain	28	21	<i>Plantago major</i>	2.05%
Hawthorn	2	22	<i>Crataegus monogyna</i>	0.05%
Hedgerow cranesbill	1	23	<i>Geranium pyrenaicum</i>	0.00%
Ivy	1	24	<i>Hedera helix</i>	0.09%
Knotgrass	3	25	<i>Polygonum aviculare</i>	0.05%
Lesser stitchwort	1	26	<i>Stellaria graminea</i>	0.05%
Meadow buttercup	5	27	<i>Ranunculus acris</i>	0.18%
Mountain ash	1	28	<i>Sorbus aucuparia</i>	0.00%
Mouse-eared chickweed	3	29	<i>Cerastium fontanum</i>	0.27%
Norway maple	2	30	<i>Acer platanoides</i>	0.18%
Ragwort	3	31	<i>Jacobaea vulgaris</i>	0.14%
Red deadnettle	1	32	<i>Lamium purpureum</i>	0.00%

Ribwort plantain	23	33	<i>Plantago lanceolata</i>	2.32%
Ryegrass	1	34	<i>Lolium perenne</i>	0.00%
Selfheal	3	35	<i>Prunella vulgaris</i>	0.18%
Sessile oak	4	36	<i>Quercus petraea</i>	0.14%
Silver birch	1	37	<i>Betula pendula</i>	0.00%
Smooth cats ear	5	38	<i>Hypochaeris glabra</i>	0.36%
Smooth hawk's beard	1	39	<i>Crepis capillaris</i>	0.00%
Smooth meadow-grass	1	40	<i>Poa pratensis</i>	0.00%
Wall barley	1	41	<i>Hordeum murinum</i>	0.00%
White clover	59	42	<i>Trifolium repens</i>	12.86%
Wood avens	1	43	<i>Geum urbanum</i>	0.00%
Yarrow	9	44	<i>Achillea millefolium</i>	0.95%
Grand total	380	42		100.00%

Other non-plant species	Latin names
Common wasp	<i>Vespula vulgaris</i>

Survey Results - Tudeley Lane RNR



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The RNR at Tudeley Lane RNR, is a good site with a good number of species present; however, it is on the lower end of the diversity in comparison to the other sites. It is also on the edge of Tonbridge town, so it has access to the green spaces just outside Tonbridge; therefore, it has good connectivity to them, making it more accessible to wildlife to use the site. In total, we recorded 39 plant species and seven non-plant species within Tudeley Lane RNR, and this site had 10 quadrats.

Management recommendations

Tudeley Lane RNR, has a good seed bank however it could be improved by sowing wildflowers seed. In terms of seed mixes, we would suggest the EM3 mix from Emorsgate Seeds (<https://wildseed.co.uk/product/mixtures/complete-mixtures/general-purpose-meadow-mixtures/special-general-purpose-meadow-mixture/>). Alternately green haying might be an option for the site, if there is a source of green hay locally. In addition, we would recommend a cut-and-collect once a year in September, to allow the wildflowers to increase and flower. Another improvement to the RNR could be to expand the area of the RNR to cover other green spaces, for example, the circular green space next to Tudeley Lane RNR (in front of 94-106 Lodge Oak Ln), if the expansion is not possible, then reducing the cutting regime of the surrounds grassland and increasing the cutting height of the machinery to 75mm would still improve the biodiversity and connectivity of the site. In addition to the habitat management recommendations, we would suggest signage to inform the public of the roadside nature reserves.

Survey recommendations

- Bumblebee Surveys (Beewalk, Once a month between March and September)
- Wildflower Surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))
- Butterfly transects (UKBMS, Weekly 1st April and 29th September)

These three surveys will help monitor the health of site over the year and identify new species for the sites. These surveys can be carried out by Medway Valley Countryside Partnership

Plant list	Number of times Plant species have been recorded	Number of plant species	Latin names	Average of Percentage cover
Autumn hawkbit	3	1	<i>Scorzoneroides autumnalis</i>	0.58%
Bare ground	11	2		3.25%
Black horehound	2	3	<i>Ballota nigra</i>	0.17%
Bramble	1	4	<i>Rubus fruticosus agg.</i>	0.00%
Bristly oxtongue	1	5	<i>Helminthotheca echioides</i>	0.17%
Cleavers	1	6	<i>Galium aparine</i>	0.00%
Cock's-foot	1	7	<i>Dactylis glomerata</i>	0.00%
Common cat's ear	2	8	<i>Hypochaeris radicata</i>	0.08%

Cow parsley	2	9	<i>Anthriscus sylvestris</i>	0.00%
Creeping buttercup	11	10	<i>Ranunculus repens</i>	1.83%
Creeping thistle	4	11	<i>Cirsium arvense</i>	1.33%
Crested dog's-tail	1	12	<i>Cynosurus cristatus</i>	0.00%
Cuckoo flower	1	13	<i>Cardamine pratensis</i>	0.00%
Curled dock	5	14	<i>Rumex crispus</i>	0.58%
Cut-leaved cranesbill	1	15	<i>Geranium dissectum</i>	0.08%
Daisy	3	16	<i>Bellis perennis</i>	0.17%
Dandelion sp.	41	17	<i>Taraxacum spp.</i>	7.42%
Garlic mustard	1	18	<i>Alliaria petiolata</i>	0.00%
Grass sp.	60	19	<i>Poaceae spp.</i>	54.00%
Greater plantain	9	20	<i>Plantago major</i>	0.75%
Green alkanet	1	21	<i>Pentaglottis sempervirens</i>	0.00%
Knapweed	1	22	<i>Centaurea nigra</i>	0.17%
Knotgrass	2	23	<i>Polygonum aviculare</i>	0.08%
Large leaf lime	1	24	<i>Tilia platyphyllos</i>	0.00%
Lords-and-ladies	1	25	<i>Arum maculatum</i>	0.00%
Meadow barely	1	26	<i>Hordeum secalinum</i>	0.00%
Meadow buttercup	1	27	<i>Ranunculus acris</i>	0.08%
Mouse eared chickweed	3	28	<i>Cerastium fontanum</i>	0.08%
Norway maple	1	29	<i>Acer platanoides</i>	0.00%
Ox eye daisy	1	30	<i>Leucanthemum vulgare</i>	0.08%
Ragwort	4	31	<i>Jacobaea vulgaris</i>	0.25%
Ribwort plantain	14	32	<i>Plantago lanceolata</i>	3.58%
Rye grass	1	33	<i>Lolium perenne</i>	0.00%
Smooth cat's ear	5	34	<i>Hypochaeris glabra</i>	0.58%
Spotted medick	1	35	<i>Medicago arabica</i>	0.67%

Timothy	1	36	<i>Phleum pratense</i>	0.00%
White clover	51	37	<i>Trifolium repens</i>	22.33%
Wild carrot	4	38	<i>Daucus carota</i>	1.67%
Wild cherry	2	39	<i>Prunus avium</i>	0.00%
Wood avens	2	40	<i>Geum urbanum</i>	0.00%
Yorkshire fog	1	41	<i>Holcus lanatus</i>	0.00%
Grand total	260	39		1

Other non-plant species	Latin names
Common carder bee	<i>Bombus pascuorum</i>
Honeybee	<i>Apis mellifera</i>
Buff-tailed bumblebee	<i>Bombus terrestris</i>
Gatekeeper butterfly	<i>Pyronia tithonus</i>
Large white butterfly	<i>Pieris brassicae</i>
Common blue butterfly	<i>Polyommatus icarus</i>
Comma butterfly	<i>Polygonia c-album</i>

RNR, and this site had 10 quadrats. In terms of the habitat conditions, Waveney Road RNR is one of the better sites in terms of the diversity of plant species. It is also one of the sites that has less than 50% grass cover; therefore, other species benefit from this.

Management recommendations

We recommend having a cut and collect once a year in September to allow for wildflowers to flower and set seed. In addition to the Annual cut and collect, a buffer of 1m along the pathway could be introduced, that is cut more regularly, though when cut making sure to increase the cutting height of the machinery, this would define the RNR more. Waveney road RNR has a good seed bank and does not need sowing. In addition, monitoring of the more scrub areas would need to be managed by scalloping different sections to control the spread of bramble. Also, other recommendations would be the expansion of the RNR south through the roadside verges, Waveney road, to improve connectivity with Darenth Avenue. RNR would benefit both sites as it allows species to migrate to different sites more easily. If the expansion is not possible, then reducing the cutting regime of the surrounds grassland and increasing the cutting height of the machinery would still improve the biodiversity and connectivity of the site. In addition to the habitat management recommendations, we would suggest signage to inform the public of the roadside nature reserves.

Survey recommendations

- Bumblebee Surveys (Beewalk, Once a month between March and September)
- Wildflower Surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))
- Butterfly transects (UKBMS, Weekly 1st April and 29th September)

These three surveys will help monitor the health of site over the year and identify new species for the sites. These surveys can be carried out by Medway Valley Countryside Partnership

Plant list	Number of times Plant species have been recorded	Number of plant species	Latin names	Average of Percentage cover
Autumn hawkbit	4	1	<i>Scorzoneroides autumnalis</i>	0.42%
Bare ground	19	2	N/A	8.42%
Bluebell	2	3	<i>Hyacinthoides non-scripta</i>	0.08%
Bramble	8	4	<i>Rubus fruticosus</i>	1.83%

Bristly oxtongue	2	5	<i>Helminthotheca echioides</i>	0.25%
Cleavers	5	6	<i>Galium aparine</i>	0.50%
Common cat's ear	2	7	<i>Hypochaeris radicata</i>	0.08%
Common mallow	3	8	<i>Malva sylvestris</i>	1.67%
Common storksbill	1	9	<i>Erodium cicutarium</i>	0.00%
Cow parsley	8	10	<i>Anthriscus sylvestris</i>	1.25%
Creeping buttercup	6	11	<i>Ranunculus repens</i>	1.08%
Creeping cinquefoil	6	12	<i>Potentilla reptans</i>	0.67%
Creeping speedwell	3	13	<i>Veronica filiformis</i>	0.42%
Curled dock	6	14	<i>Rumex crispus</i>	1.00%
Cut-leaved crane's-bill	11	15	<i>Geranium dissectum</i>	3.00%
Daisy	7	16	<i>Bellis perennis</i>	0.58%
Dandelion sp.	45	17	<i>Taraxacum officinale</i>	10.50%
Dog rose	2	18	<i>Rosa canina</i>	0.08%
Dove's-foot crane's-bill	2	19	<i>Geranium molle</i>	0.17%
English cinquefoil	16	20	<i>Potentilla anglica</i>	4.75%
Field maple	1	21	<i>Acer campestre</i>	0.17%
Field speedwell	2	22	<i>Veronica persica</i>	0.25%
Garlic mustard	1	23	<i>Alliaria petiolata</i>	0.00%
Germander speedwell	7	24	<i>Veronica chamaedrys</i>	0.75%
Grass sp.	59	25	<i>Poaceae</i>	46.92%
Greater plantain	4	26	<i>Plantago major</i>	0.33%
Ground ivy	2	27	<i>Glechoma hederacea</i>	0.00%
Groundsel	1	28	<i>Senecio vulgaris</i>	0.00%
Hawthorn	1	29	<i>Crataegus monogyna</i>	0.08%
Ivy	3	30	<i>Hedera helix</i>	0.17%
Knapweed	1	31	<i>Centaurea nigra</i>	0.00%
Knot grass	1	32	<i>Polygonum aviculare</i>	0.00%

Lesser celandine	2	33	<i>Ficaria verna</i>	0.17%
Lords and lady's	1	34	<i>Arum maculatum</i>	0.00%
Meadow barely	1	35	<i>Hordeum secalinum</i>	0.00%
Meadow buttercup	2	36	<i>Ranunculus acris</i>	0.08%
Mouse eared chickweed	2	37	<i>Cerastium fontanum</i>	0.08%
Orchard grass	1	38	<i>Dactylis glomerata</i>	0.00%
Ragwort	2	39	<i>Jacobaea vulgaris</i>	0.33%
Red clover	1	40	<i>Trifolium pratense</i>	0.25%
Red deadnettle	1	41	<i>Lamium purpureum</i>	0.00%
Ribwort plantain	4	42	<i>Plantago lanceolata</i>	0.67%
Round-leaved cranesbill	1	43	<i>Geranium rotundifolium</i>	0.00%
Selfheal	6	44	<i>Prunella vulgaris</i>	1.50%
Sessile oak	2	45	<i>Quercus petraea</i>	0.17%
Smooth cats-ear	2	46	<i>Hypochaeris glabra</i>	0.08%
Smooth sow thistle	2	47	<i>Sonchus oleraceus</i>	0.00%
Spear thistle	1	48	<i>Cirsium vulgare</i>	0.00%
Spotted medick	5	49	<i>Medicago arabica</i>	0.92%
Staghorn plantain	1	50	<i>Plantago coronopus</i>	0.00%
Teasel	1	51	<i>Dipsacus fullonum</i>	0.00%
Thyme-leaved speedwell	1	52	<i>Veronica serpyllifolia</i>	0.00%
White clover	25	53	<i>Trifolium repens</i>	6.83%
Wild carrot	4	54	<i>Daucus carota</i>	0.25%
Wild strawberry	3	55	<i>Fragaria vesca</i>	0.33%
Wood avens	10	56	<i>Geum urbanum</i>	2.92%
Grand total	322	54		100%

Other non-plant species	Latin names
Common carder bee	<i>Bombus pascuorum</i>
Red tailed bumblebee	<i>Bombus lapidarius</i>
Large white butterfly	<i>Pieris brassicae</i>
Common Wasp	<i>Vespula vulgaris</i>
Speckled wood butterfly	<i>Pararge aegeria</i>

Photos of Species found on site



Above: Red admiral butterfly found at Hazel Shaw

Below: Buff tailed bumblebee worker at Brook Street.



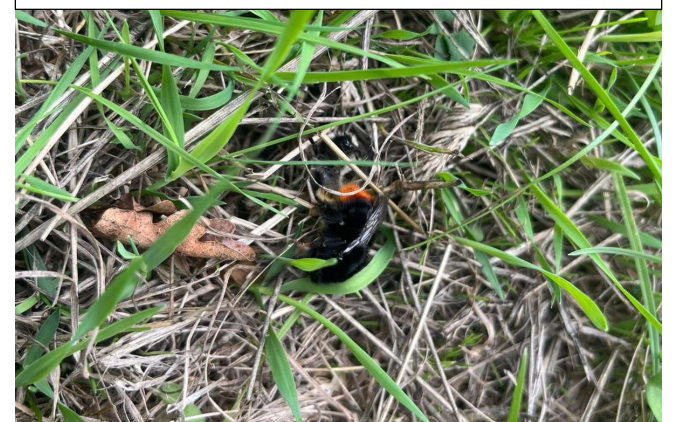
Above: Common Blue butterfly found at Gibson Building

Below: Common Blue butterfly, Meadow brown and Buff tailed bumblebee sharing Knapweed at Basted Mill



Above: Red tailed bumblebee found at Darenth Avenue.

Below Red tailed bumblebee queen and male mating found at Darenth Avenue



Management

For the RNR, there is some management advice that can be applied to most, if not all, the sites. For example, one key way to manage grassland and meadows is to reduce the cutting regime to once a year in September, we do this because it lets all of the wildflowers flower and set seed, it also produces longer grasses, which is a key habitat for small mammals and invertebrates like Harvest mice and Carder bees to nest in. The important part of this is collecting afterwards, which can either be done by a machine or manually by raking it up. This has three main benefits: it allows the seeds to spread over the site, it removes any excess energy/vegetation, reducing the fertility of the soil, therefore improving it for wildflowers, and finally, if collected, it can either be used as hay for livestock or transported to other sites as green hay (if there are enough wildflowers in the hay), or it can be used as habitat piles on-site as compost heaps are great nesting and hibernation habitats for wildlife. However, for this last one, it depends on the site if it can be left on-site.

However, long vegetation can be perceived as messy by the public and may lead to complaints. To combat this, there are a few methods that can reduce the chance of complaints. For example, having clear signage, notifying the public on why the grass is long, and the benefits of having it long. For this, you could include charismatic species that will benefit from the longer grass and more wildflowers, for example, bumblebees are popular with the public and do benefit from more wildflowers. Another way to reduce complaints from the public is to ensure that they have access and that it looks deliberate. One way this can be achieved is by cutting pathways through the RNR, so people can enjoy the meadow and appreciate it. An alternative is to clearly define the RNR's boundaries if the RNR is next to a path, you can add a buffer between the path and the RNR by having more regular cuts on the buffer and leaving the RNR long. This is currently in place though the buffer zone could be increased to a minimum of 1m at a height of 75mm this makes the longer grass and wildflowers of the RNR look deliberate, with a purpose, rather than having no clear boundary, which makes it look like it is just being left and untidy.

In late summer, many sites were drying out, and vegetation was dying back due to the high temperatures and the lack of rain and wet weather. As a result, some sites increase areas of bare ground during the late summer, and having a higher cut on the RNR and the surrounding areas can help with water retention. This also keeps the grassland greener for longer. In addition to water retention, a higher cut of 75mm on the RNRs and surrounding areas can allow low-lying vegetation like Clover, Birds foot trefoil, and Self-heal to still flower, providing a key resource for pollinators.

Most of the sites have good seed banks that don't need further seed sowing; however, some of the sites may require seed sowing. To prep the site for seed sowing, you need to scarify the surface and then sprinkle the seeds on top, and finally stamp them in. Scarifying large areas for seed sowing can be difficult and expensive. An alternative is to create one-meter plots within the site and sow these areas at a higher density as it gets the new species established into a meadow, and with the correct management, they will naturally spread throughout the meadow. In terms of seed mixes, we would suggest the EM3 mix from Emorsgate Seeds (<https://wildseed.co.uk/product/mixtures/complete->

[mixtures/general-purpose-meadow-mixtures/special-general-purpose-meadow-mixture/](#)) as it has a wide variety of wildflowers within the mix, including yellow rattle, which is a key wildflower for meadow improvement as it is semi-parasitic of grasses and can increase herb cover. Seed sowing should be carried out in the autumn, to allow seeds to germinate and develop larger root systems to cope with the droughts in the summer. Also, if sowing yellow rattle, you would need to sow it in the autumn, as it requires six frosts to germinate. If you do sow in the spring, you can put the seeds in the freezer to help them germinate, mimicking frost. An alternative way to increase wildflower species is a method called green haying. Once a wildflower-rich meadow is cut, you can take the hay from that meadow and thinly spread it over the desired area to introduce species from that meadow into the new site. This method also requires bare ground for the seeds to germinate and grow. One option could be to collect green hay from Hayston Country Park, as the meadows there are likely diverse and have a broader array of wildflowers, and they are local to all the Tonbridge sites.

Another improvement to many of the RNR is an expansion of existing RNR or creation of new ones to improve connectivity, for example, a few of the RNRs do not take up the total area of the grassland or road verge or there are green spaces or other RNR locally that, if expanded could link up and create wildlife corridors, a good example of this are the three RNR of, Waveney road Darenth avenue and Shipbourne Road, are very local to each other can could be connected if the RNR were expanded to link these three sites through road side verges. Alternatively, you could change the management of the areas adjacent to the RNRs to improve them for wildlife by changing the cutting regimes to reduce the cutting and allow for wildflowers to flower and set seed. For further information regarding habitat management, plenty of resources are available online, for example, Kent as a pollinator action plan called Kent Plan Bee, which is in collaboration with Bumblebee Conservation Trust and has monitoring and habitat guidelines for pollinators and meadows management (<https://www.kent.gov.uk/environment-waste-and-planning/nature-and-biodiversity/pollinators/kents-plan-bee-pollinator-action-plan>)

Surveying

Surveying will be a key component of monitoring the development of the RNR. In terms of future surveying of the site, we would recommend three sets of wildflower surveys for each site between April and September to get early, mid, and late of the flowering season. In addition to this, two invertebrate surveys would help monitor invertebrate populations. We recommend the following two surveys: the Monthly bee walk survey (<https://beewalk.org.uk/>) from Bumblebee Conservation Trust and the Butterfly transect (<https://ukbms.org/>) from the United Kingdom Butterfly Monitoring Scheme (UKBMS). These surveys require knowledge of the species and could be done by MVCP Staff In 2026.

Summary of recommendations

Recommendations and detail	Basted Mill	Brook Street	Carnation Crescent	Darent Avenue	Gibson Building	Hazel Shaw	Lillieburn	Lime Crescent	River Lawn	Shipbourne Road	Tudeley Lane	Wavene Road	Priority Level
Conduct an annual cut-and-collect in September at all sites.	1
Remove of Himalayan balsam in summer							.						1
Increasing the number of Roadside Nature Reserves within the Borough	1
Increase the cutting height of surrounding grass areas (including buffer zones) to 75mm.	1
Ensure that signage is installed on site to inform residents of the Roadside Nature Reserves	1
Maintain a buffer of at least 1m in width and 75mm in height around the edge of all RNRs to define areas.				1
Monitor suckers of hedges/trees		.			.								1
Where possible, increase size of existing RNRs by 1m				2
Seed Sowing EM3 mix (autumn/winter)			.				.				.		2
Seed Sowing (Yellow rattle) (autumn/winter)	.		.				.						2
Scallop the edge of scrubby areas, to control bramble												.	2
Creating a Habitat pile on-site with the cut vegetation	.						.					.	2

Carry out wildflower surveys (3 times a year, early (April-May), middle (June-July) and late (August-September))	•	•	•	•	•	•	•	•	•	•	•	•	•	3
Carry out Bumblebee Surveys (Beewalk, Once a month between March and September)	•	•	•	•	•	•	•	•	•	•	•	•	•	3
Carry out surveys of Butterfly transects (UKBMS, Weekly 1st April and 29th September)	•	•	•	•	•	•	•	•	•	•	•	•	•	3
Green Haying (if possible)	•	•										•		3

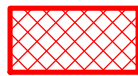

Priority Level (1 = High - 3 = Low)

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Review of Roadside Nature Reserves Annex 2 Plans of proposed extensions to existing RNRs

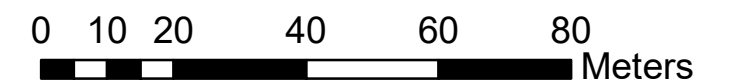
Basted Mill Extension

-  RNR Expansions
-  Existing RNRs



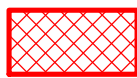

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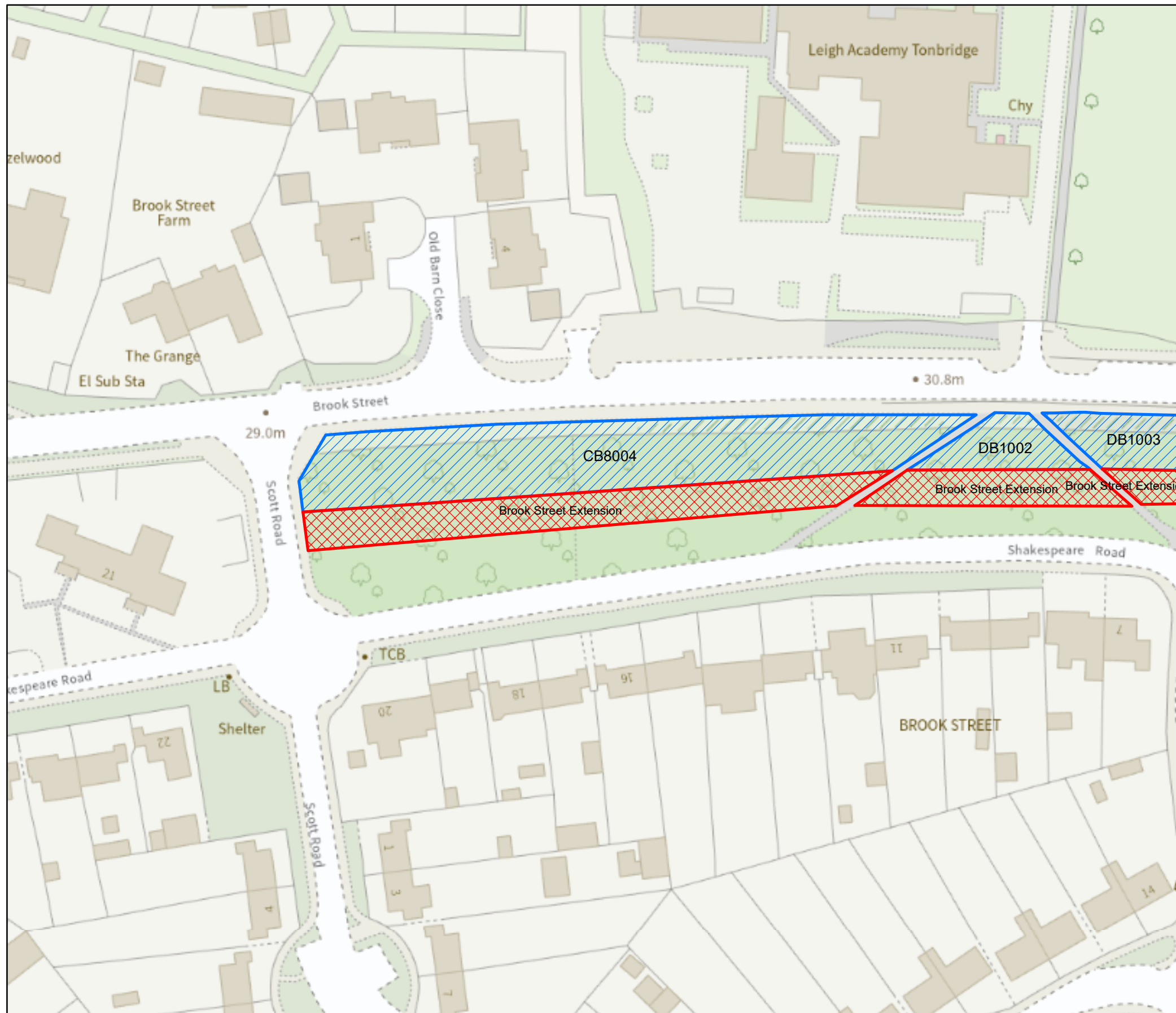
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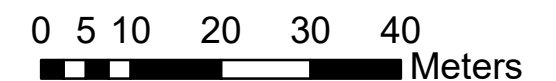
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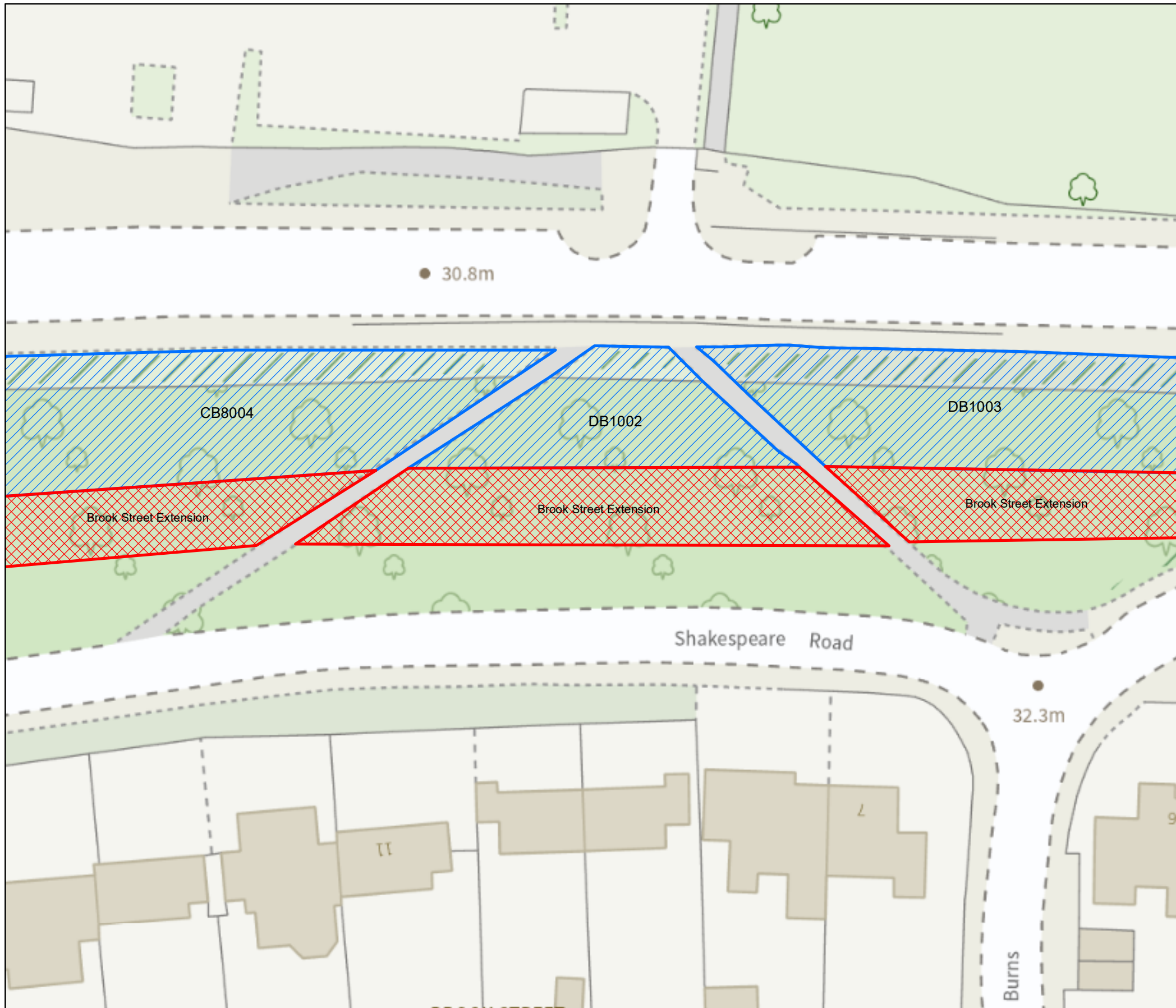
-  RNR Expansions
-  Existing RNRs



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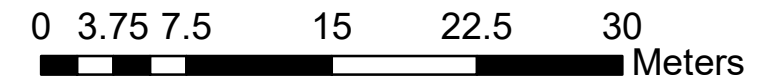
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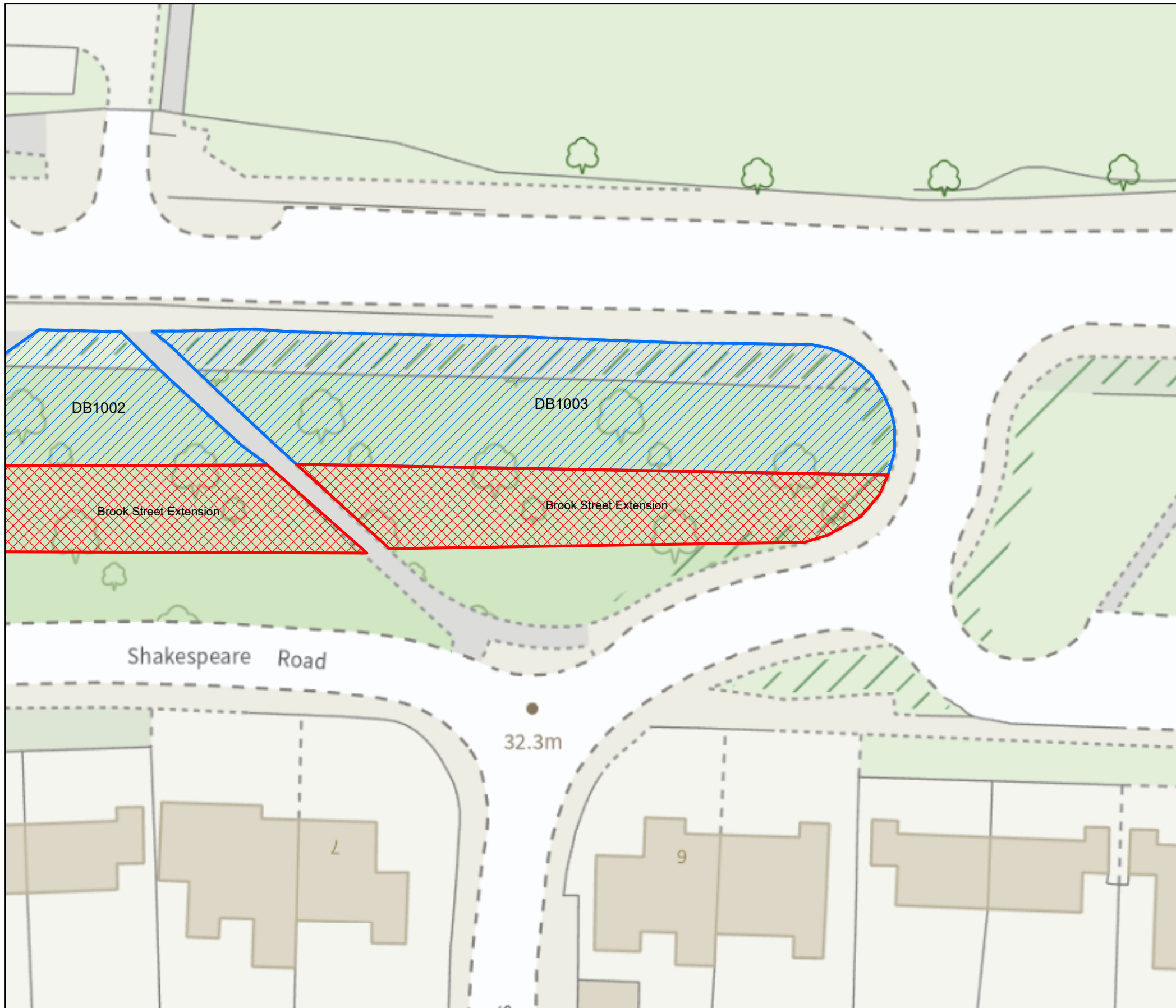
-  RNR Expansions
-  Existing RNRs



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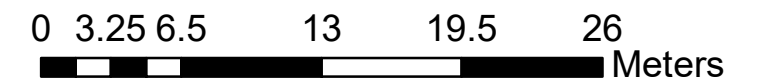
Brook Street Extension

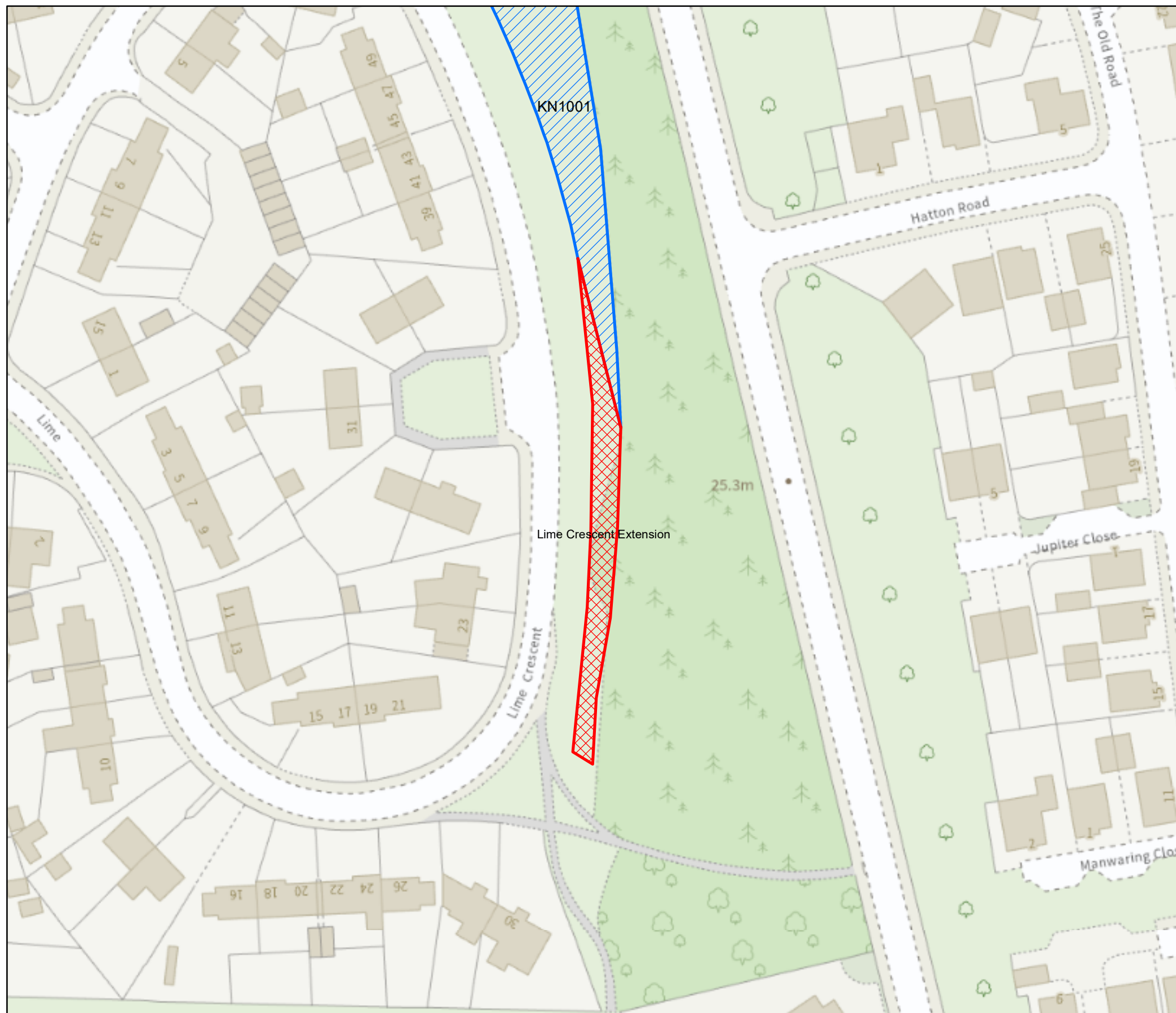
-  RNR Expansions
-  Existing RNRs



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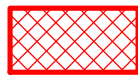

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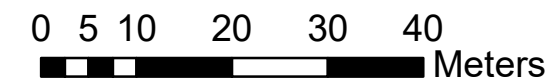
Lime Crescent Extension

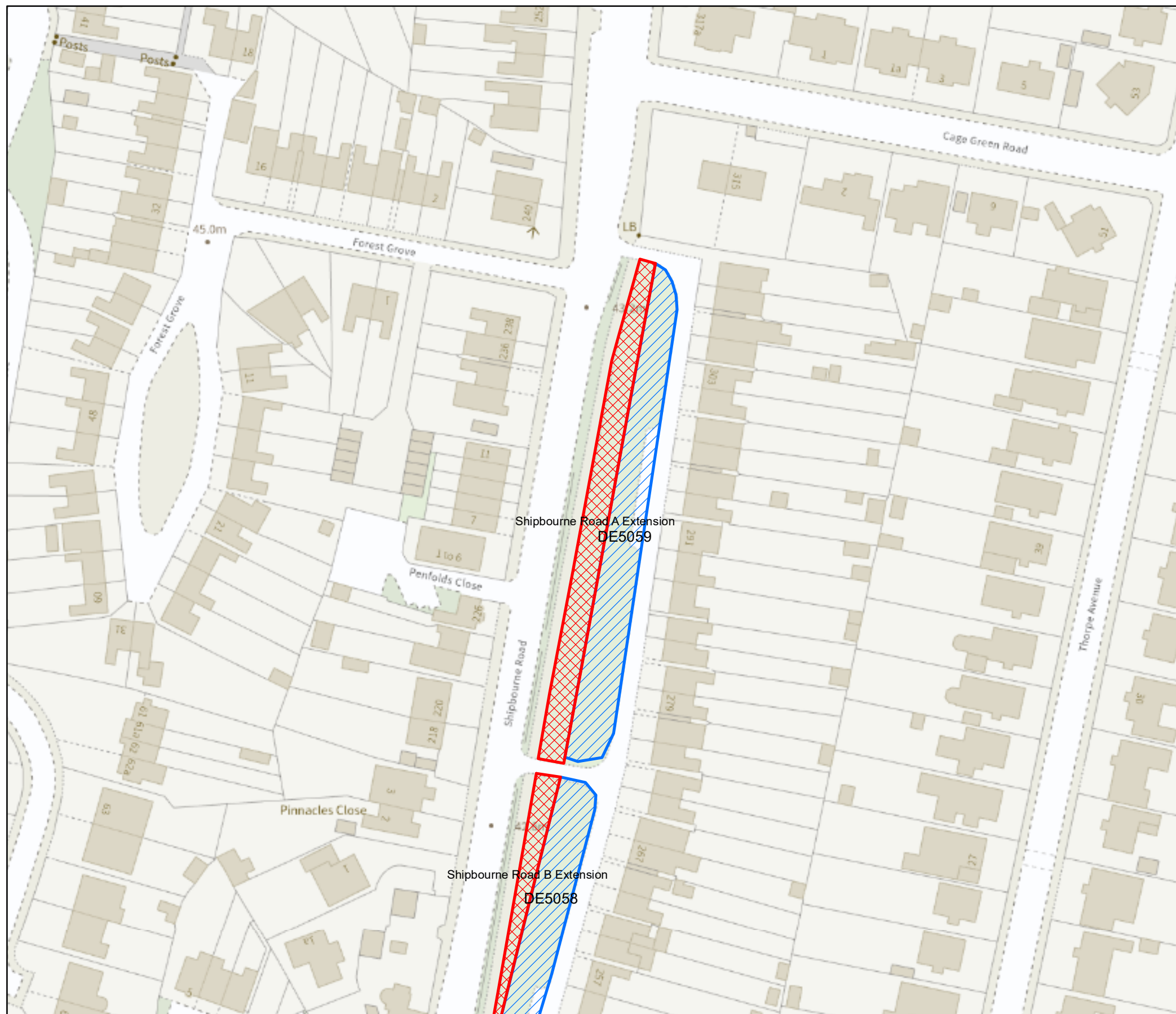
-  RNR Expansions
-  Existing RNRs



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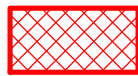

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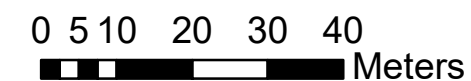
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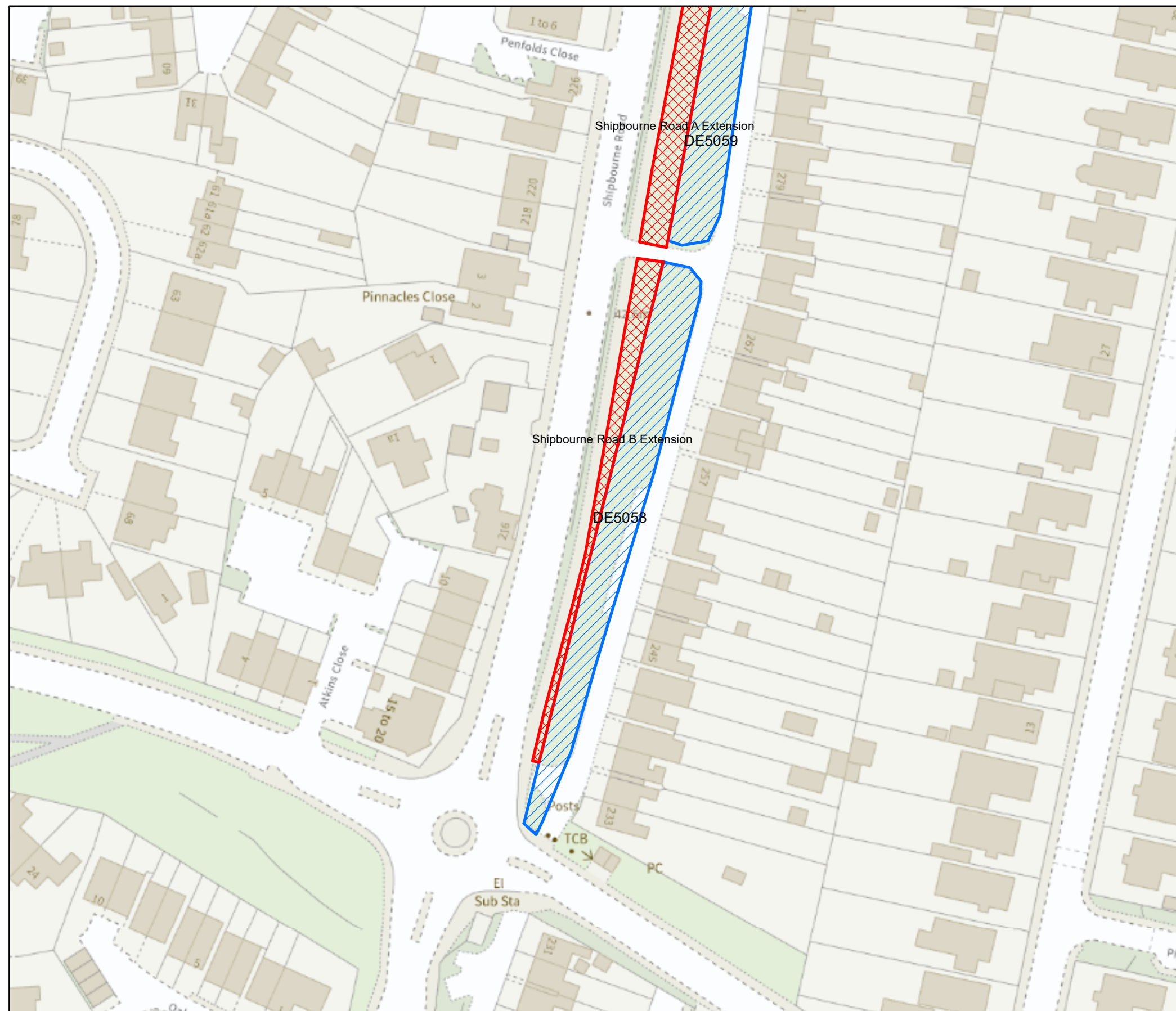
-  RNR Expansions
-  Existing RNRs



