

Tonbridge & Malling Borough Council

Local Plan

‘The Way Forward’

Regulation 18
Issues and Options

September 2016

DRAFT



Foreword

We would like to thank you for taking part in this consultation on the new Local Plan for Tonbridge & Malling.

This consultation marks the first stage of plan-making. It is about identifying and sharing with you the issues the borough will face in the coming years and how we could, through positive planning policy, provide for the needs of our communities in a way that is responsible and sustainable.

There are many issues we need to consider including homes, jobs, community facilities and transport. We also need to recognise the importance of protecting valued natural and heritage assets and understand matters such as flood risk and biodiversity.

As this is the first stage of plan-making, this consultation focusses on strategic matters and we are keen to receive your views on the direction the Local Plan should take.

We hope that you take this opportunity to help us in preparing a new Local Plan for Tonbridge & Malling by responding to the questions posed in this document.



Cllr Nicolas Heslop
Leader of the Council



Cllr Howard Rogers
Cabinet Member for Strategic
Planning and Infrastructure

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Tonbridge & Malling Borough Local Plan

The Way Forward

Regulation 18 Consultation

September 2016

**An invitation to have your say in shaping the future of
where you live**

1. Introduction

1.1. What is the role of the Local Plan?

1.1.1. The Local Plan sets out a vision and a framework for the future sustainable growth of the borough, addressing needs and opportunities for housing, the economy, community facilities and infrastructure as well as safeguarding natural and heritage assets and securing good design.

1.2. Why is it important to be involved with the making of a new Plan?

- 1.2.1. Your involvement will help the Borough Council understand what matters to you and what the priorities are in terms of delivering sustainable growth.
- 1.2.2. This consultation is an opportunity to shape policies that, once adopted, will represent the starting point for decision-taking on development proposals for the next 10-15 years.

1.3. What is this consultation exercise aiming to achieve?

1.3.1. To have a clear direction the Plan needs to take account of local views in responding positively to meeting the needs of communities. It is important

that we encourage constructive thoughts and support about how we can plan in this way.

2. Context

2.1. Why is there a need to prepare a new Plan now?

2.1.1. The Borough Council's existing [Development Plan Documents](#) are now a little dated; there is a need to respond to the [National Planning Policy Framework](#) and importantly to reflect current local evidence including objectively assessed needs for homes, land availability, flooding and employment.

2.2. What are the expectations of the Government?

2.2.1. The Government's objectives are set out in the [National Planning Policy Framework \(NPPF\)](#). The NPPF places Local Plans at the heart of the planning system, so it is essential that they are in prepared and kept up-to-date. It makes it clear that local authorities should:

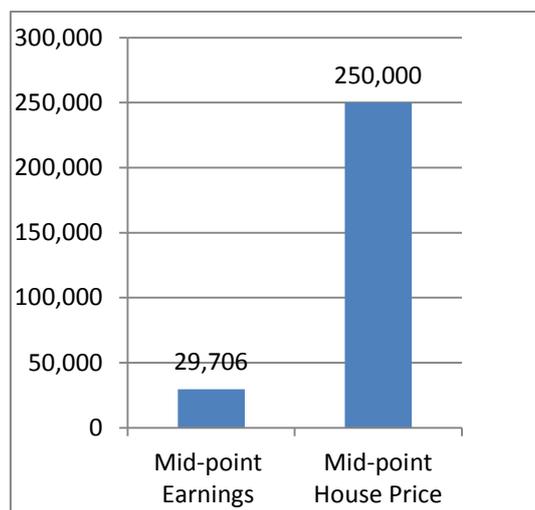
- positively seek opportunities to meet the development needs of their area (para.14)
- boost significantly the supply of housing (para.47)
- follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay (para.15)
- deliver a sound plan which is positively prepared in terms of seeking to meet objectively assessed needs; is justified by the evidence; is deliverable; and consistent with national policy, (para. 182)
- work with neighbouring authorities to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans (para.179).
- have regard to conserving biodiversity as part of policy and decision making. This is known as the Biodiversity Duty.

'... We are committed to a planning system that provides communities with certainty on where new homes are built. Local Plans produced in consultation with the community are therefore the cornerstone of our planning reforms...'
(Brandon Lewis, Minister of State for Housing and Planning, Written Statement, July 2015).

2.3. Why is the Government keen to meet needs and boost significantly the supply of housing?

2.3.1. The supply of housing across the country, particularly in the South-East, is not keeping up with need. This mismatch has meant that affordability has become an acute problem.

Figure 1: Earnings compared with house prices in Tonbridge & Malling (2014)



Source: Strategic Housing Market Assessment (Figures 26 & 31) (June 2015)

2.3.2. In Tonbridge & Malling, mid-point house prices (overall) are over 8 times greater than mid-point earnings.

2.3.3. This means that there are many households in Tonbridge & Malling that are, at present, unable to access the open housing market and unable to become homeowners. Boosting supply in an appropriate way will help address this.

‘...I will not stand by and allow this generation, many of whom have been fortunate enough to own their own home, to say to the next generation: we’re pulling up the property ladder behind us. So we will build the houses Britain needs so that more families can have the economic security that comes with home ownership....’
(George Osborne, Chancellor of the Exchequer, Mansion House Speech, June 2014)

2.4. What are the risks of not preparing a new Plan or preparing a new Plan that does not respond to the Government’s objectives?

2.4.1. There are three significant risks:

- Uncertainty – The absence of a plan means that there would be no confidence over where development may or may not happen over the next 10-15 years.
- Planning by Appeal – The absence of a plan means that decisions on proposals will increasingly be made at Appeal rather than through local decision making
- Government intervention - If the Borough Council does not move forward with plan-making, there is the risk that the Government will intervene arrange for a local plan to be prepared for the borough.

2.4.2. All of these risks have one thing in common; reduced local influence over what happens in the borough.

2.5. What are the benefits of preparing a new Plan that responds to the Government’s objectives?

2.5.1. A sound plan, shaped by local people, provides certainty, and therefore confidence, in many ways:

- Clarity over where sustainable growth should take place.
- Certainty over the level of growth needed to deliver improvements in infrastructure to benefit existing and new communities.

- Clarity over which important natural and heritage assets can be protected from development.
- Ensuring that the basis for decision-making on proposals is clear and has been shaped by local evidence and local communities through on-going engagement.

3. Plan-making process

3.1. How will the new Local Plan be prepared?

3.1.1. The starting point in the process is the gathering of evidence. The Council has collated, and continues to update, evidence covering matters including housing, jobs, flooding, as set out below. This has been shaped by the expectations of the Government. This evidence is explained in more detail in Section 4.

- Strategic Housing Market Assessment
- Strategic Land Availability Assessment
- Housing Land Supply Position
- Economic Futures Forecasting
- Employment Land Review
- A20 Corridor Study
- Gypsy and Traveller Accommodation Assessment
- Strategic Flood Risk Assessment (Level 1)
- Kent Habitats Survey
- Green Belt Study
- Plan Viability

3.1.2. This consultation is the next stage and introduces the issues the new Plan will need to tackle, together with the potential responses available to positively respond to them.

3.1.3. The Borough Council will carefully consider responses received during the initial consultation. This will inform the next stage in the plan-making process.

3.1.4. The full timetable can be found here: www.tmbc.gov.uk/localplan

3.2. How will the Plan be assessed?

- 3.2.1. The environmental, economic and social credentials of the options and policies will be subject to a **Sustainability Appraisal (SA)**. The Sustainability Appraisal plays an important role in demonstrating that the Local Plan reflects sustainability objectives and has considered all reasonable alternatives. It incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive.
- 3.2.2. The Local Plan will also be subject to a Habitats Regulations Assessment (HRA) undertaken in accordance with the Habitats Directive.
- 3.2.3. Both the Sustainability Appraisal, incorporating the requirements of the Strategic Environmental Assessment, and the Habitats Regulations Assessment will be published alongside this document for consultation.

4. Local Plan issues and objectives

4.1. How were the issues identified?

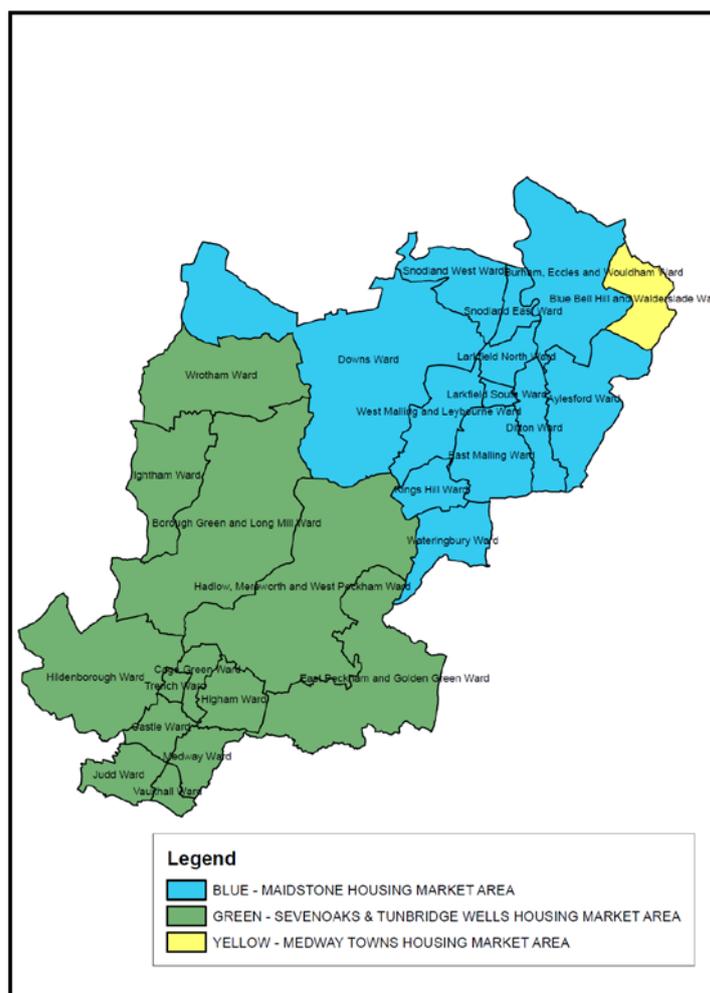
- 4.1.1. The Government's policy is very clear that '*...every effort should be made objectively to identify and then meet the housing, business and other development needs of an area...*' (NPPF, para.17, core principle 3). In response to this requirement the Council undertook evidence gathering for various issues including housing, employment and environmental matters. Set out below are the headlines from each piece of work. Further details, including the evidence itself, are available from the Local Plan web page: www.tmbc.gov.uk/localplan.

4.2. What broad issues does the existing evidence identify?

Housing

- 4.2.1. The Strategic Housing Market Assessment (SHMA) is a piece of evidence that provides an understanding of housing market dynamics, an assessment of future housing needs for both market and affordable housing and the housing requirements of different groups within the population. The Strategic Housing Market Assessment concluded that there are, broadly speaking, two Housing Market Areas (HMAs) exerting an influence across the borough:
- Maidstone/Tonbridge & Malling
 - Sevenoaks/Tunbridge Wells/Tonbridge and Malling
- 4.2.2. A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. To determine the geographical extent of HMAs, data including house prices, migration flows and contextual data including travel to work areas is analysed.
- 4.2.3. Figure 2 illustrates the extent of the influence of each of these HMAs across the borough. An appreciation of this pattern of HMAs is important for understanding how we can meet needs where they are generated and achieve sustainable patterns of development.

Figure 2: Influence of different Housing Market Areas on Tonbridge & Malling Borough



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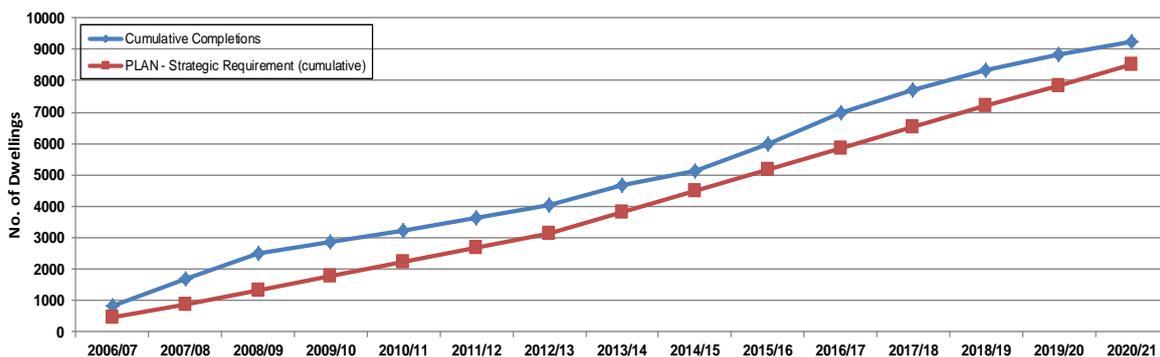
4.2.4. The Strategic Housing Market Assessment (SHMA) has identified a gross Objectively Assessed Need (OAN) of 673 homes per annum for the period 2011-2031. This is a demographic-based projection that has been subject to local sensitivity testing as required by the Government’s Planning Practice Guidance.

4.2.5. The figure of 673 homes per annum is the gross need for the borough; completions and outstanding commitments since the base date (2011) need to be subtracted, to work out the net need that the new Local Plan needs to address. As a result of positive planning by the Borough Council a significant

amount of homes have been built since 2011¹ (1,933 units) and there are many units in the pipeline that already have planning permission (4,721 units). In addition there are 83 units from unimplemented allocations in the existing Development Plan. Taking account of a modest windfall projection from small sites (i.e. sites with a capacity of less than five units); this translates to a net need that the Plan must respond to of 6,000 units (375 units per annum, 2016-2031).

- 4.2.6. In addition the SHMA identified an affordable housing need of 277 homes per annum and a registered care need (C2 use class) of 20 bed spaces per annum for the plan period (2011-2031).
- 4.2.7. Local evidence has concluded that there is a net need of 21 pitches (2012-2028) for Gypsy and Traveller accommodation. Analysis of data has shown a need for 2 plots for Travelling Showpeople over the assessment period.
- 4.2.8. **Historic Housing Land Supply:** Since the base date of the adopted Development Plan (2006/07), cumulative housing completions have consistently exceeded the cumulative requirements as illustrated in Figure 3 (below) (source: Annual Monitoring Report 2015, Figure A3). This demonstrates that the Borough Council has a sound record of delivery, according to the criteria set out in the Government's [Planning Practice Guidance](#).

Figure 3: Housing Trajectory



- 4.2.9. This is a result of the Borough Council positively planning for significant opportunities that have arisen in the past including Peter’s Village, Kings Hill, Leybourne Chase and Holborough Lakes. The expectations of the Government are that this positive planning approach needs to continue. However, due to a long history of making the most of brownfield land to meet

¹ Up until 31st March 2015, as evidenced in the [Annual Monitoring Report](#) (December 2015)

needs, the opportunities for positively responding to assessed needs on brownfield land are becoming few and far between. This presents challenges for the new Local Plan, not least the need to consider development on fresh land in sustainable locations.

4.2.10. Projected Five-Year Housing Supply: The latest published position on the local housing land supply is set out in the [Annual Monitoring Report 2015](#). As a result of positive local planning the Borough Council can demonstrate 5.3 years' worth of land supply as measured against the Objectively Assessed Need from the SHMA of 673 units per annum (+ 5% - see Table 1 below). This means that the relevant policies in the Borough Council's adopted Development Plan on supply are still current and not out-of-date, according to the requirements of [para.49](#) in the NPPF. But that is no reason for complacency. Rather it is a demonstration that forward looking planning provides the best way of managing the future of development in the borough.

Table 1: Housing Land Supply Position

Housing Land Supply 2006-2021 (673 units per year)																						
Year	Sites with Permission (1)	Small Sites Estimate	Large Sites Windfalls	Allocations (3)	Kings Hill Phase 3	Kings Hill (4)	Holborough Quarry (5)	Leybourne Grange	Peters Pit	Tonbridge Central Area completions and permissions	Completions (2)	5 Year Totals (2)	Total Supply 2006-2021 (2)	5 Year Supply 2015/16-2019/20 (2)								
2006/07	437					281	85			47	850	3210	9302	3760								
2007/08	349					300	137			53	839											
2008/09	280					224	91			203	798											
2009/10	209					93	47	16		7	372											
2010/11	145					55	18	59		74	351											
2011/12	119					90	100	22		113	444	2775			9302	3760						
2012/13	151					84	59	70		30	394											
2013/14	257					108	12	82		149	608											
2014/15	267					91	43	26		60	487	3317					9302	3760				
2015/16	387					90	80	100		185	842											
2016/17	428			5	50	73	80	108	70	198	1012											
2017/18	242			25	100	14	80	109	150	30	750											
2018/19	138			33	100	1	80	69	150	77	648											
2019/20	85			20	100		80	69	150	4	508	573	9302	3760								
2020/21	69				100		80		150		399											
2021/22	6				100		46		150		302	573			9302	3760						
2022/23					85		6		150		241											
2023/24									30		30	573							9302	3760		
2024/25											0											
2025/26											0	112					9302	3760				
Not Phased	89									23	112											
Totals	3658	0	0	83	635	1504	1124	730	1000	1253	9875											
																					SHMA 5 yr OAN +5% (8)	3533
													Difference	227								
													5-Year Supply (7)	106%								
													No. of years of HLS (8)	5.3								