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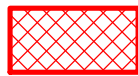

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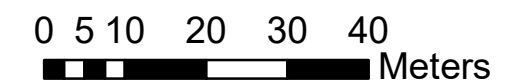
Shipbourne Road B Extension

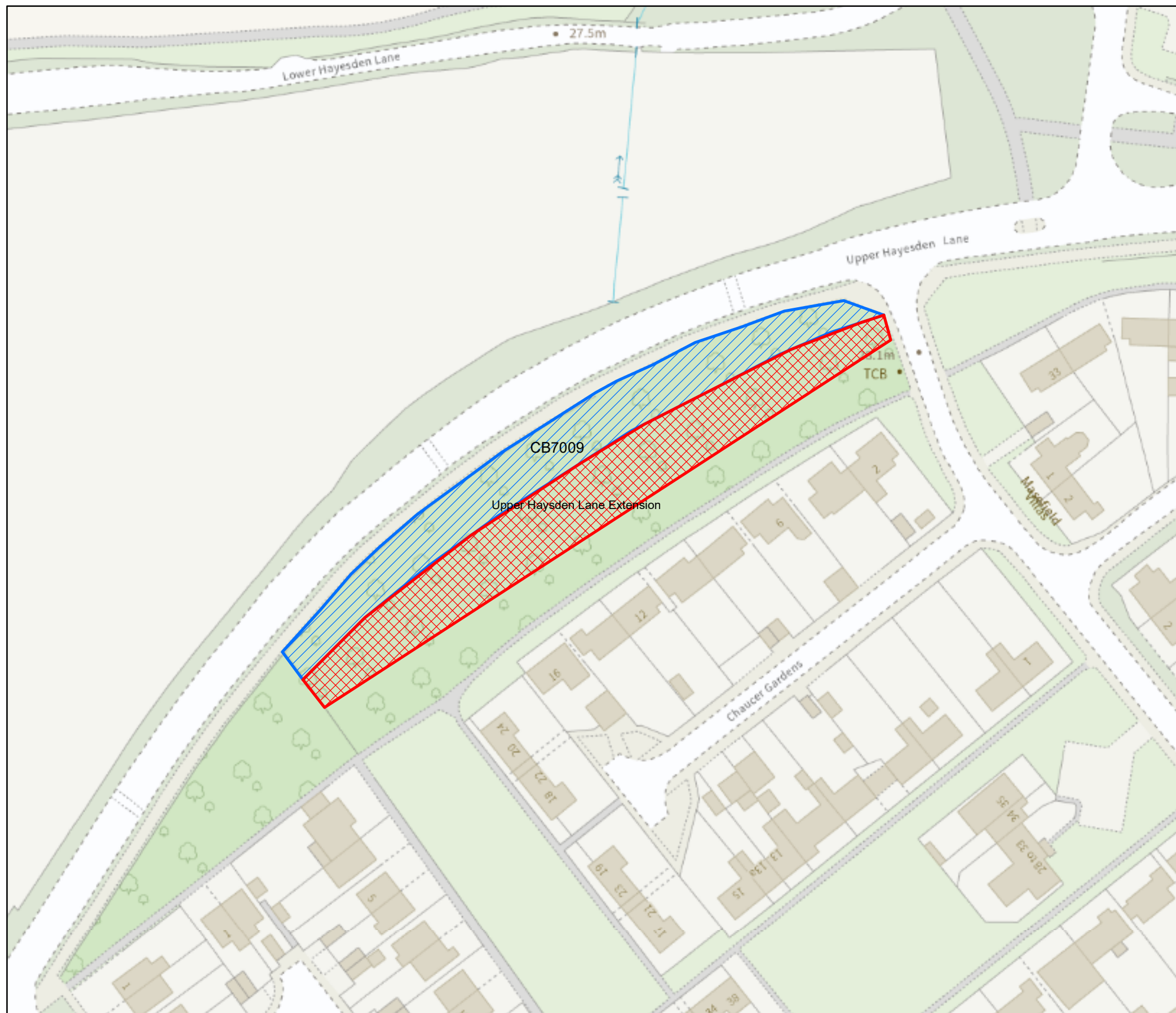
-  RNR Expansions
-  Existing RNRs



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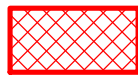

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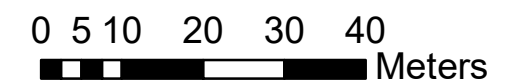
Upper Haysden Lane Extension

-  RNR Expansions
-  Existing RNRs



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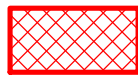

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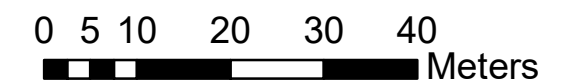
Waveney Road Extension

-  RNR Expansions
-  Existing RNRs



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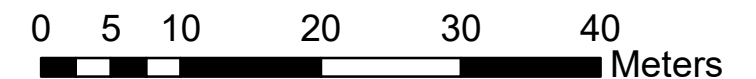
Area next to Bradford Street Car Park

-  Existing RNRs
-  New RNRs



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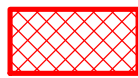
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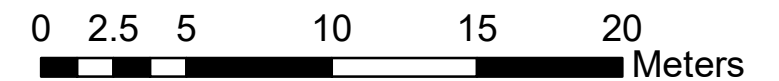
Darenth Avenue A, Tonbridge

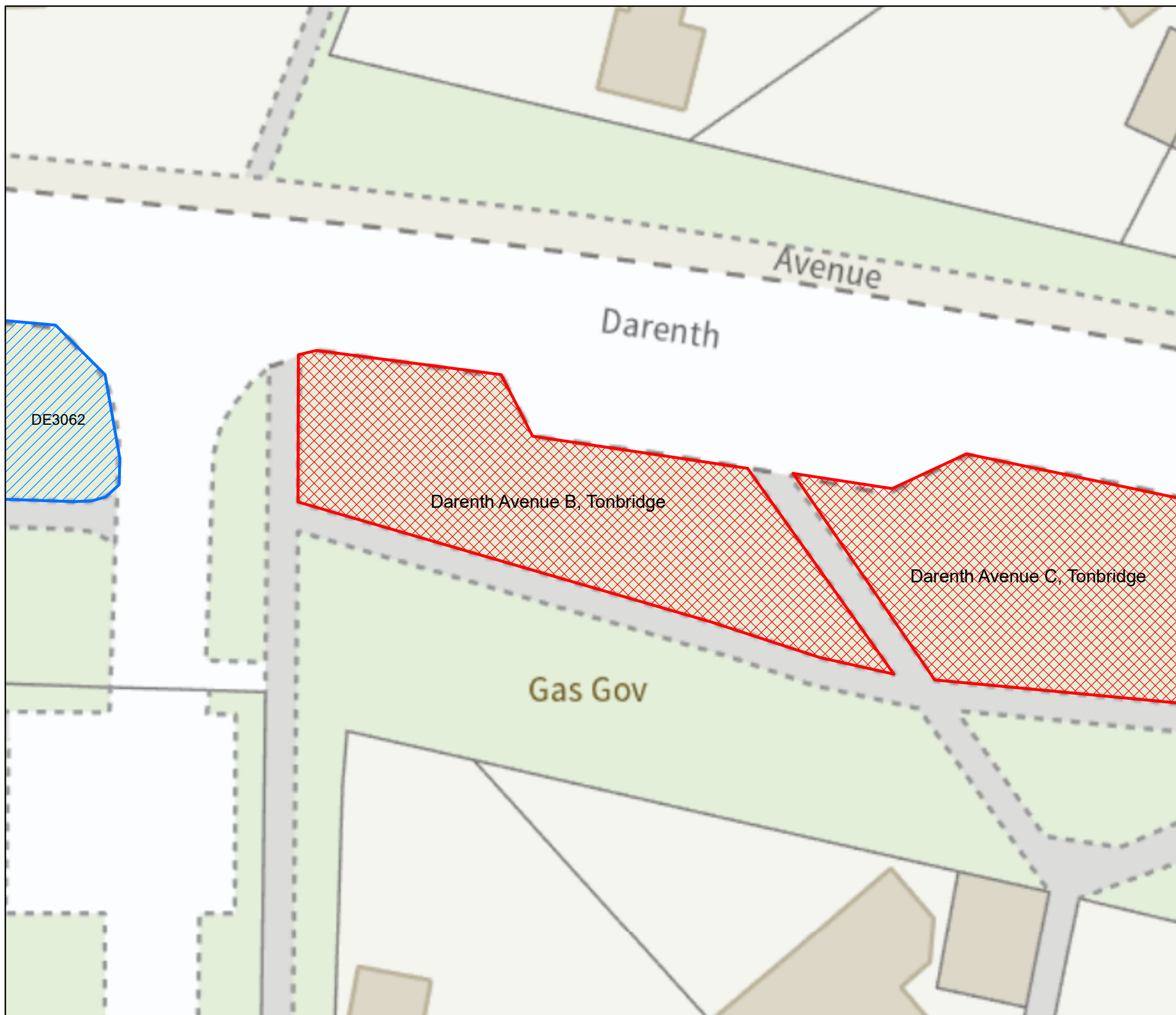
-  Existing RNRs
-  New RNRs



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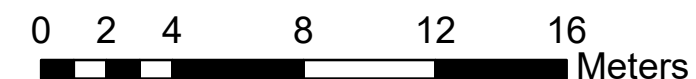
Darenth Avenue B, Tonbridge

-  Existing RNRs
-  New RNRs




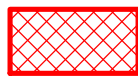
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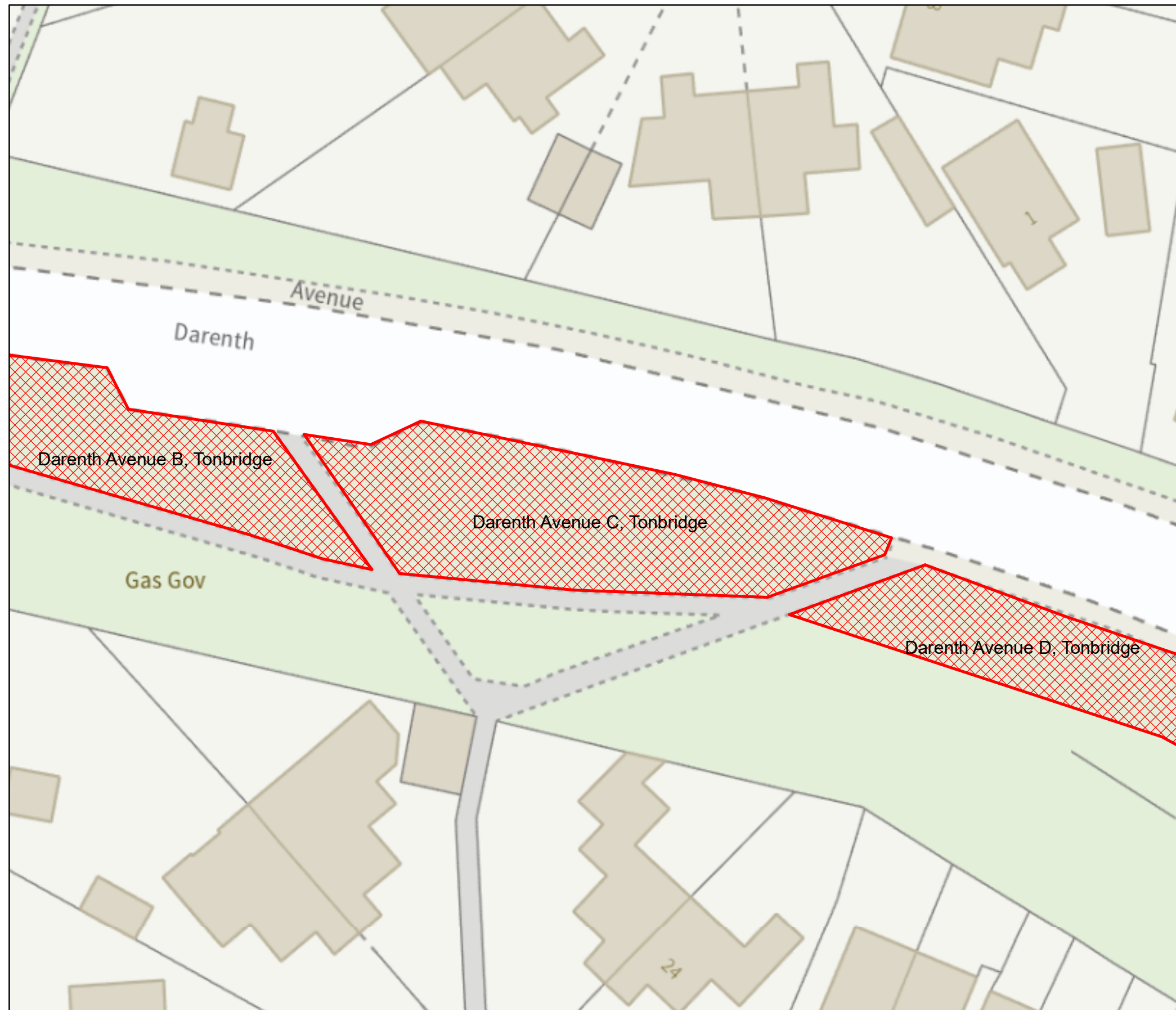
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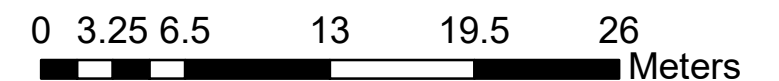
Darenth Avenue C, Tonbridge

-  Existing RNRs
-  New RNRs



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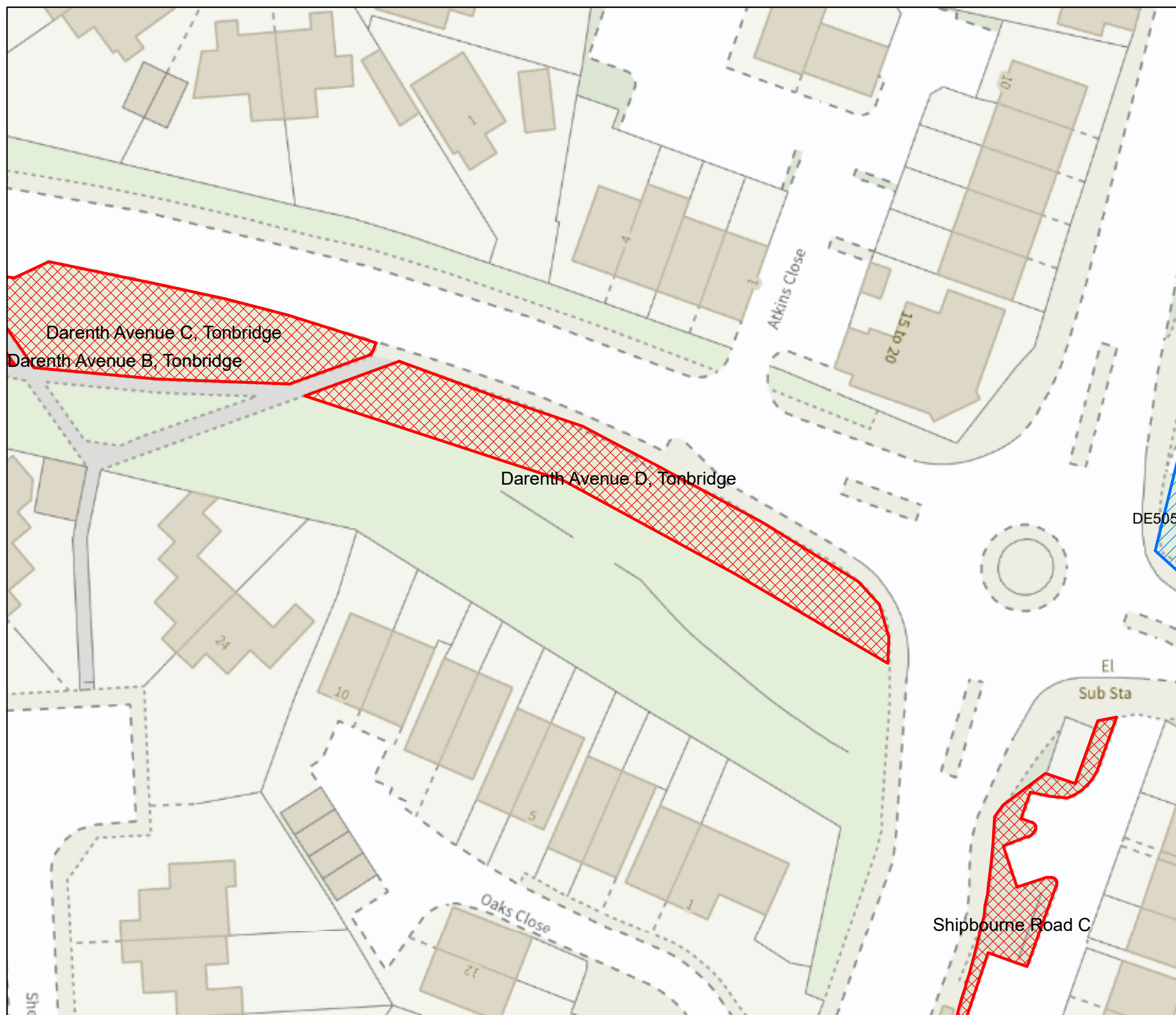
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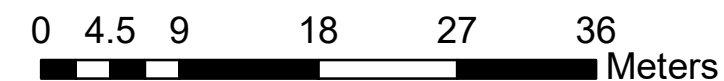
Darenth Avenue D, Tonbridge

-  Existing RNRs
-  New RNRs




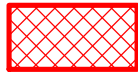
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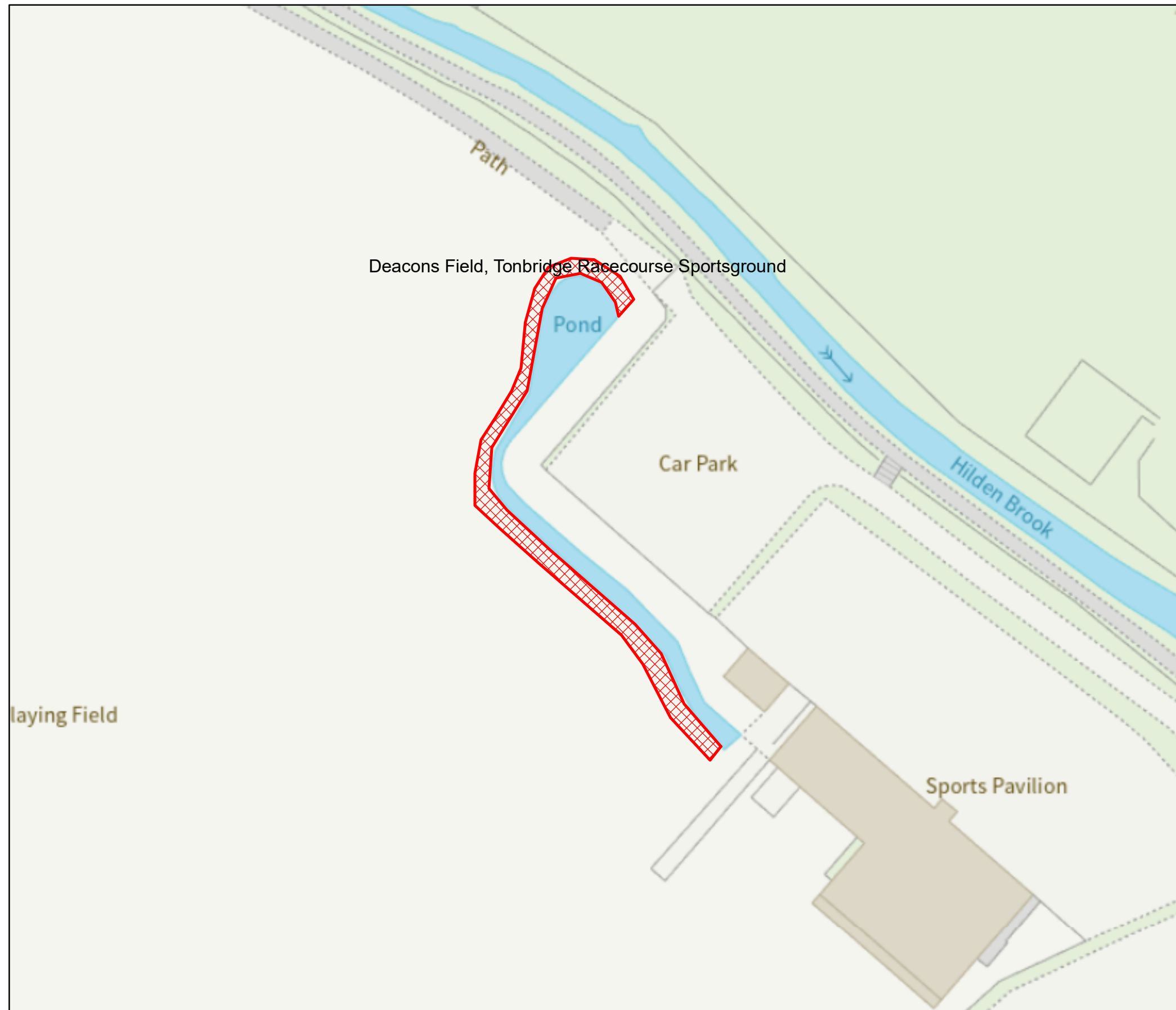
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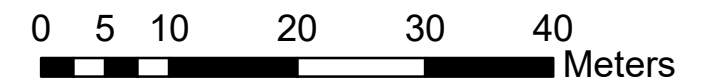
Deacons Field, Tonbridge Racecourse Sportsground

-  Existing RNRs
-  New RNRs



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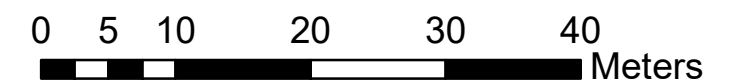
Dog Walking Area, Tonbridge Farm Sportsground

-  Existing RNRs
-  New RNRs



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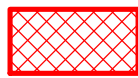
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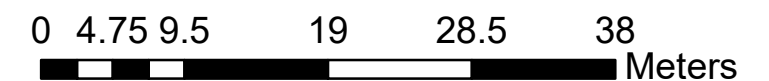
Frogbridge Sportsground

-  Existing RNRs
-  New RNRs



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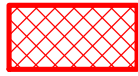
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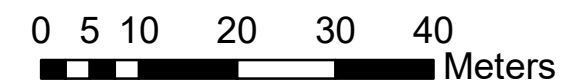
Frogbridge Sportsground

-  Existing RNRs
-  New RNRs



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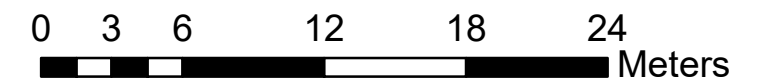
Knight Road, Tonbridge

-  Existing RNRs
-  New RNRs



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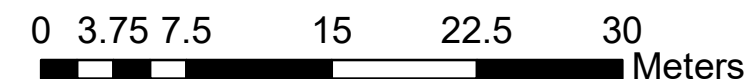
Lillieburn B, Leybourne

-  Existing RNRs
-  New RNRs





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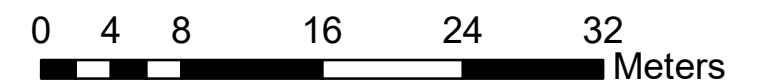
Lodge Oak Lane B

-  Existing RNRs
-  New RNRs



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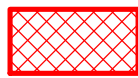
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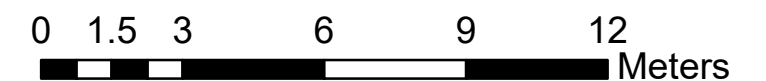
Main Area, Tonbridge Racecourse Sportsground

-  Existing RNRs
-  New RNRs



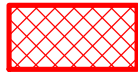
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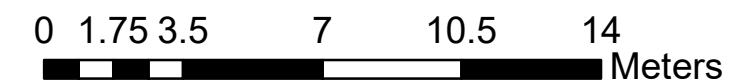
Main Area, Tonbridge Racecourse Sportsgr

-  Existing RNRs
-  New RNRs



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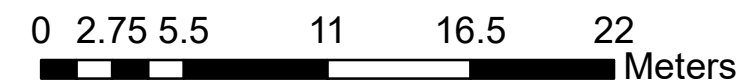
New Road, East Malling

-  Existing RNRs
-  New RNRs



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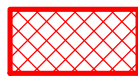
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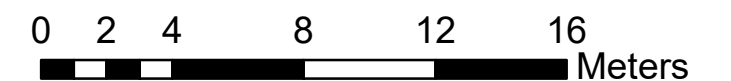
New Road, East Malling

-  Existing RNRs
-  New RNRs



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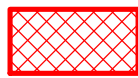
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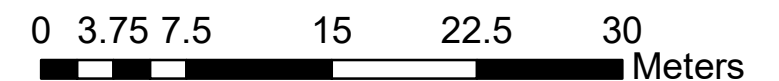
Quincewood Gardens/Cedar Crescent, Tonbridge

-  Existing RNRs
-  New RNRs




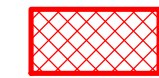
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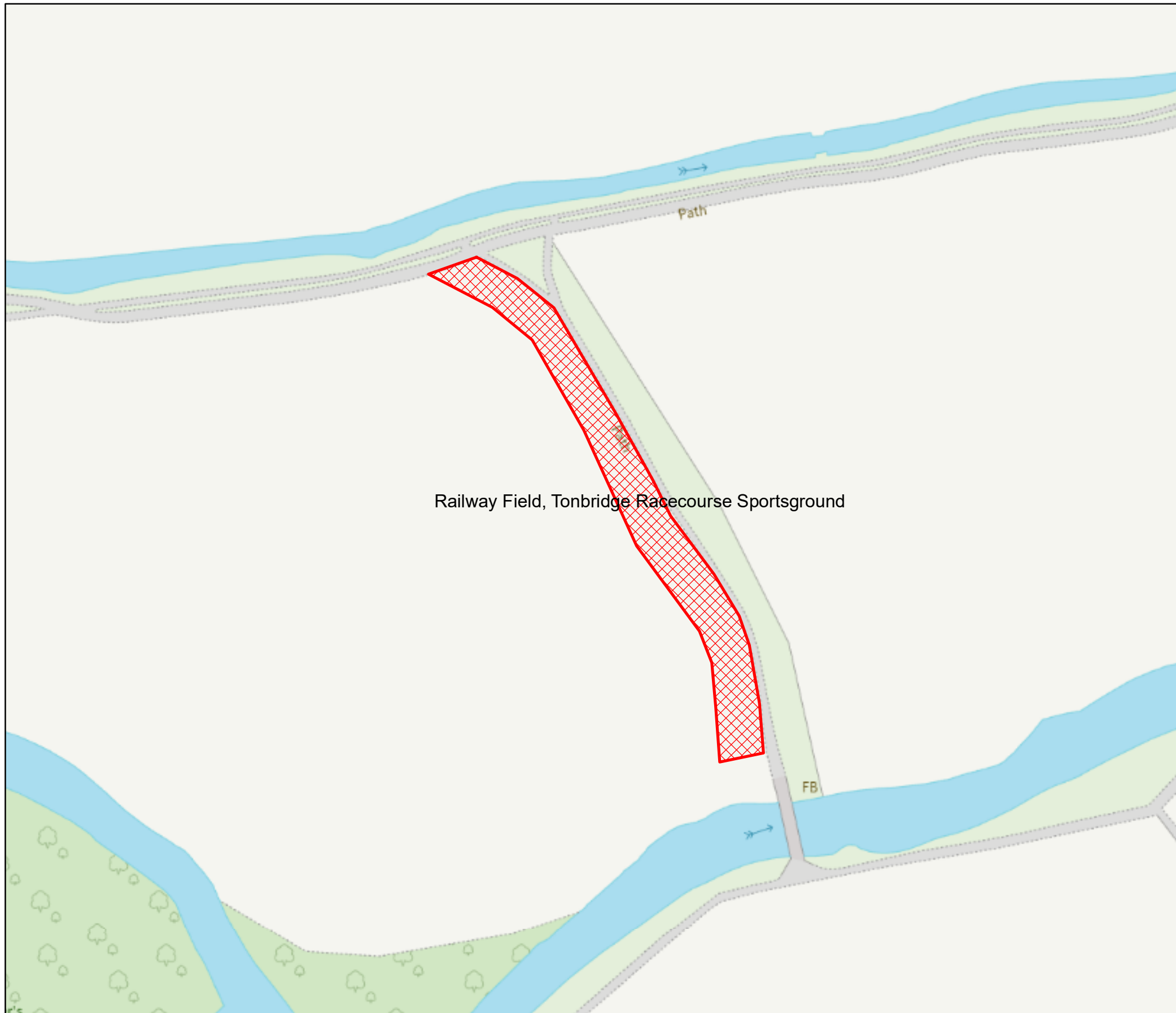
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Review of Roadside Nature Reserves Annex 3 Plans of proposed additional RNRs

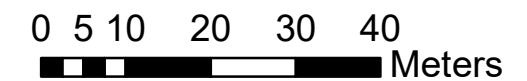
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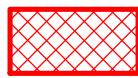
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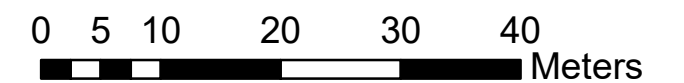
Rear of Willowmead Leybourne

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-  New RNRs



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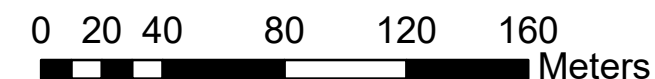
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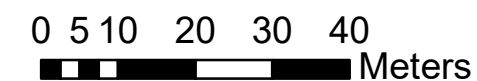
Scotchers Field, Tonbridge

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-  New RNRs




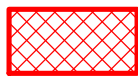
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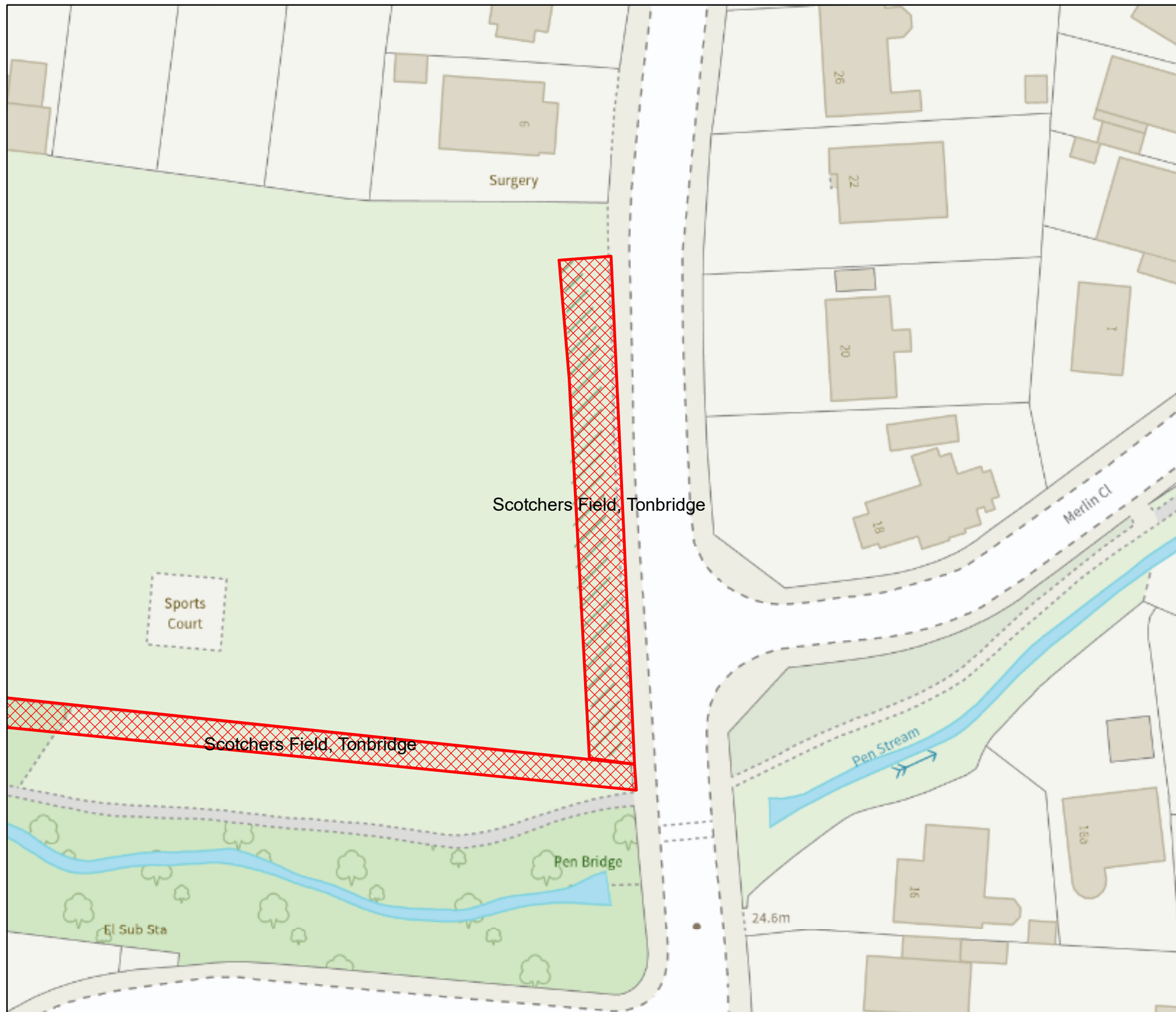
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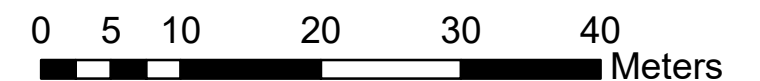
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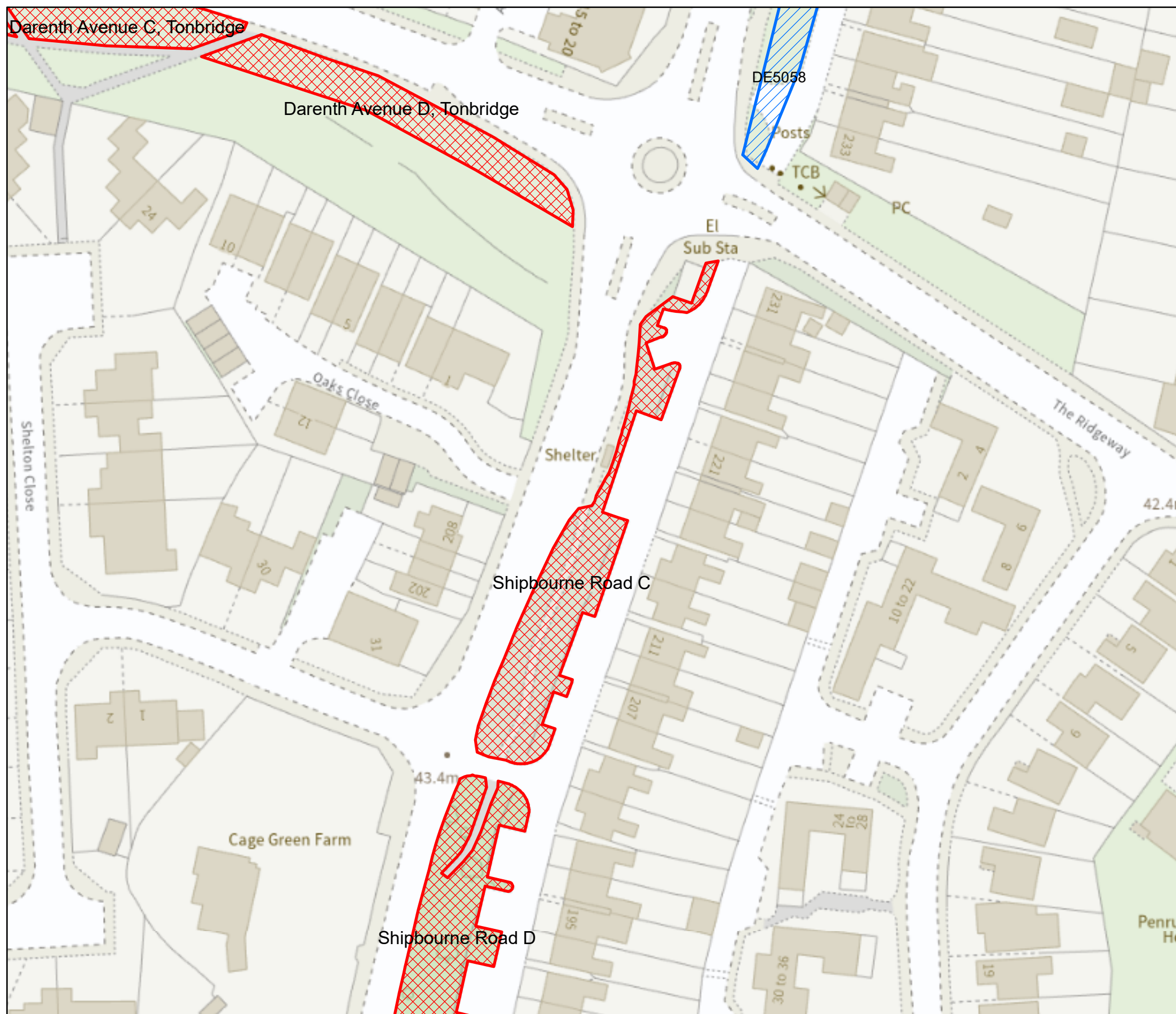
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**Review of Roadside Nature Reserves
Annex 3
Plans of proposed additional RNRs**