- Note (1) Excluding Strategic Sites & Tonbridge Town Centre
- Note (2) Excluding windfalls but including allocations
- Note (3) Includes 65 dwellings on allocated land at Kings Hill
- Note (4) Excludes 65 dwellings on allocated land without permission
- Note (5) Holborough Quarry 2008/09 error - should have been 91 units not 182 units
- Note (6) Objectively Assessed Need (OAN) for housing identified in the Strategic Housing Market Assessment (SHMA) (Overview, June 2015) plus 5% buffer as required by para. 47 in the NPPF
- Note (7) Supply of ready to develop housing sites as a % of the 5-year OAN requirement (see footnote (6))
- Note (8) Number of years of Housing Land Supply (HLS) measured against 5-year OAN requirement + 5% (see footnote (6))

	Next 5 years of projected housing supply
	5-year supply as a percentage of the OAN requirement (see footnote (6))
	Post Plan Period (2006-2021)
	Number of years of housing land supply measured against 5-year SHMA requirement (see footnote (6))

Employment

- 4.2.11. The Employment Land Review concluded that there is just enough supply, in quantitative terms, to meet office needs but there is a shortfall of industrial space of up to 33 ha. It is for the Local Plan to consider positive strategies for addressing this for the benefit of local people.
- 4.2.12. The Employment Land Review also concluded that given that much of the Borough is rural in nature, it is important that planning policy supports sustainable rural based employment development and responds positively to proposals that encourage the reuse of redundant agricultural buildings to meet future industrial and office based needs. The current roll-out of fibre broadband across Kent (which will extend coverage to significant parts of Tonbridge & Malling’s rural areas) will help to overcome the key infrastructure and accessibility barriers typically faced by rural businesses and provide the opportunity for the Borough’s rural locations to play a greater economic role in future.

Strategic Flood Risk

- 4.2.13. The Level 1 Strategic Flood Risk Assessment (SFRA) (2016) recommends a risk-based and sequential approach to development and flood risk, so that development is located in low flood risk areas where possible; it is recommended that this approach is adopted for future developments within the borough. The SFRA recommends that development must seek opportunities to reduce overall levels of flood risk at sites, for example by: reducing volume and rate of surface water runoff; locating development to areas with lower flood risk; creating space for flooding; and/or integrating green infrastructure into mitigation measures for surface water runoff from potential development.

Green Belt

- 4.2.14. An assessment of the robustness of the existing boundaries of the Green Belt, as measured against the purposes identified in the Government’s [NPPE](#), is currently work-in-progress. The objective is to ensure that, at the end of this exercise, the boundaries are robust and can endure at least for the duration of the plan period (up to 2031).

Kent Habitats

4.2.15. The [Kent Habitats Survey](#) (2012) identifies that Tonbridge & Malling District extends over four Natural Character Areas (NCAs), which contribute to the wide variety of habitats found within the area. This includes a range of UK Biodiversity Action Plan (BAP) Priority Habitats, some of which contribute significantly to Kent's overall resource.

Infrastructure

4.2.16. As part of the assessment of the Call for Sites submissions, key infrastructure providers were engaged with to help with the assessment of suitability and the likely requirements for supporting infrastructure such as schools, healthcare and highways. The need to assess potential options for the new Local Plan and the effect of planning designations on the potential yield, it is not possible, at this stage, to understand the exact land-take for the supporting infrastructure. However, it is important that we positively plan for a level of sustainable growth that can facilitate significant improvement to infrastructure for the benefit of existing and new communities and the local economy.

4.2.17. A study to establish the baseline data for the A20 between Ashton Way and the Coldharbour roundabout prepared was completed in May 2016. The study clarifies and confirms existing capacity issues along the corridor and identifies some minor improvements to junctions and traffic management measures. It also prepares the way for further modelling work for more significant improvements that could be delivered through the Local Plan.

Strategic Land Availability Assessment (SLAA)

4.2.18. This piece of evidence identifies those sites that were brought forward as part of the 'Call for Sites' exercise as being potentially suitable and deliverable for development.

4.2.19. This assessment was a technical exercise in accordance with National Guidance, primarily to clarify practical aspects of the sites, rather than to judge whether or not they should feature as future allocations for development in the Local Plan. This means that the assessment did not take account of local policy considerations, including the extent of Green Belt boundaries, which are matters for consideration during the making of the Local Plan itself.

4.2.20. Based upon an average yield of 30 dwellings per hectare, the SLAA concluded that those sites assessed as suitable and deliverable have an overall capacity of approximately 26,000 homes. The outcome of this calculation is by no means a final figure of what is acceptable in planning terms; if and when the sites are progressed through to this plan-making stage a more detailed assessment will be required, see later in this report. At that stage planning judgements about how much, if any, of a site is appropriate for development will need to be made which might well reduce the area and yield significantly. Again, at that stage it will be necessary to understand fully the land-take for supporting uses including schools, healthcare facilities, playing fields, amenity space and roads. Potential yield at this stage is therefore very much a starting point for this exercise.

Viability

4.2.21. Whole plan viability will need to be assessed. The assessment needs to demonstrate that the sites and scale of development are viable, taking into account the need for infrastructure provision. In addition, it is important to understand the consequences of pursuing a wide range of standards in the Local Plan on the delivery of development. This is required by Government policy (see para.173 in the [NPPE](#)). The opportunity to undertake this assessment is when we have a clear development strategy and detailed policies.

4.3. What key issues has the evidence identified?

4.3.1. The evidence highlighted above has identified the following key issues:

- Objectively Assessed Need (OAN) for housing of 673 units per annum (2011-2031)
- Affordable housing need of 277 units per annum (2011-2031)
- Registered care need (C2 use class) of 20 bed spaces per annum (2011-2031)
- Good long-term record of housing delivery
- 5.3 years' worth of housing land supply, see Table 1
- Shortfall of up to 33 ha of industrial space
- A range of UK Biodiversity Action Plan (BAP) Priority Habitats, some of which contribute significantly to Kent's overall resource.
- A significant number of potential sites providing choice for future development.

4.4. What the Local Plan cannot address

- 4.4.1. In addition to considering what the Plan needs to cover, it is equally important to understand what the Plan cannot include. The Government's [Planning Practice Guidance](#) makes it very clear what Local Plans should exclude:

'...In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development...' (Paragraph: 010 Reference ID: 12-010-20140306)

'...There should be no need to reiterate policies that are already set out in the National Planning Policy Framework...' (Paragraph: 010 Reference ID: 12-010-20140306)

- 4.4.2. Where it is not supported by evidence to add anything locally-distinctive to the national policy objective(s), the Local Plan will sign-post the reader to the relevant policy in the NPPF or current Government policy at the time the plan is published. Examples of such National policies include those relating to **natural and historic assets**, for example: **Conservation Areas, Listed Buildings, and Sites of Special Scientific Interest**. In addition, the purposes and policy objectives of the **Green Belt** will not be replicated, although the existing boundaries will be assessed as part of the plan-making process as expected by the Government in the NPPF.

4.5. Which key objectives does the Plan need to address?

- 4.5.1. The local evidence, Government policy and initiatives promoting the most of brownfield land and transport hubs, point to the following set of objectives that the Local Plan should aim to achieve:

Plan Objective 1: Respond positively to locally assessed need for homes and jobs

Plan Objective 2: Support and sustain local communities across the borough, big and small, by planning to meet needs where they are generated.

Plan Objective 3: Protect high value, important natural and heritage assets

Plan Objective 4: Deliver sustainable growth to support the urban and rural economies and make the best use of infrastructure

Q1. Do you agree with this set of objectives for the new Local Plan, Yes/No?

Please explain.

5. Local Plan – Strategy considerations

5.1. Introduction

5.1.1. The previous sections have identified the key national policies, issues and objectives that the Local Plan needs to respond to. This section outlines the potential way forward to address these matters.

5.2. What are the building blocks for the Local Plan strategy?

5.2.1. National planning policy has identified a number of key requirements that should underpin strategies in Local Plans. We have interpreted these as three building blocks (see list below) that should form the foundation of any strategy considered for this Local Plan.

Building Blocks:

- A. Addressing assessed needs on brownfield land within the built-up confines of settlements
- B. Addressing assessed needs on land safeguarded in the existing Development Plan for future development, including the area of opportunity
- C. Addressing needs on land at low risk of flooding within existing settlements

Q2. Do you agree with this set of building blocks for the Local Plan strategy, Yes/No?