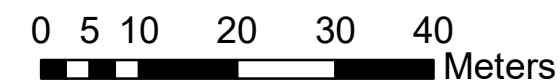
Shipbourne Road C

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-  New RNRs



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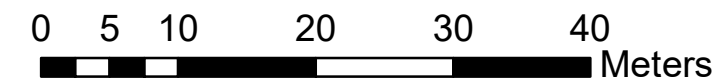
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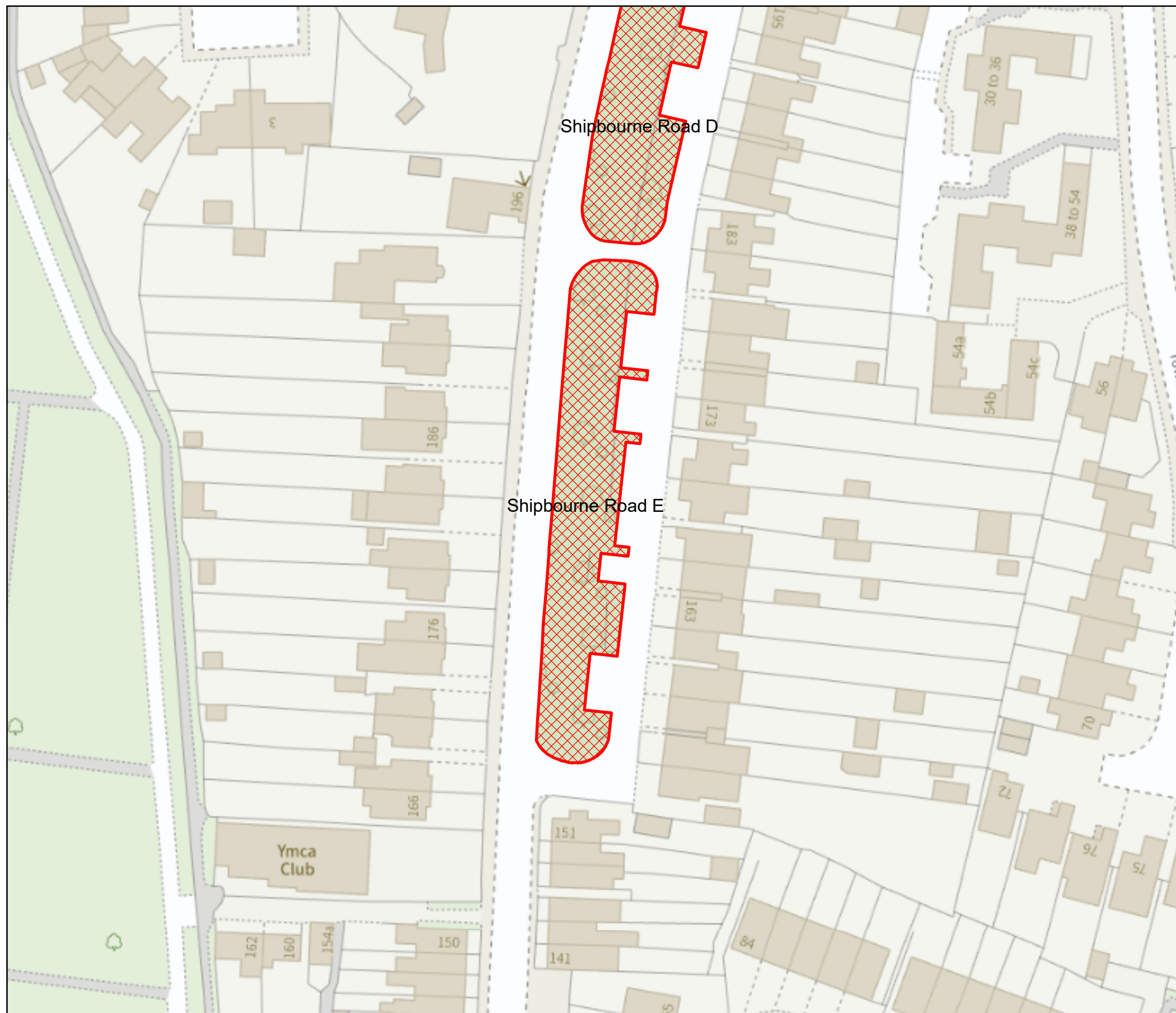
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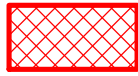
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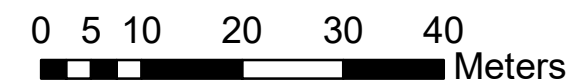
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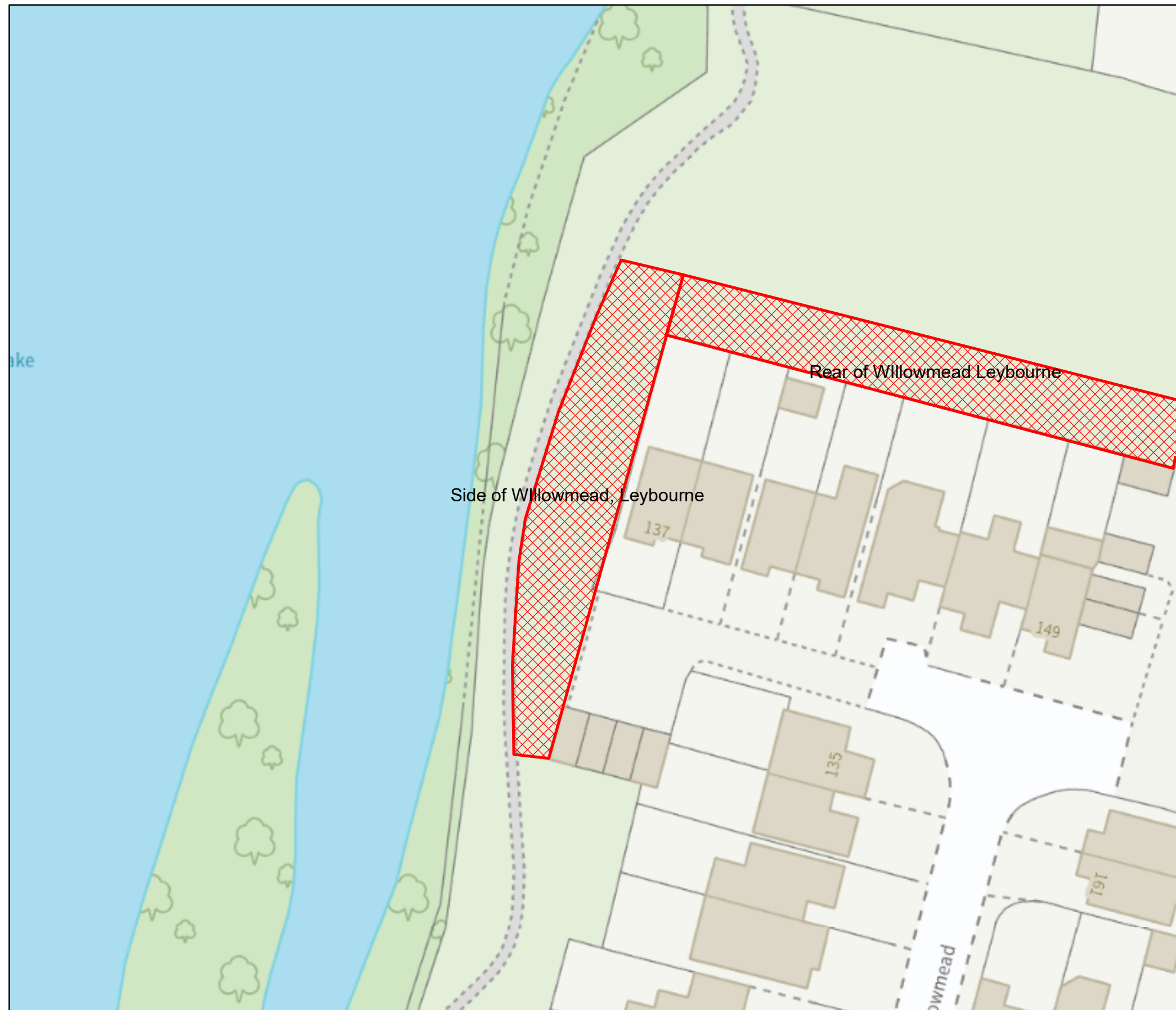
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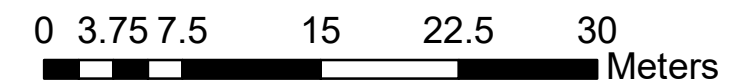
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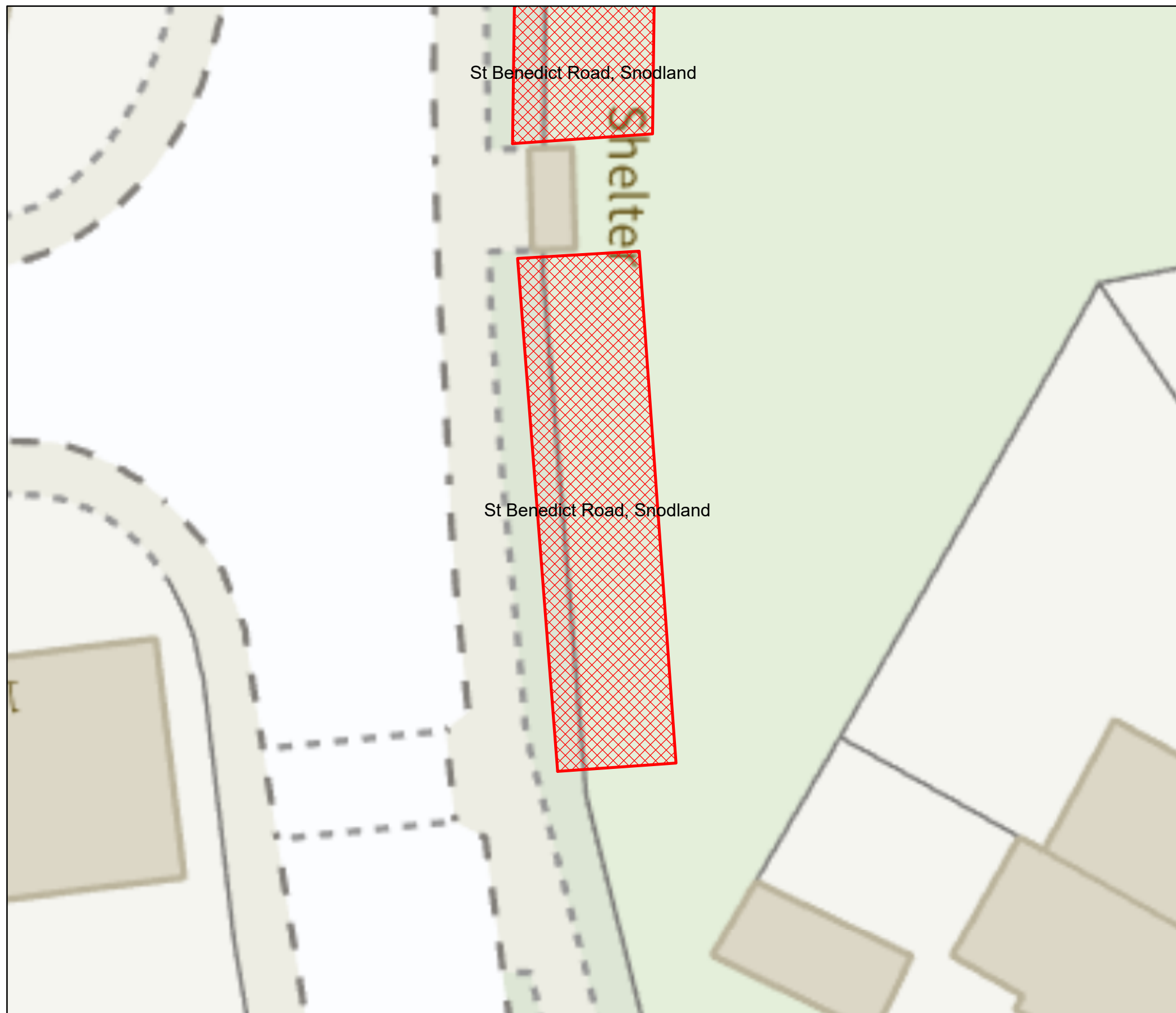
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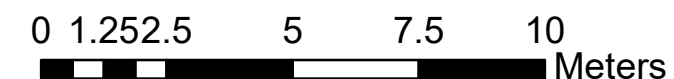
St Benedict Road, Snodland

-  Existing RNRs
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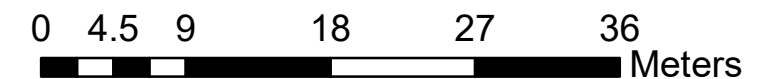
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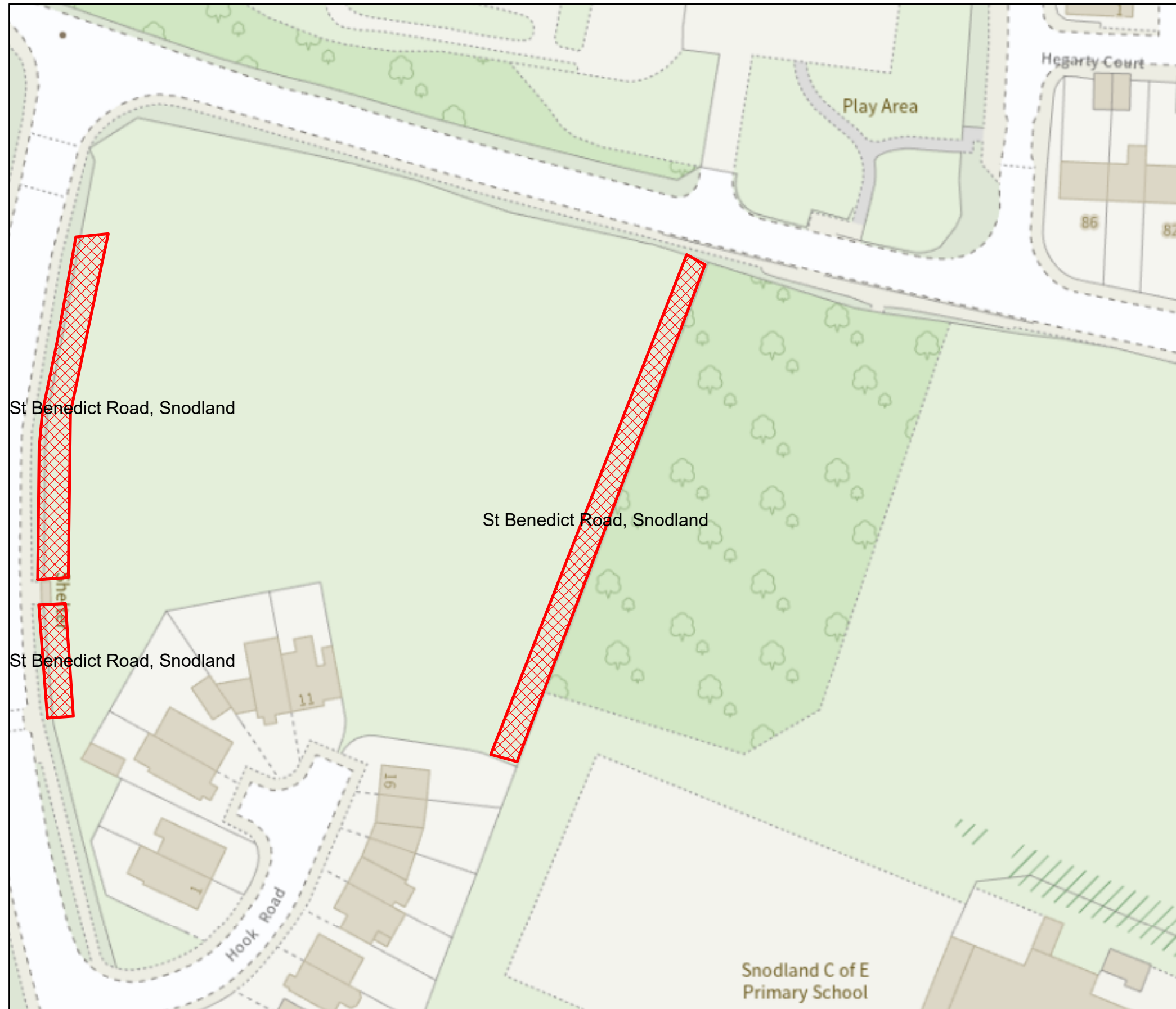
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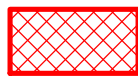
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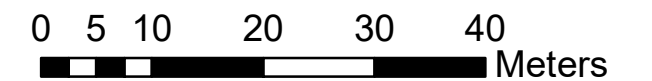
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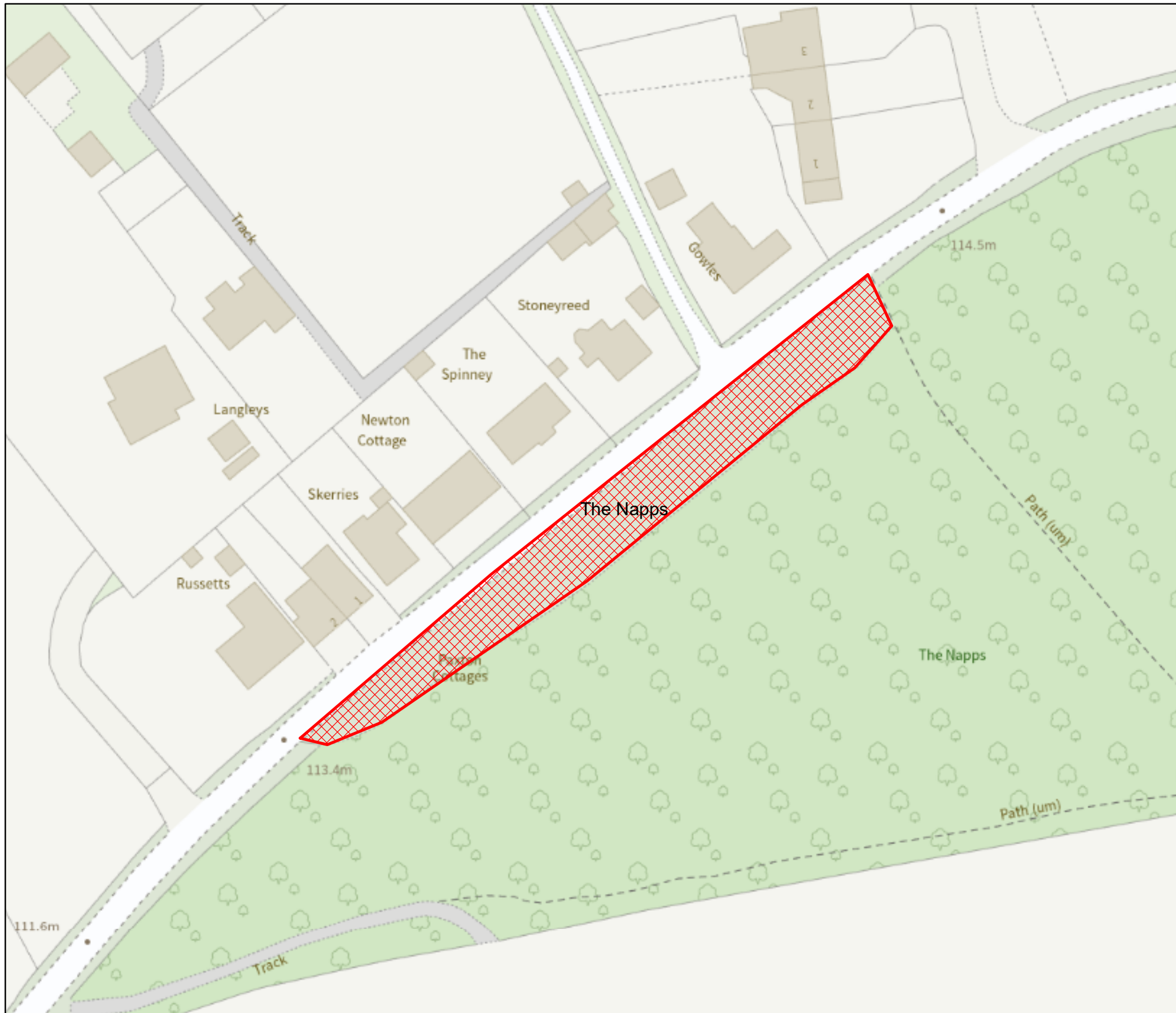
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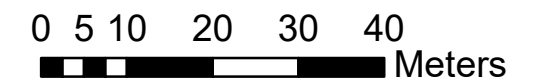
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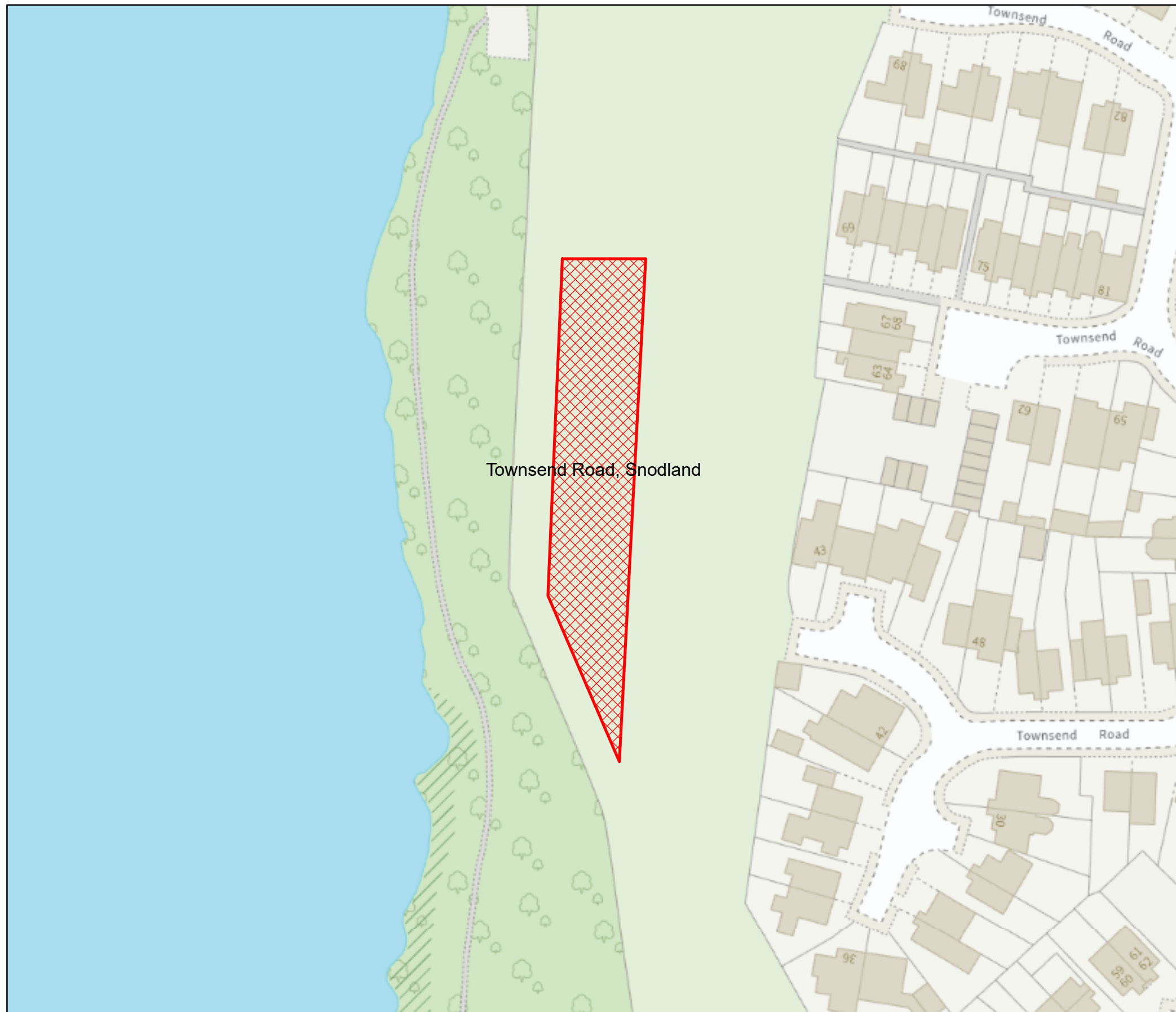
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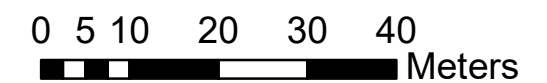
Townsend Road, Snodland

-  Existing RNRs
-  New RNRs





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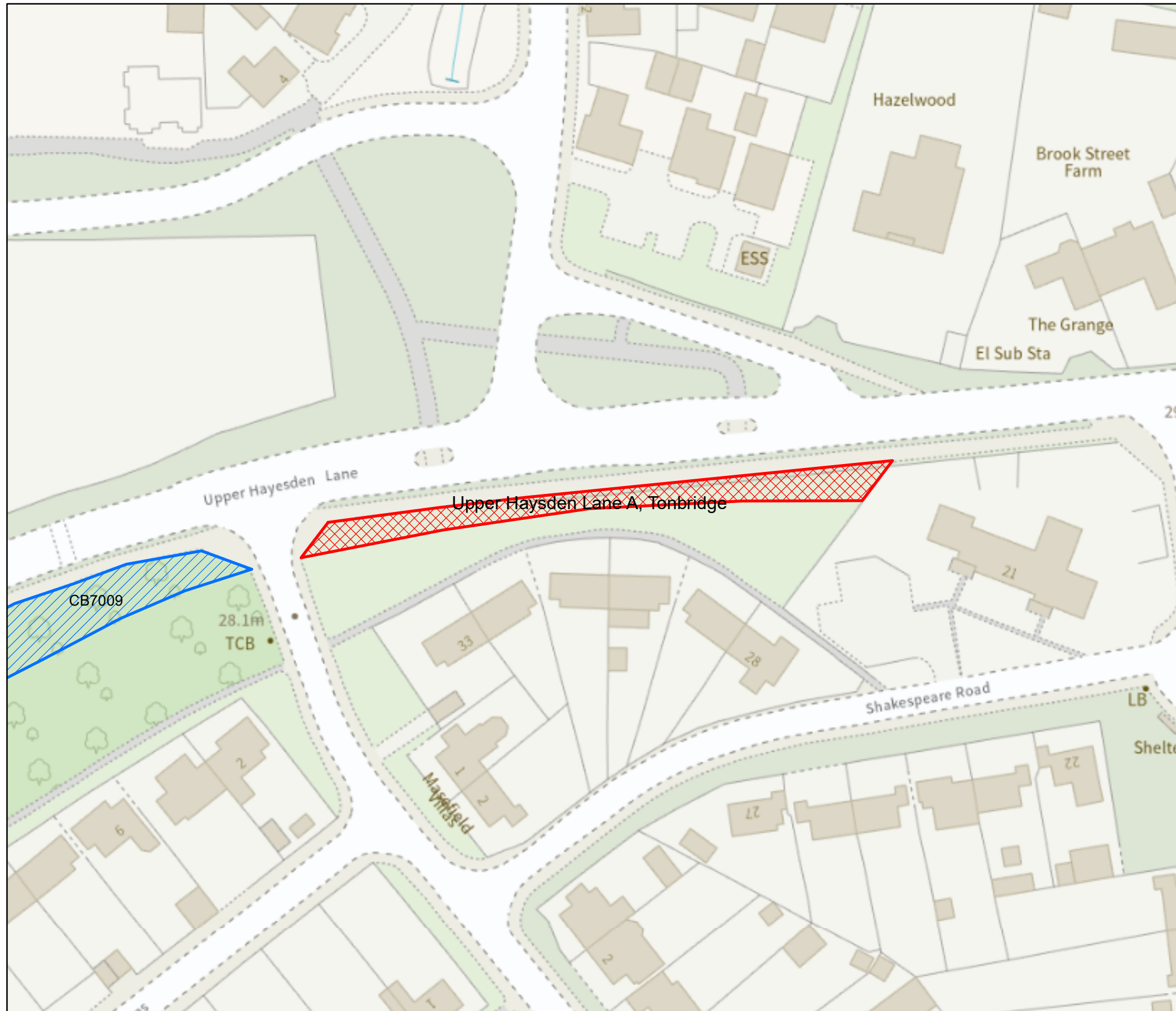
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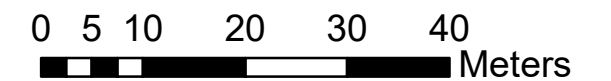
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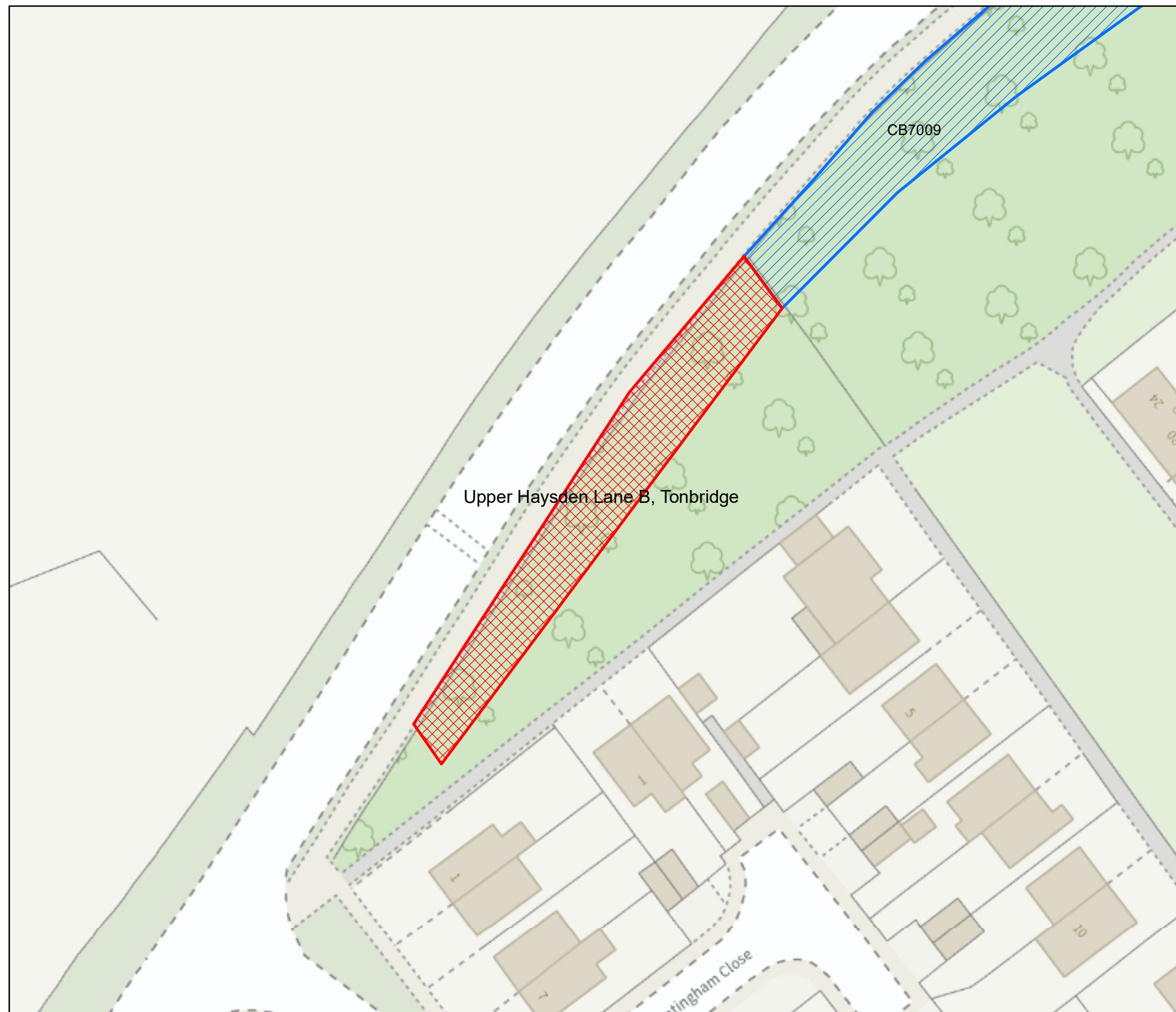
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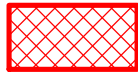
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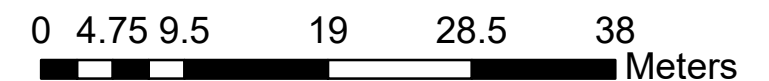
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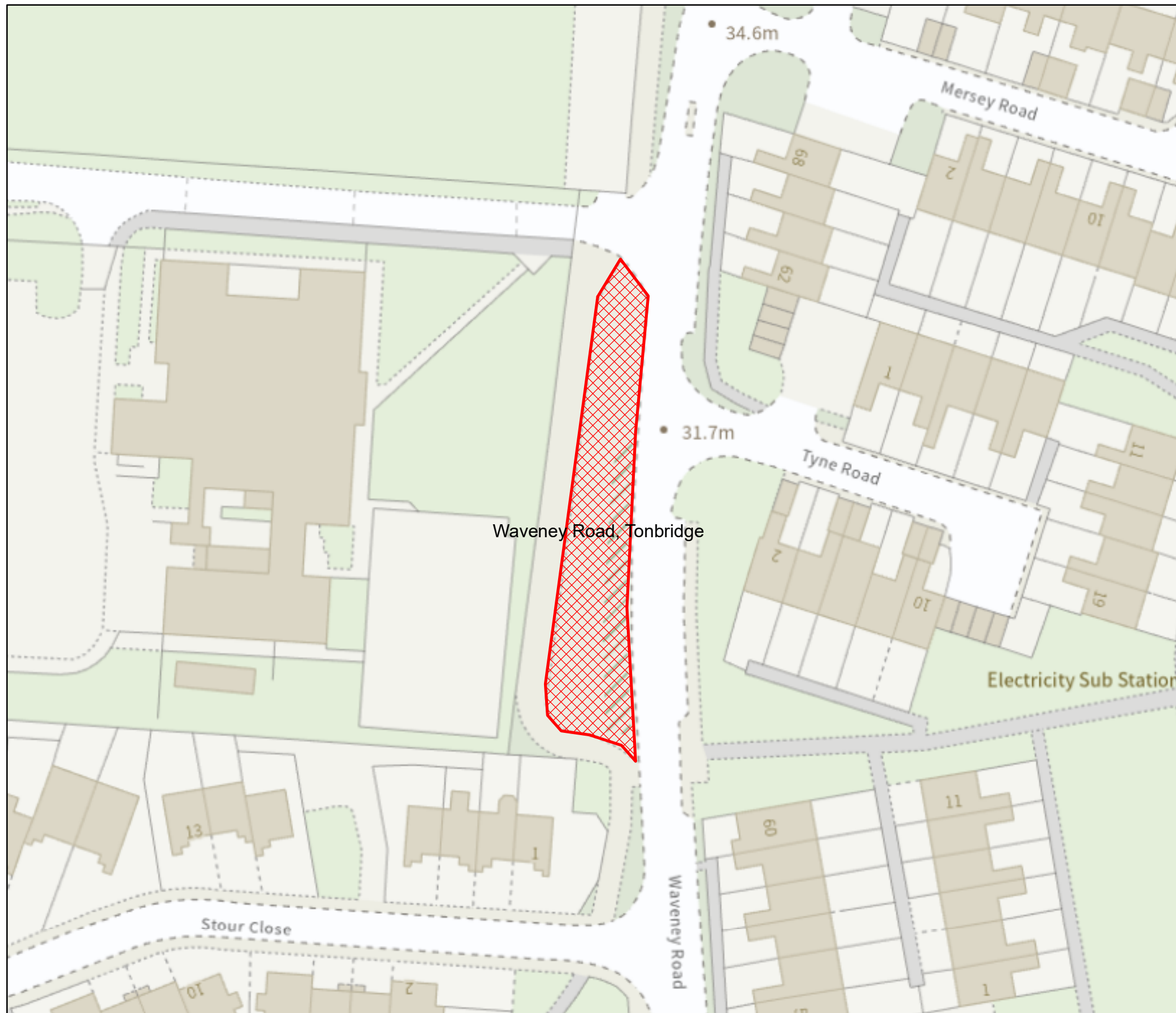
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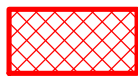
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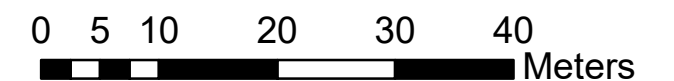
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-  Existing RNRs
-  New RNRs



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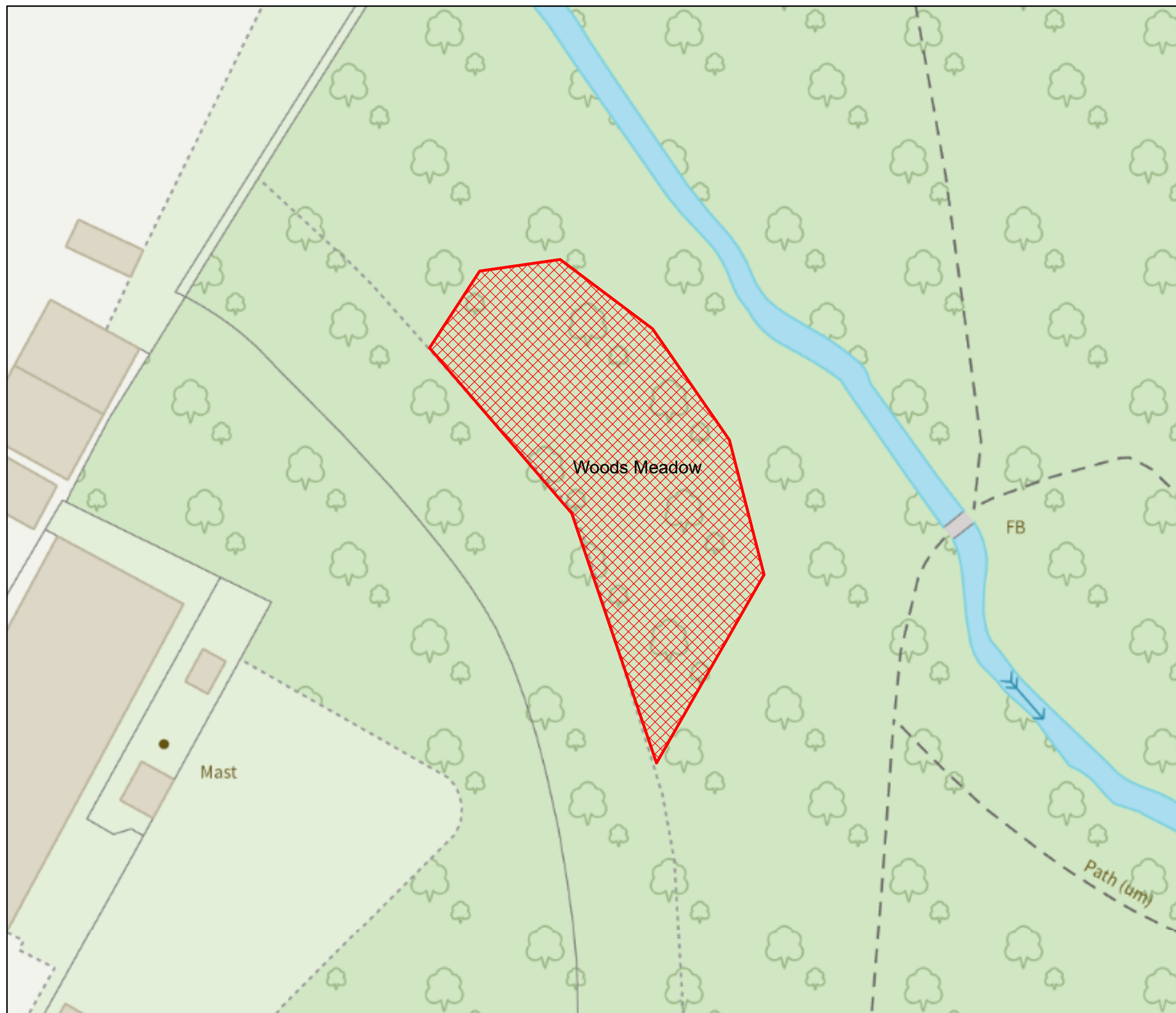
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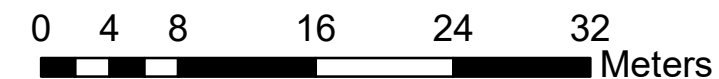
Woods Meadow

-  Existing RNRs
-  New RNRs



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HOMELESSNESS PREVENTION AND ROUGH SLEEPING STRATEGY 2026-2031

Item HP 26/9 referred from Housing and Planning Scrutiny Select Committee of 17 March 2026

The report of the Director of Planning, Housing and Regulatory Services sought approval of a draft Homelessness Prevention and Rough Sleeping Strategy 2026-2031 and Action Plan for consultation.

Particular reference was made to central Government's long-term vision for homelessness, as set out in the 'National Plan to end Homelessness', which formed the policy basis for the Borough Councils new Strategy and Action Plan (attached at Annexes 1 and 2 respectively).

There was detailed discussion in respect of the high demand for one-bedroom homes, the prevalence of out of borough placements and the Borough Council's efforts to increase local temporary accommodation. The challenges in funding and delivering suitable units, especially given grant rate limitations and operational risks was noted. It was also explained that whilst funding opportunities could be explored, priorities had focused on managing financial risks associated with temporary accommodation. Unfortunately, the Borough Council was not currently set up for large-scale operational management of additional units and any expansion would require careful consideration of ongoing costs.

Finally, it was explained that a proposed 'lived experience' advisory panel aimed to ensure that feedback from those with direct knowledge and experience of accessing homelessness services informed ongoing improvements.

In recognition that preventing homelessness and ending rough sleeping was a key priority area for the Borough Council, Cllr King proposed, Cllr Dalton seconded and it was

***RECOMMENDED:** That

- (1) the draft Homelessness Prevention and Rough Sleeping Strategy 2026-2031 (attached at Annex 1) be approved for consultation.

***Recommended to Cabinet**

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Housing and Planning Scrutiny Select Committee

17 March 2026

Part 1 - Public

Matters for Cabinet - Non-key Decision



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Cabinet Member	Cllr Robin Betts, Cabinet Member for Housing, Environment and Economy
Responsible Officer	Eleanor Hoyle, Director of Planning, Housing and Regulatory Services
Report Author	Claire Keeling, Housing Solutions Manager Linda Hibbs, Head of Housing and Regulatory Services

Homelessness Prevention and Rough Sleeping Strategy 2026-2031

1 Summary and Purpose of Report

- 1.1 This report seeks Cabinet approval of a draft Homelessness Prevention and Rough Sleeping Strategy and action plan for both Member and stakeholder consultation.

2 Corporate Strategy Priority Area

- 2.1 Improving housing options for local people whilst protecting our outdoor areas of importance.
- 2.2 Preventing homelessness and ending rough sleeping is a key priority area for the Council both in terms of having a positive impact on those who find themselves at risk and managing the cost to the Council.

3 Recommendations

- 3.1 Cabinet to **APPROVE** the draft Homelessness Prevention and Rough Sleeping Strategy 2026 – 2031 attached at Annex 1 for consultation.

4 Introduction and Background

- 4.1 Under the Homelessness Act 2002, all Local Authorities must have in place a homelessness strategy based on a full review of all forms of homelessness in the district, which should be reviewed and updated every 4 years. This was further extended in 2018 to include rough sleeping which must be considered as part of

the overall strategic objectives. To date the Council has had actions for the delivery of the Council's homelessness service incorporated within the adopted Housing Strategy, however the ambition is to now review and produce a standalone document. The review and the subsequent strategy produced will set out how the Council will continue to tackle an increasing demand for homelessness services and will aim to ensure that homelessness is prevented at the earliest opportunity, and where that is not possible to ensure there is a range of housing options available for those who have lost their homes.

5 Proposal

5.1 A draft Homelessness Prevention and Rough Sleeping Strategy has been developed and is attached at **Annex 1**.

5.2 The Government have recently set out its long-term vision for homelessness in the “National Plan to end Homelessness” including an action plan based on five pillars which are:

- Universal prevention
- Targeted prevention
- Preventing crisis
- Improving emergency responses
- Recovery and preventing repeat homelessness

5.3 This new Government plan and approach form the policy basis for Tonbridge & Malling BC's new strategy.

5.4 Within the strategy there are four priorities as below:

- Priority 1 - To prevent homelessness earlier and support those who are at risk of homelessness to remain in their homes.
- Priority 2 - To minimise the use of emergency and temporary accommodation, reduce the reliance on nightly paid out of area temporary accommodation and reduce the numbers requiring temporary accommodation.
- Priority 3 – To build on the excellent work already done to maintain the low levels of rough sleeping with the aim of achieving zero rough sleepers in the district.
- Priority 4 – To work with partners collaboratively to prevent homelessness.

- 5.5 For each priority, aims and objectives along with outcomes to measure performance are detailed.
- 5.6 An annual action plan will also be developed and monitored, and outcomes will be reported to Members via the Housing and Planning Scrutiny Select Committee. The proposed Year 1 action plan is attached at **Annex 2**.
- 5.7 An evidence base has also been collated and is attached at **Annex 3**. The evidence gathered through regular performance monitoring, mandatory reporting to Government etc has informed the priorities and actions and this will be kept under review through the life of the strategy to feed into the action plan as required.

6 Other Options

- 6.1 No other options have been considered as it is a legal requirement to carry out a review of homelessness in the district and to have in place a Homelessness and Rough Sleeping Strategy. To take a “do nothing” approach would place the Council at risk of challenge and a breach of statutory requirements for not developing this document.

7 Financial and Value for Money Considerations

- 7.1 In a climate where the cost of homelessness services is rising, failure to effectively review, forecast demand and plan homelessness services or meet statutory requirements through the production of a strategy may lead to reputational damage, late approaches to the service which limits the opportunities to prevent the loss of homes, and potential rises in the numbers in temporary accommodation.
- 7.2 The actions contain cost implications but the majority of these would likely be met by using existing resources and grants.

8 Risk Assessment

- 8.1 Not having a Homelessness and Rough Sleeping strategy places the Council at risk of legal challenge as a strategy is a statutory requirement.

9 Legal Implications

- 9.1 The Homelessness Act 2002 requires local authorities to review homelessness in their district and formulate and publish a strategy based on the results. Whilst the Council considered previously that it had met this requirement through having a specific homelessness section and action plan within our main Housing Strategy, having reviewed the legislative requirements it is considered that this approach may not meet them and hence therefore a standalone strategy is now being put in place.

10 Consultation and Communications

- 10.1 A range of key partners and stakeholders will be consulted once the draft Homelessness and Rough Sleeping Strategy is agreed by Cabinet.
- 10.2 A focussed on-line discussion session with all Members will also be planned for April/May 2026 to allow Member input ahead of the final draft strategy being presented to Cabinet in summer 2026.
- 10.3 Key areas for consultation will be the priorities and objectives as well as how stakeholders/partners can add value to our work.

11 Implementation

- 11.1 Once the draft strategy is approved a period of consultation will take place in April/May 2026. A final draft of the strategy will be presented to Cabinet in summer 2026. The strategy will then be implemented.

12 Cross Cutting Issues

12.1 Climate Change and Biodiversity

12.1.1 None

12.2 Equalities and Diversity

- 12.2.1 Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The decisions recommended through this paper directly impact on end users. The impact has not yet been analysed, but a full impact assessment will be completed and will be concluded after consultation has taken place and will be presented alongside the final draft Strategy.

12.3 Other If Relevant

- Healthy Lifestyles

- 12.3.1 Not having a home can impact in all areas of a person's life. It can affect mental and physical health and wellbeing, children's development, and places households under immense pressure. This strategy will assist in improving health and wellbeing for those in housing need.

Background Papers	None
Annexes	Annex 1 – draft Homelessness Prevention and Rough Sleeping Strategy Annex 2 – Year 1 action plan Annex 3 – Evidence base

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Tonbridge and Malling Borough Council

Housing Solutions Service

Homelessness Prevention and Rough Sleeping Strategy 2026 – 2031

Draft document for consultation

Version	Changes	Section	Date	Author	Status
1	New Draft			C. Keeling	

Contents – to be completed

DRAFT

Foreword by Cabinet Member for Housing, Environment and Economy

To be completed

DRAFT

Tonbridge & Malling – Homelessness & Rough Sleeping Strategy (2026–2031)

Tonbridge and Malling Borough Council
Homelessness Prevention and Rough Sleeping Strategy 2026 – 2031

1. Introduction

Homelessness and Rough Sleeping have a detrimental effect on individuals, families and communities, and are key challenges facing all communities across the country. They are issues caused by a range of factors, both structural, such as housing affordability and insecurity in the private rented sector as well as individual, such as drug and alcohol abuse, poor physical and mental health, crime and anti-social behaviour, poor educational attainment, debt, unemployment and the breakdown of support networks. Tackling homelessness can be costly when compared to the costs associated with proactively seeking to prevent homelessness in the first place, and many households approach the Council at the point of crisis, and so the ambition is to intervene earlier, and ensure those who come to Tonbridge and Malling Council for support with their housing situation get the right support at the right time.