Please explain.

5.3. How can the building block opportunities be assessed?

5.3.1. Information about the assessment process is set out in appendices B, C and D.

5.3.2. This assessment asked key questions including:

- Does this make a positive contribution to addressing assessed needs?
- Which plan objectives does this respond to?
- Would this achieve a sustainable pattern of development?

5.4. How is the potential contribution of each building block assessed?

5.4.1. The starting point is the assessments of the [Call for Sites](#) submissions. However, this was a technical assessment that took account of high-level constraints beyond the control of the Borough Council but which preclude development, for example, Special Areas of Conservation, and areas at high risk of flooding.

5.4.2. Now that we are at the plan-making stage, consideration needs to be given to designations which will have some bearing on what could be realistically achieved. These include: Air Quality Management Areas; Conservation Areas; Listed Buildings; Historic Parks & Gardens, Areas of Outstanding Natural Beauty; Grade 1 Agricultural Land; Local Wildlife Sites and Priority Habitat Areas.

5.4.3. In assessing the development potential of sites, these designations are discounted from the developable area. In some cases this results in suitable and deliverable sites being eliminated altogether.

5.4.4. In respect of the Green Belt, the Government's National Planning Policy Framework is very clear that the preparation of the Local Plan is the time to review the boundaries of the Green Belt ([para.83](#)). With this in mind, land that currently falls within the Green Belt is not discounted, in the first instance, from the developable area but instead the risks posed to the Green Belt are highlighted.

5.4.5. The outcome of this process is an area (hectares) which is then multiplied by 30 (average density of housing units per hectare) to understand the development potential.

Please Note: This development potential should be treated with caution because it is inevitable that there will be land-take for necessary supporting infrastructure, for example roads and amenity space. For the larger sites, the land-take for supporting infrastructure is likely to be more significant because of the need for facilities including education, healthcare and local centres. In assessing the sites, key

infrastructure providers were engaged with and issues were identified. However, due to the preliminary stage of plan-making it has not been possible to confidently predict what is essential for each site. This is something that will be revisited and worked-up in more detail once we have a clearer direction for the new Local Plan.

5.5. How do the building blocks perform in the assessment?

- 5.5.1. It is evident from the assessments that, individually, the building blocks would not effectively address assessed needs and deliver sustainable patterns of development.
- 5.5.2. To focus development on sites within existing settlements would support a sustainable pattern of development because of the proximity and connectivity to local services and employment opportunities. However, the limited number of sites would not produce enough potential to form a sound approach to housing affordability and labour supply to support the local economy. It is also evident from the assessments that, individually, the building blocks would not adequately address the draft Plan Objectives.

5.6. What is the cumulative potential of the building blocks?

- 5.6.1. The next step involves an assessment of the cumulative contribution that these three building blocks could potentially make.
- 5.6.2. According to this assessment, the combination of all three building blocks would also not address the full set of Plan Objectives.

Table 2: Cumulative contribution of the building blocks

Building Block	Description	Potential Yield
A	Addressing assessed needs on brownfield land within the built-up confines of settlements	217
B	Addressing assessed needs on land safeguarded in the existing Development Plan for future development, including the area of opportunity	1,840
C	Addressing needs on land at low risk of flooding within existing settlements	226
Total Potential Yield		2,066*

*excluding double-counting where there is overlap between the building blocks

5.6.3. Although the potential development arising from the application of these building blocks alone would fall significantly short of the identified need for development, they are sound components that should form the foundation of whatever strategy ultimately underpins the new Local Plan.

5.7. Which principles should guide the development strategy for the new Local Plan?

5.7.1. The outcome of the assessment of the building blocks means that in order to effectively respond to Government policy, local evidence and the draft plan objectives, we need to consider opportunities beyond existing settlement confines.

5.7.2. To help guide decision-making on which opportunities should be considered and assessed in more detail a set of principles have been prepared. These have been directed by National policy, the local evidence base and the draft plan objectives.

5.7.3. The guiding principles are:

- 1. Addressing assessed needs adjacent to the principal urban areas of the Medway Gap and Tonbridge, in each housing market area**
- 2. Addressing assessed needs adjacent to a range of settlements across the borough to help support and sustain local communities, big and small**
- 3. Addressing assessed needs in reasonable proximity to transport hubs, utilising and building upon existing infrastructure**
- 4. Addressing assessed needs through development focussed in the least constrained parts of the borough**
- 5. Providing a mixed portfolio of sites, big and small, to meet a range of needs throughout the duration of the plan period up to 2031, over the short-term (up to 5 years), medium-term (6-10 years) and over the long-term (11-15 years)**
- 6. Delivering a sustainable level of growth to facilitate significant improvements to supporting infrastructure, eg schools, highways and**

healthcare, for the benefit of existing and new communities

7. Focussing on the contribution that larger potential sites could deliver in a proportionate way to meet wider plan objectives and ensure delivery in the plan period.

Please Note: These principles should not be read in isolation.

Q3. Do you agree with this set of guiding principles, Yes/No?

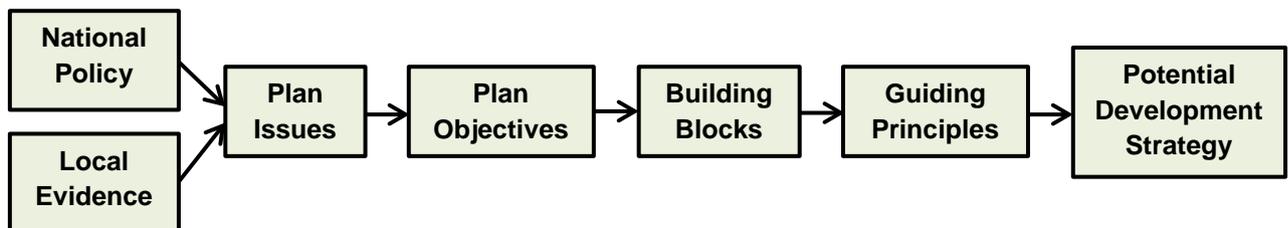
Please explain.

5.8. What do we need to consider when applying the guiding principles to the formulation of a development strategy for the Local Plan?

What is the desired outcome?

5.8.1. The desired outcome is a strategy that positively addresses assessed needs in a realistic, responsible and sustainable way. We want to achieve a future for the borough where people have a desire and ability to live locally because of the quality of life. This means that we need to consider a policy response to the evidence that can sustainably meet the plan objectives in a way that is shaped by the guiding principles. To help appreciate this process the following flow-chart has been prepared.

Figure 4: Local Plan Development Strategy: Decision-making flow-chart



How important is the size and mix of sites?

5.8.2. In determining what would make a sustainable and deliverable strategy for the new Local Plan it is important to consider the mix as well as the location

of potential development sites. A strategy dominated by small to mid-sized sites may not generate the critical mass required for significant improvements to infrastructure (schools, highways and healthcare) which could benefit existing as well as new communities. A strategy dominated by a few strategic sites would bring in to question whether the short to medium-term housing needs of the borough would be adequately addressed because larger sites, by their nature, often take longer to start delivering homes.

What could be realistically achieved?

5.8.3. In addition, it is important to consider the magnitude of development. The Local Plan needs to be realistic in terms of what the market can deliver. Historically, the local market has delivered just over 600 homes per year². In considering the magnitude of development, the Local Plan needs to strike the balance between positively addressing current assessed needs with the need to make sure opportunities remain to meet the longer-term needs of the borough beyond 2031. It is important to bear in mind that this plan has a time horizon of 2031 and that in preparing it we must have an eye on how we can possibly meet longer-term development needs stretching well beyond the plan period. This is an expectation of the Government. If we are to effectively respond to this expectation it would be unwise to exhaust all of our genuine opportunities in the short-medium term; that would not be good husbandry.

What could happen if we allocated all the potential development sites?

5.8.4. With these considerations in mind, it is evident that the unfettered allocation of all of the potentially suitable and deliverable sites (as evidenced in the Strategic Land Availability Assessment) beyond but adjacent to the confines of existing settlements would result in an unsustainable and unrealistic development strategy. The sheer quantum of development would put significant pressure on infrastructure and pose a serious risk to air quality, local amenity, natural and heritage assets and biodiversity and the local economy. Furthermore, in light of what the local market has previously delivered, it is questionable whether all the sites would be realistically deliverable in the plan period.