The strategy sets out how Tonbridge and Malling Borough Council will proactively work to achieve this and prevent homelessness for the next 5 years. It is a summary of the key priorities, and is supported by a suite of documents, namely a robust evidence base, which sets out in detail the main causes of homelessness and is informed by the national, regional and local context within which the homelessness service is delivered and is underpinned by a wide range of statistics drawn from several sources. This context underpinned by statistical information has assisted in identifying the strategic priorities, and these have then been instrumental in the development of the supporting action plan which demonstrates how the Council will deliver services to meet these priorities.

2. Vision

The Council's Housing Strategy contains the vision.

"For Tonbridge and Malling residents to have access to good quality and affordable homes that meet their needs, whether renting or buying"

The Council's Corporate Strategy 2023 to 2027 has a key priority of "Improving housing options for local people whilst protecting our outdoor areas of importance". Within that priority the Council aims to "use every power we can to support those who are most in need of housing support and at risk of becoming homeless."

3. Strategic Context

The strategic context within which this strategy sits at national, regional and local levels can be found in the Evidence base which supports this document. This can be found here

Insert hyperlink when completed and agreed

The new "National Plan to end Homelessness" was published in December 2025 and forms the policy basis for this strategy.

It sets out the Governments long term vision to make homelessness rare, brief and non-recurring with the key aim framed around shifting the focus of homelessness from managing crisis to preventing homelessness and to step in and resolve it quickly where homelessness does occur. To achieve its commitments, it has developed an action plan based on **5 pillars**.

- **Universal prevention** – this is aimed at tackling the root causes of homelessness and make homelessness rare, by reducing the risk across the whole population. The indicated priorities are around housing affordability and poverty and there is clear

integration here with plans for house building and increasing the supply of affordable housing and poverty which are set out in the national wider Housing Strategy.

- **Targeted prevention** – this provides support for those who are more risk of becoming homeless and ensures that tackling homelessness is shared responsibility with all public services collaborating to prevent homelessness. This contains the creation of joint cross government targets to reduce those leaving institutions such as hospitals and prisons homeless and will introduce the duty to collaborate.
- **Preventing crisis** – this is to help people remain in their homes by giving councils the flexibility to deliver services to meet the needs of the local community and focus on prevention. Local Authority Homelessness Services are the focus of this pillar, with clear direction given to Councils to prioritise people to seek help as early as possible and increase the proportion of households being assisted to remain their current home.
- **Improving emergency responses** – the focus on improving TA and making the experience better if people do become homeless.
- **Recovery and preventing repeat homelessness** – At the heart of this pillar is a new target to halve rough sleeping within the lifetime of this parliament.

Also set out in the document are the underpinning and cross cutting foundations that sit across the strategy and includes how there will be national and local accountability, a new national workforce programme, and the enabling factors as to how the Government will hold itself to account, as well as the introduction of the Local Government Outcomes Framework.

Following the publication of this document in December 2025, Councils in England are expected to develop and publish local action plans to align with the national goals. Given the high profile of this new document and the £3.5bn of funding announced to support this work nationally, this strategy along with the associated documents will demonstrate how Tonbridge and Malling Borough Council will deliver against this locally.

4. What the evidence tells us

The evidence contained within the evidence base shows that the Council is performing well, prevention levels are in line with national averages, numbers are reducing in TA, and households are moving on from TA. However, this strategy sets out how the Council will continue to improve and develop with the aim of delivering excellent services for those who need them.

It shows that housing in the district can be unaffordable for some households and that there is a high demand for social housing, particularly when compared to supply.

Homelessness is at lower-than-average rates given the profile of the borough, but demand on the service is increasing.

Prevention activity is positive and improving, however this can still be improved to continue to reduce those households that access the service at the point of crisis.

The Council needs to address the issue of out of area placements as there are high rates of households placed out of area, disrupting education, support and employment. National guidance requires Councils to minimise this whenever possible.

The borough has low levels of rough sleeping and effective working partnerships are key to keeping these numbers low. The Council and its partners need to ensure those who do sleep rough get the support needed to get away from the streets and stay off the streets.

5. Building on the successes

The introduction of a Triage model has allowed the Council to promptly consider approaches from households and the action required and where required provide more timely advice and assistance to all approaches with the aim of recognising opportunities to prevent at an earlier stage and ensuring they are allocated to a Prevention Officer.

The focus within the service has shifted significantly towards prevention with the development of a specialist prevention service, who do a substantial amount of work by negotiating with families, landlords and providers, assisting with applications for discretionary housing payments, which has resulted in 167 households having their homelessness successfully prevented in 2024 – 2025 and providing advice on accessing the private rented sector. Since the introduction of this in 2021 the service has consistently accepted more prevention duties (before becoming homeless) than relief which is the stage where homelessness has occurred.

It should be noted that this considerable change in the service to focus on prevention followed external consultancy review of which Members supported and drove forwards the recommendations in full including new financial investment into the team.

The recent provision of 19 units of owned and managed TA in the borough, alongside the 15 units already owned and managed by the Council in the district and the further 7 procured in Maidstone (specialist support), has allowed the Council to reduce the number of out of area placements bringing them back to support networks, more local to education and employment as well as reducing the costs for the Council due to the subsidy available for long term owned and managed TA units.

Numbers of rough sleepers have remained consistently low in the district, and Porchlight is the Council's commissioned partner, working with us to prevent rough sleeping and ensuring that anyone is identified on the streets has stays that are brief and non-recurring.

As part of this service provision, the Council has worked with Porchlight and Clarion Housing to open dedicated supported provision to provide off the street accommodation for those who would otherwise not have a priority need for housing and who may remain on the streets.

The following case study highlights one of the successes of having his type of accommodation.

Person X is a 48-year-old man who became homeless following the death of his parents. After his mother's death a year ago, X's relationship with his brother broke down, leaving him without accommodation. He has been sleeping rough for several months in the Tonbridge and Malling area, accompanied by his dog. Having a pet has provided X with emotional support but has also made it harder to find accommodation.

X has a history of mental health difficulties and substance misuse. He attempted to take his own life three months prior to engagement with services, at a time when he described feeling at his lowest due to grief, addiction, and housing loss. With encouragement from a friend, X began attending a 12-step recovery group linked to a local church, which has since become his main source of support. He now attends church three times a week, values the sense of belonging there, and has built positive connections with his sponsor and peers.

At his first assessment in July 2025, he expressed a desire to move into safe housing to help stabilise his wellbeing, reduce the risks associated with rough sleeping, and rebuild his relationship with his teenage son, who lives locally with his mother.

Physically, X reports general aches and back pain caused by rough sleeping, but no diagnosed condition. His mental health remains fragile, and ongoing monitoring is advised due to the previous suicide attempt and history of depression. X is registered with a GP and has previously been prescribed antidepressants.

Economically, X is unemployed and receives Universal Credit. He is a qualified printer and has experience in several other roles. He hopes to return to work or volunteer in the future, potentially with Porchlight, once his situation stabilises.

X has supportive links through his church community and a good relationship with his sister, though contact with other family members is limited. He did not feel safe sleeping rough, particularly as the weather worsened, and worried about theft or harassment. Despite this, he showed resilience by seeking quieter, safer places to camp and staying connected with positive influences.

X has recently moved into supported accommodation with his dog, which is a big step forward in his recovery. He has now been substance free for three months and continues to attend his 12 step meetings and church regularly. The main focus is on helping X stay stable, keep up his mental health and recovery support, and start planning for longer term housing. His move into supported accommodation will help with this by giving him a safe base where he can focus on his wellbeing and future plans.

The Council has also worked with the Kent Housing Group on a revised joint protocol for 16 / 17-year-olds, and a care leavers protocol, which ensure a consistent approach to supporting these groups of potentially vulnerable residents.

Delivery partnerships are a strength; however, the Council needs to continue to build on these and ensure they are maintained and developed and drive service improvement along with feedback from those with lived experience.

Domestic Abuse Housing Alliance (DAHA) Accreditation

Tonbridge and Malling Borough Council
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Domestic Abuse (DA) is consistently one of the top 3 reasons for the loss of a home in the district. The Council's response when someone approaches could give someone the opportunity to live a life free of abuse. To ensure that the Council is delivering the best possible service DAHA accreditation is being worked towards.

This is a priority for the Council and will result in delivering a whole housing approach to those who approach due to DA.

12 DA Champions recruited across the council, who are responsible for providing and signposting to DA resources, information, learning and good practice

Work with specialist partners such as DAVVs and Look Ahead

A specialist Housing IDVA is employed who works with high-risk cases who approach the service for assistance with rehousing due to DA

Staff training including DASH risk assessments, intersectionality issues and mini bitesize sessions to focus on Female Genital Mutilation and Honour Based Violence, Domestic Abuse and multiple disadvantages, Domestic Abuse and No Recourse to Public Funds

The Council is signed up to a DA Reciprocal protocol, which supports moves for those who are at high risk of DA

The Council also has access to the Kent wide Safer scheme, which allows survivors to remain in their own homes via providing safety measures

6. What are the challenges?

High rents and house prices – the generally high prices in the borough means that accessing the private rented sector is more challenging for lower income households. The Renters Rights Act 2025 could also impact on the number of private rented properties available with changes to tenancies and tenancy law.

The ongoing current economic situation, higher mortgage rates, increasing rents and the freezing of Local Housing Allowance rates are all factors that influence housing options.

The Council has a low rate of ending duties into the private rented sector and this is an area that requires further development to provide more housing options.

The Council has a high number of out of area TA placements compared to other districts in Kent and it is an area that the Homelessness Advice and Support Team advisor has raised as an area to focus on improvement in. Where households are placed out of borough this can have a negative and disruptive impact, for example challenges in accessing usual support, employment, schools etc.

Tonbridge & Malling has low numbers of rough sleepers, but work needs to continue to prevent anyone from accessing street sleeping.

7. What are the priorities?

Given the successes and the areas identified for further work, and within the national framework set out, the priorities focus on the move away from crisis management towards strong advice and targeted prevention, alongside improving TA from a management and resident perspective and further developing partnerships and collaboration with key partners that the Council works with. These priorities align with the 5 pillars set out in the national strategy but deliver locally for those who live in Tonbridge and Malling.

Priority 1 – To prevent homelessness earlier and support those who are at risk of homelessness to remain in their homes

Our aim - Why do we want to do this?

Early prevention means identifying those who may be at risk of loss of home early to stop the homelessness and preventing the loss of that home and this can have a significant and positive impact on households. The Council wants to stop homelessness before it happens.

Our objectives - How will we do this?

- Strengthen early intervention and advice services. Provide accurate and up to date advice and assistance on housing and homelessness ensuring this is accessible to all.
- Work more closely with duty to refer to partner agencies, such as probation, the NHS and prisons, to ensure the service is receiving early notifications of households that may become homeless to maximise the time to work with them and establish closer working relationships with agencies to improve referral processes.
- Review the prevention tools in use and ensure the initiatives employed are fit for purpose to ensure that these support the early identification and the work of the officers to maximise opportunities to prevent the loss of the home.

Our outcomes - How will we measure this?

- Number of total approaches to the service
- Number of Prevention cases accepted
- % of duties owed where homelessness was prevented
- Where prevention was successful numbers where duty was ended by keeping applicant in own home, or alternative and how many became homeless
- Number of duty to refer referrals

Priority 2 – To minimise the use of emergency and temporary accommodation, reduce the reliance on nightly paid out of area TA and reduce numbers requiring TA

Our aim - Why do we want to do this?

The Council recognises that there will always be households who need TA and where this is the case it will ensure that good quality, affordable TA is provided. However, the provision of TA is costly and so exploring options for TA, reducing the use of nightly paid accommodation and reducing the overall number of households and the per unit cost of that accommodation will have a significant impact on Council budgets. It will also have an impact on outcomes for those who do require TA, as they will be closer to their employment, education, support networks, and will contribute to a household's overall health and wellbeing.

Our objectives - How will we do this?

- The approach to prevention will be reviewed with the aim of preventing households from requiring TA (Priority 1)

- Continue to seek alternative ways to provide TA in borough both through provision of the Council's own accommodation and exploring the use of registered provider and private rented accommodation.
- Continue to improve the quality of the Council's own TA and work with partners across Kent to drive up standards in the nightly paid sector
- Work with staff and key stakeholders to review the offer made to landlords to work with the Council to allow good quality suitable private sector accommodation to be secured with a personalised package of support once moved on to reduce stays in TA.

Our outcomes - How will we measure this?

- Total number of households in TA (this is monitored regularly and reported on at month end)
- Number of units the Council owns or leases
- Average length of stay in TA
- Number of households in TA with children
- Number of households placed out of area

Priority 3 – To build on the excellent work already done to maintain the low levels of rough sleeping with the aim of achieving zero rough sleepers in the district

Our aim - Why do we want to do this?

Tonbridge and Malling Council has an excellent track record of having low numbers of rough sleepers and the aim is to sustain this and keep numbers low, with the aim being to fully eradicate any forms of rough sleeping in the district.

Our objective - How will we do this?

- Work with rough sleeping partners to ensure that anyone who enters the street, or is found rough sleeping gets rapid intervention and wrap around support including a pathway for those who may not have a "priority"
- Provide safe and appropriate accommodation
- Develop effective move on pathways from TA into longer term settled accommodation

Our outcomes - How will we measure this?

- Number of people rough sleeping on a single night
- Faster access to accommodation from when the service becomes aware of someone rough sleeping
- Reduced repeat rough sleeping

Priority 4 – To work with partners collaboratively to prevent homelessness

Our aim - Why do we want to do this?

This is an ambitious strategy and is intended to deliver a proactive prevention homelessness service, but this cannot be done alone.

The Council must work with partners, as many factors that cause homelessness are beyond its direct control and so to deliver homelessness services there needs to be collaboration with partners, at a national, regional and local level and this will become more relevant as Local Government Reform progresses.

Our objective - How will we do this?

- Work with RPs to make better use of stock in the district and promote improved access to affordable housing
- Bring together key partners such as Porchlight, registered providers and key voluntary and statutory agencies via the development of a formal partnership board to bring additional resources and expertise to deliver the aims of the strategy
- Continue to gather performance monitoring data to use as evidence to underpin service development and improvement and ensure needs of those in the district are met
- Establish a lived experience advisory panel to further enhance the performance monitoring to further drive forward any service improvements and delivery
- Develop mechanisms for gaining insight through a variety of feedback routes ensuring these are used to drive service improvement
- Maximise opportunities to work with partners such as drug and alcohol services.

Our outcomes - How will we measure this?

- Quarterly performance reports to Management Team
- Quarterly performance reports to partnership board
- Identification of service improvements because of feedback in quarterly reports

8. Monitoring, Governance & Reporting

The Council is the owner of this strategy and is ultimately responsible for delivering against the action plan and monitoring its effectiveness. However, it must be recognised that the Council is not able to deliver this without the support of key stakeholders and partners.

Given this the action plan that supports the strategy will be regularly monitored and updated to ensure that progress made, and the key actions are being delivered. This will be monitored by the Council's Management Team, via quarterly reports in addition to monthly performance monitoring.

The strategy will be kept under review and amended if there are any changes to legislation, or practice which may impact on the strategy and any resulting actions contained within the action plan, but where this happens it will be in consultation with stakeholders.

The strategy action plan will be refreshed each year for the life of the strategy and discussed with stakeholders and presented to elected Members for feedback and endorsement.

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Tonbridge and Malling Borough Council
Housing Solutions Service
Homelessness and Rough Sleeping Strategy 2026 – 2031
Year 1 Action Plan
Draft for consultation

This Action plan sets out the actions the council will take to meet the priorities identified in the supporting evidence base and Strategy

Priority/Aim	Objective	How will we do this	Lead officer and by when
<p>To prevent homelessness earlier and support those who are at risk of homelessness to remain in their homes</p> <p>Early prevention means identifying those who may be at risk of loss of home early to stop the homelessness and preventing the loss of that home and this can have a significant and positive impact on households. We want to stop homelessness before it happens</p>	<p>Strengthen early intervention and advice services. Provide accurate and up to date advice and assistance on housing and homelessness ensuring this is accessible to all.</p>	<p>Review our website and the use of social media and introduce contact us before crisis messaging</p>	<p>Housing Solutions Housing Management Team</p> <p>June 2026</p>
		<p>Introduce a “no wrong door” approach – train all frontline staff to identify the risk of homelessness early and refer internally</p>	<p>Housing Solutions Manager</p> <p>September 2026</p>
		<p>Introduce face to face visits for all family evictions and provide mediation to families where there is a risk of eviction</p>	<p>Senior Housing Solutions Officer</p> <p>September 2026</p>
		<p>Introduce a single point of contact for private landlords to resolve problems early and engage and promote this to landlords via landlord forums</p>	<p>Senior Accommodation Officer and Senior Housing Solutions Officer</p> <p>June 2026</p>
	<p>Work more closely with our duty to refer (DTR) partner agencies to ensure we are receiving early notifications of households that may become homeless to maximise the time we must work with them and establish closer working relationships with agencies to improve referral processes.</p>	<p>Identify the agencies who are not referring and target engagement accordingly</p>	<p>Housing Solutions Manager</p> <p>March 2027</p>
		<p>Offer short virtual DTR briefings for new partner staff</p>	<p>Housing Solutions Manager</p> <p>December 2026</p>
		<p>Appoint a named DTR lead within the Housing Solutions Service and establish named leads in DTR operational services</p>	<p>Senior Housing Solutions Officer</p> <p>June 2026</p>
		<p>Develop a local DTR protocol and establish agreed referral times with key partners in line with any KHOG protocols</p>	<p>Housing Solutions Manager</p> <p>June 2026</p>
	<p>Review our prevention tools and ensure the initiatives employed are fit for purpose to ensure that these support the early identification and the work of the officers to maximise opportunities to prevent the loss of the home.</p>	<p>Review current prevention tools, by mapping them, DHP, mediation, PRS incentives, outreach, advice, SAFER scheme etc</p>	<p>Housing Solutions Manager and Senior Housing Solutions Officer</p>

			December 2026
		Review our website and the use of social media and introduce contact us before crisis messaging	Housing Solutions Housing Management Team June 2026
		Review the Prevention Fund and ensure we can offer small rapid grants for common issues that maybe wider than traditional "offers" but may assist in the preventing the loss of the home	Housing Solutions Manager and Senior Housing Solutions Officer December 2026
		Introduce a "no wrong door" approach – train all frontline staff to identify the risk of homelessness early and refer internally	Housing Solutions Manager September 2026
<p>To minimise the use of emergency and temporary accommodation, reduce the reliance on nightly paid out of area TA and reduce numbers requiring TA</p> <p>We must recognise that there will always be families who need TA and where this is the case we will ensure that we provide good quality affordable TA. However, the provision of TA is costly and so exploring options for TA, reducing the use of nightly paid and reducing the numbers in will have a significant impact on council budgets. It will also have an impact on outcomes for those who do require TA, as they will be closer to their employment, education, support networks, and will</p>	We will review our approach to prevention with the aim of preventing households from requiring TA	See priority 1 for how we will do this	As above
	Continue to improve the quality of our own TA and work with partners across Kent to drive up standards in the nightly paid sector	Deliver and occupy Bluebell Hill	Director of Housing, Planning and Regulatory Services Head of Housing and Regulatory Services March 2027
		Continue to engage in the TA project which has commenced working with other local authorities to drive up standards in nightly paid accommodation and establish a framework for procurement	Senior Accommodation Officer March 2027
		Revisit and review the use of registered provider stock for short term temporary accommodation	Senior Accommodation Officer

contribute to a household's overall health and wellbeing.			March 2027	
	Work with staff and key stakeholders to review the offer we make to landlords to work with us to allow us to find good quality suitable private sector accommodation with a personalised package of support once moved on.	Review and update the current Tonbridge and Malling Borough Council Landlord Offer based on feedback from landlords and staff	Senior Accommodation Officer	August 2026
		Develop a landlord offer prospectus, which sets out what landlords can expect from the Council, SPOC, fast decision-making financial support options ongoing tenancy sustainment support	Senior Accommodation Officer	May 2026
		Work with landlords to raise the profile of our Move on Officer and the role they can play around being a single point of contact, and provision of a rapid response to tenancy issues with a clear escalation route where issues cannot be resolved to other service areas	Senior Accommodation Officer	May 2026
		Strengthen pre tenancy readiness and ongoing support by ensuring any accommodation is affordable, and the provision of ongoing tenancy support when placed	Senior Accommodation Officer	May 2026
<p>Build on the excellent work already done to maintain the low levels of rough sleeping with the aim of achieving zero rough sleepers in the district</p> <p>Tonbridge and Malling Council has an excellent track record of having low numbers of rough sleepers and the aim is to sustain this and keep numbers low, with the aim being to fully eradicate any forms of rough sleeping in the district.</p>	Work with our rough sleeping partners to ensure that anyone who enters the street, or is found rough sleeping gets rapid intervention and wrap around support including a pathway for those who may not have a "priority"	Develop a multi-agency rough sleeping protocol which sets out a written rapid intervention procedure	Housing Solutions Manager and Senior Housing Solutions Officer December 2026	
		Use of the website to encourage the use of public reporting tools such as streetlink	Housing Solutions Housing Management Team June 2026	
		Develop rapid assessment pathways by offering same day assessments for those found rough sleeping	Rough Sleeper Resettlement Manager September 2026	

	Provide safe and appropriate accommodation	Continue to work with the contracted provider to increase access to supported housing for those who rough sleep	Housing Solutions Manager and Rough Sleeper Resettlement Manager March 2027
		Review housing first	Housing Solutions Manager and Rough Sleeper Resettlement Manager March 2027
	Develop effective move on pathways from accommodation into longer term settled accommodation	Introduce a monthly move on panel to review all residents within emergency / supported housing who may have rough slept to identify barriers to move on	Housing Solutions Manager and Rough Sleeper Resettlement Manager March 2027
<p>Work with partners collaboratively to prevent homelessness</p> <p>This is an ambitious strategy and is intended to deliver a proactive prevention homelessness service, but this cannot be done alone. We must work with partners, as many factors that cause homelessness are beyond the direct control of the Council and so to deliver homelessness services we need to collaborate with partners, at a national, regional and local level and this will become more relevant as Local Government Reform progresses.</p>	Work with RPs to make better use of stock in the district and promote improved access to affordable housing	Establish a Registered provider strategic forum which meets quarterly to share homelessness demand data, Temporary accommodation pressures and move on issues with agreed joint priorities which are reviewed annually	Housing Solutions Manager and Senior Allocations Officer September 2026
		Undertake an annual review of each registered providers nomination uptake, evictions into homelessness, void times and refusal rates	Housing Solutions Manager and Senior Allocations Officer December 2026
		Strengthen nomination agreements – review and revisit nomination agreements	Senior Allocations Officer December 2026
		Align the housing options team with the tenancy sustainment teams in RPs and promote and develop the use of joint sustainment plans	Senior Housing Solutions Officer December 2026
	Bring together key partners via the development of a formal partnership board to bring additional resources and expertise to deliver the aims of the strategy	Draft a clear terms of reference for the board which sets out the boards purpose	Housing Solutions Manager June 2026
		Identify who needs to be present and attend	Housing Solutions Manager

			September 2026
		Set up quarterly strategic meetings and monthly operational meetings	Housing Solutions Manager September 2026
		Reporting to be fed back to Senior Management Team	Housing Solutions Manager December 2026
Continue to gather performance monitoring data to use as evidence to underpin service development and improvement and ensure needs of those in the district are met		Develop outcomes linked to the Governments emerging Outcome Framework	Housing Solutions Manager April 2026
		Develop and implement a performance framework based on the customer journey, not only using H-Clic data	Housing Solutions Manager April 2026
Establish a lived experience advisory panel to further enhance the performance monitoring to further drive forward any service improvements and delivery		Work with media to recruit to a lived experience panel to ensure feedback from service users is incorporated into service development and delivery	Housing Solutions Manager September 2026
		Deliver bi-annual meetings, and in between utilise different methods to get feedback form service users on tier experiences	Housing Solutions Manager March 2027
Develop mechanisms for gaining insight through a variety of feedback routes ensuring these are used to drive service improvement		Review complaints and MP enquiries to identify any trends in issues	Housing Solutions Manager July 2026
		Use service user feedback from the lived experience panel	Housing Solutions Manager December 2026
Maximise opportunities to work with partners such as drug and alcohol services.		Identify partners and ensure they are invited to attend forums, meetings panels etc.	Housing Solutions Manager March 2027

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Tonbridge and Malling Borough Council

Housing Solutions Service

Homelessness and Rough Sleeping Strategy 2026-2031

Evidence Base

Version	Changes	Section	Date	Author	Status
1	New Draft			C. Keeling	

Evidence Base for the Homelessness and Rough Sleeping Strategy (2026-2031)

1. Introduction

Homelessness and Rough Sleeping have a detrimental effect on individuals, families and society, and is a key challenge facing all communities across the country. It is driven by a range of factors, both structural, such as housing affordability, insecurity in the private rented sector as well as individual factors such as drug and alcohol abuse, poor physical and mental health, crime and anti-social behaviour, poor educational attainment, debt, unemployment and the breakdown of support networks. Tackling homelessness can be costly when compared to the costs associated with proactively seeking to prevent homelessness in the first place, and many households approach the council at the point of crisis, and so our ambition is to intervene earlier, and ensure those who come to Tonbridge and Malling Council about their housing situation get the right support at the right time.

The Housing Act 1996 (as amended 2002) is the primary homelessness legislation and provides the statutory framework within which local authorities work. The 1996 Act was amended in 2002, and this introduced the requirement for all local authorities to have a homelessness strategy which is based on a review of homelessness in the district. The legislation determines that the strategy must set out the authorities plans for the prevention of homelessness and securing sufficient accommodation and support is available for households that approach the local authority as homeless. Tonbridge and Malling previously worked with other West Kent Authorities and there was a West Kent Strategy, but when this expired, actions were included in the Councils housing strategy related to Homelessness and Rough Sleeping, but with the increase in demand on services the Council has an ambition to develop a standalone Homelessness and Rough Sleeping strategy to take the Council through to Local Government Reform in 2028.

This evidence base meets the requirement contained within the 2002 Act, that we must base any strategy in a review of homelessness in the district, and this will underpin the new Homelessness and Rough Sleeping Strategy 2026-2031. It provides a comprehensive overview of the national, regional and local context within which the council homelessness service operates, and will set out homelessness trends, local housing market pressures, and the wider socio-economic context in the Tonbridge and Malling district and will form part of a suite of documents including the Strategy, a comprehensive action plan, which will be based on what the evidence tells us within this document, a full equalities impact assessment and a risk assessment.

Throughout this document Homelessness will be used as a generic term, however where information relates to specific cohorts, this will be identified.

2. Our current service

Tonbridge and Malling Housing Solutions Service delivers the strategic housing function of providing advice and assistance to those who need help to keep their home or find a new one in line with Parts VI and VII of the Housing Act 1996. People approach directly but can also be referred and we deal with multiple housing issues. We average 3 appointments a day in the service, and Customer Services dealt with 9,464 calls for the service in 2024-2025.

Our website also contains information on a range of housing issues, and we engage with social media when there is a key message we want to get out such as when we activate SWEP. We actively encourage users to self-serve and to try and resolve their own issues, however there will always be households who are not able to do this and who will need support and guidance from the council.

During Covid a lot of this work was done remotely and via telephone, however services are now offered face to face again on an appointment basis, although no one will be turned away if they drop in. It is hoped with the refurbishment of the Gibson building; we will be able to continue with delivering face to face services to those who need to access advice and support with their housing issues.

The Housing Solutions Service is delivered across three teams

Homelessness and Rough Sleeping service is responsible for initial point of contact with applicants. Applicants are triaged, and once this is completed it is determined what happens to the application. If an application is to progress to a prevention or relief duty, then it is allocated to an officer to complete the prevention and relief work. This team also work to deliver services for those who are rough sleeping working with our commissioned service Porchlight.

The Accommodation service deal with bookings for temporary accommodation as well as managing our TA stock, compliance and standards in this, and move on options for those who may be in TA. Our landlord Offer also sits within this team.

Allocations are responsible for the administration of the housing register, they assess applications, advertising of properties, as well as nominations agreements, shortlisting and are instrumental to developing our emerging approach to partnership working with RPs around forums and performance management.

We also received new burdens funding when the Domestic Abuse Act was introduced, and we have utilised this and share a Housing Independent Domestic Abuse Advisor (IDVA) with Tunbridge Wells Council. We are also working closely with our DA coordinator who is situated in the Community Safety Team on achieving the Domestic Abuse Housing Alliance Accreditation. (DAHA) This has resulted in training for the team as well as improving awareness of the issues faced by those who come to the service who have or who are experiencing DA.

Our Rough Sleeping Grant was used to procure jointly with Tunbridge Wells Porchlight to deliver our rough sleeper services. This includes our verification process, rapid intervention and support, prevention work, tenancy sustainment and a Housing First project for Tonbridge and Malling. We have also secured 9 units of off the street accommodation in the district and are working with Porchlight and Tunbridge Wells to secure further units.

3.. What is homelessness?

To access the Council's service, a household must be threatened with homelessness, or Homeless. These are defined within the Code of Guidance;

A person is threatened with homelessness if they are likely to become homeless within 56 days. An applicant who has been served with valid notice under section 21 of the Housing Act 1998 to end their assured shorthold tenancy is also threatened with homelessness, if the notice has expired or will expire within 56 days and is served in respect of the only accommodation that is available for them to occupy.

An applicant is to be considered homeless if they do not have accommodation that they have a legal right to occupy, which is accessible and physically available to them (and their household) and which it would be reasonable for them to continue to live in.

Rough sleeping is defined for the purpose of rough sleeping estimates as

People sleeping, about to bed down (sitting on/in or standing next to their bedding) or bedded down in the open air (such as on the streets, in tents, doorways, parks, bus shelters or encampments). People in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, derelict boats, stations, or ébashesê).

4. Strategic context

This section sets out the Strategic and legislative context within which this strategy is framed at a national, regional, and local level

4.1 National context

Since the implementation of the 1996 Housing Act (as amended 2002), focus within housing services has been on the prevention of homelessness, along with the key requirement to produce a Homelessness Strategy. The following section sets out some of the key pieces of legislation that frame the delivery of homelessness services across England.

4.1.1 Housing Act 1996 (as amended 2002)

Prior to the 1996 Housing Act, Councils had a broad duty to secure permanent accommodation for homeless households, where they were homeless or threatened with homelessness, had a priority need and were not intentionally homeless. When introduced The Housing Act 1996 reshaped these homelessness duties and tightened and formalised the homelessness processes.

The 1996 Act was amended in 2002 and introduced the requirement for authorities to have a homelessness strategy which is reviewed every 5 years, with a supporting evidence base, strengthened the prevention duty, encouraged the need to work with other agencies, and enhanced the role of advice and information services for all applicants.

4.1.2 Homeless Reduction Act 2017

This became the biggest change to homelessness duties since the amendments in 2002 to the Housing Act. It kept the 1996 framework but widened it and introduced a duty to prevent or relieve homelessness. The Act ensured that all households who are homeless or threatened with homelessness is entitled to support regardless of priority or intentionality. This is achieved via the assessment of eligible households needs, and whether a household requires support to secure and sustain accommodation via the development of a personalised housing plan.

The requirement for a personalised housing plan is contained within the legislation, as is the duty to refer which was introduced to encourage public bodies to work together to prevent and relieve homelessness through a duty to refer.

[Housing Act 1996](#)

There are also statutory instruments and guidance to which the Council must have regard when exercising its functions relating to homelessness.

4.1.3 Homelessness Code of Guidance

This is document that provides guidance to which local authorities should give regard to when exercising their homeless functions

[Homelessness code of guidance for local authorities - Guidance - GOV.UK](#)

4.1.4 The Homelessness (Suitability of Accommodation) Order 1996

This order sets out the factors that must be considered when considering if it would be reasonable for a household to remain in their accommodation in relation to its affordability.

[The Homelessness \(Suitability of Accommodation\) Order 1996](#)

4.1.5 The Homelessness (Suitability of Accommodation) (England) Order 2003

This order amended the earlier 1996 order to strengthen the protection for those who are homeless and are vulnerable, particularly around the use of Bed and Breakfast Accommodation (B&B). This order sets out that this is not to be considered suitable for families with children, and when it is used, it is only done so in an emergency and for a maximum of 6 weeks.

4.1.6 The Homelessness (Suitability of Accommodation) (England) Order 2012

The Localism Act 2011 gave local authorities powers to end their homeless duties with an offer of accommodation in the private sector without requiring the applicants consent to do so. To ensure that any accommodation offered was suitable, the 2012 Suitability Order was introduced. This sets out the circumstances in which accommodation used to end a homeless duty in the private rented sector should not be considered suitable.

These remain the primary orders; however, amendments were made in 2022 and 2023 in response to households from overseas being placed in Hotel Accommodation,

[The Homelessness \(Suitability of Accommodation\) \(England\) Order 2012](#)

4.1.7 The Homelessness (Suitability of Accommodation) (England) Order 2022

This order modified the 2003 order and the 2012 order for a period of 1 year, to address the specific requirements of recent arrivals to the UK with family commitments to accommodate in B&B for more than 6 weeks, where no other accommodation is available to those households. It ensured that accommodation suitability was evaluated with a focus on caring duties. This was due to expire on the 01 June 2023.

4.1.8 The Homelessness (Suitability of Accommodation) (England) (Amendment) Order 2023

This amended the 2022 order and the 2003 order to extend the modifications to the rules on the accommodation deemed suitable for homeless individuals, and adjusted the definition of B&B. This was due to expire on the 01 June 2024 but was further extended until June 2025.

[The Homelessness \(Suitability of Accommodation\) \(England\) \(Amendment\) Order 2024](#)

These have now expired, and the suitability rules have now reverted to the primary orders, The Homelessness (Suitability of Accommodation) (England) Order 2003 The Homelessness (Suitability of Accommodation) (England) Order 2012

4.1.9 Procedures for referrals of homeless applicants to another local authority

The Local Government Association has developed procedures to guide local authorities in situations where an applicant approaches an authority but has no local connection. If a local authority considers the conditions of referral of the case are met, it must notify the other authority of this opinion. Referrals are discretionary.

[Procedures for referrals of homeless applicants to another local authority | Local Government Association](#)

Figure 1 shows the evolution of homelessness law in England (it is important to note that Homelessness legislation is different in Wales and Scotland)

EVOLUTION OF HOMELESSNESS LAW IN ENGLAND

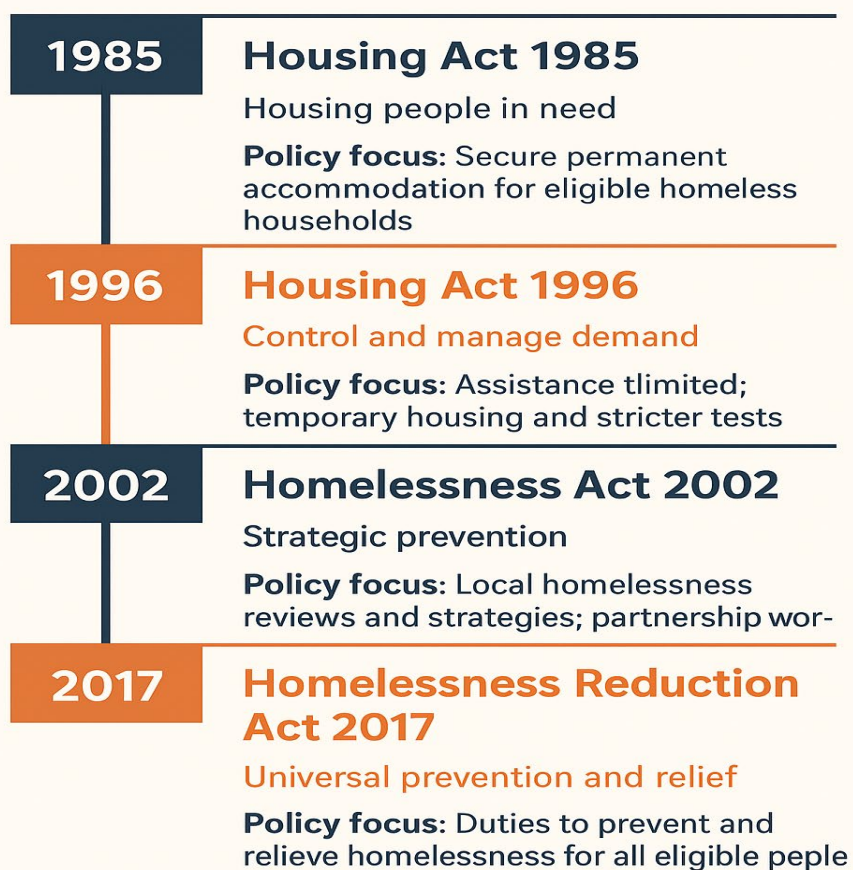


Figure 1 | Evolution of homelessness law in England

4.1.10 The Government's strategic framework for Homelessness

Initially published in 2018 the Government, via its Rough Sleeping Strategy committed to halve rough sleeping by 2022 and end it by 2027. The strategy focused on three key themes, prevention, intervention, and recovery. Between publication and the update in 2022, the Country went into lockdown in March 2020 due to the Covid Pandemic. This involved all Councils being required to ensure the health and wellbeing of all rough sleepers and they were required to provide TA, regardless of priority need. This was known as the Everyone In initiative.

The Government then published their updated Rough Sleeping Strategy in 2022, 'Ending Rough Sleeping for Good'. This was a cross departmental document with a goal of ending rough sleeping. It contained four key themes, Prevention, Intervention, Recovery and transparent and joined up systems. It also set out a definition of what is meant by ending rough sleeping, which is

'Prevented wherever possible. And where it does occur it is rare, brief, and non-recurrent'

This has now been superseded by the new plan to end homelessness which was published in December 2025.

The National Plan to end Homelessness sets out a long-term vision to make homelessness rare, brief, and non-recurring. The key aim is to shift the focus from managing crisis to preventing homelessness before it happens and stepping into resolve it quickly where it does. The plan has involved lived experience in its development and contains both national targets as well as cross government targets, to reduce the number of people becoming homeless when they leave public institutions.

The national headline targets are

- To build 1.5 million new homes
- To increase the proportion of people supported to remain in their own homes or helped to find alternative accommodation when they approach the council for support
- Eliminate the use of B&B accommodation for families and
- To halve the number of people experiencing long term rough sleeping.

To achieve the national targets and those committed to by the Government departments, the national plan has a comprehensive action plan based on 5 pillars

- Universal prevention – this is aimed at tackling the root causes of homelessness and make homelessness rare, by providing a boost to homebuilding, making the best use of stock, and improving supported housing and housing for people with additional needs
- Targeted prevention – this provides support for those who are more risk of becoming homeless and ensures that tackling homelessness is shared responsibility with all public services collaborating to prevent homelessness
- Preventing crisis – this is to help people remain in their homes by giving councils the flexibility to deliver services to meet the needs of the local community and focus on prevention
- Improving emergency responses – the focus on improving TA and making the experience better if people do become homeless
- Recovery and preventing repeat homelessness – ending the cycle of homelessness and halving rough sleeping

The action plan includes change across the short, medium, and long term

The plan can be found here

[A National Plan to End Homelessness - GOV.UK](#)

4.1.11 Domestic Abuse Act 2021

The Domestic Abuse (DA) Act introduced in 2021, set out a legal definition of DA, created a DA commissioner, and introduced new DA notices and orders. It also requires authorities to place those who are leaving an abusive situation to be placed in safe accommodation and recognises children as victims of DA if they witness it. It defines DA as

Behaviour of a person (‘A’) towards another person (‘B’) is ‘domestic abuse’ if

- (a) A and B are each aged 16 or over and are personally connected to each other, and
 - (b) the behaviour is abusive.
- (3) Behaviour is ‘abusive’ if it consists of any of the following:
- (a) physical or sexual abuse;
 - (b) violent or threatening behaviour;

(c)controlling or coercive behaviour;

(d)economic abuse (see subsection (4));

(e)psychological, emotional, or other abuse;

and it does not matter whether the behaviour consists of a single incident or a course of conduct.

(4) "Economic abuse" means any behaviour that has a substantial adverse effect on B's ability to

(a)acquire, use, or maintain money or other property, or

(b)obtain goods or services.

(5) For the purposes of this Act A's behaviour may be behaviour "towards" B even though it consists of conduct directed at another person (for example, B's child).

The key change brought about by the introduction of the DA act for homelessness services was the extension of the eligibility criteria for priority need for homelessness to include households who have been forced to leave their homes due to fleeing DA.

[Domestic Abuse Act 2021](#)

4.1.12 Supported Housing (Regulatory Oversight) Act 2023

The Supported Housing (Regulatory Oversight) Act came into force in 2023. It was introduced as a private members bill, in response to issues with the quality of supported accommodation. The key aim was to regulate supported housing, more specifically exempt accommodation, to improve standards across the sector with the aim of protecting vulnerable tenants from exploitation and ensure that they are living in decent homes with a good standard of care or support.

Contained within this act were changes to when a local authority can make an Intentional Homeless decision. The Act allows the Government to create national supported housing standards. If a person is evicted from accommodation which does not meet these standards, then they cannot be found intentionally homeless.

This element has not yet been implemented as the proposals for implementing the measures contained within the act were consulted on in early 2025, with further consultation expected in 2026 on the draft regulations which will then allow the Act to be implemented.

4.1.13 Renters Reform Act 2025

The Renters Reform Bill 2025 has recently been given Royal Assent and is now legislation. When enacted (there is phased enactment, with the key homelessness changes in May 2026) it is set to transform the experience of private renting, with the most notable change being the abolition of Section 21 "no fault" evictions. The aim is to give renters more security and stability.

Whilst there is a raft of reforms due to be introduced via the introduction of this bill, the key reforms are

- The abolition of section 21 no fault evictions
- To level up possession grounds and ensure they are fair for both parties
- The introduction of a Private Sector Landlord Ombudsman
- Create a private rented database
- Apply Decent Homes standard to the private sector
- Introduce Awaab's law
- Make it illegal for landlords and agents to discriminate against tenants on benefits and with pets
- Strengthen Local authority enforcement powers

4.1.14 Equalities Act 2010

The Equalities Act contains a specific Public Sector Equality Duty which requires public authorities to consider how policies, decisions and services affect people with protected characteristics and have due regard to the need to eliminate unlawful discrimination.

4.2 Regional Context

At a more local level there are county initiatives that impact on the delivery of homelessness services in Kent

4.2.1 Kent Housing Group

The Kent Housing Group (KHG) is a forum for housing organisations in Kent. KHG has representation from all twelve Kent local authorities, Medway Council, housing associations, and Kent County Council. KHG also has affiliated representation from other partner agencies such as the National Housing Federation and the National Landlords Association. Representation from each of the members is at a senior level, so a Head of Service within the local authority or Chief Executive of a housing association.

KHG has an Executive Board, which oversees and provides guidance for the wider membership and subgroups, to ensure that the aims and objectives of the group are met.

Primarily KHG encourages sharing best practice, identifying areas for joint working, and agreeing positive objectives for housing. As a collective the group also aims to

Provide strategic leadership in shaping and setting the housing agenda;

To build relationships and influence decisions for the benefit of Kent;

To draw in resources from both traditional and alternative sources.

To work together to improve the supply and quality of affordable homes.

To create sustainable communities in Kent.

The KHG is also responsible for the review and production of the Kent and Medway Housing Strategy.