² 615 units per annum average (2001/2 to 2011/12), para. 4.109, Strategic Housing Market Assessment (March 2014)

5.9. How can we find a proportionate policy response?

- 5.9.1. To help focus on what could represent a proportionate policy response, the Borough Council has devised a set of sustainability buffers. These are areas beyond but immediately adjacent to the settlement confines. These buffers extend beyond the confines by 500 metres for urban areas and 250 metres for all other settlements. These are considered to be reasonable sustainable distances from the outer extents (a maximum of 10 mins walking distance) which would help avoid the coalescence of settlements, thereby protecting the integrity and separate identity of urban areas and villages. We appreciate that this is important to local communities.
- 5.9.2. These buffers have only been devised as a guide for focussing on a potential way forward; they are not prescriptive. In some cases, the potential developable area identified for each opportunity site is not necessarily the full extent of the land within the buffer that is free from constraint and local designations. Issues including topography, landscape, existing operations (on-site and neighbouring) and access have been considered which has had the effect of reducing the extent of the potential developable area.
- 5.9.3. The application of the buffers to the urban areas, rural service centres and rural settlements has resulted in a number of opportunities across the borough for consideration. In determining which opportunities should feature in the Local Plan strategy, it is important to revisit the objectives and understand what the Plan is trying to achieve.

Does the Local Plan strategy need to include all of those suitable and deliverable sites that feature within the sustainability buffers?

- 5.9.4. As highlighted above, these buffers have been devised to help focus the mind on which opportunities could be considered as part of the Local Plan development strategy; they are not prescriptive.
- 5.9.5. It is important to bear in mind the wider plan objectives, building blocks and the guiding principles when determining what could be a potential sustainable development strategy for the new Local Plan. This may mean that certain sites assessed in the Strategic Land Availability Assessment as not being suitable and deliverable could be considered if it is evident that they would make a significant positive contribution to the strategy and where the issues identified are not insurmountable.

5.10. What could a sustainable development strategy for the new Local Plan look like?

5.10.1. With the plan objectives, building blocks, guiding principles and the Government's expectations in mind, the strategy illustrated in Appendix E could represent a sound direction for the new Local Plan to take. This could, potentially, deliver in the region of 10,000 homes so it builds in some flexibility and choices, although this estimate would need to be subject to more detailed assessment.

What contribution could this strategy make to the plan objectives?

5.10.2. A potential development strategy of this type could make a positive contribution to each and every Plan Objective by supporting growth across the borough in communities (big and small) in each of the Housing Market Areas, thereby enabling a sustainable pattern of development with good connectivity to local services and employment opportunities (locally and further afield).

How does this potential strategy relate to the building blocks?

5.10.3. The foundation of the strategy are the **three building blocks** of: (A) making the most of brownfield land in existing settlements; (B) utilising areas safeguarded in the existing Development Plan for future development; and (C) avoiding land at high risk of flooding within built-up areas.

Would this potential strategy represent a proportionate policy response?

5.10.4. This foundation is built-upon by the realistic and sustainable opportunities presented by the guiding principles (the reasonable alternatives), making sure a **proportionate policy response** is achieved in light of the assessed needs, infrastructure capacity, local natural and heritage assets and biodiversity, and the need to consider long-term development needs beyond the plan-period (i.e. good husbandry).

Would this potential strategy deliver a mixed portfolio of development sites?

5.10.5. These opportunities would enable the supply of a mixed portfolio of sites that should enable the delivery of homes over the period of the Plan (short, medium and long-term, as sourced from the Strategic Land Availability Assessment) for the benefit of urban and rural communities. The inclusion of strategic sized development areas will facilitate, in the medium to long-term, significant improvements in infrastructure provision which will be of benefit

not just to those people moving into the new homes but the wider local community.

How does this potential strategy perform against the Sustainability Appraisal objectives?

5.10.6. **Summary of Interim Assessment:** Although avoiding areas of high environmental value and flood risk, making use of existing brownfield land and delivering the quantum of development necessary to meet our identified need, this option does require the use of some greenfield land. The dispersed pattern of development at a range of settlements across the borough provides support for both the urban and rural economies and attempts to address the needs of a range of communities, including significant support for the town centre. A distribution of sites across both HMAs supports a sustainable pattern of development. The small sites are likely to result in short-term small scale impacts which could be mitigated where necessary. However, the large strategic sites may have a long lead in time which could mean that they are more likely to begin delivery in the medium to long-term, and therefore any impacts are also likely to see a similar time frame.

What to do next

5.10.7. We would like your views on this potential approach to a development strategy for the new Local Plan. When considering your response, please bear in mind the evidence base, the Government's expectations, the plan objectives and the guiding principles.

Q4. Do you agree that this potential approach to a development strategy could provide a sound direction for the new Local Plan to take, Yes/No?

Please explain.

6. Local Plan – Other key strategic considerations

6.1. How should the new Local Plan respond to the economic evidence?

6.1.1. The Employment Land Review concluded that there is just enough supply, in quantitative terms, to meet office needs but there is a shortfall of industrial space of up 33 ha, depending on the scenario for future growth.

6.1.2. National planning policy in respect of employment land has evolved significantly since the existing Development Plan was prepared. The expectation of the Government is that a more flexible approach to economic development needs to be deployed by local planning authorities in order support its growth. The NPPF, at [para. 22](#), states:

'...Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities....'

6.1.3. It is important to bear in mind the degree to which the Local Plan can actually influence current and future patterns of economic development. For example, offices can now be converted to residential properties under permitted development rights.

6.1.4. In light of these changes and policy expectations, we need to consider how we can effectively respond to the economic evidence in a way that is compliant with national policies and regulations and nurtures (and does not hinder) economic growth.

Q5. Should the new Local Plan continue to support and focus new economic development at and around existing economic hubs such as the Tonbridge Industrial Estate, New Hythe Lane, Kings Hill, Hermitage Lane and Quarry Wood or should an alternative strategy be considered?

Please explain.

Q6. Should the Council be more flexible and consider a wide range of employment generating uses within existing economic hubs in the borough, Yes/No?

Please explain.

Q7. Should the Local Plan be supportive of more mixed-use developments, including start-up units within residential schemes, Yes/No?

Please explain.

6.2. What should be the future role of Tonbridge Town Centre?

- 6.2.1. Tonbridge is the principal town in the Borough.
- 6.2.2. Tonbridge Town Centre has undergone a significant transformation over the past 10 years. A key part of this has been steered by the Borough Council's [Tonbridge Central Area Action Plan](#) which has seen more people living in the heart of the town. Improvements to the High Street have been undertaken this year to help improve the environment for shoppers, workers and visitors alike.
- 6.2.3. At the same time, rapid transformation has occurred in shopping habits which has had a consequential impact on retail markets and the types of activity that we see in the town centre today.
- 6.2.4. As a result, the character of Tonbridge has evolved, with a significant number of people now living close to the centre.
- 6.2.5. With these changes in mind, and with a view that the rate of change for some of the influences on Tonbridge, eg retail market, has proven to be quicker than the cycle of Local Plan making itself, we need to carefully consider what the best policy response is for the Town moving forward. We must consider how we can effectively balance the need to protect Tonbridge's identity with the need to allow it to effectively respond to changing markets and the opportunities they present to allow it to thrive and be a vital place.

Q8. What should be the role of Tonbridge Town Centre moving forward, i.e. should it be a retail hub, a social and cultural hub or a combination of the two?

Please explain.

**Q9. Should the Local Plan include a flexible policy framework for Tonbridge to allow the Town to be able to respond to future market opportunities to enable the Centre and adjoining areas to thrive
Yes/No?**

Please explain.

Q10. Do you have other thoughts about how planning policy should guide development in and around the town centre?

6.3. What should the Green Belt boundaries be in the Local Plan?

6.3.1. As part of the evidence gathering for the new Local Plan, the robustness of the existing Green Belt boundaries was assessed. The boundaries were assessed against the five purposes of the Green Belt as identified in the [Government's NPPF](#):

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.3.2. The Government's National Planning Policy Framework is very clear that the preparation of the Local Plan is the time to review the boundaries of the Green Belt ([para.83](#)). Furthermore, the NPPF makes it very clear ([para.84](#)) that in....

'...reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development...'

6.3.3. It further states:

‘... They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary...’.