[Kent and Medway Housing Strategy 2025-2030, Better Homes: Growth, Wellbeing and Choice - Kent Housing Group](#)

Subgroups

Kent Housing Group has several subgroups that sit beneath the umbrella of the main membership. These subgroups are both strategic and operational, they all have varying roles and functions, but they all support the vision and objectives of Kent Housing Group

[Kent Housing Options Group](#)

The key subgroup for the purposes of supporting the work of the strategy is the Kent Housing Options Subgroup.

4.2.2 Domestic Abuse Housing Alliance (DAHA) Accreditation

DAHA accreditation provides a framework for accreditation in delivering DA services in the Housing Sector. Tonbridge and Malling Borough Council is working towards achieving this, along with all other districts across Kent.

The accreditation focuses on 8 key areas that looks at the organisation's operations, and ensures the Council is delivering a safe and effective response to DA.

To achieve accreditation organisations must be signed up as a member with DAHA, and this membership provides resources, events, and advice from the DAHA service, as well as the opportunity to network with other providers.

4.3 Local context

4.3.1 TMBC Corporate Strategy 2023 to 2025

Tonbridge and Malling Borough Councils Corporate plan sets out the Councils vision for the period 2023 to 2027 and how the Council will plan and deliver services to ensure they are cost effective and remain relevant to the needs of residents, Businesses, and visitors to the district. It sets out the Councils vision

“To be an innovative and forward-thinking council, which leads people and businesses of the borough towards a vibrant, prosperous and sustainable future”

The Council also has identified three core values that it believes are key to achieving this aim

- Innovation
- Transformation
- Delivery

Sitting under these values are four key priorities, which then form an action plan to guide the councils service delivery

Efficient services for all our residents maintaining an effective council

Sustaining a borough which cares for the Environment

Improving housing options for local people whilst protecting our outdoor areas of importance

Investing in our local economy

4.3.2 Housing Strategy

Tonbridge and Malling have a current Housing Strategy supported by a complete action plan.

[Housing strategy and policy in Tonbridge and Malling Borough Council](#)

4.3.3 Allocations Scheme

Every local authority must have an allocations scheme which sets out how social housing within the district will be allocated.

[Housing allocation scheme in Tonbridge and Malling Borough Council](#)

This strategy will sit alongside these documents and provide the key framework within which the Housing Solutions Service operates.

4.3.4 Other key council strategies and Policies

The corporate strategy does not stand alone, and all the following underpin the strategy and contribute to the delivery of this.

Climate Change Strategy

[Climate change strategy 2020 to 2030 in Tonbridge and Malling Borough Council](#)

Digital Strategy

[Digital strategy 2023 -2027 in Tonbridge and Malling Borough Council](#)

Economic Recovery Strategy

Tonbridge and Malling Borough Council
Homelessness and Rough Sleeping Strategy 2026 to 2031
Evidence Base

Local Plan

[Local plan i Tonbridge and Malling Borough Council](#)

Savings and Transformation strategy

[Search results i Tonbridge and Malling Borough Council](#)

4.4 Health and Homelessness

It has long been recognised that there are significant links between housing and the health of the population, with housing being recognised as a key determinant of health in the 2010 Independent Marmot Report.

10 years later in the updated report The Marmot Review 10 years on, it was stated that inferior quality housing harms health and evidence shows that exposure to poor housing conditions (including damp, mould, and noise) is strongly linked to poor health, both physical and mental.

Homelessness also impacts on the life expectancy of those who rough sleep with the average age of death for those rough sleeping being much lower than the general population.

4.5 The impact of homelessness on children (House of Commons Report) England's Homeless Children: The crisis in temporary accommodation.

The highest number of children on record are currently living in TA. A report published in April 2025 looked at this issue and the outcomes for these children and the unsustainable cost pressures on local authorities.

Many households stay in often unsuitable TA for prolonged periods with many authorities breaching the 6-week limit on families in B&Bs, with households sharing, communal facilities, often with strangers, and at least 74 child deaths in the last 5 years where temporary housing has been a contributory factor. It also touched on the impact of household being placed out of district, and the impact on children's education.

The report made several recommendations

- That all TA must be inspected before first use and whenever new residents are placed.
- B&B use must be ended
- More formal monitoring of the use of out of area placements
- Improve the notification process where households are placed out of area
- The extension of Awaab's law to TA

5. Funding

The Council has now had its funding for the next three years confirmed. The allocation is set out in table 1 below. A breakdown between homelessness and rough sleeping funding has not been provided, as local authorities are expected to design services holistically across all forms of homelessness. However indicative funding amounts for Homelessness and Rough Sleeping, Renters' Rights New Burden and Domestic Abuse Safe Accommodation Grant have been put in the table. These funding streams form part of the larger ring-fenced Homelessness, Rough Sleeping and Domestic Abuse grant.

Year	Homelessness, Rough Sleeping, Domestic Abuse Grant TOTAL	Funding for homelessness and rough sleeping	Funding for Renters' Rights Act 2025 New Burdens	Funding for Domestic Abuse Safe Accommodation Grant
Financial year 2026/27	£923,296	£827,930	£57,197	£38,169
Financial year 2027/28	£933,208	£867,265	£26,931	£39,012
Financial year 2028/29	£939,281	£899,467	£0	£39,814
Total Allocation Financial Years 2026-29	£2,795,785	£2,594,662	£84,128	£116,995

Table 1 i Funding for 2026 i 2029

6. Evidence

This section focuses on the scale and nature of homelessness both nationally and locally. Nationally statistics on homelessness are published by MHCLG and are based on quarterly statistical returns submitted to MHCLG on a quarterly basis called the 'homelessness case level information collection' (H-Clic).

Rough sleeper numbers are published on an annual basis based on a count on a given night in the autumn.

6.1 Demographic data

The 2021 Census identified that the population of Tonbridge and Malling is 132,201 people which is an increase of 9.4% from the previous census in 2011.

As of 2021 the district contained 55,487 dwellings and 53,536 households which means there is a vacancy rate of around 3.5%

Women make up 51.3% of the population with men 48.7%

89% of residents were born in England with smaller proportions born elsewhere in the UK or abroad.

The ethnic composition of the district is 93% white with the next biggest groups being

- Asian / Asian British 2.9%
- Mixed 2.2%
- Black / black British 1%

6.2 Current housing provision in Tonbridge and Malling

The following data is taken from the Council's Strategic Housing Market Assessment which can be found at the following link for more detail

[Local Plan evidence i Tonbridge and Malling Borough Council](#)

Housing delivery since 2015 i 2016 has averaged 242 dwelling annually, but this has increased significantly to 483 in 2021 i 2022

The borough has a high-level owner occupation compared to wider areas (72.1%) with the average house price being £390,000 which exceeds the national and regional equivalents

House prices have risen over the last 10 years

Affordability has reduced but average prices are 11 times over the average earnings in the district

Average rents in April 2025 were higher than the national and regional averages, at £1370 with rents increasing by around 28%

The number of children in the district is above average, with around 32% of households in the district containing children compared with 29% regionally and nationally

There is a marked difference between types of households with married couples with children more likely to live in the owner-occupied sector and lone parents in the social or private rented sector

Older people have high levels of owner occupation, and this is projected to increase. An ageing population is likely to increase the levels of disabilities in the district

The housing situation in the district has also been impacted by the situations in Syria, Hong Kong, Afghanistan and more recently Ukraine, with the Government setting up schemes to support refugees from these countries to settle in the UK. The longer-term impact of these schemes is not clear, but there is likely to be ongoing pressure placed on available housing in the district.

6.2 Lettings demand

The council operates the housing register for the district, although it does not own or manage any stock.

In 2023 the Council updated its allocations scheme and introduced a new system to manage the housing register. Applicants were asked to reapply to join the register, and the resulting effect was a significant reduction in the numbers of households waiting for social housing. However, applications to the housing register have significantly increased. This is a trend that is showing no signs of slowing with the highest number of applications submitted in January the highest figure recorded (The peak in June and July 2023 was when we closed our previous system down and introduced the new one and asked all applicants to reapply) However since then applications have been consistently higher as can be seen in figure 2

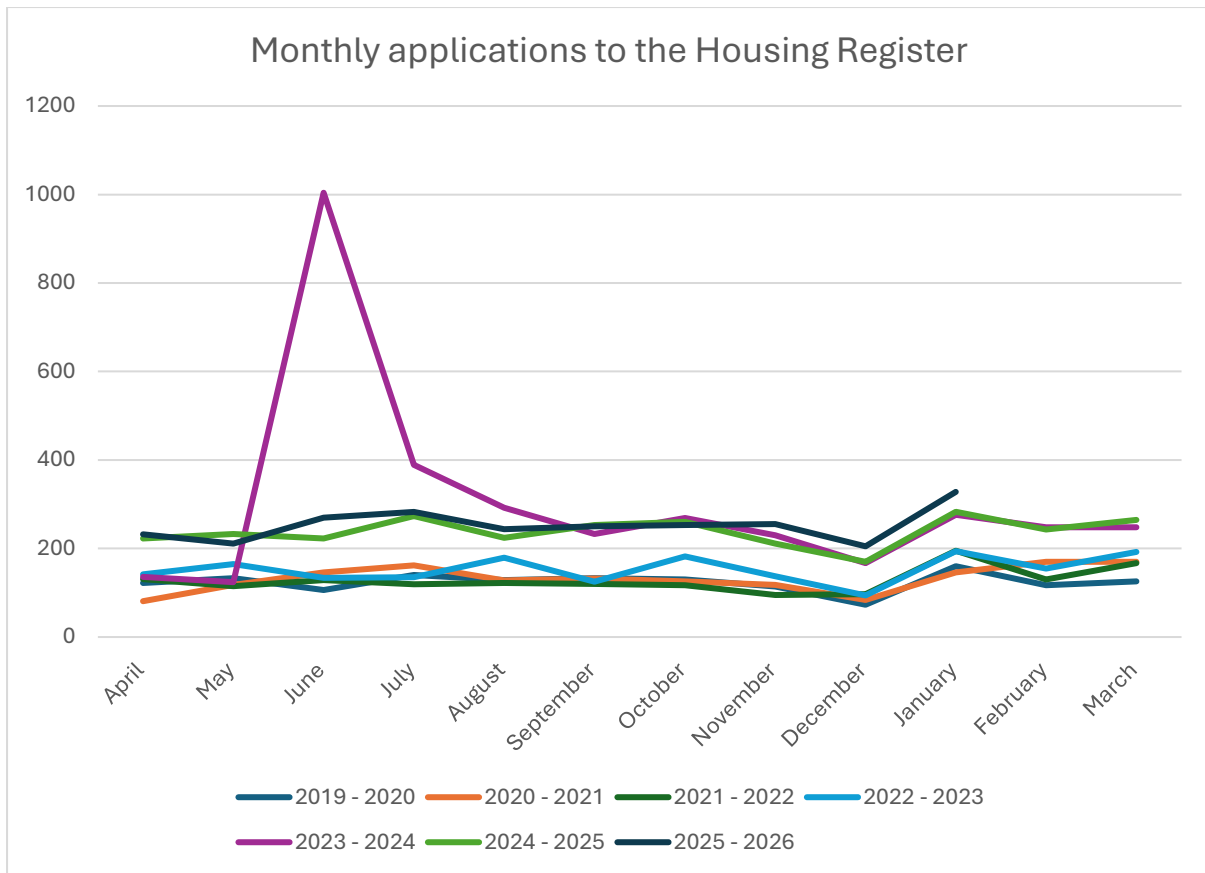


Figure 2 i applications to the housing register

Demand is highest for one-bedroom homes, which suggests that younger households are applying as they cannot afford to get on the property ladder, and may also reflect that one of the main reasons for homelessness in the district is friends and family no longer willing to accommodate

Demand for larger properties is less, but due to limited availability of 4+ bedroom homes, these households wait the longest on the register to be rehoused.

6.3 Homelessness data

This section looks at homelessness data for the district.

1278 households approached or were referred to the service in 2024 i 2025. The Service assessed 689 of these and accepted a duty to 512 households, this was a 4% increase from the previous year. Whilst there have been some fluctuations, what this table demonstrates is a consistent increase in households owed a duty. Table 1 illustrates numbers assessed as being owed a duty have increased consistently with a 72% increase in demand from 2019 in Tonbridge and Malling. Nationally this figure increased by 14%.

Duty to refer remains a keyway for households at risk of homelessness to be referred into the service. We saw a 49% increase in those referring via the duty to refer process between 2023 i 2024 and 2024 i 2025. The agencies who refer the most are the Job Centre and Probation.

Table 2 shows the number of applications where a duty was accepted nationally, regionally, across the southeast and locally in Tonbridge and Malling

	2019 - 2020	2020 - 2021	2021 - 2022	2022 - 2023	2023 - 2024	2024 - 2025
Owed a duty nationally	288220	269450	276360	298180	326090	330140
Owed a duty southeast	40430	37950	36300	39990	44640	43890
Owed a duty T&M	296	306	265	323	491	512

Table 2 i Prevention and Relief duties accepted by year nationally, regionally and locally

Following a review of the Housing Solutions Service, specifically the Homeless and Rough Sleeping service, in early 2021, the service was split out into a specialist triage service, prevention and relief. The first prevention officer was recruited into this service in Quarter 4 of 2021. Figure 3 clearly demonstrates that prior to this relief acceptances were consistently higher than prevention. However, since the inception of the prevention service, constantly prevention acceptances have been higher than relief. Whilst this does not always mean prevention is successful, more cases are going through prevention increasing the opportunity to prevent homelessness and stop the use of TA.

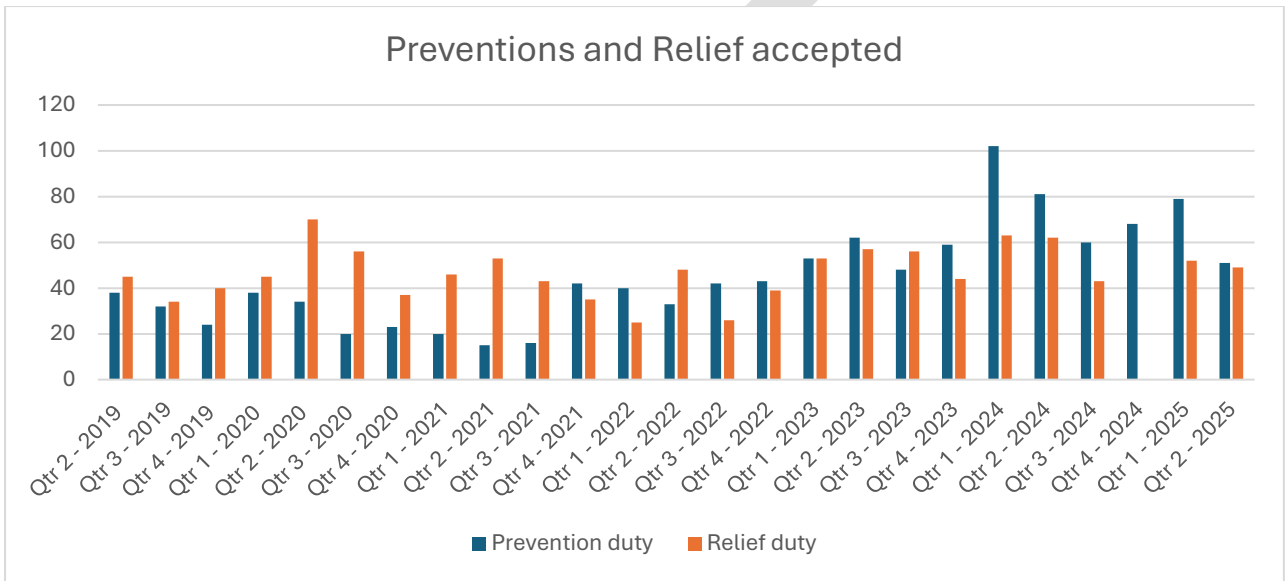


Figure 3 i Preventions and Reliefs accepted

The main reasons for homelessness in the district reflect national statistics and generally regional statistics with the main reasons for approach being given as

- Friends and family no longer willing to accommodate
- Ending of private rented sector tenancies
- Domestic Abuse

Figure 4 shows the main reasons for loss of home in 2024 i 2025 and 2025 year to date (as of the end of January 2025)

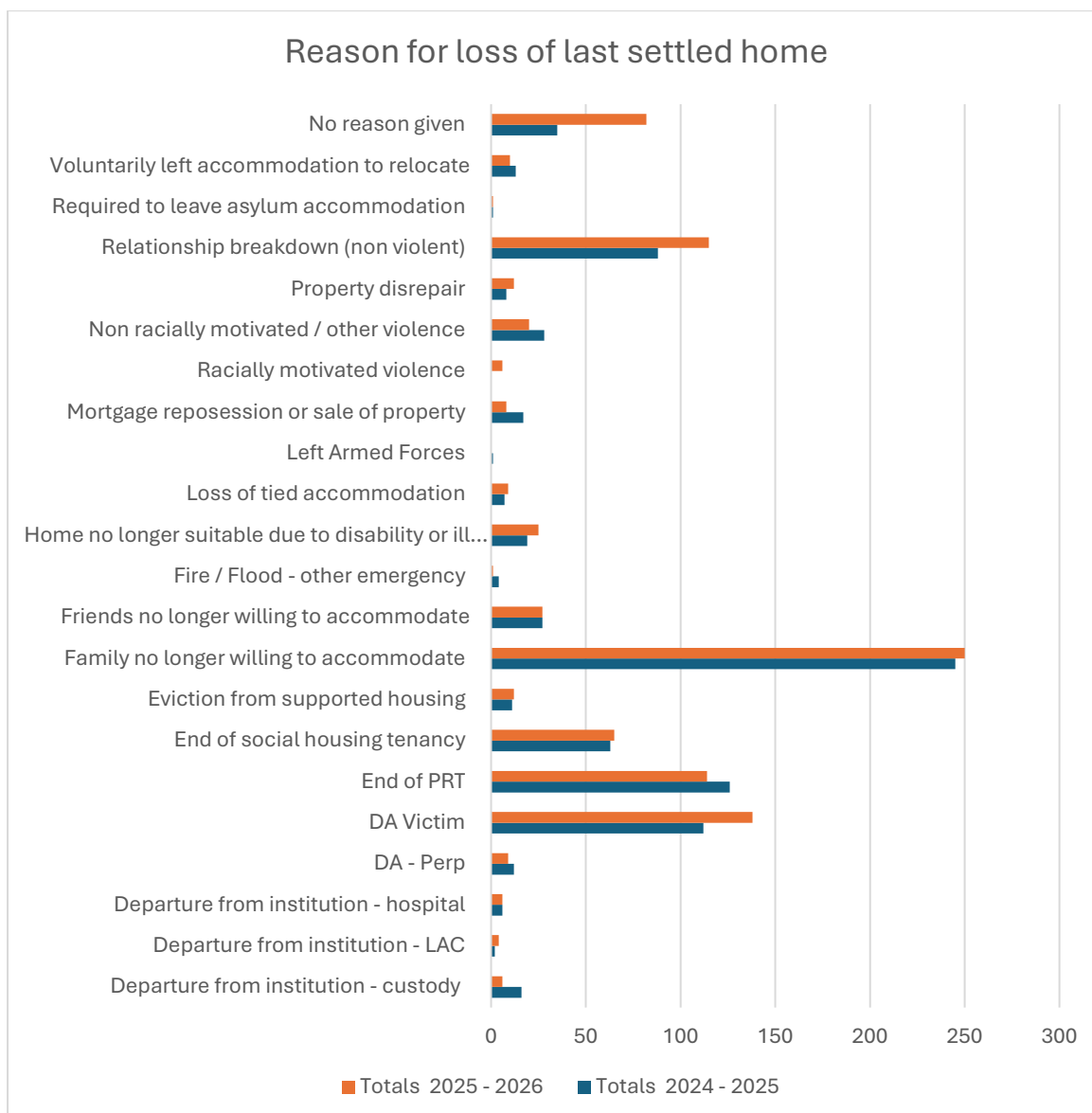


Figure 4 i main reasons for loss of home

Whilst family and friends no longer willing to accommodate is consistently the main reason for loss of the home, this can be a broad category with many reasons to it, and it needs further interrogation to try and understand it.

Similarly, no reason given makes up a significant number of approaches and this also needs further interrogation.

It is also anticipated that the implementation of the abolition of section 21s in May 2026 as part of the changes being made through the Renters Reform Act 2025 will lead to an increase in section 21 notices being served over the coming months as landlords anticipate the changes.

6.4 Temporary Accommodation

Local housing authorities in England have a duty to secure accommodation for unintentionally homeless households in priority need under Part 7 of the Housing Act (1996). Households may be placed in temporary accommodation pending the completion of inquiries into an application, or they may spend time waiting in temporary accommodation after an application is accepted until suitable secure accommodation becomes available.

Most applicants placed by the council in temporary accommodation are either awaiting the outcome of a homeless application under section 188 of the 1996 Act, (an interim duty to accommodate), or are waiting for an offer of suitable accommodation.

Figure 5 shows a snapshot of households in TA at the end of each month from 2019 to January 2026.

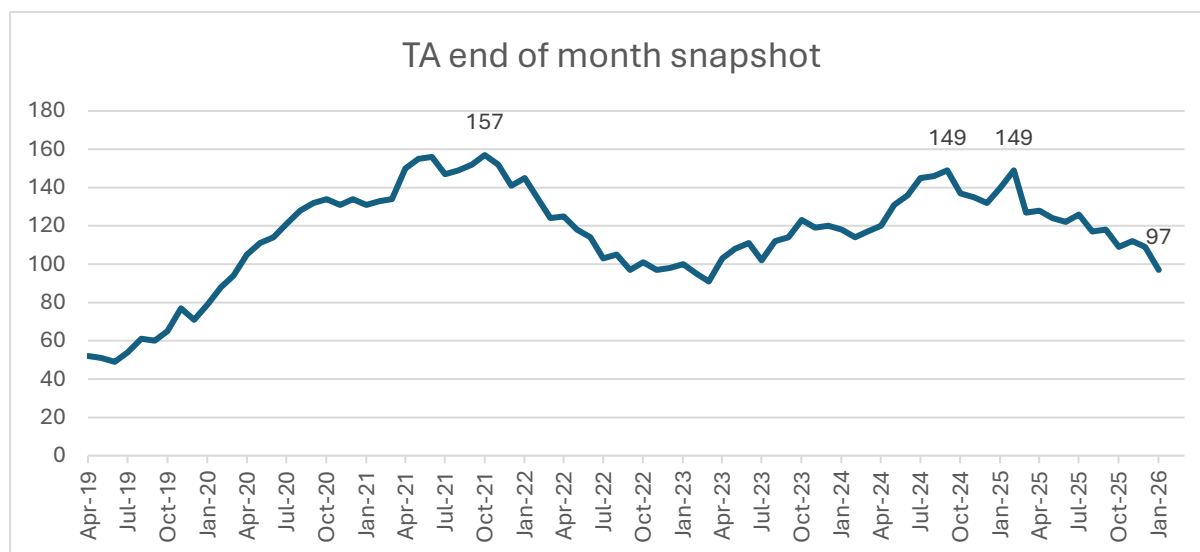


Figure 5 i Snapshot of TA at month end

In many areas lack of suitable TA has led to councils having to use B&B for families for longer than the 6-week period. Tonbridge and Malling do not use B&B accommodation for any families. However high costs of housing in the district means that supply of nightly paid accommodation in the district is limited and whilst the Council does own lease and manage TA, numbers have been low, and there has traditionally been an over reliance on expensive nightly paid, often out of the district which can lead to additional challenges for those who are homeless, such as being moved away from support networks, employment and crucially schools for children.

The average percentage placed outside of the district for 2024 i 2025 was 77% of households, which is one of the highest numbers in England. The last recorded quarter on H-Click (April i June 2025) was 80% of households out of area. This is anticipated to decrease with the new provision in Tonbridge and the development of other TA in the borough with the aim of bringing it more in line with national and regional averages, which nationally for 2024 i 2025 was 32% and regionally for the same period is 18%.

We do have a policy for determining which households get priority for moving back into the district, based on special educational needs, exams etc. This Policy was approved in 2021, but this now needs revision subject to member approval. So, affordability and availability hamper the Councils ability to place local families into accommodation in the district.

However, the Council aims to reduce this figure, by working on expanding the stock of TA managed by the Council. Initially the Council had 16 units in borough, 2 HMOs with a total of 8 bed spaces, 2 x 4-bedroom houses and 6 flats, a mix of 1 and 2 bedrooms, and a unit in Maidstone with 7 self-contained studios. In October 2025 the Council opened new TA in Tonbridge giving an additional 18 units of accommodation in the borough. One 4-bedroom house will shortly be used for resettlement purposes. This brings the total up to 40 units under the Councils control at the moment. Plans have also recently been approved to put 12 modular units on land at the top of Bluebell Hill. Figure 6 is an artists impression of what the units could look like when completed.

The data shows variation in the demand for TA, but it is anticipated with the changes to renting that the demand for TA and the Councils services will continue to grow.



Figure 6 i Proposed modular TA accommodation

Most households move on from TA into the social rented sector. In 2024 i 2025 we accepted a main housing duty to 184 households and 113 of those had their duty ended with an offer of social housing, and we had only 1 main duty ended via a formal private rented sector offer.

In May 2025 the Accommodation Service was moved to sit within the Housing Solutions Service and what this has led to is better joint working between the teams, and whilst demand is increasing on the service TA numbers are reducing.

This service has had some success in ending duties with offers in the private rented sector, however there was a recognition that this was an area where we could improve. Given this the Accommodation Service was expanded to include a specialist move on officer for the private sector. This has provided a resource within the team to work on developing the offer for private landlords and ensuring we are using the private sector for move on, particularly for larger households where stays in TA are significantly longer due to a limited number of homes available to move on into.

Rough Sleeping

This is the most visible form of homelessness, and the Council has a strong track record of tackling rough sleeping and working in a multi-agency environment with stakeholder in both the statutory and voluntary sectors.

Because of the strength of the partnerships, numbers of rough sleepers have remained consistently low in the district, and we commission Porchlight to work with us to prevent rough sleeping and where it does happen this ensures where anyone who is identified on the streets the stays are brief and non-recurring.

Working with Porchlight and Clarion Housing we have opened New Wharf as dedicated supported provision to provide off the street accommodation for those who would otherwise not have a priority need for housing and who may remain on the streets. We have 9 units of which TMBC have 5 utilised.

Again, working with Porchlight and Clarion we have a successful Housing First project in Tonbridge and Malling with 8 clients currently housed and working closely with their support worker.

We also work closely with mental health and the NHS and have available to us when we need it access to a Mental Health worker and a complex care nurse to call on when required.

On the single night rough sleeper count carried out in November 2025 we had a return of 6 rough Sleepers which is an increase from the previous year, however we monitor consistently and currently have 3 rough sleepers we know of sleeping out.

5 What is the evidence telling us?

All of the evidence presented above shows us that housing in the district can be unaffordable for some and there is a high demand for social housing.

Homelessness is at lower-than-average rates, but demand on the service is increasing

That we do well at prevention, but this can still be improved to continue to reduce those coming in at crisis point

We must address the issue of out of area placements as we have high rates of households placed out of area, disrupting education support and employment.

We have low levels of rough sleeping, but effective working partnerships are key to keeping these numbers low and ensuring those who do sleep rough get the support needed to stay off the streets.

6 What are our priorities?

Given all of the above we have identified the following as our key priorities

Priority 1 is To prevent homelessness earlier and support those who are at risk of homelessness to remain in their homes

Priority 2 is To minimise the use of emergency and temporary accommodation, reduce the reliance on nightly paid out of area TA and reduce numbers requiring TA

Priority 3 is Build on the excellent work already done to maintain the low levels of rough sleeping with the aim of achieving zero rough sleepers in the district

Priority 4 is Work with partners collaboratively to prevent homelessness

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LOCAL PLAN REGULATION 18 (STAGE 2) CONSULTATION - UPDATE

Item HP 26/10 referred from Housing and Planning Scrutiny Select Committee of 17 March 2026

Members were provided with an update on the Local Plan Regulation 18 (stage 2) Consultation that took place between 10 November 2025 and 2 January 2026. An update on Local Plan transport work and the associated financial implications was also provided.

Summaries of the feedback received, individual question responses and analysis and supporting information was available on www.tmbc.gov.uk/local-plan-responses

General key themes from those responding to the consultation had expressed views in respect of overall housing numbers, scale / location of proposed site allocations, infrastructure capacity especially highways, water, healthcare and schools, greenbelt protection and the adequacy of supporting evidence. Concerns about the impact of development on local character, heritage and the environment were also raised.

With regard to the emerging risk from South East Waters response to the Local Plan consultation and concerns around their capacity to provide sufficient water supply to new development, it was confirmed that discussions with Government, South East Water and neighbouring authorities were ongoing. Further guidance was awaited and Members would be updated as soon as possible.

Particular reference was made to the further transport related work required to inform and support the next stage in plan-making for the Regulation 19 Local Plan, as detailed in 12.3 to 12.7 of the report. In summary this included further testing for a preferred growth scenario for Regulation 19, more detailed junction design and mitigation testing and integrating the findings into the Infrastructure Delivery Plan. Microsimulation modelling was currently being investigated for Tonbridge and M20 Junction 6. This could be in the region of £45,000 up to £80,000 respectively, dependent on whether an existing model could be updated and built upon.

There was detailed and robust discussion in relation to the perceived adequacy of junction analysis and the realism of modal shift assumptions, the risks associated with missing the statutory deadline for plan submission, including potential Government intervention, speculative development and uncertainty due to local government reorganisation. The importance of maintaining progress and meeting the December 2026 deadline for submission of a Local Plan was recognised. Members would receive regular updates via the Housing and Planning Scrutiny Select Committee and wider engagement sessions.

In recognition that the Local Plan, once adopted, would be the key planning document for Tonbridge and Malling, Cllr King proposed, Cllr Thornewell seconded and it was

***RECOMMENDED:** That

- (1) the responses received to the Regulation 18 Local Plan Consultation and their publication on the Borough Council's website be noted and endorsed;
- (2) the Regulation 18 Local Plan Consultation question response summaries and associated officer comments, as published on the Borough Council's website be endorsed;
- (3) the Regulation 18 Local Plan Consultation responses be fully considered in the preparation of the Tonbridge and Malling Borough Council Regulation 19 Local Plan; and
- (4) the update provided in relation to progress on transport evidence for the Local Plan and the potential cost implications of the work proposed be noted.

***Recommended to Cabinet**

Housing and Planning Scrutiny Select Committee

17 March 2026

Part 1 - Public

Matters for Cabinet - Non-key Decision



www.tmbc.gov.uk

Cabinet Member Cllr Mike Taylor – Cabinet Member for Planning

Responsible Officer Eleanor Hoyle - Director of Planning, Housing & Regulatory Services

Report Author Kelly Sharp – Planning Policy Manager

Local Plan Regulation 18 (Stage 2) Consultation - Update

1 Summary and Purpose of Report

1.1 The purpose of this report is to provide an update to Members on the Tonbridge and Malling Borough Council Local Plan Regulation 18 (stage 2) consultation that took place between 10th November 2025 and 2nd January 2026. The report also seeks to update Members on Local Plan transport work and the financial implications of this work.

2 Corporate Strategy Priority Area

2.1 The report will contribute to the following corporate priorities:

- Efficient services for all our residents, maintaining an effective council.
- Sustaining a borough which cares for the environment.
- Improving housing options for local people whilst protecting our outdoor areas of importance.
- Investing in our local economy.

2.2 The Local Plan once progressed to adoption will be the key planning document for Tonbridge and Malling, setting out the Council's strategy for land use, therefore contributing to the achievement of all of the Council's Corporate Priorities.

3 Recommendations

3.1 HPSSC is asked to recommend to Cabinet to:

- NOTE the responses received to the Regulation 18 consultation and ENDORSE their publication on the Council's website.
- ENDORSE the Regulation 18 Local Plan consultation question response summaries and associated officer response should as published on the Council's website.
- CONFIRM that the Regulation 18 Local Plan consultation responses will be fully considered in the preparation of the Tonbridge and Malling Borough Council Regulation 19 Local Plan.
- NOTE the update provided in relation to progress on Transport evidence for the Local Plan and NOTE the potential cost implications of the work proposed.

4 Introduction and Background

- 4.1 Following the Cabinet Decision on 29th October 2025, the Council consulted upon a second Regulation 18 Local Plan for an eight-week period between 10th November 2025 and 2nd January 2026.
- 4.2 The Regulation 18 (2) Local Plan contained a draft vision and objectives for the borough, a draft spatial strategy for the area and included a number of housing and employment allocations to meet the borough's housing and employment need between 2024 – 2042. The Plan also contained a number of topic-based chapters setting out fully formed draft strategic and non-strategic policies.
- 4.3 Alongside the Regulation 18 Local Plan, the Council published numerous supporting documents including its Interim Sustainability Appraisal, Interim Habitats Regulations Assessment and Interim Combined impact Assessment (Equalities and Health) as well as an Interim Infrastructure Delivery Plan. A suite of other supporting documents and evidence bases were also published covering matters relating to housing, the economy, infrastructure, climate change, Green Belt and the natural and historic environment. All documents were available as part of the consultation on the Council's Local Plan website.
- 4.4 In addition, the Council undertook a fourth 'Call for sites', given that the Regulation 18 (2) Local Plan was not able to provide a sufficient buffer to the Government's housing requirement. A draft Active Travel Strategy was also consulted upon within the same consultation period.

5 Consultation engagement

- 5.1 The Regulation 18 Local Plan consultation was undertaken in accordance with the Council's adopted Statement of Community Involvement (2022) and its supporting Local Plan Engagement and Consultation Strategy (2024). Notification of the consultation was sent to all those held on the Local Plan consultation database either by email or post, which also includes statutory consultees, Duty to

Cooperate partners including relevant Local Authorities, Town and Parish Council's, other consultation bodies and interested parties. The Consultation was further promoted through various channels including the Council's website, TMBC app notifications (My TMBC) and social media platforms as well as a leaflet drop to all addresses within Tonbridge and Malling and adjacent postcode areas. To support accessibility and provide different ways to take part, we also hosted a virtual exhibition and provided an explainer video. All details of the consultation were published on our Commonplace consultation platform as well as the Council's website.

- 5.2 During the consultation period the Council held a programme of in-person drop-in sessions at Kings Hill and Tonbridge. In addition, the Leader of the Council attended 27 community group and parish and town council meetings, supported at many of these by the Cabinet Member for Planning. Virtual drop-in sessions were also held for Parish Councils as well as a number of officer meetings also.
- 5.3 In terms of reach, the online consultation platform received over 14,000 visitors. The Local Plan pages on our website were viewed 36,000 times; social media posts reached over 55,000 people and the virtual exhibition boards received over 5,000 views. Approximately, 2,150 people attended public meetings.

6 Responses to the Regulation 18 Local Plan Consultation

- 6.1 Following the Council's extensive engagement methods, there were a total of 6456 contributions received from 2,206 respondents. The previous Regulation 18 Local Plan Consultation in 2021/2022 received over 4,000 representations from 2,228 people. For our latest consultation, the majority (71%) of responses were received via our consultation platform. The remaining 29% of responses were submitted via email (963), with a very small number of responses received by post (38). All responses received by email or post have been entered into our consultation system by officers where the submissions related to a specific question / topic. Given the nature and sometimes length of the responses i.e. many did not answer specific consultation questions, officers took a 'best fit' by question or topic approach to inputting these responses.
- 6.2 Where submissions contained supporting information, such as landscape reports or specific site information that is not necessarily directly relevant to the consultation but is relevant to a site, then these documents have been added to the consultation system and have been made publicly available. A full list of PDFs and links to these documents are provided on our website (link below).
- 6.3 Nearly half of the responses (460) received by email / post were repeat representations relating mainly to draft site allocations (and other matters) as set out below.
- 308 email repeat representations relating to draft allocation TO1 (North Tonbridge).

- 37 email repeat representations relating to draft allocation SN1 (North of Holborough).
- 76 email repeat representations relating to draft allocations in and around Hildenborough (H12, TO4, HI1, TO3).
- 39 email repeat representations relating to draft allocation KH1 (Broadwater Farm).

6.4 We also received the following:

- A response from East Peckham Parish Council with 653 signatures.
- A questionnaire from Kings Hill Parish Council with 164 signatures.
- A questionnaire from Hildenborough Parish Council with 120 signatures.
- A response from East Malling and Larkfield with 257 signatures.

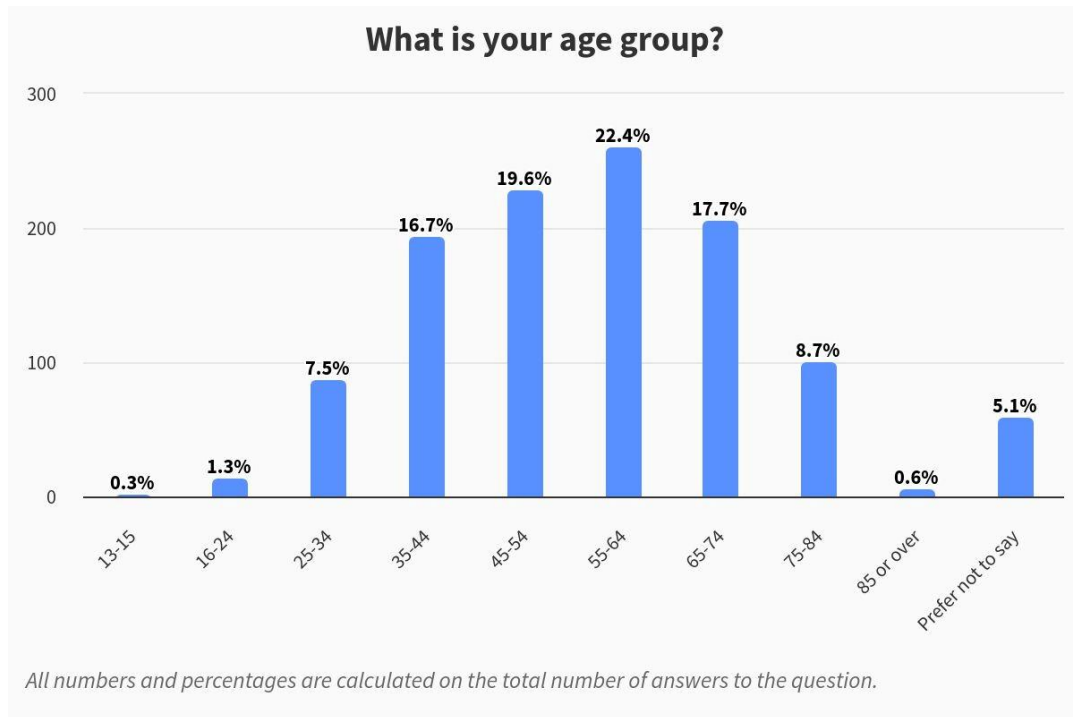
6.5 In addition to consultation responses, we received a total of 28 site submissions (17 new sites) as part of the Land Availability Assessment call for sites and one new site put forward to be considered as a Local Green Space. The assessment of the sites submitted will take place in due course and will be made publicly available via the public map, as per other call for sites information. We received 15 responses in relation to the Draft Active Travel Strategy Consultation.

7 Respondent profiles

7.1 The following graphs set out data on those who responded to the consultation. Providing this information was not compulsory and was provided only where respondents opted to do so. Around 1,180 respondents provided this data.

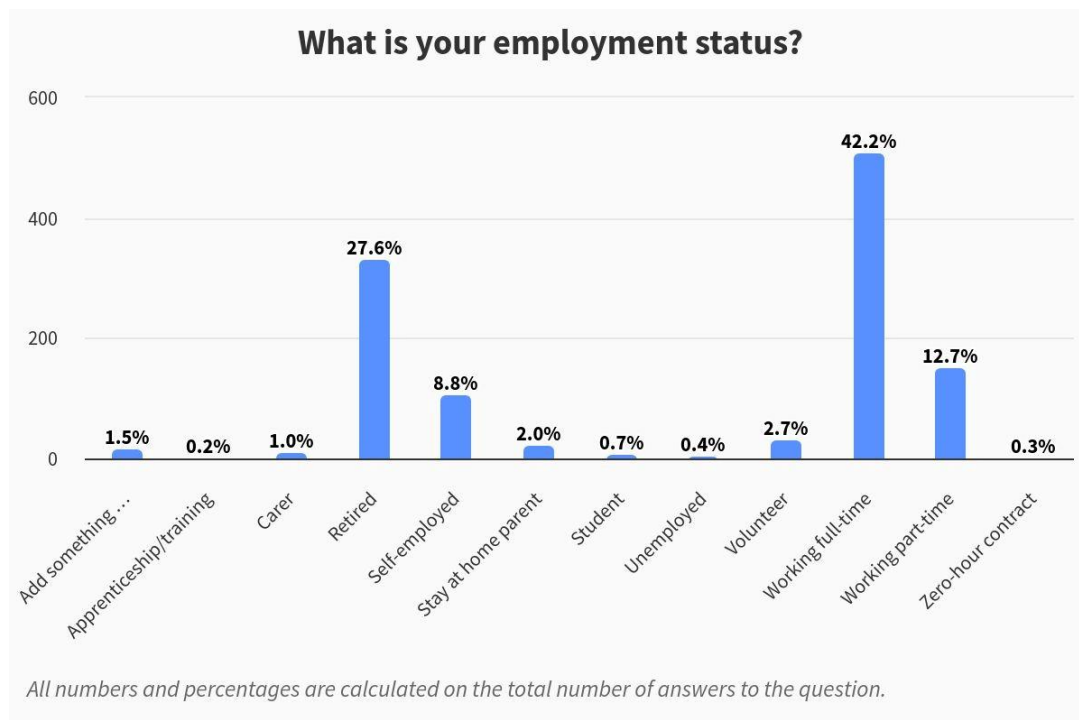
7.2 The majority of respondents (67.5%) were of a working age (16 – 64), with a smaller proportion (27%) of respondents over 65. There was a good range of people from different age groups taking part in the consultation.

Figure 1: Age group of respondents



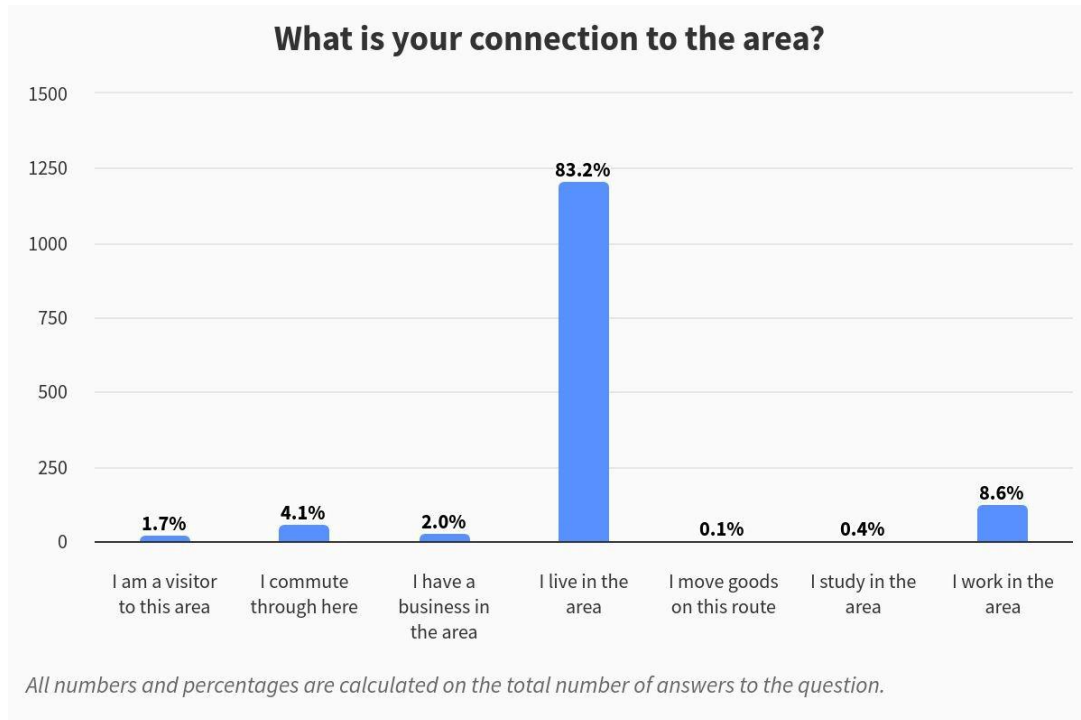
7.3 The majority of respondents were employed (64%), either working full-time or parttime, with 0.9% of respondents studying or in an apprenticeship and 27% of respondents having retired.

Figure 2: Employment status of respondents



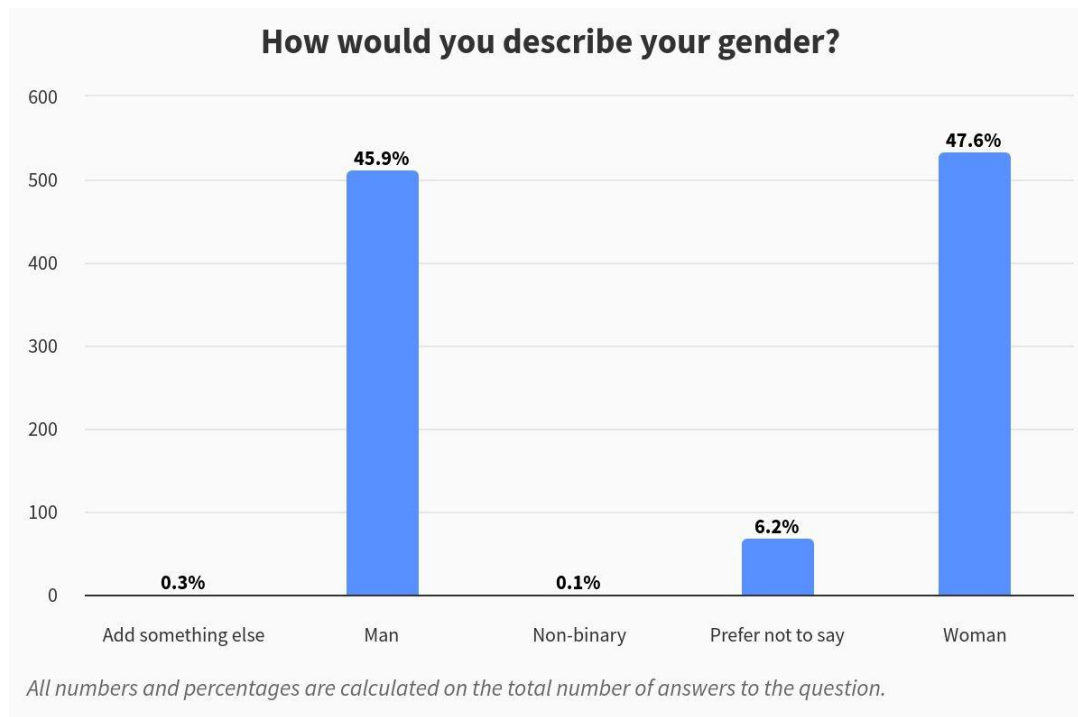
The majority of respondents who took part in the consultation lived in the area (83.2%) with 10.6% either working or having a business in the area.

Figure 3: Respondents connection to the area



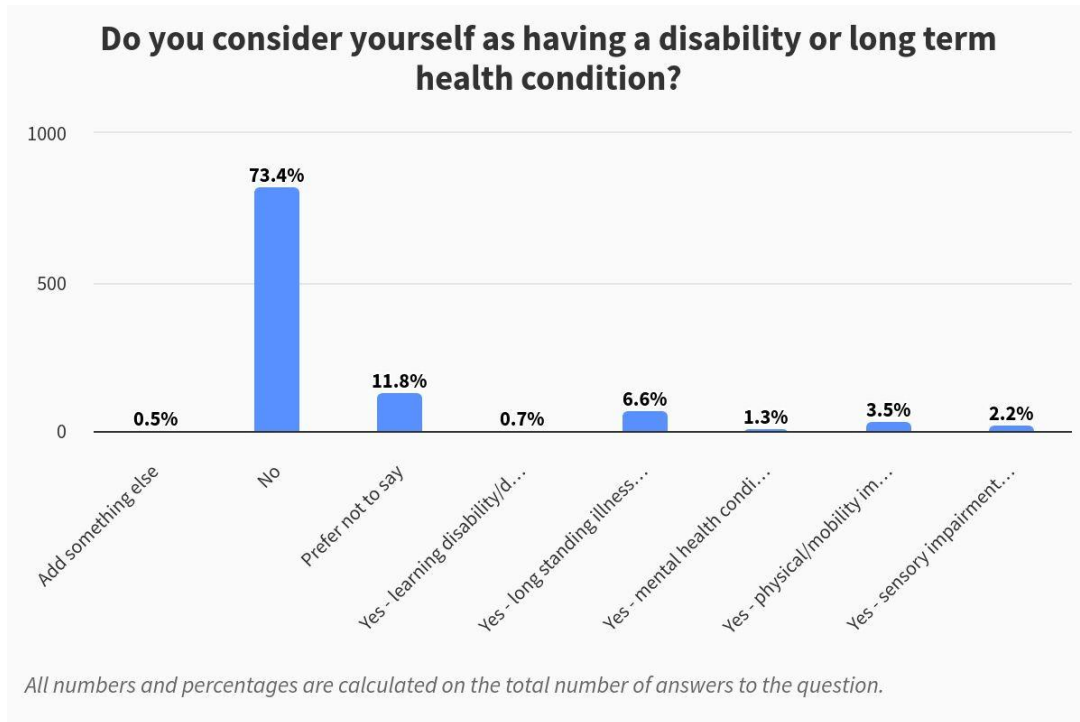
7.4 Slightly more women (47.6%) took part in the consultation compared to men (45.9%).

Figure 4: Respondents gender



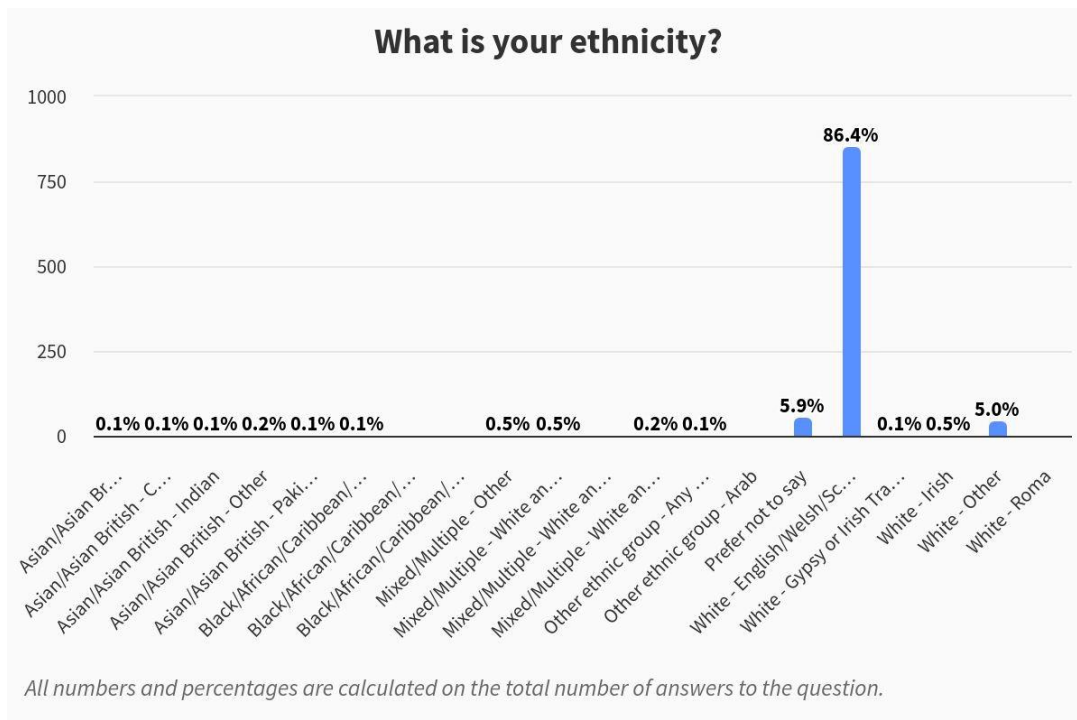
7.5 Whilst most respondents, did not have a health condition or disability (73.4%) around 14% of respondents did.

Figure 5 Health of respondents



7.6 Most respondents were white (91.4) with only 2.7% of respondents of another ethnicity.

Figure 6 Respondents ethnicity



8 Progress since the Regulation 18 Local Plan consultation closed

- 8.1 Members will be aware that the timetable to meet the Government's Local Plan submission deadline of 31st December 2026 is extremely challenging and that it is pertinent to meet our Local Development Scheme timetable if we are to submit a Plan by December 2026 to be examined under the current planning system.
- 8.2 Since the 2nd of January, when the consultation closed, officers both within the Planning Policy Team, with support from officers in the Development Management Teams have:
- Input 963 responses from consultees who emailed or sent their response by post into the consultation system to allow for analysis of all responses submitted.
 - Organised and published all comments submitted in response to the consultation on a question-by-question basis. This includes comments that were made in relation to Local Plan policies and sites.
 - Redacted personal information from all PDFs that were submitted to support consultation responses and / or the promotion of sites, so that these can be made publicly available.
 - Considered and analyse responses to all questions relating to the various Local Plan chapters / policies and consider work required to progress the Plan and policies for the Regulation 19 Local Plan.
 - Reviewed all consultation submissions relating to draft site allocations.
- 8.3 Consultation responses and analysis of these responses as well as links to supporting information submitted have been published on the Council's website at www.tmbc.gov.uk/local-plan-responses.

9 Local Plan and Draft Active Travel Strategy consultation questions and analysis

- 9.1 The consultation set 113 questions in total as identified below:
- Vision and objectives – Questions 1 – 3
 - Spatial Strategy – Questions 4 – 14
 - Climate change – Questions 15 – 25
 - Natural Environment - Questions 26 – 43
 - Historic Environment - Questions 44 – 51
 - Design – Questions 52 – 55

- Housing – Questions 56 – 68
- Development in rural areas – Questions 69 – 80
- Economic growth and development – Questions 81 – 90
- Infrastructure – Questions 91 – 98
- Policy A1: Housing and Employment Allocations - Question 99
- Development allocations map – Questions 100, 111 - 112¹
- Evidence base Questions – Questions 113 – 114
- Sustainability Appraisal – Questions 115 – 116
- Draft Active Travel Strategy- Questions 117 - 123

9.2 The consultation was structured around gathering views on the draft vision and objectives, the draft spatial strategy, local plan policies and the proposed development sites. This was presented in a simple question format designed to capture sentiment and collect specific concerns or support on the relevant aspects of the Draft Regulation 18 Local Plan. The questions were designed to provide an opportunity for respondents to tell us what aspects of the plan were supported, what respondents objected to as well as provide information on suggestions where we can improve the Plan and / or its policies. The word limit for responses was not limited, and respondents could answer as many questions as they wished, or just those questions of individual interest. Supporting information could also be uploaded in relation to proposed allocations and the Sustainability Appraisal. Information uploaded by respondents generally included photographs of sites and issues, technical documentation, vision documents and reports or additional information relating to site constraints / objections.

9.3 Whilst we did receive a small number of complaints in relation to the useability consultation platform, the majority of people engaged with the system quite easily, and the level of issue raised is considered usual with a consultation exercise of this scale. This is evidenced by 71% of the responses received being via the consultation system. The majority of those who did not engage with the consultation platform were those who sent in repeat / standardised representations as per 6.3 above or those submissions of a technical nature, such as those from developers who wished to submit supporting information and other organisations.

¹ Please note that question numbering jumped from 100 to 111 and therefore questions 101 – 110 did not exist.

10 Local Plan consultation analysis

10.1 Analysis for each of the consultation questions has been published on our website (link above). The analysis has been carried out using a consistent, transparent and methodical approach across all questions. The following sections explain how we have presented the analysis.

Sentiment Question

10.2 For each consultation question the number of responses to the sentiment question have been broken down. This provides a clear overview of the level of engagement and the balance of opinion relevant to each question.

10.3 It is worth noting that not everyone answered the sentiment questions. Also, for responses received by email or post, where text was required to be added by officers into the consultation system, officers did not answer sentiment questions on behalf of respondents, unless the response related directly to a site allocation. This is because in most instances the response did not explicitly state whether a policy was supported or not. The sentiment question for site allocations was answered because it was not possible to input a response without answering this question, which related to the technicalities of the consultation system. Officers therefore answered the sentiment question in accordance with the nature of the response, which was mostly an objection to the site.

10.4 We have indicated for each question how many people did not answer the sentiment question compared to how many comments were received in relation to the question. There is sometimes a mismatch in the numbers that we report, because some respondents only answered the sentiment question only and did not make a comment and vice versa.

10.5 In addition to the above, the officer summaries indicate sentiment responses from on specific policies (as relevant) for Specific Consultees, District and Boroughs, Town and Parish Councils and other organisations. This is to demonstrate the level of support from those with a strategic or technical interest on specific elements / policies contained in the Regulation 18 Local Plan. We have also published at Annex 1 how specific consultees and other organisations responded to the sentiment questions.

Summary of issues raised

10.6 A summary of issues raised has been provided. This section has been drafted following a review of all comment received with the analysis then grouped into key themes, and in most cases presented separately for supportive, neutral, opposed responses, as well as for those responses submitted with no stated sentiment. This approach has ensured that different viewpoints have been captured accurately and proportionately.

- 10.7 Where coordinated or template representations were submitted, these are identified and reported separately. This has been done to maintain transparency while avoiding distortion of thematic conclusions.
- 10.8 Many respondents wished to comment on the overall housing requirement, which is dictated by Government. Given that this is not within the gift of TMBC, we did not include a specific question on this. However, where responses of this nature were received by email, these responses were generally inputted either in the vision and objectives section or within the spatial strategy section and reported accordingly.

Specific Consultation Bodies and other organisations

- 10.9 The response summaries have also provided a dedicated summary for Specific Consultation Bodies and other organisations. A list of the specific consultation bodies and other organisations is provided in Annex 1. The sub-section in the analysis summaries has been provided to reflect responses that are either strategic or technically important in relation to plan-making. Annex 2 provides a summary of how the Specific Consultation Bodies and other organisations responded to the sentiment questions.

Officer response

- 10.10 Each consultation question concludes with an officer response, which may provide clarification and explain the approach taken in the Regulation 18 Local Plan as necessary, set out where areas of concern can be addressed and / or propose amendments for the next stage of plan-making.

Analysis reporting generally

- 10.11 Overall, it is hoped that the analysis provides Members with a balanced, evidence-based picture of consultation feedback, which clearly distinguishes different respondent groups and demonstrates how the Local Plan can evolve to respond to issues raised as the Local Plan progresses to the next stage.

Draft site allocations - Further consultation analysis to be completed –

- 10.12 In the nine weeks that we have had since the consultation closed it has not been possible to complete the reporting on the responses that we received in relation to draft site allocations in time for HPSSC publication. However, this work will be near to completion shortly and will be shared with Members informally as soon as possible.
- 10.13 The consultation provided a map where people could drop a pin and comment on a draft allocation or allocations. In line with normal trends, a significant proportion of responses were received (2705) as part of the consultation relating to this aspect of the Regulation 18 Local Plan.

- 10.14 Most respondents felt negatively about the site that they commented upon. This has been noted, however, as part of plan making, we are required to address the Government's housing requirement and therefore we are not able to address the negative feelings that our communities may have in relation to delivering housing and employment growth.
- 10.15 Work is progressing on the Council's growth strategy for the next stage of the Local Plan and consultation responses will continue to be considered alongside this work to refine the growth strategy. A number of site promoters submitted information relating to site allocations and this information can be viewed via our website.
- 10.16 Whilst understanding objections and support to the draft allocations is important to progressing our Local Plan, it has been necessary to firstly focus on the main topic-based aspects of the Plan in order to progress the Local Plan at the pace that is required and to meet the LDS timetable. The focus of reporting to Members for this Committee is therefore on these key topic-based themes, with reporting on site allocation responses to follow very shortly. We will continue to work with Members as we progress the Plan towards its next Regulation 19 stage.

11 Next steps

- 11.1 The next stage in the preparation of the Local Plan will be to produce a Regulation 19 Draft Local Plan. The Local Development Scheme identifies this to be published and consulted upon in quarter 2 2026 / 2027, ahead of submission by the end of December 2026. The following sets out in general terms the Local Plan work programme leading up to the publication of the Regulation 19 Local Plan.
- a) Procure further evidence to support the Regulation 19 Local Plan, taking into account advice from the Planning Advisory Service. This will include updating housing, economy, infrastructure, flood risk, sites related evidence (Green Belt, landscape, heritage), density, urban capacity etc.
 - b) Review the Local Plan and its policies taking into account consultation comments, as identified in the analysis summaries and other relevant information and evidence. In addition, draft site allocation policies, where these are required for specific sites.
 - c) Consider the draft NPPF in view of the emerging Local Plan. Where it is prudent to do so, ensure that emerging policies are future-proofed as far as possible, whilst being mindful that this Plan will be assessed against the December 2024 NPPF.
 - d) Consider and update the Local Plan growth strategy, including working with developers, infrastructure providers and other stakeholders to understand / test the capacity and deliverability of sites. It is worth noting that additional

resource has been provided to the Planning Policy Team to progress work on strategic and other sites to support the plan-making process.

- e) Work with infrastructure providers to progress the Infrastructure Delivery Plan, taking into account emerging site allocations.
- f) Work with Local Authority and other partners to progress Duty To Cooperate matters including Statements of Common Ground (SoCG) and Memorandums of Understanding (MoUs), as relevant.
- g) Update relevant supporting documents and produce other topic papers such as that required for housing.
- h) Obtain relevant legal advice on plan-making as required, alongside facilitating a Planning Inspectorate Advisory visit.
- i) Undertake further engagement with Members, other organisations and other Council services as relevant.
- j) Update the Council's Statement of Community Involvement.

12 Local Plan Transport Evidence base

- 12.1 The Cabinet report of 29th October 2026, recognised Members significant concerns in respect of ensuring that infrastructure was developed to support both new and existing communities and in respect of traffic and highways modelling. A motion was proposed and supported to progress enhanced engagement with infrastructure providers and to ensure a robust transport evidence base for the Local Plan.
- 12.2 The transport evidence to date comprises a comprehensive suite of technical assessments which are designed to understand existing conditions, forecast future travel demand and evaluate transport impacts of potential growth scenarios associated with the emerging Local Plan for the Regulation 18 stage in plan-making. Work has also been undertaken to provide detailed assessments of 27 key junctions to identify potential improvement schemes that will be required to support proposed growth. In addition, the Council has also published a Draft Active Travel Strategy to set out opportunities to enable walking and cycling across the borough, to improve connectivity, reduce car dependency and guide investment in active and sustainable travel. Together, the work undertaken so far ensures the Local Plan at the Regulation 18 stage is supported and informed by robust analysis in relation to transport capacity and constraints, effects of development on the highway and public transport networks, likely mitigation and infrastructure requirements and opportunities to enhance sustainable travel. The evidence is both robust and proportionate for the Local Plan Regulation 18 stage.

- 12.3 The work undertaken so far also clearly sets out what further transport related work is required to inform and support the next stage in plan-making for the Regulation 19 Local Plan. This includes:
- 1) Further testing of a preferred growth scenario for Regulation 19, which will involve running a new model scenario that incorporates updated site selections, revised housing and employment trajectories, incorporating up-to-date information and consultation feedback for example from National Highways, Kent County Council and other stakeholders as relevant.
 - 2) More detailed junction design work and identifying whether any additional junctions will require mitigation as per the preferred growth scenario that will be tested. This will involve designing mitigation options, testing layouts, signalisation and capacity improvements. This will include liaison with National Highways and Kent County Council.
 - 3) Integrating the findings into the Infrastructure Delivery Plan, including aligning proposed allocations with required transport improvements and identifying delivery pathways (S106, external funding, phasing).
- 12.4 In addition to the above, the Council has recently procured a Bus Study. This study will examine the current local bus network operating across Tonbridge and Malling, to understand how the network and related infrastructure could be improved to support the proposed spatial strategy and developments in the Local Plan. The study is required to help demonstrate how mode shift from the private car could be achieved during the plan period, to help mitigate the trip impacts of growth. The study will feed into the overall transport evidence base.
- 12.5 In addition to the above, we have discussed with our consultants whether the evidence obtained thus far would justify more detailed modelling in certain locations, taking into account what is reasonable and proportionate to be progressed to support the Local Plan. Whilst we are unable to fully answer this question currently, on the basis that the Regulation 19 scenario testing will be required to inform this, it is likely that further detailed modelling (VISSIM / Microsimulation) could be justified based on the current evidence for two locations in the borough; Tonbridge area and M20 (Junction 6).
- 12.6 We have not yet received the costings for the transport work for Regulation 19. However, we have enquired about any additional costs associated with microsimulation. Costs to undertake microsimulation for the whole Tonbridge area is likely to be in the region of £45k and to develop a new model for the M20 (Junction 6) could be in the region of up to £80k. However, this could be lower dependent on whether an existing model can be updated. This is currently being investigated.
- 12.7 Where other highways modelling issues were identified as part of the evidence for Regulation 18, junction modelling will be undertaken as part of the existing work

programme with the Council's Highways consultants and in collaboration with National Highways and Kent County Council, as well as other stakeholders as relevant. Work relating to specific sites will be considered with site promoters. It will be necessary for site promoters to ensure that they have fully evidenced how highways impacts can be mitigated. Any work of this nature will be reviewed by the Local Plan team and the Council's Highways consultants.

13 Other Options

- 13.1 The Government has made it clear that local plans should be progressed as quickly as possible and submitted no later than 31st December 2026. The Government have made it clear that it is unacceptable for local authorities not to make a local plan and that if plans are not in place, the Government will intervene under new intervention powers to ensure housing delivery. Should the Council not succeed to submit a Local Plan by the end of December 2026 date, then plan-making will need to be undertaken under a new planning system and in accordance with a new NPPF, which is due to be published in July 2026.
- 13.2 Progressing a Local Plan under the new Planning system would result in starting the plan-making process from the beginning given that there are new requirements and processes under the new plan making system to follow. This would result in a delay to adopting a local plan and therefore a continued and real risk of speculative development, and for a much longer period of time. This risks the inability to plan strategically which particularly affects the delivery of and consideration of infrastructure on a strategic basis. It would also mean instability and uncertainty regarding future decisions about growth in the area given that future strategic plan-making will be undertaken across the sub-region when Local Government Reorganisation takes place. There is also a risk of Government intervention, as reported to this Committee previously. Given the above, it is therefore important to progress this Local Plan in accordance with the Local Plan timetable to ensure that communities and stakeholders have certainty and that priorities for our communities can be delivered and can continue to be delivered when Local Government Reorganisation takes place.

14 Financial and Value for Money Considerations

- 14.1 Local Plan costs were estimated and reported to HPSSC on 12th February 2025 and a budget of £105,791 for 2026/27 for transport modelling was estimated. Given the work required alongside the costs of the Bus Study at approximately £32K, additional funding will be required should microsimulation be required to support the Regulation 19 Local Plan.
- 14.2 There is a current underspend of approximately £56k, however, this underspend is accounted for to progress studies that did not occur in the 2025/26 financial year but will occur in 2026/27. For example, to progress the Strategic Flood Risk Assessment Level 2, a density study and work on Gypsy and Traveller sites.

- 14.3 Following the Regulation 18 consultation, we are now in a position to understand the further work required to progress the Local Plan. We will shortly be reviewing the budget for 2026/27 to understand the position against the estimated costs presented in February 2025. It is worth noting, that the additional transport work discussed in section 12 (Bus Study and Microsimulation) was not budgeted for in the February 2025 estimate as at this stage the requirement for this work was not known.
- 14.4 Should microsimulation modelling be progressed, then further funds may be required, over and above those estimated in February 2025 and subsequently agreed by Full Council as part of budget setting. The Local Plan budget is kept under review with the Finance team.

15 Risk Assessment

- 15.1 The Council provided an up-to-date risk assessment for the purposes of the previous HPSSC report (3rd February 2026). There have been no updates since this time. However, the below remains to be relevant.
- 15.2 The preparation of the new local plan will provide the council with an up-to-date Local Plan on adoption. This will alleviate the current risks associated with not having an up-to-date development plan in place. There is a requirement to meet current National Planning Policy in delivering a new Local Plan and this will be tested at examination. The Government have been clear that it is unacceptable for LPAs to not make a Local Plan and the intervention criteria has been updated. The Government are also clear that plans should continue to be progressed under the existing planning system without delay and have provided transitional arrangements to achieve this where all plans will need to be submitted no later than 31st December 2026.
- 15.3 The Risk assessment has been re-provided at Annex 3.

16 Legal Implications

- 16.1 Local Planning Authorities are required to prepare and keep an up-to-date development plan for their area. The Planning and Compulsory Purchase 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) set out the requirements and the statutory process for the preparation of a Local Plan.

17 Consultation and Communications

- 17.1 The Council adopted a Statement of Community Involvement (SCI) in September 2022, and a Local Plan Engagement Strategy was adopted by Cabinet in December 2024. These documents set out the consultation and communication arrangements that have been implemented in relation to the Regulation 18 Local Plan consultation. It has been advised for the Council's SCI to be updated ahead of the Regulation 19 consultation by the Planning Advisory Service.

18 Cross Cutting Issues

18.1 Climate Change and Biodiversity

18.1.1 Adaptation and resilience have been considered.

18.1.2 Climate change advice has not been sought in the preparation of the options and recommendations in this report. The Local Plan itself once adopted will seek to address climate change mitigation and adaptation and will seek to reduce carbon emissions as relevant to new and existing development.

18.2 Equalities and Diversity

18.2.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users. An Equalities Impact assessment was prepared alongside the Local Plan and this will be updated to inform the Regulation 19 Local Plan.

18.3 Data Protection

18.4 As part of the consultation data has been collected via our Common Place consultation system. The relevant privacy policy can be accessed here: <https://www.commonplace.is/privacy-policy> The Council has published a comments record, however this has been checked and meets GDPR requirements. In addition, personal data has also been redacted from other related consultation documents that were submitted. The Council's Privacy Policy can be accessed here: <https://www.tmbc.gov.uk/council/local-plan-privacy-notice>

Background Papers	<ul style="list-style-type: none"> • Statement of Community Involvement https://www.tmbc.gov.uk/downloads/download/470/statement-of-community-involvement • Local Plan Engagement Strategy https://democracy.tmbc.gov.uk/documents/s82843/Updated+Annex+1+-+TMBC+Local+Plan+Engagement+and+Consultation+Strategy.Final.pdf • Analysis summaries (presented on a chapter basis) and consultation responses / List of additional material submitted as part of the Regulation 18 consultation www.tmbc.gov.uk/local-plan-responses
Annexs	<p>Annex 1 – List of Specific Consultation Bodies and other organisations</p> <p>Annex 2 – Sentiment question responses from Specific Consultation Bodies and other organisations</p> <p>Annex 3 - Risk Assessment</p>

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Annex 1 Statutory Consultees and Specific Consultation Bodies

The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (Regulation 2)

In these Regulations a “relevant authority” means:

- a) a local planning authority
- b) a county council
- c) a parish council
- d) a local policing body

Specific consultation bodies in the Regulations are as follows:

- a) Coal Authority
- b) Environment Agency
- c) Historic Buildings and Monuments Commission for England (known as English Heritage)
- d) Marine Management Organisation
- e) Natural England
- f) Network Rail Infrastructure Limited
- g) a strategic highways company (for the time being appointed under Part 1 of the Infrastructure Act 2015) any part of whose area is in or adjoins the area of the local planning authority. Where the Secretary of State is the highway authority for any highway in the area of the local planning authority, the Secretary of State for Transport
- h) a relevant authority any part of whose area is in or adjoins the local planning authority's area and a relevant authority any part of whose area is in or adjoins the local planning authority's area
- i) any person to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003, and who owns or controls electronic communications apparatus situated in any part of the local planning authority's area
- j) if it exercises functions in any part of the local planning authority's area:
 - an integrated care board
 - NHS England
 - a person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989
 - a person to whom a licence has been granted under section 7(2) of the Gas Act 1986
 - a sewerage undertaker
 - a water undertaker
- k) the Homes and Communities Agency (now Homes England)
- l) where the local planning authority are a London borough council, the Mayor of London;

Duty to co-operate

The duty to cooperate was introduced by the Localism Act 2011 and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. The duty to cooperate covers local planning authorities, county councils and the following bodies:

- a) Environment Agency
- b) Historic Buildings and Monuments Commission for England (known as English Heritage)
- c) Natural England
- d) Mayor of London
- e) Civil Aviation Authority
- f) Homes and Communities Agency (now Homes England)
- g) each integrated care board
- h) NHS England
- i) Office of Rail and Road
- j) Transport for London
- k) Each Integrated Transport Authority
- l) Each highway authority (including the Secretary of State, where the Secretary of State is the highways authority)
- m) Marine Management Organisation.

(2) The bodies prescribed for the purposes of section 33A (9) of the Act are:

- a) each local enterprise partnership; and
- b) each local nature partnership

Responses received from organisation bodies to the Regulation 18 Local Plan consultation:

Consultation Body	Response received	No response received
Civil Aviation Authority		
Coal Authority		
Environment Agency		
Highways Agency		
Historic England (English Heritage)		
Homes England		
NHS Kent & Medway		
Marine Management Organisation		

Mobile UK		
National Grid		
National Highways		
Natural England		
Network Rail		
NHS Property Services		
Police and Crime Commissioners		
South East Water		
Southern Water		
Southern Gas Networks		
UK Power Networks		
Other Local Authorities		
• Kent County Council		
• Gravesham		
• Maidstone		
• Medway		
• Sevenoaks		
• Tunbridge Wells		
Parish/Town Councils		
• Addington		
• Aylesford		
• Birling		
• Borough Green		
• Burham		
• Ditton		
• East Malling & Larkfield		
• East Peckham		
• Hadlow		

• Hildenborough		
• Ightham		
• Kings Hill		
• Leybourne		
• Mereworth		
• Offham		
• Platt		
• Plaxtol		
• Ryarsh		
• Shipbourne		
• Snodland		
• Stansted		
• Trottiscliffe		
• Watringbury		
• West Malling		
• West Peckham		
• Wouldham		
• Wrotham		
General Consultation Bodies		
• High Weald National Landscape		
• Local Enterprise Partnership		
• Kent Downs National Landscape		
• Kent Nature Partnership		
• Kent Wildlife Trust		
• RSPB		
• Sport England		
• Woodland Trust		

Annex 2: Sentiment question responses from Specific Consultation Bodies and other organisations

This annex provides an overview of the above for those organisations who answered Local Plan consultation sentiment questions. Please note that if an organisation is not listed, then this means that sentiment questions were not answered by that organisation. The main reason for this is that some organisations submitted their comments electronically (by email) and in these responses an answer to the sentiment question was not provided.

Specific Consultation Bodies

Historic England

- 1 - Do you agree with the Local Plan overall vision? – Agree (plus comment)
- 2 - Do you agree with the Local Plan objectives? – Agree (plus comment)
- 44 - Do you agree with Policy HE1: The Historic Environment? – Strongly Agree (plus comment)
- 45 - Do you agree with Policy HE2: Listed Buildings? – Agree (no comments)
- 46 - Do you agree with Policy HE3: Conservation Areas? - Agree (no comments)
- 47 - Do you agree with Policy HE4: Historic Parks and gardens? - Agree (no comments)
- 48 - Do you agree with Policy HE5: Archaeology? - Agree (no comments)
- 49 - Do you agree with Policy HE6: Enabling Development for Heritage Assets? - Agree (no comments)
- 99 - Do you agree with Policy A1: Housing and Employment Allocations? – Agree (with comments)

Network Rail

- 92 - Do you agree with Policy INF2: Sustainable Transport and Active Travel? – Strongly Agree (with further comments)

NHS Kent & Medway

- 4 - Do you agree with Policy SP1 Spatial Strategy? – Agree (with comments)
- 15 - Do you agree with Policy CC1: Addressing Climate Change? – Strongly Agree (with comments)
- 16 - Do you agree with Policy CC2: Circular Economy and its approach to reducing waste and reusing resources? – Strongly Agree (with comments)
- 17 - Do you agree with Policy CC3: Sustainable Design and Construction – Strongly Agree (with comments)
- 18 - Do you agree with Policy CC4: Energy and Heating? – Strongly Agree (with comments)
- 19 - Do you agree with Policy CC5: Renewable and Low Carbon and Heat Projects? - Strongly Agree (with comments)
- 20 - Do you agree with Policy CC6: Water Efficiency? – Agree (with comments)
- 99 - Do you agree with Policy A1: Housing and Employment Allocations? – Agree (no comments)

Parish Councils

Aylesford Parish Council

- 1 - Do you agree with the Local Plan overall vision? – Neutral (with comments)
- 2 - Do you agree with the Local Plan objectives? - Agree (no comments)
- 4 - Do you agree with Policy SP1 Spatial Strategy? – Disagree (with comments)
- 5 - Do you agree with the spatial distribution for future growth in the borough provided at table 5.2? - Disagree (with comments)
- 6 - Do you agree with the settlement hierarchy in table 5.6? - Disagree (with comments)
- 7 - Do you agree with Policy SP3: Settlement hierarchy and general development principles? - Disagree (with comments)
- 9 - Do you agree with Policy SP5: Future Employment Growth? – Neutral (with comments)
- 10 - Do you agree with Policy SP7: Green Belt? – Neutral (with comments)
- 11 - Do you agree with SP8 Managing Development in the Green Belt? – Neutral (with comments)
- 12 - Policy SP9 proposes a Local Green Gap near West Malling, Kings Hill and East Malling. Do you agree with the proposed boundary? – Agree (with comments)
- 15 - Do you agree with Policy CC1: Addressing Climate Change? – Agree (with comments)
- 16 - Do you agree with Policy CC2: Circular Economy and its approach to reducing waste and reusing resources? – Agree (with comments)
- 17 - Do you agree with Policy CC3: Sustainable Design and Construction? - Agree (with comments)
- 18 - Do you agree with Policy CC4: Energy and Heating? - Agree (with comments)
- 19 - Do you agree with Policy CC5: Renewable and Low Carbon and Heat Projects? - Agree (with comments)
- 20 - Do you agree with Policy CC6: Water Efficiency? - Agree (with comments)
- 21 - Do you agree with Policy CC7: Managing Development Within Flood Risk Areas? - Agree (with comments)
- 22 - Do you agree with Policy CC8: Sustainable Drainage Systems (SuDS)? - Agree (with comments)
- 26 - Do you agree with Policy NE1: Conserving and enhancing the natural environment? – Agree (with comments)
- 27 - Do you agree with Policy NE2: National Landscapes? - Agree (with comments)
- 28 - Do you agree with Policy NE3: Landscape Character? - Agree (with comments)
- 29 - Do you agree with Policy NE4: Designated sites, irreplaceable habitat and priority habitat and species? – Agree (with comments)
- 30 - Do you agree with Policy NE5: Biodiversity Net Gain? - Agree (with comments)
- 32 - Do you agree with Policy NE6: Green and Blue Infrastructure? - Agree (with comments)
- 33 - Do you agree with Policy NE7: Woodland, trees and hedgerows? – Agree (no comments)
- 37 - Do you agree with Policy NE8: Best and most versatile agricultural land? - – Agree (no comments)
- 38 - Do you agree with Policy NE9 Noise, vibration and odour Pollution. – Agree (no comments)
- 39 - Do you agree with Policy NE10 Air quality? — Agree (no comments)
- 40 - Do you agree with Policy NE11: Ground Contamination? – Agree (no comments)

- 41 - Do you agree with Policy NE12: Light Pollution? – Agree (no comments)
- 44 - Do you agree with Policy HE1: The Historic Environment? – Agree (with comments)
- 45 - Do you agree with Policy HE2: Listed Buildings? – Agree (with comments)
- 46 - Do you agree with Policy HE3: Conservation Areas? – Agree (with comments)
- 47 - Do you agree with Policy HE4: Historic Parks and gardens? – Agree (with comments)
- 48 - Do you agree with Policy HE5: Archaeology? – Agree (with comments)
- 49 - Do you agree with Policy HE6: Enabling Development for Heritage Assets? – Agree (with comments)
- 52 - Do you agree with Policy D1: Achieving High Quality Design? – Agree (with comments)
- 53 - Do you agree with Policy D2: Design Codes and Masterplans? – Agree (with comments)
- 55 - Overall, how Agree are you with the Design policies? – – 4 (no comments)
- 56 - Do you agree with Policy H1: Housing to Address Needs? – Neutral (no comments)
- 57 - Do you agree with Policy H2: Affordable Housing? – Agree (no comments)
- 59 - Do you agree with Policy H3: Build to Rent? – Agree (no comments)
- 60 - Do you agree with Policy H4: Gypsy Traveller and Travelling Showpeople – Safeguarding Sites? - Agree (with comments)
- 61 - Do you agree with Policy H5: Gypsy, Traveller and Travelling Showpeople – Site Criteria? – Agree (with comments)
- 62 - Do you agree with Policy H6: Specialist Housing to Meet the Needs of Older and Vulnerable People? - Agree (no comments)
- 63 - Do you agree with Policy H7: Accessible and Adaptable Homes? – Agree (no comments)
- 64 - Do you agree with Policy H8: Self and Custom Build Homes? – Agree (no comments)
- 65 - Do you agree with Policy H9: Houses in Multiple Occupation? – Agree (no comments)
- 66 - Do you agree with Policy H10: Residential Extensions, Alterations, Annexes and Ancillary Accommodation? - Agree (no comments)
- 81 - Do you agree with Policy E1: Supporting a Prosperous, Inclusive and 2.Sustainable Economic Future? – Agree (no comments)
- 82 - Do you agree with Policy E2: Strategic Employment Areas? – Agree (no comments)
- 83 - Do you agree with Policy E3: Other Employment Sites, Premises and Floorspace? - Agree (with comments)
- 84 - Do you agree with Policy E4: Employment and Skills? - Agree (no comments)
- 85 - Do you agree with Policy E5: Supporting the Vitality of Town, Service and Local Centres? – Agree (no comments)
- 86 - Do you agree with Policy E6: Primary Shopping Areas? – Agree (no comments)
- 87 - Do you agree with Policy E7: Above Ground Floorspace? – Agree (no comments)
- 88 - Do you agree with Policy E8: Sequential and Local Impact Tests? – Agree (no comments)
- 69 - Do you agree with Policy R1: Rural Exception Sites? - Agree (no comments)
- 70 - Do you agree with Policy R2: Housing For Rural Workers? - Agree (with comments)

- 71 - Do you agree with Policy R3: Replacement Dwellings Outside Settlement Confines? - Agree (no comments)
- 72 - Do you agree with Policy R4: Conversion of an Existing Building to Residential Use Outside Settlement Confines? – Agree (no comments)
- 73 - Do you agree with Policy R5: Residential Parks? – Agree (no comments)
- 74 - Do you agree with Policy R6: Employment Development Outside Existing Settlement Confines? – Agree (no comments)
- 75 - Do you agree with Policy R7: Agriculture, Forestry and Horticulture? – Agree (no comments)
- 76 - Do you agree with Policy R8: Farm Diversification? - Agree (no comments)
- 77 - Do you agree with Policy R9: Sustainable Tourism and Visitor Accommodation? - Agree (no comments)
- 78 - Do you agree with Policy R10: Equestrian Facilities in the Countryside? – Agree (no comments)
- 91 - Do you agree with Policy INF1: Provision of Infrastructure and Services? – Neutral (with comments)
- 92 - Do you agree with Policy INF2: Sustainable Transport and Active Travel? – Disagree (with comments)
- 93 - Do you agree with Policy H2: Affordable Housing? - {690476b4bce7f97ee941a063} – Neutral (with comments)
- 94 - Do you agree with Policy INF3: Parking? – Agree (with comments)
- 95 - Do you agree with Policy INF4: Community Facilities? - Agree (with comments)
- 96 - Do you agree with Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision? – Agree (with comments)
- 99 - Do you agree with Policy A1: Housing and Employment Allocations? – Neutral (with comments)
- 117 - What do you think of our Active Travel Strategy? - Neutral (with comments)

Burham Parish Council

- 4 - Do you agree with Policy SP1 Spatial Strategy? – Agree (regarding SP1)
- 5 - Do you agree with the spatial distribution for future growth in the borough provided at table 5.2? - Agree (with comments)
- 7 - Do you agree with Policy SP3: Settlement hierarchy and general development principles? – Strongly Agree (with comments)
- 9 - Do you agree with Policy SP5: Future Employment Growth? – Neutral (no comments)
- 10 - Do you agree with Policy SP7: Green Belt? – Strongly Agree (with comments)
- 11 - Do you agree with SP8 Managing Development in the Green Belt? – Agree (with comments)
- 12 - Policy SP9 proposes a Local Green Gap near West Malling, Kings Hill and East Malling. Do you agree with the proposed boundary? – Disagree (with comments)
- 91 - Do you agree with Policy INF1: Provision of Infrastructure and Services? – Strongly Disagree (with comments)
- 92 - Do you agree with Policy INF2: Sustainable Transport and Active Travel? – Strongly Disagree (with comments)
- 94 - Do you agree with Policy INF3: Parking? - Strongly Disagree (with comments)
- 95 - Do you agree with Policy INF4: Community Facilities? – Agree (with comments)
- 96 - Do you agree with Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision? – Agree (with comments)

East Malling and Larkfield Parish Council

- 12 - Policy SP9 proposes a Local Green Gap near West Malling, Kings Hill and East Malling. Do you agree with the proposed boundary? – Strongly Agree (with comments)
- 96 - Do you agree with Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision? – Agree (with comments)

East Peckham Parish Council

- 1 - Do you agree with the Local Plan overall vision? – Strongly disagree
- 2 - Do you agree with the Local Plan objectives? - Strongly Disagree
- 4 - Do you agree with Policy SP1 Spatial Strategy? – Strongly Disagree
- 5 - Do you agree with the spatial distribution for future growth in the borough provided at table 5.2? - Strongly Disagree
- 6 - Do you agree with the settlement hierarchy in table 5.6? – Strongly Disagree
- 7 - Do you agree with Policy SP3: Settlement hierarchy and general development principles? – Strongly Disagree
- 10 - Do you agree with Policy SP7: Green Belt? – Strongly Disagree
- 11 - Do you agree with SP8 Managing Development in the Green Belt? – Strongly Disagree
- 12 - Policy SP9 proposes a Local Green Gap near West Malling, Kings Hill and East Malling. Do you agree with the proposed boundary? – Strongly Disagree
- 46 - Do you agree with Policy HE3: Conservation Areas? – Strongly Disagree
- 52 - Do you agree with Policy D1: Achieving High Quality Design? – Strongly Disagree
- 53 - Do you agree with Policy D2: Design Codes and Masterplans? - Strongly Disagree

Mereworth Parish Council

- 1 - Do you agree with the Local Plan overall vision? – Strongly Agree
- 2 - Do you agree with the Local Plan objectives? - Strongly Agree (no comments)

Offham Parish Council

- 1 - Do you agree with the Local Plan overall vision? – Neutral
- 2 - Do you agree with the Local Plan objectives? - Neutral (no comments)

Stansted Parish Council

- 44 - Do you agree with Policy HE1: The Historic Environment? – Strongly Disagree
- 52 - Do you agree with Policy D1: Achieving High Quality Design? – Strongly Agree (no comments)
- 53 - Do you agree with Policy D2: Design Codes and Masterplans? – Neutral
- 69 - Do you agree with Policy R1: Rural Exception Sites? – Strongly Agree (no comments)
- 70 - Do you agree with Policy R2: Housing For Rural Workers? – Strongly Agree (no comments)
- 71 - Do you agree with Policy R3: Replacement Dwellings Outside Settlement Confines? - Strongly Agree (no comments)
- 72 - Do you agree with Policy R4: Conversion of an Existing Building to Residential Use Outside Settlement Confines? – Strongly Agree (no comments)
- 73 - Do you agree with Policy R5: Residential Parks? - Strongly Disagree