- 6.3.4. With this in mind and taking account of the Housing Market Areas exerting an influence over the borough, it is evident that if the new Local Plan is to effectively promote sustainable patterns of development and positively address assessed needs to support and sustain communities across the borough, some land will inevitably need to be taken out of the Green Belt.
- 6.3.5. This is a difficult decision to take but it would, ultimately, be positive action that could help improve housing affordability and help mitigate wider negative impacts on the environment, amenity and the local economy of sustainable growth. It is important that the Green Belt boundaries that feature in the new plan are strategically defensible and can endure for at least the lifetime of the plan.
- 6.3.6. Having said this, the preparation of the new Local Plan presents an opportunity to consider whether certain boundaries need to be re-aligned so that the Green Belt performs a more effective function (as measured against the five purposes outlined in the Government’s NPPF – see above). This could have the consequence of increasing the amount of land within the Green Belt in certain locations which, overall, could ensure the quantum of land within the Green Belt across the borough is not significantly eroded.
- 6.3.7. Figure 5 (overleaf) suggests a proposed strategic extension to the Green Belt in the vicinity of West Malling and Kings Hill.
- 6.3.8. It is considered that this would be a more reliable and defensible boundary that would contribute positively to purposes of the Green Belt.
- 6.3.9. This would result in approximately 134 ha being put into the Green Belt.

Q11. Do you agree that the Local Plan should put land into the Green Belt east of West Malling, Yes/No?

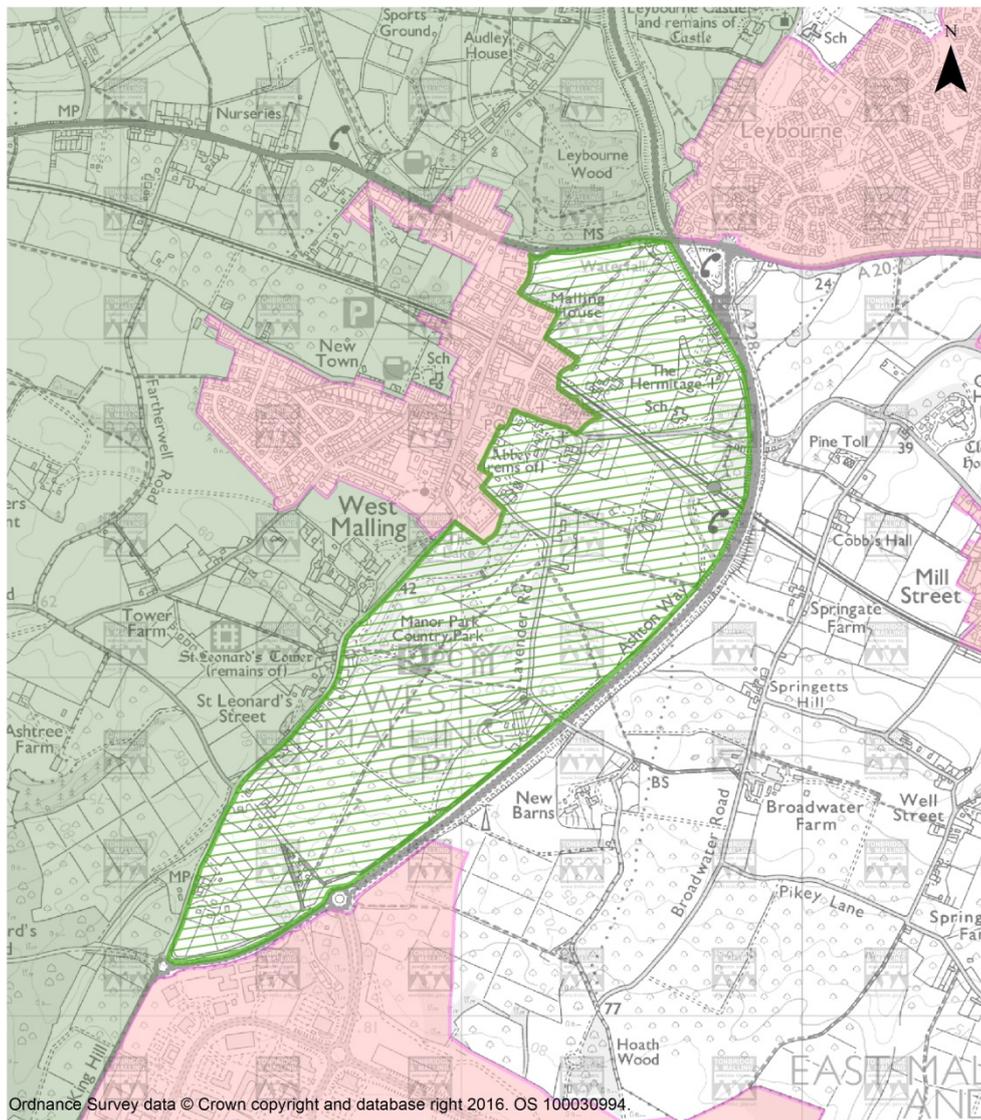
Please explain.

Q12. Are there any other parcels of land in the borough that you think could be justifiably (as measured against the five purposes)

put in the Green Belt without putting at risk the requirement for the Local Plan to positively address assessed needs?

Please explain.

Figure 5: Proposed extension of the Green Belt in the vicinity of West Malling and Kings Hill



Legend

-  Potential addition to Green Belt
-  Existing Green Belt extent
-  Confines of built up areas

7. Local Plan – Managing development

7.1. In delivering sustainable growth, what issues are important to you?

- 7.1.1. It is important that when development takes place, it does so in a way that will achieve a quality living experience for the benefit of local communities. However, in pursuing this objective the Borough Council needs to be mindful of the need for the sites allocated for development in the new Local Plan to be viable and therefore deliverable. This message is made very clear in the Government’s National Planning Policy Framework ([paras. 173 and 174](#)) which states:

‘...the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened...’.

‘...In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk...’.

- 7.1.2. With this in mind, the Borough Council needs to understand which local standards are important to you. It is unlikely that all of the following potential standards could be pursued fully, if at all, because of viability. The extent to which the Borough Council can pursue any or a combination of the following local standards will be informed by evidence but will ultimately be determined by viability assessments. It should be noted that a significant outcome of the Government’s [Housing Standards Review](#) was the withdrawal of the Code for Sustainable Homes and the integration of the requirements in respect of the environmental performance of new buildings (carbon emissions) within the Building Regulations.

Q13. In delivering development, which local standards are important to you? Please can you rank the following potential standards in order of importance, giving 1 for the most important down to 7 for the least important:

- Affordable housing
- Publicly accessible open space
- Car parking
- Housing densities
- Internal space standards
- Accessibility standards
- Water efficiency standards

7.2. How should the Local Plan respond to the optional National Standards?

- 7.2.1. One of the outcomes of the Government’s [Housing Standards Review](#) was the establishment of additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. The Government’s [Planning Practice Guidance](#) makes it very clear that the time to consider exceeding and/or pursuing the optional space standard is at the plan-making stage and that these should only be justified through local evidence and viability testing.
- 7.2.2. The Government’s [Technical housing standards – nationally described space standard](#). The minimum gross internal space standards in the technical housing standards are set out in Table 3.
- 7.2.3. Further information on the access and water efficiency standards in the Building Regulations is available from the [Planning Portal](#).

Table 3 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) ²			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

Q14. Do you think the Borough Council should assess the viability of including the nationally described space standards in the new Local Plan, Yes/No?

Please explain.

7.2.4. In considering which standards you think should be set in the Local Plan, please be mindful of the cumulative impact of these standards and the risks this could pose to the implementation of the plan as a whole. With this in mind:

Q15. Do you think the Borough Council should assess the viability of exceeding the minimum standards required by Building Regulations in respect of access and water, Yes / No?

Please explain.

8. Local Plan – Participation

8.1. How can you participate in this consultation?

8.1.1. There are many ways that you can take part in this consultation:

- **Online** – The consultation document and an interactive form is available from the Council’s website: www.tmbc.gov.uk/localplan
- **E-mail** – You can download the consultation form and complete it offline and e-mail it to: localplan@tmbc.gov.uk
- **In-writing** – You can submit your responses to the questions to the following postal address:
 - Ian Bailey, Planning Policy Manager, Tonbridge & Malling Borough Council, Gibson Building, Gibson Drive, Kings Hill, West Malling, Kent ME19 4LZ

8.1.2. The document is also available to view at the Council’s offices at Kings Hill and Tonbridge Castle. In addition public exhibitions will be held at the following locations:

- **XXXXXX**, date, time
- **YYYYYY**, date time

8.1.3. As a reminder, the full set of consultation questions are listed on the following pages.

8.1.4. The deadline for comments is **xx xxxxxxxx 2016**.

Summary of Consultation Questions

Q1. Do you agree with this set of objectives for the new Local Plan, Yes/No? (p.17)

Please explain.

Q2. Do you agree with this set of building blocks for the Local Plan strategy, Yes/No? (p.19)

Please explain.

Q3. Do you agree with this set of guiding principles, Yes/No? (p.23)

Please explain.

Q4. Do you agree that this potential approach to a development strategy could provide a sound direction for the new Local Plan to take, Yes/No? (p.27)

Please explain.

Q5. Should the new Local Plan continue to support and focus new economic development at and around existing economic hubs such as the Tonbridge Industrial Estate, New Hythe Lane, Kings Hill, Hermitage Lane and Quarry Wood or should an alternative strategy be considered? (p.29)

Please explain.

Q6. Should the Council be more flexible and consider a wide range of employment generating uses within existing economic hubs in the borough, Yes/No? (p.30)

Please explain.

Q7. Should the Local Plan be supportive of more mixed-use developments, including start-up units within residential schemes, Yes/No? (p.30)

Please explain.

Q8. What should be the role of Tonbridge Town Centre moving forward, i.e. should it be a retail hub, a social and cultural hub or a combination of the two? (p.31)

Please explain.

Q9. Should the Local Plan include a flexible policy framework for Tonbridge to allow the Town to be able to respond to future market opportunities to enable the Centre and adjoining areas to thrive Yes/No? (p.31)

Please explain.

Q10. Do you have other thoughts about how planning policy should guide development in and around the town centre? (p.31)

Q11. Do you agree that the Local Plan should put land into the Green Belt east of West Malling, Yes/No? (p.32)

Please explain.

Q12. Are there any other parcels of land in the borough that you think could be justifiably (as measured against the five purposes) put in the Green Belt without putting at risk the requirement for the Local Plan to positively address assessed needs? (p.32)

Please explain.

Q13. In delivering development, which local standards are important to you? Please can you rank the following potential standards in order of importance, giving 1 for the most important down to 7 for the least important (p.35):

- Affordable housing
- Publicly accessible open space
- Car parking
- Housing densities
- Internal space standards
- Accessibility standards
- Water efficiency standards

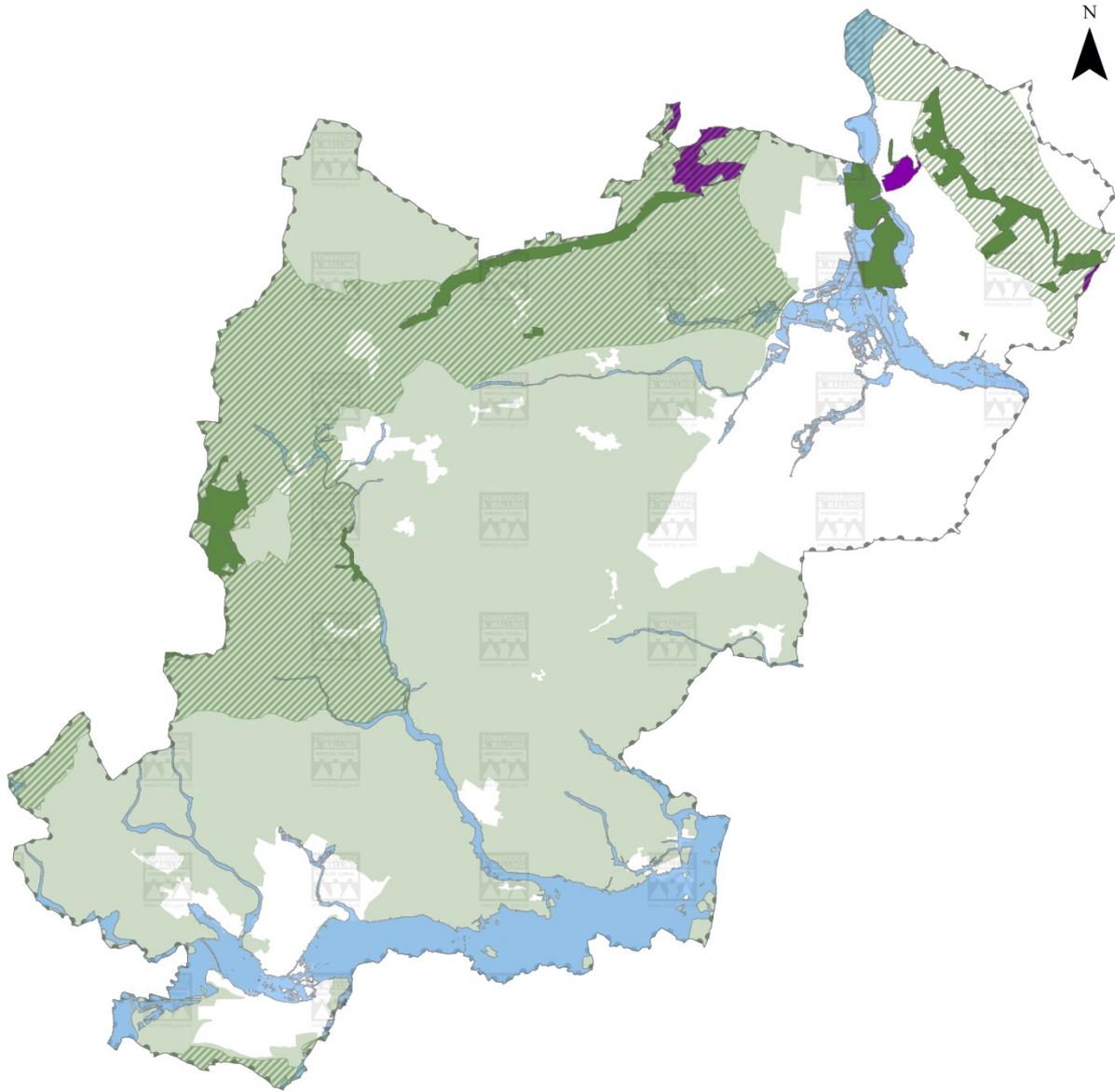
Q14. Do you think the Borough Council should assess the viability of including the nationally described space standards in the new Local Plan, Yes/No? (p.37)

Please explain.

Q15. Do you think the Borough Council should assess the viability of exceeding the minimum standards required by Building Regulations in respect of access and water, Yes/No? (see p.37)

Please explain.

Appendix A: Key Constraints



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Legend

-  AONB
-  SAC
-  SSSI
-  Flood Zone 3
-  Green Belt

Appendix B: Building Blocks Assessment Pro-forma

Building Block Title	
Description	A brief description of the building block, outlining what it means.
Spatial Representation	A visual representation of the building block and how it relates to settlement confines and housing market areas and high-level constraints
Does this make a positive contribution to addressing assessed needs?	A high-level assessment of whether this option could deliver, across the time frame of the plan period (up to 2031) a quantum of development that could positively address assessed needs, in particular the Objectively assessed Need for housing. This assessment would take account of high level constraints ³ and designations ⁴ .
Which Plan Objectives does this respond to?	A list of Plan objectives that this building block would make a contribution to.
Would this achieve a sustainable pattern of development?	An assessment of whether the resultant quantity, deliverability and geographical spread of sites would amount to a sustainable pattern of development. The objective of the Government is for Local Plan strategies to promote sustainable patterns of development, particularly when reviewing Green Belt boundaries (see para. 84 in the NPPE). In answering the question ' <i>Will this strategy achieve a sustainable pattern of development?</i> ' factors including housing market areas and economic generating opportunities, as well as important natural and heritage assets, are taken into account.
What are the risks of pursuing this alone?	An initial assessment of the consequences of pursuing this building block alone without considering alternative/additional opportunities.

³ High-level constraints that preclude development are: Special Areas of Conservation (SAC); Sites of Special Scientific Interest (SSSI); Flood Zone 3 (for more vulnerable uses, eg residential); Ancient Monuments; Ancient Woodlands; and areas, parks and woodlands covered by Tree Preservation Orders

⁴ Air Quality Management Areas; Conservation Areas; Listed Buildings; Historic Parks & Gardens, Areas of Outstanding Natural Beauty; Green Belt; and Local Wildlife Sites

Appendix C: Building Blocks (A, B and C) Pro-formas

Building Block A	Addressing assessed needs on brownfield land within the built-up confines of settlements
<p>Description</p>	<p>This building block focusses on the opportunities of responding to assessed needs on previously-developed land within the built-up confines of existing settlements⁵. This is, essentially, land which is or was occupied by development, including the curtilage of the developed land. It excludes land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time. The Figure below illustrates the extent of the settlement confines and the distribution of those sites assessed as suitable and deliverable for development, as well as the relationship with the Housing Market Areas.</p>
<p>Does this make a positive contribution to addressing assessed needs?</p>	<p>No. This building block, alone, would not generate a mixed portfolio of suitable and deliverable sites over the short, medium and long-term of the plan period (up to 2031) to positively address the net Objectively Assessed Need. It would only generate a potential yield of 217 units, all of which are small. A basic assessment discounting high level constraints and designations means that there is limited potential from this source.</p>
<p>Which Plan Objectives does this respond to?</p>	<p>Objectives 3</p>
<p>Would this achieve a sustainable pattern of development?</p>	<p>No. Whilst this building block would make the best use of existing previously-developed land within the built-up confines of the settlements across the borough in both housing market areas, it would, in reality, deliver very few new homes. Opportunities to support and sustain a range of communities across the borough would be limited.</p>
<p>What are the risks of pursuing this alone?</p>	<p>A significant risk of pursuing this building block, alone, is that affordability is likely to worsen, resulting in more and more local people being unable to access housing in the borough (to</p>

⁵ built-up confines of urban areas, rural service centres and rural settlements as defined in the Council's existing Development Plan. These are illustrated on the [Proposals Map](#)

Building Block A	Addressing assessed needs on brownfield land within the built-up confines of settlements
	buy/rent).