West Malling Parish Council

- 1 - Do you agree with the Local Plan overall vision? – Agree
- 2 - Do you agree with the Local Plan objectives? - Agree
- 4 - Do you agree with Policy SP1 Spatial Strategy? – Neutral
- 5 - Do you agree with the spatial distribution for future growth in the borough provided at table 5.2? - Neutral
- 6 - Do you agree with the settlement hierarchy in table 5.6? – Agree
- 7 - Do you agree with Policy SP3: Settlement hierarchy and general development principles? – Agree
- 9 - Do you agree with Policy SP5: Future Employment Growth? – Agree
- 10 - Do you agree with Policy SP7: Green Belt? – Neutral
- 11 - Do you agree with SP8 Managing Development in the Green Belt? – Disagree
- 12 - Policy SP9 proposes a Local Green Gap near West Malling, Kings Hill and East Malling. Do you agree with the proposed boundary? – Disagree
- 15 - Do you agree with Policy CC1: Addressing Climate Change? – Strongly Agree
- 16 - Do you agree with Policy CC2: Circular Economy and its approach to reducing waste and reusing resources? – Agree
- 17 - Do you agree with Policy CC3: Sustainable Design and Construction – Agree
- 18 - Do you agree with Policy CC4: Energy and Heating? – Agree
- 19 - Do you agree with Policy CC5: Renewable and Low Carbon and Heat Projects? - Strongly Agree
- 20 - Do you agree with Policy CC6: Water Efficiency? – Agree
- 21 - Do you agree with Policy CC7: Managing Development Within Flood Risk Areas? - Neutral
- 22 - Do you agree with Policy CC8: Sustainable Drainage Systems (SuDS)? - Agree
- 26 - Do you agree with Policy NE1: Conserving and enhancing the natural environment? – Agree
- 27 - Do you agree with Policy NE2: National Landscapes? – Agree
- 28 - Do you agree with Policy NE3: Landscape Character? – Agree
- 29 - Do you agree with Policy NE4: Designated sites, irreplaceable habitat and priority habitat and species? – Agree
- 30 - Do you agree with Policy NE5: Biodiversity Net Gain? – Agree
- 32 - Do you agree with Policy NE6: Green and Blue Infrastructure? - Agree (no comments)
- 33 - Do you agree with Policy NE7: Woodland, trees and hedgerows? – Agree
- 37 - Do you agree with Policy NE8: Best and most versatile agricultural land? - Agree
- 38 - Do you agree with Policy NE9 Noise, vibration and odour Pollution. – Agree
- 39 - Do you agree with Policy NE10 Air quality? – Agree
- 44 - Do you agree with Policy HE1: The Historic Environment? – Agree
- 45 - Do you agree with Policy HE2: Listed Buildings? – Agree
- 46 - Do you agree with Policy HE3: Conservation Areas? – Agree
- 47 - Do you agree with Policy HE4: Historic Parks and gardens? – Agree
- 48 - Do you agree with Policy HE5: Archaeology? – Agree
- 49 - Do you agree with Policy HE6: Enabling Development for Heritage Assets? – Neutral
- 52 - Do you agree with Policy D1: Achieving High Quality Design? – Agree
- 53 - Do you agree with Policy D2: Design Codes and Masterplans? – Agree
- 56 - Do you agree with Policy H1: Housing to Address Needs? – Agree
- 57 - Do you agree with Policy H2: Affordable Housing? – Agree

- 59 - Do you agree with Policy H3: Build to Rent? – Agree
- 60 - Do you agree with Policy H4: Gypsy Traveller and Travelling Showpeople – Safeguarding Sites? – Agree
- 61 - Do you agree with Policy H5: Gypsy, Traveller and Travelling Showpeople – Site Criteria? – Agree
- 62 - Do you agree with Policy H6: Specialist Housing to Meet the Needs of Older and Vulnerable People? – Agree
- 64 - Do you agree with Policy H8: Self and Custom Build Homes? – Agree
- 65 - Do you agree with Policy H9: Houses in Multiple Occupation? – Agree
- 81 - Do you agree with Policy E1: Supporting a Prosperous, Inclusive and 2. Sustainable Economic Future? – Agree
- 82 - Do you agree with Policy E2: Strategic Employment Areas? – Neutral
- 83 - Do you agree with Policy E3: Other Employment Sites, Premises and Floorspace? – Strongly Agree
- 84 - Do you agree with Policy E4: Employment and Skills? - Strongly Agree
- 85 - Do you agree with Policy E5: Supporting the Vitality of Town, Service and Local Centres? – Strongly Agree
- 87 - Do you agree with Policy E7: Above Ground Floorspace? – Neutral
- 88 - Do you agree with Policy E8: Sequential and Local Impact Tests? – Strongly Agree
- 69 - Do you agree with Policy R1: Rural Exception Sites? – Agree
- 70 - Do you agree with Policy R2: Housing For Rural Workers? – Neutral
- 71 - Do you agree with Policy R3: Replacement Dwellings Outside Settlement Confines? - Strongly Agree
- 72 - Do you agree with Policy R4: Conversion of an Existing Building to Residential Use Outside Settlement Confines? – Strongly Agree
- 73 - Do you agree with Policy R5: Residential Parks? – Strongly Agree
- 74 - Do you agree with Policy R6: Employment Development Outside Existing Settlement Confines? – Agree
- 75 - Do you agree with Policy R7: Agriculture, Forestry and Horticulture? – Strongly Agree
- 76 - Do you agree with Policy R8: Farm Diversification? - Strongly Agree
- 77 - Do you agree with Policy R9: Sustainable Tourism and Visitor Accommodation? - Strongly Agree
- 78 - Do you agree with Policy R10: Equestrian Facilities in the Countryside? – Strongly Agree
- 91 - Do you agree with Policy INF1: Provision of Infrastructure and Services? – Agree
- 92 - Do you agree with Policy INF2: Sustainable Transport and Active Travel? – Agree
- 93 - Do you agree with Policy H2: Affordable Housing? – Neutral
- 94 - Do you agree with Policy INF3: Parking? – Agree
- 95 - Do you agree with Policy INF4: Community Facilities? – Agree
- 96 - Do you agree with Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision? – Agree

Other Local Authorities

Maidstone Borough Council

- 1 - Do you agree with the Local Plan overall vision? – Neutral (no comments)
- 2 - Do you agree with the Local Plan objectives? - Neutral

- 4 - Do you agree with Policy SP1 Spatial Strategy? – Neutral (no comments)
- 5 - Do you agree with the spatial distribution for future growth in the borough provided at table 5.2? - Disagree
- 6 - Do you agree with the settlement hierarchy in table 5.6? – Neutral (no comments)
- 7 - Do you agree with Policy SP3: Settlement hierarchy and general development principles? – Neutral
- 9 - Do you agree with Policy SP5: Future Employment Growth? – Agree
- 10 - Do you agree with Policy SP7: Green Belt? – Neutral
- 12 - Policy SP9 proposes a Local Green Gap near West Malling, Kings Hill and East Malling. Do you agree with the proposed boundary? – Neutral
- 15 - Do you agree with Policy CC1: Addressing Climate Change? – Neutral (no comments)
- 16 - Do you agree with Policy CC2: Circular Economy and its approach to reducing waste and reusing resources? – Neutral (no comments)
- 17 - Do you agree with Policy CC3: Sustainable Design and Construction – Neutral
- 18 - Do you agree with Policy CC4: Energy and Heating? – Neutral (no comments)
- 19 - Do you agree with Policy CC5: Renewable and Low Carbon and Heat Projects? - Neutral (no comments)
- 20 - Do you agree with Policy CC6: Water Efficiency? – Neutral (no comments)
- 21 - Do you agree with Policy CC7: Managing Development Within Flood Risk Areas? - Neutral (no comments)
- 22 - Do you agree with Policy CC8: Sustainable Drainage Systems (SuDS)? - Neutral (no comments)
- 26 - Do you agree with Policy NE1: Conserving and enhancing the natural environment? – Disagree
- 27 - Do you agree with Policy NE2: National Landscapes? – Neutral (no comments)
- 28 - Do you agree with Policy NE3: Landscape Character? – Neutral (no comments)
- 29 - Do you agree with Policy NE4: Designated sites, irreplaceable habitat and priority habitat and species? – Neutral (no comments)
- 30 - Do you agree with Policy NE5: Biodiversity Net Gain? – Disagree
- 32 - Do you agree with Policy NE6: Green and Blue Infrastructure? – Neutral (no comments)
- 33 - Do you agree with Policy NE7: Woodland, trees and hedgerows? – Neutral (no comments)
- 37 - Do you agree with Policy NE8: Best and most versatile agricultural land? - Neutral (no comments)
- 39 - Do you agree with Policy NE10 Air quality? – Neutral (no comments)
- 41 - Do you agree with Policy NE12: Light Pollution? – Neutral (no comments)
- 44 - Do you agree with Policy HE1: The Historic Environment? – Neutral (no comments)
- 45 - Do you agree with Policy HE2: Listed Buildings? – Neutral (no comments)
- 46 - Do you agree with Policy HE3: Conservation Areas? – Disagree
- 47 - Do you agree with Policy HE4: Historic Parks and gardens? – Neutral (no comments)
- 48 - Do you agree with Policy HE5: Archaeology? – Neutral (no comments)
- 49 - Do you agree with Policy HE6: Enabling Development for Heritage Assets? – Neutral (no comments)
- 52 - Do you agree with Policy D1: Achieving High Quality Design? – Neutral (no comments)
- 53 - Do you agree with Policy D2: Design Codes and Masterplans? – Neutral (no comments)

- 56 - Do you agree with Policy H1: Housing to Address Needs? – Neutral (no comments)
- 57 - Do you agree with Policy H2: Affordable Housing? – Neutral
- 59 - Do you agree with Policy H3: Build to Rent? – Agree (no comments)
- 66 - Do you agree with Policy H10: Residential Extensions, Alterations, Annexes and Ancillary Accommodation? - Agree (no comments)
- 69 - Do you agree with Policy R1: Rural Exception Sites? – Neutral (no comments)
- 70 - Do you agree with Policy R2: Housing For Rural Workers? – Neutral (no comments)
- 71 - Do you agree with Policy R3: Replacement Dwellings Outside Settlement Confines? - Neutral (no comments)
- 72 - Do you agree with Policy R4: Conversion of an Existing Building to Residential Use Outside Settlement Confines? – Neutral (no comments)
- 73 - Do you agree with Policy R5: Residential Parks? – Neutral (no comments)
- 74 - Do you agree with Policy R6: Employment Development Outside Existing Settlement Confines? – Neutral (no comments)
- 75 - Do you agree with Policy R7: Agriculture, Forestry and Horticulture? – Neutral
- 76 - Do you agree with Policy R8: Farm Diversification? - Neutral (no comments)
- 77 - Do you agree with Policy R9: Sustainable Tourism and Visitor Accommodation? - Neutral (no comments)
- 78 - Do you agree with Policy R10: Equestrian Facilities in the Countryside? – Neutral (no comments)
- 91 - Do you agree with Policy INF1: Provision of Infrastructure and Services? – Disagree
- 92 - Do you agree with Policy INF2: Sustainable Transport and Active Travel? – Disagree
- 94 - Do you agree with Policy INF3: Parking? – Agree
- 95 - Do you agree with Policy INF4: Community Facilities? – Agree (no comments)
- 99 - Do you agree with Policy A1: Housing and Employment Allocations? – Disagree

Tunbridge Wells Borough Council

- 1 - Do you agree with the Local Plan overall vision? – Agree
- 4 - Do you agree with Policy SP1 Spatial Strategy? – Neutral
- 9 - Do you agree with Policy SP5: Future Employment Growth? – Agree
- 12 - Policy SP9 proposes a Local Green Gap near West Malling, Kings Hill and East Malling. Do you agree with the proposed boundary? – Agree
- 15 - Do you agree with Policy CC1: Addressing Climate Change? – Agree
- 16 - Do you agree with Policy CC2: Circular Economy and its approach to reducing waste and reusing resources? – Agree
- 26 - Do you agree with Policy NE1: Conserving and enhancing the natural environment? – Agree
- 27 - Do you agree with Policy NE2: National Landscapes? – Agree
- 28 - Do you agree with Policy NE3: Landscape Character? – Agree
- 44 - Do you agree with Policy HE1: The Historic Environment? – Agree
- 52 - Do you agree with Policy D1: Achieving High Quality Design? – Agree
- 56 - Do you agree with Policy H1: Housing to Address Needs? – Agree
- 57 - Do you agree with Policy H2: Affordable Housing? – Agree
- 60 - Do you agree with Policy H4: Gypsy Traveller and Travelling Showpeople – Safeguarding Sites? – Agree
- 62 - Do you agree with Policy H6: Specialist Housing to Meet the Needs of Older and Vulnerable People? – Agree

- 81 - Do you agree with Policy E1: Supporting a Prosperous, Inclusive and 2. Sustainable Economic Future? – Agree
- 82 - Do you agree with Policy E2: Strategic Employment Areas? – Agree
- 91 - Do you agree with Policy INF1: Provision of Infrastructure and Services? – Neutral
- 92 - Do you agree with Policy INF2: Sustainable Transport and Active Travel? – Neutral

Other Consultation Bodies

Sport England

- 52 - Do you agree with Policy D1: Achieving High Quality Design? – Strongly Agree (no comments)
- 91 - Do you agree with Policy INF1: Provision of Infrastructure and Services? – Agree (no comments)
- 92 - Do you agree with Policy INF2: Sustainable Transport and Active Travel? – Agree (no comments)
- 94 - Do you agree with Policy INF3: Parking? – Agree (no comments)
- 96 - Do you agree with Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision? – Strongly Agree
- 99 - Do you agree with Policy A1: Housing and Employment Allocations? – Neutral

RSPB

- 4 - Do you agree with Policy SP1 Spatial Strategy? – Disagree (with comments)
- 19 - Do you agree with Policy CC5: Renewable and Low Carbon and Heat Projects? – Neutral (with comments)
- 26 - Do you agree with Policy NE1: Conserving and enhancing the natural environment? – Satisfied (with comments)
- 29 - Do you agree with Policy NE4: Designated sites, irreplaceable habitat and priority habitat and species? – Agree
- 30 - Do you agree with Policy NE5: Biodiversity Net Gain? – Neutral
- 32 - Do you agree with Policy NE6: Green and Blue Infrastructure? – Neutral
- 41 - Do you agree with Policy NE12: Light Pollution? – Agree

Woodland Trust

- 15 - Do you agree with Policy CC1: Addressing Climate Change? – Agree
- 26 - Do you agree with Policy NE1: Conserving and enhancing the natural environment? – Strongly Agree
- 28 - Do you agree with Policy NE3: Landscape Character? – Strongly Agree
- 29 - Do you agree with Policy NE4: Designated sites, irreplaceable habitat and priority habitat and species? – Neutral
- 30 - Do you agree with Policy NE5: Biodiversity Net Gain? – Neutral
- 32 - Do you agree with Policy NE6: Green and Blue Infrastructure? – Agree
- 33 - Do you agree with Policy NE7: Woodland, trees and hedgerows? – Agree
- 99 - Do you agree with Policy A1: Housing and Employment Allocations? – Disagree

Annex 3 - Risk Register for Local Plan - Planning Policy January 2026

Number	Risk Title & Description	Effect of non compliance	Classification	Risk Owner from Management Team	Date identified	Last date of review	Unmitigated risk Score			Movement to previous review	Current mitigation in place	Mitigated risk Score			Movement to previous review	Actions required to reduce score further	Link to Annual Service Development Plan	Links to Strategies
							Likelihood Score (1-5)	Impact score (1-5)	Overall risk score			Likelihood Score (1-5)	Impact score (1-5)	Overall risk score				
1	Risk of Government intervention if a plan is not progressed	Loss of control over planning decisions; increased vulnerability to 'planning by appeal'; increase in funding required to defend appeals or to progress additional work associated with intervention measures; loss of strategic approach to infrastructure provision; reputational damage and reduced public confidence; difficulty influencing the spatial strategy and site allocations; diminished role in plan-making for elected members and communities.	F, R	Director of Planning, Housing and Environmental Health	22/01/26	N/A	5	5	25		Maintain and keep up to date the Local Development Scheme; progress evidence in a timely manner; ongoing engagement with members and communities; Develop a robust Infrastructure Delivery Plan; collaboration with the Planning Inspectorate with advisory visit; maintaining a clear audit trail in decision making; continued work with the Planning Advisory Service; obtaining legal advice as required.	2	5	10		Strengthen Member training in key areas; strengthen collaboration with MHCLG; ensure political consistency and corporate ownership of the Local Plan.	5.1 and 10.1	Corporate Strategy
2	Not meeting the Government's submission deadline of 31 st December 2026 under the transitional arrangements.	Forced switch to plan-making under a new planning system; requirement to either set aside previous Local Plan work or substantially re-work; any emerging Local Plan would carry no weight increasing exposure to speculative developments; increased risk of Government intervention; longer delay to having an adopted Local Plan; increased costs where work will require updating; reputational damage and reduced public confidence.	F, R	Director of Planning, Housing and Environmental Health	01/09/24	01/01/26	4	5	20		Maintain momentum on plan-making; meet critical path deadlines and all other deadlines as far as possible; address meeting development needs early in the plan-making process; communicate the work programme with communities, Members and stakeholders.	3	5	15		Enhance governance and Member training to avoid politically driven delays; prepare a Contingency Plan for plan-making under a new planning system, in case the deadline cannot be met.	5.1 and 10.1	Corporate Strategy
3	National policy reform	Forced to re-write or re-scope the emerging Local Plan to future proof the Plan; reduced weight for Local Policies once the Local Plan is adopted; a need to re-work some of the evidence base to future proof the plan where possible; delay to Local Plan timetable; Risk of delay to the Local Plan timetable; increased pressure on staff resources; budget implications if updated evidence or additional resources are required.	F	Director of Planning, Housing and Environmental Health	22/01/26	N/A	5	4	20		Early alignment with emerging national policy; strengthen the evidence base to future proof the Local Plan; adapt the spatial strategy to demonstrate consistency; expand policies to account for changes in climate change approach and environmental matters; set housing requirements above minimum requirement; engage with PAS and the Planning Inspectorate.	5	3	15		Undertake or procure a NPPF/NDMP compliance review.	5.1 and 10.1	Corporate Strategy
4	Change in political administration	Delay or revisiting key aspects of the local plan; heightened Member objection and political challenges; need to re-open or update evidence; shift in policy objectives; failure to meet 'transitional arrangements' as proposed by Government; failure to achieve an adopted plan under the current planning system and potential for Government intervention in plan-making.	F, R	Director of Planning, Housing and Environmental Health	01/09/24	Jan-26	3	5	15		Progress the Local Plan in line with the Engagement Strategy setting out how both internal and external engagement will be progressed; Continued working and discussions with members to gain understanding and awareness of the local plan, the process, the outputs of evidence and the direction of the spatial strategy and local plan policies; Regular member meetings and briefings; maintain an evidence based led approach; Communicate the consequences of not progressing a Local Plan; maintain consistent staffing to assist with member communications.	3	5	15		Strengthen cross-party ownership of the Local Plan; provide Member induction training; prepare scenario plans for political change; engage early with new administration; Work with Members to lock in political ownership early in the Regulation 19 stage making clear any risks; document decision-making; use external peers to reinforce stability; engage external technical peer review including legal or Planning Advisory Service to assist with key matters raised; external legal and other technical advice to be communicated to members.	5.1 and 10.1	Corporate Strategy

5	Community opposition leading to Member objections to the Local Plan	Local Plan delay; missing the Government's transitional deadlines; Government intervention in plan-making; Compromised spatial strategy and weakened policy position in emerging Local Plan; greater exposure to speculative development; increased costs, resource pressure and evidence needs; increased complaints, FOIs; reduced confidence from infrastructure providers and developers; increased risk of legal challenge; weakened case for infrastructure funding and reprioritising investment away from the Borough.	F, R	Director of Planning, Housing and Environmental Health	22/01/26	N/A	3	5	15	Early and transparent engagement with the community; engage in accordance with the Engagement strategy; strengthen member communication and governance via briefings; present a strong evidence- led narrative; demonstrate how the Local Plan responds to Local concerns; engage infrastructure providers early; clear and consistent political leadership; manage expectations around what can and cannot be changed or done; provide structured feedback to communities; pre-empt legal risks and maintain a clear audit trail of decisions and Local Plan activities; ensure statutory processes are met; Engage external support such as PAS, legal advice and the Planning Inspectorate; reinforce the consequences of not progressing a Local Plan.	3	5	15	N/A	5.1 and 10.1	Corporate Strategy
6	Not achieving political consensus on the Local Plan Spatial Strategy	Significant delays to plan progression due to a potential need to revisit spatial options including spatial option testing, protracted engagement with members causing staff capacity constraints; Not meeting the Government's Local Plan submission timeframe; Potential Government intervention in plan-making; Not achieving Regulation 19 consultation or submission due to Committee decision not to proceed; Weakened position and / or risk of unsoundness at Examination, if spatial strategy decisions are unclear; Reduced confidence from stakeholders and Infrastructure providers; Withdrawal of Local Plan during Examination.	F, R	Director of Planning, Housing and Environmental Health	22/01/26	N/A	4	5	20	Hold member briefings to explain evidence requirements and assumptions; engage external support such as PAS, legal advice and the Planning Inspectorate; reinforce the consequences of not progressing a Local Plan.	4	5	20	Strengthen member and stakeholder alignment as early as possible.	5.1 and 10.1	Corporate Strategy
7	Overall increase in costs required to progress a local plan and additional / sufficient budget not being available and / or agreed	Delay to the Local Plan work programme; inability to meet the Government's submission timeframe; inability to commission the evidence required; Local Plan soundness risk and greater risk of legal challenge; reduction in scope / the quality of the Local Plan; abandonment of the Local Plan; inability to provide the level of staff resource to deliver the Local Plan within the timeframe; inability to respond to evidence update requirements to account for Regulation 18 consultation responses or national policy changes.	F, R	Director of Planning, Housing and Environmental Health	03/11/24	Jan-26	4	5	20	Establish a robust and early budget strategy for the Local Plan programme to adoption including individual project contingency; ensure that evidence base requirements are proportionate; strong project and financial management; ensure ongoing monitoring of the budget and individual projects including value for money; early and on-going engagement with Management Team and finance.	3	5	15	Keep the budget position under regular review; Ensure flexibility within the budget to make best and most efficient use of funding across the work streams; identify the cost of not progressing a Local Plan; create a business case linked to statutory obligations for plan-making.	5.1 and 10.1	Corporate Strategy
8	Member requests for additional evidence not procedurally required to support the submission of a Local Plan or requests for additional peer review using different consultants	Requirement for additional funding; Potential delay to the Local Plan programme to procure and undertake the work; Increased pressure on consultants to progress work in a short period of time; increased pressure on staff to progress additional work streams; Potential to delay evidence gathering due to procurement or additional interdependencies of evidence or delay to the Local Plan due to reconciling evidence; increased examination scrutiny where disagreements or differences remain unresolved; increased risk of Local Plan challenge; derailment of the Local Plan should it not be possible to fund or obtain the requested evidence; possible Government intervention.	F, R	Director of Planning, Housing and Environmental Health	22/01/26	N/A	4	4	16	Critical friend review - Inspector Pre-submission advisory visit / PAS / Legal advice. Local Plan programme discipline to reduce political disruption to the programme; provide briefings to Members around outputs of programmed evidence base.	3	4	12	Introduce a Governance structure that defines who and what stage requests for new evidence can be made and how these are evaluated and approved; adopt a 'test for necessity and proportionality' before agreeing to extra evidence; provide member training on evidence requirements and soundness tests; agree scope of evidence with Members as early as possible.	5.1 and 10.1	Corporate Strategy

9	Slippage in the Local Plan Project management timetable, (as set out in the Council approved Local Development Scheme) for the Regulation 19 Local Plan consultation.	Failure to meet the Government's Local Plan submission deadline of 31 st December 2026 under the current planning system, leading to much abortive work and costs and a requirement to progress a Local Plan under a new planning system.	F, R	Director of Planning, Housing and Environmental Health	01/09/24	Jan-26	4	5	20	The provision of a detailed project plan setting out tasks and the timetable clearly; provision of sufficient and timely staff resources to deliver the project plan; ensure a budget to fund the resources required to deliver a Local Plan; Regular project management meetings between the PPM and HOS and the PPM and PPTL and Planning Policy Team; Ensure that staff have the right skills and experience to progress the workstreams; procure evidence base work at the earliest opportunity to ensure its availability to feed into the Regulation 19 Local Plan; manage political risks and highlight the consequences of additional work requests and the consequences this has on staff resources and potential delay and associated risks.	3	5	15	Given the tight timetable, ensure that the Planning Policy team are provided the space to progress the Local Plan work programme and are not distracted by non-Local Plan workstreams or additional work that is not directly required to progress the Local Plan.	5.1 and 10.1	Corporate Strategy
10	Delay to testing the spatial strategy Infrastructure, viability and development phasing	Delay to the overall Local Plan timetable; Not achieving the Government's timescale for submission; knock on impact to progressing other statutory required evidence such as the Sustainability Appraisal and Habitats Regulations Assessment; risk of not applying an evidence base-led approach to defining the spatial strategy with an increased examination risk of being found unsound; risk of viability and deliverability disputes later in the process and at Examination; risk of selecting undeliverable sites; housing trajectory and five-year supply becomes unreliable; vulnerability to requiring further work and additional sites during the Examination to make the Plan sound; Member decision not to Adopt the Local Plan; Local Plan abortive work and costs; risk of speculative development early in the plan period.	F, R	Director of Planning, Housing and Environmental Health	22/01/26	N/A	4	5	20	Commission infrastructure and viability evidence early and in parallel with Reg 19 option development; use iterative testing with scenarios; update the SA sequentially rather than at a late stage; early and structured engagement with infrastructure providers.	3	5	15	Identify where it is possible to progress testing sequentially if there is a likelihood of delay; agree key assumptions with infrastructure providers; ensure SA / HRA is integrated into the process and not bolted on.	5.1 and 10.1	Corporate Strategy
11	Failure to meet Statutory requirements in plan-making (Sustainability Appraisal, Habitats Regulations and Equality Impact Assessment) including insufficient data and evidence gaps	Legal challenge on adoption of the Local Plan; delay to plan-making and not meeting the Government's timeline; poor integration between assessments and the Local Plan; Delay in Examination.	F, R	Director of Planning, Housing and Environmental Health	01/09/24	Jan-26	4	5	20	Begin work on the Statutory evidence requirements early; Ensure strong and up-to-date baseline evidence; use clear methodologies and document reasonable alternatives clearly; embed the processes into Plan-making; maintain continuous engagement with statutory consultees and key stakeholders; ensure a clear audit trail and high quality documentation; ensure timescales are aligned in the Local Plan work programme; ensure adequate staff resource for project management.	3	5	15	Work with the Planning Advisory Service on how to navigate any issues; obtaining legal advice as required and advice from the Planning Inspectorate as required.	5.1 and 10.1	Corporate Strategy
12	Failure to obtain the required evidence on the required topic area to inform the Regulation 19 Local Plan.	Plan found unsound at Examination; legal challenge on adoption of the Plan; inability to publish a legally compliant Regulation 19 Plan; delays to Local Plan timetable; not meeting the Government's timeframe for submission; Members not agreeing to take forward the Local Plan to Regulation 19; Weak policy framework that is vulnerable to challenge; increased risk of unresolved objections at Regulation 19 and at examination; stakeholder objections and criticisms.	F, R	Director of Planning, Housing and Environmental Health	01/09/24	Jan-26	4	5	20	Identify all required evidence workstreams as early as possible; Frontload commissioning and gathering the additional evidence to support the Regulation 19 Local Plan; identify evidence dependencies in the work programme and the critical path; schedule early meetings with stakeholders and line up their required input at relevant key stages; draft clear specifications for work; avoid over scoping of the work and ensure proportionality; consider emerging national policy changes early to avoid repetitive work.	3	5	15	Continue to use PAS as a critical friend on evidence gathering and use advice once received particularly around proportionality.	5.1 and 10.1	Corporate Strategy

13	Restricted availability of consultants and / or capacity for consultants to complete the evidence base work required within the project timeline.	Delay to evidence base completion; Local Plan timetable slippage; not being able to procure good quality consultants; increased risk to soundness at examination due to poor or incomplete evidence; inability to progress to Regulation 19; heightened legal compliance risk; higher contract prices; greater officer time required to procure and manage contracts.	F, R	Director of Planning, Housing and Environmental Health	22/01/26	N/A	3	5	15	Consider and strengthen procurement strategy; procure at the earliest time possible; commission partial or interim outputs / phasing of the work; ensure that the scope of works is proportionate; maintain continual engagement with consultants.	2	5	10	Adjust the project plan and where possible build in contingency; provide internal capacity to progress workstreams through additional staff resources.	5.1 and 10.1	Corporate Strategy
14	Procurement / contract delay	Delay to the progression, publication and analysis of the evidence base; inability for policies to be underpinned by evidence; slippage in the Local Plan timetable including key milestones; increased risk of challenge at examination; procedural risk if evidence base not available for committee decision to progress the Regulation 19 consultation and submission; delays to progressing statements of common ground; increased pressure on resources and capacity; uncertainty in decision making.	F, R	Director of Planning, Housing and Environmental Health	22/01/26	N/A	5	5	25	Undertake a peer review by PAS on evidence base; identify early the procurement and contract needs; extend existing contracts where necessary; maintain a clear audit trail of where delays occur and address these for future contracts; re-sequence the Local Plan project programme to ensure critical path activities can be progressed; where feasible run assessments and Local Plan work streams in parallel; prioritise and provide work streams in key phases and request interim reports / partial outputs; use Framework contracts to accelerate commission times; provide clear scopes of work; build in contingency; early engagement with statutory bodies sharing work in draft.	3	5	15	Identify an additional resource to ensure that contracts can progress.	5.1 and 10.1	Corporate Strategy
15	Not meeting the minimum housing need requirement in the Local Plan or demonstrating sufficient land in the first five years.	Local Plan risk of failure at examination on the basis of the soundness tests; a requirement for the plan to be paused for additional evidence and / or major modifications to make the plan sound; Substantial re-working of the Local Plan; prolonged examination and therefore a later adoption of the Plan; greater scrutiny at examination; loss of weight of policies during the examination period; increased risk of speculative development; risk of legal challenge post-adoption; complete loss of work if Plan withdrawn or found unsound.	F, R	Director of Planning, Housing and Environmental Health	01/09/24	Jan-26	3	5	15	Frontload work on housing and employment evidence including the LAA and test supply assumptions; build a realistic and defensible housing trajectory; allocate a wider mix of sites; include a windfall allowance with sufficient justification; engage infrastructure providers to confirm that sites are genuinely deliverable; use Statements of Common Ground.	2	5	10	If it is not possible to meet housing need, seek to identify reserve sites; develop a clear strategy for addressing under-delivery.	5.1 and 10.1	Corporate Strategy
16	Duty To Cooperate (DTC)	DTC issues raised prior to Reg 19 or Local Plan submission; including matters such as unmet development needs and cumulative infrastructure issues; Not meeting the Local Plan timetable; Failure to demonstrate DTC at examination; not meeting the Government deadline for submission.	F, R	Director of Planning, Housing and Environmental Health	01/09/24	Jan-26	3	5	15	Early, regular and documented engagement and cooperation with partners; the production of effective Statements of Common Ground; commissioning joint evidence bases or sharing methodologies on strategic matters; establish political commitment where required and audit trails.	2	5	10	In the work undertaken ensure that engagement with DTC partners leads to effective, deliverable and strategic outcomes and engage external legal and / or technical advice from Barristers / PAS.	5.1 and 10.1	Corporate Strategy
17	Regulation 18 consultation responses identify a fundamental matter relating to evidence or strategy that cannot be addressed within the timescales to achieve Regulation 19	Delay to the Local Plan timetable due to a need to revisit evidence, revise the spatial strategy or re-consult if changes required are substantial; that the Local Plan cannot progress to Regulation 19 within the timeframe or at all; increased risk of the plan being found unsound if critical warning is not addressed; requirement for additional consultation at Regulation 18; reputational issues with communities, Members and stakeholders.	F, R	Director of Planning, Housing and Environmental Health	22/01/26	N/A	3	5	15	Frontload the evidence base work; adjust the project plan if possible; revisit and adapt the strategy; strengthen engagement and Duty to Cooperate; avoid premature progression to Regulation 19.	2	5	10	Commission an independent review of the Local Plan and matter raised.	5.1 and 10.1	Corporate Strategy

18	Loss of staff either through leaving the Council, sickness or unexpected absences	Delay to timetable, health and wellbeing implications for remaining staff members, failure to meet the Local Plan timetable and Government deadline for Local Plan submission.	F, R, H	Director of Planning, Housing and Environmental Health	01/09/24	Jan-26	3	3	9	Regular team meetings, 1:1s, effective file management and knowledge sharing, risk management escalation; utilising contractor staff. Smart recruitment policy and investigation of specialist support. Work with recruitment agencies to fill permanent positions and to cover staff absence.	3	2	6	Predict early where more staff resource may be required; Keep under review the staffing budget; keep up-to-date with the recruitment market offerings and make any offers early.	5.1 and 10.1	Corporate Strategy
19	No / limited internal expertise on matters relating to heritage	Delays to evidence gathering and site assessments including through requiring procurement lead in times; risk of incomplete or insufficient evidence at submission and / or at Examination; Increased risk of challenge at Examination on heritage matters; Local Plan found unsound at Examination; Bottleneck in site allocations workstream; dependency on external consultants increasing budget costs and requiring a staff resource to manage workstream; Not meeting Local Plan timetable.	F, R	Director of Planning, Housing and Environmental Health	01/09/24	Jan-26	5	5	25	Commission heritage specialists as early as possible; share services with Sevenoaks Borough Council where possible; develop clear scopes for external Heritage work; undertake early engagement with Historic England; integrate heritage work into site selection as early as practically possible.	2	3	6	Engage external legal and / or technical advice from Barristers / PAS.	5.1 and 10.1	Corporate Strategy
20	Capacity constraints within the Planning Policy Team and / or skills and experience shortage	Delays / slippage and slower progress for work streams; Missed project milestones; Not meeting the Local Plan timetable overall due to work stream interdependencies; Not meeting the Governments submission timeframe; dependency on external consultants and / or existing / temporary staff to plug skills gaps; weak or incomplete evidence base with gaps in technical and key evidence; risk of an unsound plan at examination; legal compliance risks for SA, HRA, Equalities Impact Assessment, statutory Regulation 19 consultation; reduced ability to engage and negotiate with key stakeholders; staff burnout and turnover.	F, R, H	Director of Planning, Housing and Environmental Health	22/01/26	N/A	5	5	25	Strengthen internal capacity by recruiting permanent planners; upskill staff; ensure that the work programme is detailed with clear responsibilities identified; hold regular 1:1s and team meetings; use external support either in relation to recruiting temporary planners or consultants to progress key workstreams; regular monitoring of workloads and priority setting; strengthen corporate and cross-departmental support; manage staff wellbeing and retention.	3	3	9	Secure additional financial funding; Plan for the worst-case scenario through contingency planning.	5.1 and 10.1	Corporate Strategy
21	Not meeting the Committee date to report the Regulation 18 consultation due to the level of responses to analyse	Strategic, procedural, political and resource implications including - delay to the Local Plan programme; not meeting the Government's timeline for submission; increased risk of Government intervention; knock on delays to the evidence base to support Regulation 19; political and governance risks; reputational risks with the community and stakeholders; increased workload and compression of future tasks; financial implications in progressing additional resources to assist in meeting the programme; abortive local plan work if overall work programme and submission cannot be achieved.	F, R	Director of Planning, Housing and Environmental Health	22/01/26	N/A	3	5	15	Identify and get in place additional resource and free up capacity to deliver the Regulation 18 consultation workstream; cross departmental working; ensure that the task is prioritised over other workstreams where possible and subject to other critical pathways; provide a reporting template and prioritise key deliverables.	2	5	10	Agree a clear escalation process; Corporate support and cross - departmental working to progress the work streams	5.1 and 10.1	Corporate Strategy
22	Delays caused by IT issues (internal and external systems)	Delay to progressing work streams; Local Plan timetable slippage; inability to finalise work when required; increased costs and inefficiency; increased pressure on resources and capacity.	F, R, H	Director of Planning, Housing and Environmental Health	22/01/26	N/A	3	3	9	Ensure stable and well supported systems; ensure software updates are undertaken outside working hours; understand the systems and plan for eventualities.	3	2	6	Ensure updates do not affect performance; ensure updates will not affect work momentum or require too much learning or affect data; identify IT dependencies and monitor risks; strengthen IT support; ensure responsive IT support; ensure capacity and build flexibility into the work programme; Ensure flexibility in the IT budget for contingency and modernisation.	5.1 and 10.1	Corporate Strategy

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PLANNING ENFORCEMENT PLAN REVIEW

Item HP 26/11 referred from Housing and Planning Scrutiny Select Committee of 17 March 2026

A number of proposed changes to the Planning Enforcement Plan (attached at Annex 1) and associated activities were presented for consideration. In addition, options for a pro-active approach were outlined.

Members were advised that the Planning Enforcement Plan (PEP) would be updated to reflect the current National Planning Policy Framework. This would ensure it was up to date, correct and that Members and the public were clear on the changes to national policy and submission requirements for retrospective applications.

In addition, to streamline the submission of a complaint of a breach of planning control, it was proposed that a link be inserted into the PEP directing to the General Permitted Development Order 2015 (technical guidance). This would ensure that stakeholders understood the planning process and what was considered to be a breach of planning control.

Following stakeholder feedback, consideration had been given to a more pro-active approach to enforcement within legislative and capacity constraints. The proposed approach included the issuing of letters outlining the breach and offences requiring immediate cessation without the invitation of a retrospective planning application. New letters had been drafted (attached at Annexes 2-5) to ensure clear messaging was given to contraveners as to whether enforcement action was initiated, a retrospective planning was invited, no further action was required.

Whilst Members welcomed the proposed improvements to planning enforcement, concern was expressed about the timeliness of enforcement, communication with complainants and the lack of regular updates. In response, ongoing efforts to improve responsiveness and transparency were outlined.

Finally, it was confirmed that third-party evidence, such as photographs, was accepted for enforcement cases. However, it was clarified that for legal proceedings, the Borough Council must gather its own evidence to avoid relying on untrained individuals in court.

In recognition that having an effective Planning Enforcement Plan in place ensured that there was a framework of prioritisation and decision making that reduced the risk of legal challenge, Cllr King proposed, Cllr Palmer seconded and it was

***RECOMMENDED:** That

- (1) the proposed changes to the Planning Enforcement Plan and the associated activity and timescales, set out in section 5 of the report, be agreed; and
- (2) the pro-active approach, proposed letter templates and direct action against s215 notices being issued and resourcing options, set out in section 7 of the report, be agreed.

***Recommended to Cabinet**

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3 Recommendations

- 3.1 **CONSIDER** the proposed changes to the Planning Enforcement Plan and the associated activity and timescales, as laid out in section 5 of this report and **RECOMMEND** to Cabinet that these changes be agreed for implementation.
- 3.2 **CONSIDER** the pro-active approach, proposed letter templates and direct action against to s215 notices being issued and resourcing options laid out in section 6 to be read alongside the financial considerations in section 7 and the risk assessment in section 8 and **RECOMMEND** to Cabinet that these changes be agreed for implementation.

4 Introduction and Background

- 4.1 The Council's Planning Enforcement Plan (PEP) was first published in 2016 and has been appended by a number of protocols since that time. It has always been the intention that this document would be subject to regular review to ensure it remains in line with legislative requirements and is a useful tool for both officers and those who engage with the service.
- 4.2 Active/ongoing enforcement investigations are confidential and may not be publicly discussed or information thereof shared and some investigations into breaches of planning control may be conducted outside of the scope of the Planning Enforcement Plan.
- 4.3 A further administrative operational update is proposed to be implemented when UNIFORM is fully functional. This update seeks to include an update to the acknowledgement letter to include details of the investigation targets outlined in the priority ranking of the PEP and provides clear timelines for the "initial site inspection" and the "acknowledgement of the complaint"
- 4.4 An administrative review relating to the current approach on advertising/flyposting is currently underway. In addition to the proposed 7 and 14 day letters, where possible, an additional letter specifically relating to these transgression is being considered.
- 4.5 In the past three years, the enforcement team have received 511 cases between January 2022 and December 2025. As of 13 January, there are 368 live enforcement cases, which under investigation and pending consideration. The number of cases closed are 143.

5 Proposal

- 5.1 At present, the Planning Enforcement Plan does not refer to the most recent National Planning Policy Framework (NPPF) December 2024 and does not correctly reference the legislative framework for the submission of planning applications. In the amended Planning Enforcement Plan (PEP) draft appended to this report, updated policy references to the NPPF and application types are

recommended. This is to ensure that the PEP is up to date, correct and that Members and the public are clear on the changes to national policy and submission mission requirements for retrospective applications. Additional updates include an a more prescriptive list of what will be investigated and examples of exclusion of harm.

5.2 To streamline the submission of a complaint of a breach of planning control, a link is proposed to be inserted into the Planning Enforcement Plan that directs the public to the General Permitted Development Order 2015 (technical guidance). This will ensure that stakeholders more widely understand the planning process and what is considered to be a breach of planning control.

5.3 The recommended amendments to the existing Planning Enforcement Plan are minor and relate mainly to and are included in the attached draft PEP (see **Annex 1**):

- Policy referencing in terms of the recent update to the National Planning Policy Framework in December 2024.
- An update on Examples of harm resulting from a breach of planning control could concern:
 - *Untidy land (residential properties that are in disrepair, overgrown gardens and broken boundary fences).*
 - *Unauthorised works to TPO's and Listed Buildings.*
- Exclusion of harm examples:
 - an extension to a building that is slightly larger than permitted development rights allow but does not create any comparative harm -
 - private rights to a view.
 - High Hedges (Government guidance encourages these issues to be resolved privately prior to Council intervention and investigation at a cost).
- A change in the naming of prioritisation of case from 'Top' to 'Immediate'.
- An update to the "case characteristics" of the priority ranking "high" to include:
 - **Under Development causing significant harm : (*examples: Loss of Privacy and Overlooking/ Daylight and Overshadowing/ Overbearing Impact -noncompliance with operating hours stipulated in conditions of approvals and deviations from approved plans/Traffic and parking – CMP's not being complied with*)**

Under Development potentially causing significant harm to the landscape:
Greenbelt/ National Landscapes (formerly Areas of Outstanding Natural Beauty – AONBs- Valued Landscapes/ Ancient Woodland

Update the PEP to include: ***Distinguishment between Public and Private Harm: Public harm*** involves development that does not benefit from planning approval that endanger the life, health and property of the public, or obstruct the use of public places.

Private harm constitutes a substantial and unreasonable interference with an individual's use or enjoyment of their land or property.

- ***When might it be appropriate to serve an Enforcement Notice?***

“Enforcement Notices are our main enforcement tool. Government guidance sets out that the power to issue an enforcement notice is discretionary (Section 171B and 72 of the Town and Country Planning Act 1990)”.

- **Update to “Involvement in the process”**

Advising the council of possible breaches

“Reports of possible breaches of planning control should be made via our [online enforcement portal](#) . This enables the council to have a record of the need for initiating investigation and possible action”.

By using the link, a determination can be made on whether the development benefits from permitted development rights or requires planning permission and results in a potential breach of planning control:

https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwj6s8yu0K2RAXUAd0EAHS65OKoQFnoECBwQAw&url=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F5d77afc8e5274a27cdb2c9e9%2F190910_Tech_Guide_for_publishing.pdf&usq=AOvVaw2cyZByZVkpzbXFI7pnErmS&opi=89978449

6 Other Options

- 6.1 Following stakeholder feedback, the Planning Enforcement team has considered how a more proactive approach to enforcement can be taken within legislative and capacity constraints. This includes more decisive and stringent assessments of breaches planning control that result in harm and would be contrary to planning policy. The proposed approach includes the issuing of letters outlining the breach and offences requiring immediate cessation without the invitation of a retrospective planning application.

- 6.2 This pro-active approach has is supported by the recent Planning Advisory Service (PAS) review. It recognised that the direction of travel within the Enforcement team and recommendation 14 of the review sought to build on the progress made on strengthening planning enforcement performance by creating a culture of proactive enforcement and involving local members in helping to prioritise enforcement cases that have the biggest impact.
- 6.3 Linked to this approach, new letters have been drafted which are intended to make decisive decisions on unlawful development (see Annexes 2,3,4 and 5). The intention behind these letters is to ensure a very clear message is given to the contravener that whether enforcement action is initiated, a retrospective planning application is invited, or no further action is required.
- 6.4 The intention behind these letters is to ensure initial action is taken more quickly, providing a template to quickly progress cases and for those cases that cause the greatest harm and are unacceptable in policy terms, the threat of enforcement action is highlighted, should the breach not be rectified without formal action.
- 6.5 To streamline the triage process when determining what action is to be taken a revised priority list has been created. The priority list sets out those cases that cause the greatest harm and where the Council's resources should be prioritised to prevent further harm occurring.
- 6.6 The priority list is maintained by the Enforcement Manager and regularly updated and reviewed by the Development Manager. Items included on this list relate to development that has commenced without planning approval and were requested to cease and where a decision has been taken to progress with enforcement action due to the nature of the breach. In order to ensure best and most effective use of resources, only those creating the most significant harm are progressed to formal action.

Direct Action – against s215 notices

- 6.7 Linked to the aforementioned pro-active approach and an update to the report for consideration, included within the priority list, is a list of untidy sites that have been issued with S215 notices without compliance and that have been cautioned of prosecution action in compliance with item 129 of the planning act. The Enforcement Manager has worked with the Empty Homes officer on identifying any unspent pot of money (previously awarded for formal Green Belt direction action - but which can be spent on direction action outside the Green Belt) and this money will be used to remedy the untidy site by direct action.

Software upgrade - Plan X (UK Digital Planning)

- 6.8 At present, there is an influx of no-breach reports being sent into the Enforcement Team for investigation. These reports for the most part are either permitted development or non-planning issues that are addressed by other departments.

Reviewing these no-breach reports puts additional pressure on the Planning Enforcement team.

- 6.9 Therefore, it is proposed to develop a business case to implement the Plan X software. The implementation of the software is aimed at managing the enforcement cases and provide real time information to Members and at the same time provide an opportunity for residents of TMBC to identify whether issues they are experiencing are breaches of planning law that require investigation. The software has been rolled out in a number of other nearby boroughs and has proven to drastically reduce the number of enforcement cases requiring response, with information.
- 6.10 Plan X is an open-source, low-code content management system (CMS) for local planning authorities to build and manage digital planning services.

7 Financial and Value for Money Considerations

- 7.1 The Director of Planning, Housing & Regulatory Services confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and Policy Framework.
- 7.2 The funding for the direct action on s215 has been redistributed from a previous DEFRA grant aimed at contraventions in the greenbelt. The DEFRA grant previously awarded to the Council remained unspent and currently provides a sum of £15,889 in the reserve. This was placed in the reserve for the Planning Enforcement Fund and would no longer have restrictions placed on its use. It is therefore intended to use this reserve flexibly and on direct action where the most significant harm lies.
- 7.3 The cost of defending any appeals arising from Enforcement Action is covered by the Appeals budget.

8 Risk Assessment

- 8.1 Stakeholder expectations are not met - reputational risk which undermines the confidence in the planning enforcement system.
- 8.2 Breaches rise due to Council's inability to efficiently enforce due to workload and to a lack of resourcing, decisive decisions and proactive enforcement action.

9 Legal Implications

- 9.1 Having an effective Planning Enforcement Plan in place ensures that there is a framework for prioritisation and decision making that reduces the risk of the Council's decisions being subject to successful legal challenge. It is also considered to be best practice to have such a plan in place.

9.2 Planning enforcement work is discretionary and there are no statutory provisions requiring the Council to undertake such work. However, as set out in the NPPF, effective planning enforcement is important to maintain public confidence in the planning system. Insufficient or ineffective enforcement could lead to long term harm to the amenity of the Council's area, a lack of trust in the planning system and an inability for the Council properly to administer effective planning control.

10 Consultation and Communications

10.1 None

11 Implementation

11.1 Immediately following approval by Cabinet.

12 Cross Cutting Issues

12.1 Climate Change and Biodiversity

12.1.1 None

12.2 Equalities and Diversity

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

12.2.2 There is no perceived impact on end users

12.3 Other If Relevant

- Business Continuity / Resilience

Background Papers	None
Annexes	Annex 1 – Revised and updated Enforcement Plan Annex 2 – Proposed - 7 day letter Annex 3 – Proposed - 14 day letter Annex 4 – Proposed TPO/Listed building letter Annex 5 – Proposed material change of use/operational development

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Background context

This document sets out the approach the council will take in relation to breaches of planning control in the borough. Where breaches take place planning law lays down strict requirements which must be followed before the council can enforce against them. These requirements seek to balance the concerns of local people and the rights of owners against the need to secure proper planning control in the borough.

The council understands that breaches of planning control impact on peoples' lives. Consequently, the delivery of effective planning enforcement is an important issue.

With this in mind, this plan sets out how the council's planning enforcement service will seek to address breaches of planning control and prioritise its work. It describes the range of powers available to the council, how the council will decide whether or not to pursue enforcement action and the process of enforcement.

The council's objectives in producing a planning enforcement plan are consistent with the National Planning Policy Framework **2024(2024)** (NPPF). The framework states:

"Effective enforcement is important to maintain public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. They should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where it is appropriate to do so."

Planning enforcement covers the areas of planning permission, advertisement consent, listed building consent, and conservation area consent and tree preservation orders. National legislation allows some minor and small-scale works to be undertaken without the need for any further consent or approval. These works are known as "permitted development". Any works carried out as permitted development cannot be subject to enforcement action.

This plan is in accordance with the objectives and approaches contained within the council's [Corporate enforcement policy](#) and should be read in conjunction with that document.

In dealing with any enforcement issues the council must take into account the council's adopted frameworks and strategies as well as the guidance contained within the National Planning Policy Framework (NPPF) and the associated Planning Practice Guidance (PPG).

Scope of planning enforcement

There are two key principles which underpin the planning enforcement system:

A breach of planning control is not a criminal offence, except for unauthorised works to listed buildings, illegal advertisements, demolition without consent and unauthorised works to trees with tree preservation orders or within conservation areas.

Other than in these cases, a criminal offence only arises when an enforcement notice or other formal notice has been served and has not been complied with upon the expiry of a specified time limit.

There is a common misconception that breaches of planning control are a criminal offence and should automatically attract formal enforcement action. In fact, enforcement action is a

discretionary power. It is for each local planning authority to decide the amount of resource to put into enforcement, how to determine when action is necessary and the type of action that is appropriate. In making these decisions the authority should be mindful of maintaining public confidence in the planning system but it should be recognised that in the majority of cases, formal enforcement action should be seen as a last resort.

It is at the council's discretion whether action will be taken - any action proposed must be proportionate to the alleged breach and be in the public interest.

In investigating alleged breaches of planning control formally reported to it, the council will make a reasoned decision whether the alleged breach merits further action. However, formal enforcement action will only be taken where it is fair and reasonable to do so. In making this judgement, we will assess all of the circumstances of the case and make reference to our adopted planning policies. In addition we must also consider central government enforcement policy and guidance which is currently set out in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) which specifically references when Authorities should take enforcement action.

Importantly, the NPPF sets out that 'local planning authorities should act proportionately in responding to suspected breaches of planning control'.

Formal enforcement action may only be taken in cases where:

- there is a breach of planning control and
- it is expedient to take such action

What does expedient mean?

In general terms, this means where an unauthorised development is causing serious harm, rather than it being a minor or technical breach of planning control.

The matter of "expediency" covers a range of matters upon which a judgement needs to be based, a key issue is whether the breach would unacceptably affect public amenity or use of land that should be protected in the public interest.

Any enforcement action should be proportionate to the breach, so for example, it would be inappropriate to take formal action against a trivial or technical breach.

There will be cases where there is a breach of planning legislation, but the breach or harm is so minor that action cannot be justified, in other words it is not expedient or in the public interest to pursue the case.

Examples of harm resulting from a breach of planning control could concern:

- **Untidy land (residential properties that are in disrepair, overgrown gardens and broken boundary fences)**
- **Unauthorised works to TPO's and Listed Buildings**
 - harm to amenity
 - highway safety issues for example danger from increased traffic flows
 - noise nuisance
 - loss of daylight or privacy

This is not an exhaustive list of 'harm' but indicates that there must be recognisable planning harm.

Such harm would not include, for example:

- loss of value to a neighbouring property
- competition to another business
- an extension to a building that is slightly larger than permitted development rights allow but does not create any comparative harm
- private rights to a view
- **High Hedges (Government guidance encourages these issues to be resolved privately prior to Council intervention and investigation at a cost)**

As such, the planning enforcement team will not investigate the following:

- neighbour disputes or other civil issues including boundary disputes or enforcement of covenants. In these matters, complainants need to contact their solicitor or local Citizens Advice office
- the use of or development on adopted highways, pavements or highway grass verges. These matters should be addressed to Kent County Council as the Highways Authority
- dangerous structures. These matters should be addressed to the council's building control team
- fly-tipping, litter and fly posting. These should be addressed to the council's waste and street scene service

The general approach to enforcement - guiding principles

Government guidance on enforcement focuses not just on the impact of any breach on the complainant but on the rights of the owner or occupier where the alleged breach is occurring. With this in mind, the Council is committed to acting in a fair and consistent manner and has adopted this enforcement plan as part of this commitment. When exercising its enforcement functions the council will act in a way that is:

- consistent and fair
We will look at past cases and try to take a similar approach, for consistency, where this seems fair and reasonable. Cases will be investigated in accordance with the priorities set out within the plan.
- transparent and accountable
Members, residents, existing and potential local businesses, complainants, alleged offenders and council staff should understand how we provide the service and the principles that guide it. We will provide an easy-to-access service, where the procedures, level of service provided and the rights of appeal for the alleged offenders are clearly explained and easy to understand.
- proportionate and targeted

Any proposed action is in keeping with the scale of the alleged breach and the amount of harm caused. In each case we will decide on the most appropriate course of action to follow. Under the law we are only allowed to take enforcement action if it is expedient to do so having taken into account government guidance, our own development plan policies and the specific circumstances of the case.

How we deal with alleged breaches of planning control

How we prioritise cases

When the enforcement team receives an allegation that a breach of planning control may be occurring, the case will be assigned by a senior officer to a member of the enforcement team. An initial assessment of the nature of the breach is then carried out and the case is categorised according to what level of priority it should be accorded.

All allegations of planning control breaches will be prioritised and investigated thoroughly and accurately. Below are the priorities we have assigned to different types of alleged breaches, and the target times we have set to carry out an initial site visit and send an acknowledgement to the complainant.

Please be aware: These are target timescales for the undertaking of an initial site inspection and will be adhered to as far as reasonably practicable in the prevailing circumstances. Following the initial inspection, a subsequent investigation will take place the length of which will be dependent on the complexities of the individual case.

Priority ranking	Case characteristics	Targets for: 1. Initial site inspection 2. Acknowledgement to the complainant	Comments
Top /Immediate	1. Work to listed buildings 2. Work to protected trees 3. Development likely to have a serious impact on health or public safety. Breaches of planning control in respect of development subject to Environmental Impact Assessment	1. One working day 2. Within two working days	In effect the approach would be as soon as possible to prevent irrevocable damage.
High	Development causing significant harm to the quality of life of a significant number of local residents. (examples: Loss of Privacy and Overlooking/ Daylight and Overshadowing/ Overbearing Impact -	1. Five working days 2. Within two working days	Cases with these characteristics are inevitably themselves subject to assessment and judgement during triage -

Priority ranking	Case characteristics	Targets for: 1. Initial site inspection 2. Acknowledgement to the complainant	Comments
	<p>noncompliance with operating hours stipulated in conditions of approvals and deviations from approved plans/Traffic and parking – CMP’s not being complied with)</p> <p>Development with some (less serious or immediately threatening) impact on health or public safety.</p> <p>Development causing potential harm to a Conservation Area or Site of Special Scientific Interest.</p> <p>Development potentially causing significant harm to the landscape.</p> <p>Greenbelt/ National Landscapes (formerly Areas of Outstanding Natural Beauty – AONBs- Valued Landscapes/ Ancient Woodland</p>		<p>may require engagement with outside specialist bodies which may have more appropriate powers of control or enforcement (for example Environment Agency, Health and Safety Executive</p>
Medium	<p>Development which causes limited harm to individuals and/or local communities.</p> <p>Development other than of a wholly minor nature not falling within any other category.</p>	<p>1. 10 working days 2. Within two working days</p>	
Other	<p>Minor developments such as sheds, fences</p> <p>Most advertisements</p> <p>Other minor breaches of planning conditions</p> <p>Minor departures from</p>	<p>1. 15 working days 2. Within two working days</p>	

Priority ranking	Case characteristics	Targets for: 1. Initial site inspection 2. Acknowledgement to the complainant	Comments
	<p>approved plans Most cases of untidy sites other than those which have particular characteristics which fall within a higher priority</p>		

This prioritisation reflects the perceived urgency and level of harm arising to amenity or to areas or features that benefit from special protection.

At this stage the complainant is informed of the case officer's name and contact details. The named Officer will act as the main point of contact and will advise all parties on the outcome of the case. It should be noted that due to the confidentiality requirements of some of the legal processes involved in Planning Enforcement cases, detailed updates on, for example, the type of enforcement action being taken, cannot be provided to members of the public.

Additionally, borough council members are informed of the receipt of allegations on a weekly basis.

Distinguishment between Public and Private Harm:

Public harm generally involves development that does not benefit from planning approval that endanger the life, health and property of the public, or obstruct the use of public places.

Private harm constitutes a substantial and unreasonable interference with an individual's use or enjoyment of their land or property.

How we investigate alleged breaches

The enforcement case officer will inspect the site within the given timescale to determine if a breach of planning control is occurring. This is an essential part of almost every case to establish the actual circumstances on the ground and will also involve research into the site planning history.

If there is no evidence of a breach occurring at this stage, a brief report is produced by the case officer and passed to a team leader / principle planning officer or the development manager for endorsement.

Should the first inspection prove inconclusive, the enforcement case officer will contact the site owner requesting a meeting on the site, or request further information as might be necessary, so that further investigations can be undertaken.

Whatever the assessment, the complainant will be informed and advised of the next course of action.

What we do if a breach is identified

If a breach of planning control is found an assessment must be made, on a case-by-case basis, as to whether:

- it is or is not appropriate to take any further action at all

- to proceed to try to resolve the breach informally through negotiation
- to seek to invite a retrospective planning application; we will only do this if there is some prospect of permission being granted
- to proceed directly towards formal action such as the service of an enforcement notice

The assessments are made by the enforcement team member, in conjunction with a senior officer, who also endorses any recommendations made.

No formal action

It is not automatically the case that the local planning authority will take any action (whether formal or informal) in the event that a breach is discovered to seek to rectify matters. A judgement must be made in each and every case as to whether any action is expedient. This judgement will involve consideration of the seriousness of the breach, the level and nature of any harm that is being caused, and the proportionality of any contemplated remedial action. If the breach is relatively minor, inconsequential or of a purely technical nature, there will be some instances where no further action is appropriate.

Negotiation

In some cases, it may be possible to bring about a satisfactory resolution through informal action such as negotiations with those responsible. This may, for example, bring about the cessation of the unlawful activity, or reduce any harmful impacts so that they are within acceptable bounds.

Government guidance makes it clear that in all but the most serious cases we should initially seek to have planning breaches remedied through negotiation. In these events, the person carrying out the breach will be sent a letter confirming that the breach should be remedied in a specific timescale, or information should be provided to justify to us that no further action should be taken.

Retrospective planning applications

A local planning authority can invite a retrospective application. In circumstances where they consider that an application is the appropriate way forward to regularise the situation, the owner or occupier of the land should be invited to submit their application (Section 73A of the Town and Country Planning Act 1990) without delay.

We will only do this where it is considered that there is a reasonable prospect of permission being granted. The invitation to submit an application is not, however, meant to imply that permission will necessarily be granted. But it does provide a formal process for consideration of the merits of the case including, importantly, public consultation. In many cases where we follow this course of action, we may eventually conclude that it is appropriate to grant permission subject to conditions that exercise control over the most significant and potentially harmful impacts.

When might it be appropriate to serve an Enforcement Notice?

Wherever possible, we will try to resolve harmful activities through informal action or the planning application process. However, where it is felt that the breach is significantly harmful and is unlikely to be rectified by way of the submission of a planning application we will request that the breach is ceased/remedied within a specified timescale; this is determined on a case-by-case basis and will depend upon the seriousness of the breach and the nature

of harm that is being caused. Should the owners fail to meet this request then enforcement action is required.

Enforcement Notices are our main enforcement tool. Government guidance sets out that the power to issue an enforcement notice is discretionary (Section **171B** and 72 of the Town and Country Planning Act 1990). An enforcement notice should only be issued where we are satisfied that it appears that there has been a breach of planning control and it is expedient to issue a notice, taking into account the provisions of the development plan and any other material considerations.

Enforcement notices are formal legal documents that will require the owner or occupier to take specific steps to remedy the planning breach in a specified time. Once served, the enforcement notice is entered onto the Local Land Charges Register and will remain on the register until the notice is withdrawn or any subsequent appeal is dismissed by the Planning Inspector. If the notice is not complied with the planning breach will become a criminal offence which can be prosecuted in the Courts. However, the notice may be appealed to an independent, government- appointed Planning Inspector. In such cases the effect of the Enforcement Notice is suspended whilst the appeal is ongoing. Inspectors can decide to uphold the notice, amend it or have it quashed.

Alternatively, if the breach consists of a breach of conditions on an existing permission, a Breach of Conditions Notice can be issued. In this case, a continuing breach could lead to prosecution in the Magistrates' Court. There is no right of appeal against a Breach of Condition Notice.

Where a planning application is invited but none is submitted within a reasonable period, consideration is given to taking further action. Where formal action is contemplated, we will take legal advice before commencing such action.

In addition, the council will, in exercising its duties under Regulation 35 of the Environmental Impact Assessment Regulations 2017, have particular regard to any breaches which have implications for features of developments intended to avoid, prevent, reduce or offset significant adverse effects on the environment that have been approved within the context of an Environmental Statement.

Other possible types of formal action

Planning Contravention Notice (PCN)

This is a legal notice which allows us to bring the breach to the attention of the owner or occupier and requires the alleged offender to provide certain information. A planning contravention notice may be issued under Section 171C of the Town and Country Planning Act 1990 and can be used to do the following:

- allow us to require any information for enforcement purposes about any operations being carried out, any use of or activities being carried out on the land
- can be used to invite its recipient to respond constructively to us about how any suspected breach of planning control may be satisfactorily remedied

The issuing of a PCN is discretionary. We need not serve one before considering whether it is expedient to issue an enforcement notice or to take any other appropriate enforcement action.

It is a criminal offence to give false or misleading information in response to a PCN and in the event the council becomes aware of such an occurrence consideration will be given as to whether prosecution of the offence would be in the public interest.

Section 215 notices

A Local Planning Authority has the power to issue a notice under s215 if the amenity of part of its area is adversely affected by the condition of a piece of land. The notice requires such steps as may be specified for remedying the condition of the land (includes buildings) and provides a minimum of 28 days before it takes effect. There is no right of appeal to a planning inspector, although before the notice takes effect an appeal may be made to the Magistrates Court by those served with the notice or any other person having an interest in the land. The council will consider serving such a notice where clear and demonstrable harm is arising to public amenity as a direct result of the condition of a piece of land.

Stop notices, temporary stop notices and court injunctions

These can be used to bring a quick stop to development where a breach is causing serious or irreparable harm and immediate action is justified. They will therefore generally only be used in the most serious cases. The use of injunctions will be considered in appropriate cases, such as where a listed building is undergoing alterations without consent that affects its special historic and architectural interest or where the council has evidence that a site will be developed without planning permission and in doing so will cause serious harm to particular planning interests.

Prosecution

In most cases the council cannot prosecute until we have taken formal enforcement action through the service of a formal notice, such as an Enforcement Notice or Breach of Conditions Notice, and any period specified in that notice has expired.

Prosecution does not bring about the remedying of a breach; rather it can be seen as the Courts "punishing" the person responsible, usually through a fine. Even though a successful prosecution may not remedy a planning breach on its own it can have an important deterrent effect.

We will not take a prosecution forward without first taking legal advice. As part of that advice, an assessment will be made as to whether there is sufficient evidence to take a prosecution forward and whether it is, in all the circumstances, in the public interest to take a prosecution, in accordance with the Code for Crown Prosecutors.

Additional prosecutions in response to ongoing non-compliance

Further to prosecution action as set out above, the breach of a notice may continue. In such circumstances, the council will consider whether further prosecutions are appropriate and in the public interest in addition to the following possible courses of action.

Proceeds of Crime Act 2002 (POCA)

Confiscation orders under the Proceeds of Crime Act 2002 (POCA) provides power to local authorities to obtain confiscation orders against people who commit planning crimes, to deprive them of the financial benefit they have gained as a result of committing planning crimes.

With a few exceptions, breaching planning control is generally not a criminal offence, but such activities can become criminal where they continue to occur in breach of a valid, effective enforcement notice.

Obtaining a confiscation order under POCA in these circumstances punishes the offender by forfeiting the profits attributable to the planning breaches, and in such circumstances the local authority receives a share of those profits. Using careful judgement and thorough investigation, local authorities can use this tool to target known repeat offenders, creating a real deterrent against breaches of planning law, while at the same time recovering sums to cover costs of any necessary remedial action.

In considering cases of ongoing breaches of effective enforcement notices, the council will consider whether such action is appropriate and proportionate.

Injunctions

The council will, when it is considered to be expedient for any actual or apprehended breach of planning control to be restrained, apply to the High Court or County Court for an injunction to restrain a breach of planning control (section 187B of the Town and Country Planning Act 1990).

Direct action

The council has the power in certain circumstances to make sure an enforcement notice is complied with by carrying out the required steps directly. It can also make the decision to take direct action to remedy a breach of planning control rather than serve a formal notice in the first instance.

In such circumstances, the council can recover all the costs incurred from the owner. Deciding whether or not to pursue direct action will only be done following a detailed review all the relevant circumstances of an individual case and the balancing of all determinative factors. Such action will only be taken if the council is confident that it is proportionate and necessary to do so.

Out of hours

There is rarely an opportunity or a justification for action to be taken out of hours whilst balancing all the relevant elements including European Convention on Human Rights (ECHR) considerations, and as such the council does not operate an out of hours planning enforcement service.

Involvement in the process

Advising the council of possible breaches

Reports of possible breaches of planning control should be made via our [online enforcement portal](#). This enables the council to have a record of the need for initiating investigation and possible action.

By using the link, a determination can be made on whether the development benefits from permitted development rights or requires planning permission and results in a potential breach of planning control:

https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwj6s8yu0K2RAxUAd0EAHS65OKoQFnoECBwQAw&url=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fmedia%2F5d77afc8e5274a27cdb2c9e9%2F190910_Tech_Guide_for_publishing.pdf&usq=AOvVaw2cyZByZVkpzbzXF17pnErmS&opi=89978449

When this is not possible reports should be made in person, for example, by telephone to enable council officers to make a detailed written record.

Anonymous reports will not be investigated unless they concern a statutory listed building or a protected tree.

Vexatious or repeated complaints will not be investigated. The development manager will determine these on a case by case basis.

No personal data relating to those making complaints will be shared with any party involved in the alleged breach.

In the event that a request is made to the council under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, personal information of individual complainants will not be disclosed in accordance with the principles of relevant data protection law.

If we have been informed that you may be responsible for a planning breach we will:

- provide identification whenever we visit
- provide the name of the officer carrying out the investigation
- investigate the complaint thoroughly before making any decision on what action to take
- write to you explaining our conclusions
- explain what you need to do to put matters right, how long you have to do this and what the consequences might be if this does not happen
- inform you if we decide to issue an enforcement notice, intend to take any direct action or start legal action

If you feel that there has been an error in the way in which an enforcement investigation is being carried out, or you are dissatisfied with the outcome of the council's investigations, you should use the council's formal complaints procedure which can be found on the council's website at Make a complaint. planhousinghealth@tmbc.gov.uk

Communication with members

Borough council members are informed of the receipt of allegations of breaches of planning on a weekly basis and are also informed of all cases that are closed.

Due to the confidentiality requirements of some of the legal processes involved in Planning Enforcement cases, detailed updates on, for example, the type of enforcement action being taken, cannot be provided to members of the public. However due to the nature of member involvement in operational matters, certain categories of information relating to the type of enforcement action being taken can be provided to Borough councillors.

In addition to this borough councillors have access to a digital enforcement tracker which enable them to access real time information on enforcement complaints.

Communication with stakeholders

If any stakeholder (a member of the public, a parish or town council or a borough councillor) draw our attention to a possible planning enforcement issue we will:

- not consider anonymous enquiries or vexatious or repeated complaints
- write to acknowledge your complaint within the prescribed time period

- write to let you know the priority it has been given and who is investigating it
- contact you if we need further information
- keep you informed on progress at key stages of our investigation
- let you know the final outcome of your complaint
- treat your complaint confidentially

Parish and town council involvement

In addition to this, if you are a parish or town council:

The council recognises that parish and town council members have an important role to play in this process. Town and parish councils have a great deal of local knowledge and awareness of what is happening in their areas. Town and parish councils can inform the planning enforcement process and as such the council encourages them to engage with officers over planning enforcement issues, on the understanding that decisions on whether or not to take enforcement action are governed largely by the law and clearly defined material planning considerations and as a result cannot be unduly influenced only by local perception.

Managing planning enforcement

Scheme of delegation

The Director of Planning, Housing and Environmental Health has delegated authority to issue all planning enforcement notices.

The responsibility for endorsing decisions will sit with the relevant team leader or service manager in planning services (the team leader will not endorse their own decisions) and will be escalated to the Head of Planning or Director of PHEH as necessary.

The decision as to whether criminal, or other legal proceedings should be brought, is delegated to the Director of Central Services. In addition, there is standing authorisation from the Director of Central Services to the Head of Legal and Democratic Services to make such decisions.

Annex 2



www.tmbc.gov.uk

Planning, Housing &
Environmental Health

XXXXXXXXXXXXXXXXX
XXXXXXXXXX
XXXXXXXXXX
XXXXXXXX

Our ref XXXXXXXXXX
Contact XXXXXXXXXX
Email XXXXXXXXXX@tmbc.gov.uk
Date XXXXXXXXXX

Dear Sir/Madam

Town and Country Planning Act 1990 (as amended)

Site: XXXXXXXXXXXXXXXXXXXXXXXXXXXXX.

Breach : XXXXXXXXXXXXXXXXXXXXXXXXXXXXX.

In response to a complaint received by Tonbridge and Malling Borough Council regarding a breach of planning law in the form of **Delete not applicable : Work to a listed buildings/Work to protected trees/ Development likely to have a serious impact on health or public safety – officer to describe breach.**

A site inspection carried out at the property on the **insert date: XXXXXXXXXXXXX**, has confirmed the unauthorised **Delete not applicable: Work to a listed buildings/Work to protected trees/ Development likely to have a serious impact on health or public safety – officer to describe breach.** Thus, confirming that a breach of planning law has occurred.

The works carried out without **planning/listed building or TPO consent** are considered to have a significant impact on the **heritage asset/conservation area/neighbour amenity** and is unlikely to be supported.

In light of the above, and to avoid enforcement action being taken, you are required to cease the unauthorised works immediately.

A compliance inspection will be conducted within **7 days** to confirm the cessation of the works and further details regarding any remedial measures will be provided within **14 days** of the compliance inspection.

Yours faithfully

Offer name: XXXXXXXXXXXXXXXXXXXX
Planning Enforcement Officer

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Annex 3



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Planning, Housing & Environmental Health

XXXXXXXXXXXXXXXXX
XXXXXXXXXX
XXXXXXXXXXXX
XXXXXXXX

Our ref xxxxxxxxxxxx
Contact xxxxxxxxxxxx
Email xxxxxxxxxxxx@tmbc.gov.uk
Date xxxxxxxxxxxx

Dear Sir/Madam

Town and Country Planning Act 1990 (as amended)

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx.

Breach : xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx.

In response to a complaint received by Tonbridge and Malling Borough Council regarding a breach of planning law in the form of Delete not applicable : Material change of use/ Operational development in the form of- officer to describe breach.

A site inspection carried out at the property on the insert date: xxxxxxxxxxxxxxxx, has confirmed the unauthorised Delete not applicable: Material change of use/ Operational development in the form of- officer to describe breach Thus, confirming that a breach of planning law has occurred.

The material change of use/operational development in the form of carried out without planning permission is considered to have a significant impact on the conservation area/ANOB/ neighbour amenity and is unlikely to be supported.

The unauthorised Material change of use/operational development is an offence under Section 55(1)/Section 57(1) of the Town and Country Planning Act 1990.

In light of the above, and to avoid enforcement action being taken, you are required to cease the unauthorised works immediately.

A compliance inspection will be conducted within 14 days to confirm the cessation of the works and further details regarding any remedial measures will be provided within 14 days from the date of the compliance inspection.

Yours faithfully

Offer name: xxxxxxxxxxxxxxxxxxxx

Annex 3



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**Planning, Housing &
Environmental Health**

Planning Enforcement Officer

Annex 4



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Planning, Housing &
Environmental Health

XXXXXXXXXXXXXXXXX
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XXXXXXXX

Our ref XXXXXXXXXX
Contact XXXXXXXXXX
Email XXXXXXXXXX@tmbc.gov.uk
Date XXXXXXXXXX

CAUTION: THIS IS IMPORTANT INFORMATION RELATING TO THE UNAUTHORISED TREE WORKS RECENTLY CARRIED OUT AT THE PROPERTY.

Dear Sir/Madam

Town and Country Planning Act 1990 (as amended)

Site: XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

Criminal Offence/Breach of planning law: Unauthorised lopping of branches from several trees standing at the above site and removal of which were also standing at the above site all of which are included within of the Tree Preservation Orders.

Trees at the property of are protected because they stand within a Conservation Area and their **removal/lopping/damage** is considered to be a criminal offence in terms of **Section 210 of the Town and Country Planning Act 1990 and the Town and Country Planning (Tree Preservation) (England) Regulations 2012.** .

In accordance with the tree preservation legislation the prior formal consent of the Local Planning Authority (LPA - Tonbridge and Malling Borough Council) is required for work to trees that are included within a TPO and six weeks' prior written Notice must be given to the LPA for work to trees which benefit solely from Conservation Area protection.

The Council (LPA) has no record of having received any recent application/notification in respect of the work to the trees at the above site, or of having granted any consent for the works which have been undertaken.

Annex 4



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**Planning, Housing &
Environmental Health**

An inspection conducted on theconfirms that that offences under the tree preservation legislation have been committed.

Any further works to the protected trees at the aforementioned property shall cease with immediate effect and details of the prosecution proceedings initiated against the responsible parties will be shared within 7 days from the date of this letter.

Yours sincerely,

{investigating officer}

Planning Enforcement Officer

Annex 5



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Planning, Housing & Environmental Health

XXXXXXXXXXXXXXXXX
XXXXXXXXXX
XXXXXXXXXXXX
XXXXXXX

Our ref xxxxxxxxxxxx
Contact xxxxxxxxxxxx
Email xxxxxxxxxxxx@tmbc.gov.uk
Date xxxxxxxxxxxx

CAUTION: THIS IS IMPORTANT INFORMATION RELATING TO THE UNAUTHORISED WORKS RECENTLY CARRIED OUT AT THE PROPERTY.

Dear Sir/Madam

Town and Country Planning Act 1990 (as amended)

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

Criminal Offence/Breach of planning law: Unauthorised works to a Listed Building in the form of.....

The building cited on the property of are protected under the [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#). These building are heritage asserted and any works to the Listed Buildings without prior Listed Building Consent is considered to be a criminal offence in terms of **Section 9 of the Town and Country Planning Act 1990 and the [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#)**.

The Council (LPA) has no record of having received any recent application/notification in respect of the work to the Listed Building at the above site, or of having granted any consent for the works which have been undertaken.

An inspection conducted on theconfirms that that offences under the **Town and Country Planning Act 1990 and the [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#)** have been committed.

Annex 5



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**Planning, Housing &
Environmental Health**

Any further works to the heritage asset at the aforementioned property shall cease with immediate effect and details of the prosecution proceedings initiated against the responsible parties will be shared within 7 days from the date of this letter.

Yours sincerely,

{investigating officer}

Planning Enforcement Officer

Executive Decisions Record - March 2026

Decision Number	Title	Cabinet Member	Date of Decision	Date Published	Call-in period ends	Called in	Scrutiny Committee Consideration	Referred back to Cabinet	Referred back to Council	Council referred to Cabinet	Date Decision Effective
D260020MEM	Business Rates Discretionary Relief Awards	Finance, Waste and Technical Services	02.03.26	04.03.26	11.03.26						12.03.26
D260021MEM	Business Rates Discretionary Relief Awards	Finance, Waste and Technical Services	02.03.26	04.03.26	11.03.26						
D260022MEM	Application for Section 13A 1(C) Council Tax Discount	Finance, Waste and Technical Services	02.03.26	04.03.26	11.03.26						
D260023MEM	Application for Section 13A 1(C) Council Tax Discount	Finance, Waste and Technical Services	02.03.26	04.03.26	11.03.26						
D260024MEM	Application for Section 13A 1(C) Council Tax Discount	Finance, Waste and Technical Services	02.03.26	04.03.26	11.03.26						
D260025MEM	Application for Section 13A 1(C) Council Tax Discount	Finance, Waste and Technical Services	02.03.26	04.03.26	11.03.26						
D260026MEM	Application for Section 13A 1(C) Council Tax Discount	Finance, Waste and Technical Services	02.03.26	04.03.26	11.03.26						
D260027MEM	Application for Section 13A 1(C) Council Tax Discount	Finance, Waste and Technical Services	02.03.26	04.03.26	11.03.26						
D260028MEM	Application for Section 13A 1(C) Council Tax Discount	Finance, Waste and Technical Services	02.03.26	04.03.26	11.03.26						
D260029MEM	Application for Section 13A 1(C) Council Tax Discount	Finance, Waste and Technical Services	02.03.26	04.03.26	11.03.26						
D260030MEM	Application for Section 13A 1(C) Council Tax Discount	Finance, Waste and Technical Services	02.03.26	04.03.26	11.03.26						
D260031MEM	Write Off of Unrecoverable Debts Over £5,000	Finance, Waste and Technical Services	02.03.26	04.03.26	11.03.26						
D260032CAB	Learning and Development Resources	Cabinet	03.03.26	05.03.26	12.03.26						13.03.26
D260033CAB	Options for LAHF - Purchase of Property										
D260034CAB	Internal Audit Service										
D260035MEM	Parking Action Plan - Phase 15 - Formal Consultation	Finance, Waste and Technical Services	02.03.26	05.03.26	12.03.26						13.03.26
D260036MEM	Biodiversity Duty	Housing, Environment and Economy	04.03.26	06.03.26	13.03.26						14.03.26
D260037MEM	Application for Section 13A 1(C) Council Tax Discount	Finance, Waste and Technical Services	13.03.26	17.03.26	24.03.26						25.03.26
D260038MEM	Application for Section 13A 1(C) Council Tax Discount	Finance, Waste and Technical Services	13.03.26	17.03.26	24.03.26						25.03.26

Decision pending Call in period Key Decision Private Urgent
 Subject to call in

URG - outside of budget and policy framework

Number of monthly call-ins:	0
Number of call-ins for year:	0

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**TONBRIDGE AND MALLING BOROUGH COUNCIL
NOTICE OF FORTHCOMING KEY DECISIONS**

In accordance with the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, at least 28 days before a key decision is expected to be taken a Notice of Forthcoming Key Decisions will be published. A 'key decision' is an executive decision which is likely either

- (a) to result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the local authority's budget for the service or functions to which the decision relates.

'Significant' when applied to expenditure or savings shall mean a sum in excess of £100,000 or such other sum as may be specified in any enactment or other statutory provision.

or

- (b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards in the area of the local authority.

The Notice of Forthcoming Key Decisions sets out:

- (a) the matter in respect of which a key decision is to be made;
- (b) details of the decision taker and the date on which the key decision will be made;
- (c) a list of documents to be submitted to the decision taker for consideration in relation to the matter;
- (d) the address from which, subject to any prohibition or restriction on their disclosure, copies of or extracts from any document listed is available and the procedure for requesting details.

All key decisions will be made by the Cabinet on the dates specified unless otherwise stated*. The agenda and documents to be submitted to the Cabinet (unless they contain exempt information) will be available for inspection at the Council Offices and on the website 5 clear working days before the meeting. Copies or extracts are available from committee.services@tmbc.gov.uk or Democratic Services, Tonbridge & Malling Borough Council, Gibson Building, Gibson Drive, Kings Hill, West Malling ME19 4LZ.

This document also gives notice of the Council's intention to hold a private meeting (or part thereof) of the Cabinet. It indicates any items where it is likely that the public will be excluded because public discussion would disclose confidential or exempt information and the reasons in each case. Any representations against the intention to hold a private meeting may be made to committee.services@tmbc.gov.uk or Committee Services, Tonbridge & Malling Borough Council, Gibson Building, Gibson Drive, Kings Hill, West Malling ME19 4LZ.

Members of the Cabinet and their areas of responsibility:

Councillor Matt Boughton (Leader)
Councillor Robin Betts (Housing, Environment and Economy)
Councillor Martin Coffin (Deputy Leader; and Finance, Waste and Technical Services)
Councillor Des Keers (Community Services)
Councillor Adem Mehmet (Infrastructure and Tonbridge Regeneration)
Councillor Mike Taylor (Planning)

(*Note: This Notice is subject to change as the reporting/governance timetable may change and it may become necessary to defer decisions until the next meeting of Cabinet)

NOTICE OF FORTHCOMING KEY DECISIONS: APRIL TO JUNE 2026

Description of Decision	Date of Cabinet	Who is to be consulted	Contact Officer	Documents to be submitted to Cabinet	Public or Private (reason if Private)
Homelessness Prevention and Rough Sleeping Strategy - Adoption	Between 1 Apr 2026 and 31 Jul 2026	Internal consultation via Housing and Planning Scrutiny Select Committee and Cabinet as detailed in the reports to be considered by Members. (Note: This matter is a non-key decision until the Strategy is presented for adoption).	Head of Housing and Regulatory Services	Officer report	Public
Decisions relating to Local Government Re-organisation (if required)	Between 1 Apr 2026 and 30 May 2026	Internal consultation via Cabinet as detailed in the reports to be considered by Members.	Chief Executive	Officer report	Public

Description of Decision	Date of Cabinet	Who is to be consulted	Contact Officer	Documents to be submitted to Cabinet	Public or Private (reason if Private)
Proposals for Future of Council-owned Assets in Tonbridge	Between 1 Apr 2026 and 30 Jun 2026	Internal consultation via Cabinet as detailed in the reports to be considered by Members.	Head of Housing and Regulatory Services	Officer report	Fully exempt Information relating to the financial or business affairs of any particular person (including the authority holding that information)
Lease Arrangements Tonbridge Farm Sportsground	Between 1 Apr 2026 and 30 Jun 2026	Internal consultation via Cabinet as detailed in the reports to be considered by Members.	Head of Administrative and Property Services	Officer report	Fully exempt Information relating to the financial or business affairs of any particular person (including the authority holding that information)

Description of Decision	Date of Cabinet	Who is to be consulted	Contact Officer	Documents to be submitted to Cabinet	Public or Private (reason if Private)
Tonbridge Town Centre Programme Board - Recommendations (if any)	Between 1 Apr 2026 and 30 Jun 2026	Internal consultation via Cabinet as detailed in the reports to be considered by Members.	Tonbridge Town Centre Programme Manager	Officer report	Part exempt Information relating to the financial or business affairs of any particular person (including the authority holding that information)
<p>Contact: committee.services@tmbc.gov.uk</p> <p>Published: 10 March 2026</p>					

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TONBRIDGE AND MALLING BOROUGH COUNCIL NOTICE OF FORTHCOMING KEY DECISIONS

In accordance with the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, at least 28 days before a key decision is expected to be taken a Notice of Forthcoming Key Decisions will be published. A 'key decision' is an executive decision which is likely either

- (a) to result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the local authority's budget for the service or functions to which the decision relates.

'Significant' when applied to expenditure or savings shall mean a sum in excess of £100,000 or such other sum as may be specified in any enactment or other statutory provision.

or

- (b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards in the area of the local authority.

The Notice of Forthcoming Key Decisions sets out:

- (a) the matter in respect of which a key decision is to be made;
- (b) details of the decision taker and the date on which the key decision will be made;
- (c) a list of documents to be submitted to the decision taker for consideration in relation to the matter;
- (d) the address from which, subject to any prohibition or restriction on their disclosure, copies of or extracts from any document listed is available and the procedure for requesting details.

All key decisions will be made by the Cabinet on the dates specified unless otherwise stated*. The agenda and documents to be submitted to the Cabinet (unless they contain exempt information) will be available for inspection at the Council Offices and on the website 5 clear working days before the meeting. Copies or extracts are available from committee.services@tmbc.gov.uk or Democratic Services, Tonbridge & Malling Borough Council, Gibson Building, Gibson Drive, Kings Hill, West Malling ME19 4LZ.

This document also gives notice of the Council's intention to hold a private meeting (or part thereof) of the Cabinet. It indicates any items where it is likely that the public will be excluded because public discussion would disclose confidential or exempt information and the reasons in each case. Any representations against the intention to hold a private meeting may be made to committee.services@tmbc.gov.uk or Committee Services, Tonbridge & Malling Borough Council, Gibson Building, Gibson Drive, Kings Hill, West Malling ME19 4LZ.

Members of the Cabinet and their areas of responsibility:

Councillor Matt Boughton (Leader)
Councillor Robin Betts (Housing, Environment and Economy)
Councillor Martin Coffin (Deputy Leader; and Finance, Waste and Technical Services)
Councillor Des Keers (Community Services)
Councillor Adem Mehmet (Infrastructure and Tonbridge Regeneration)
Councillor Mike Taylor (Planning)

(*Note: This Notice is subject to change as the reporting/governance timetable may change and it may become necessary to defer decisions until the next meeting of Cabinet)

NOTICE OF FORTHCOMING KEY DECISIONS – GENERAL EXCEPTION – APRIL 2026

Description of Decision	Date of Cabinet	Who is to be consulted	Contact Officer	Documents to be submitted to Cabinet	Public or Private (reason if Private)
Poult Wood Golf Course - Installation of Heat Pumps	7 Apr 2026	Internal consultation via Cabinet as detailed in the reports to be considered by Members.	Head of Administrative and Property Services	Officer report	Fully exempt Information relating to the financial or business affairs of any particular person (including the authority holding that information)
<p>In accordance with General Exception Rule 15 in the Access to Information Rules (as set out in Part 4 of the Constitution), the Chair of Overview and Scrutiny Committee has been informed that this decision is being taken as a general exception as the intention to make this key decision was not published 28 days before the meeting of Cabinet (as required in Rule 14.2 – publication of Key Decisions) and the matter cannot reasonably wait until the next meeting for the following reason:</p> <p>(1) Due to the timetable for accessing external grant funding and implementing the work.</p>					
<p>Contact: committee.services@tmhc.gov.uk</p> <p>Published: 12 March 2026</p>					

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Agenda Item 14

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 15

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 18

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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