Building Block B	Addressing assessed needs on land safeguarded in the existing Development Plan for future development, including the area of opportunity
Description	This building block focusses on the opportunities of responding to assessed needs on land safeguarded in the Council's existing Development Plan to meet longer-term development needs beyond the existing plan period (up to 2021). This includes sites identified in Policy CP4 in the Core Strategy as well as the Bushey Wood Area of Opportunity (Policy CP16 in the Core Strategy). The Figure overleaf illustrates the distribution of the safeguarded sites and the relationship with the two broad Housing Market Areas.
Does this make a positive contribution to addressing assessed needs?	No. This building block, alone, would not generate a mixed portfolio of suitable and deliverable sites, particularly over the short-term of the plan period, to positively address the net Objectively Assessed Need. It would only generate a potential yield of 1,840 units, with the majority of potential on a single site (Bushey Wood Area of Opportunity). A basic assessment discounting high level constraints and designations means that there is limited potential from this source.
Which Plan Objectives does this respond to?	Partially Objectives 1, 2 and 3
Would this achieve a sustainable pattern of development?	No. Whilst this building block would make use of previously identified opportunities at locations in each Housing Market Area, it would not deliver a mixed portfolio of sites and would not deliver a sufficient number of new homes. Opportunities to support and sustain a range of communities across the borough would be limited.
What are the risks of pursuing this alone?	A significant risk of pursuing this building block, alone, is that affordability is likely to worsen, resulting in more and more local people being unable to access housing in the borough (to buy/rent). Furthermore there is the risk that there would be an adequate supply of new homes in the short to medium term of the Local Plan.

Building Block C	Addressing needs on land at low risk of flooding within existing settlements
Description	<p>This building block focusses on the opportunities of responding to assessed needs on suitable and deliverable sites in areas at low risk of flooding (Flood Zone 1) within existing settlements. The Government's Planning Practice Guidance is very clear that the Sequential Test should be applied in the preparation of a Local Plan, hence the assessment of this strategy option. The Sequential Test essentially involves, in the first instance, the assessment of whether or not sustainable development can be achieved through new development located entirely within areas with a low probability of flooding (Flood Zone 1). For the purposes of this assessment, 'sustainable development' is defined as development close to services and centres, i.e. within the built-up confines of existing settlements⁶ The Figure overleaf illustrates the extent of Flood Zone 1 and the distribution of those sites assessed as suitable and deliverable for development, as well as the relationship with the Housing Market Areas.</p>
Does this make a positive contribution to addressing assessed needs?	<p>No. This building block, alone, would not generate a mixed portfolio of suitable and deliverable sites, to positively address the net Objectively Assessed Need. It would only generate a potential yield of 226 units. A basic assessment discounting high level constraints and designations means that there is limited potential from this source.</p>
Which Plan Objectives does this respond to?	<p>Partially Objective 3.</p>
Would this achieve a sustainable pattern of development?	<p>No. Whilst this building block would make use of opportunities at locations in each Housing Market Area, it would not deliver a mixed portfolio of sites and would not deliver a sufficient number of new homes. Opportunities to support and sustain a range of communities across the borough would be limited.</p>
What are the risks of pursuing this alone?	<p>A significant risk of pursuing this building block, alone, is that affordability is likely to worsen, resulting in more and more local people being unable to access housing in the borough (to buy/rent).</p>

⁶ built-up confines of urban areas, rural service centres and rural settlements as defined in the Council's existing Development Plan. These are illustrated on the [Proposals Map](#)

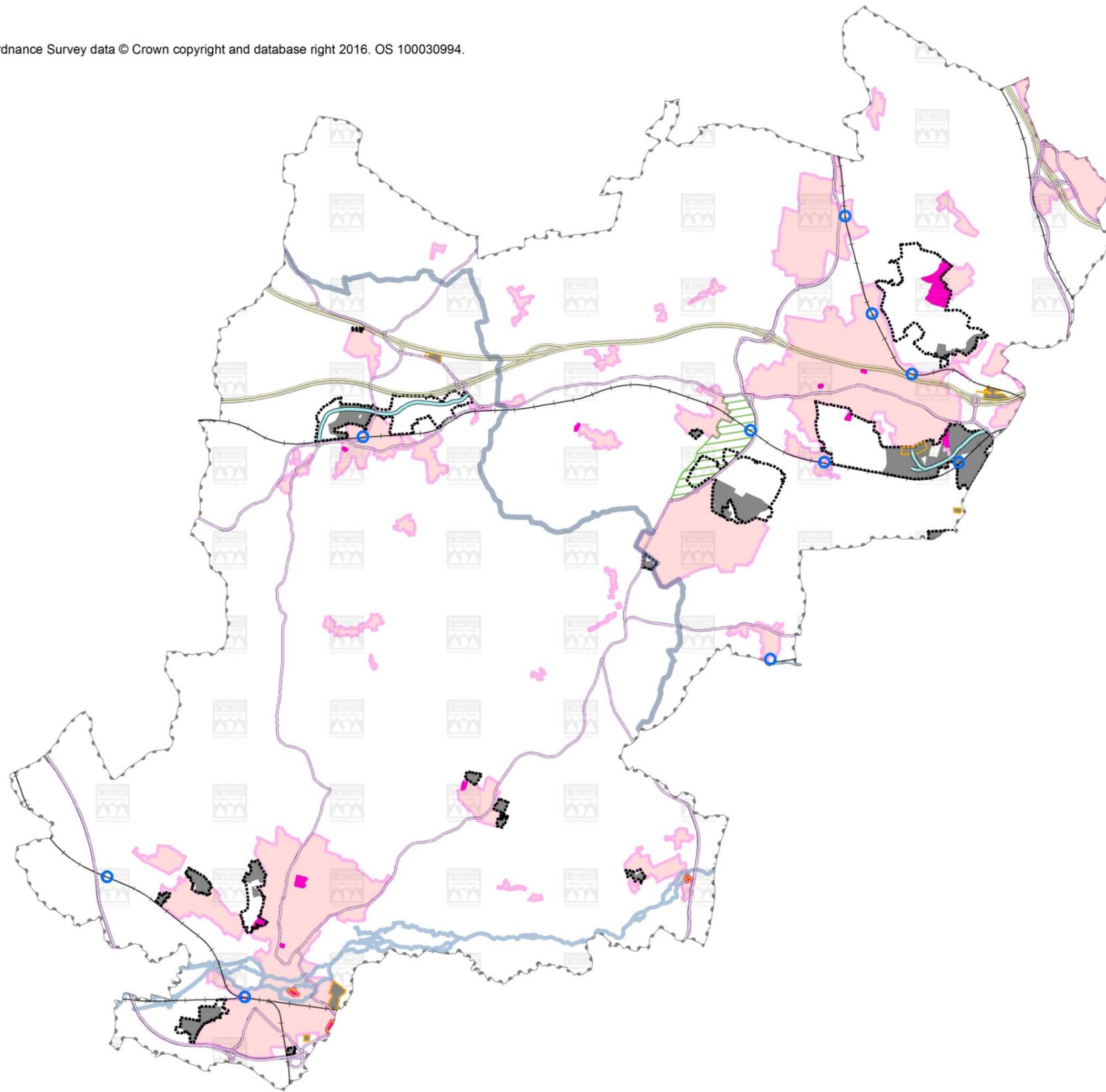
Appendix D: Combined Building Blocks (A, B and C) Map and Pro-forma assessment

Building Blocks A, B and C	Combination of all 3 (Addressing assessed needs on brownfield land within the built-up confines of settlements, addressing assessed needs on land safeguarded in the existing Development Plan for future development, including the area of opportunity and addressing needs on land at low risk of flooding within existing settlements)
Description	See above and the pro forma for each building block
Does this make a positive contribution to addressing assessed needs?	No, it would not make a very positive contribution. Cumulatively the building blocks would generate a potential yield of 2,066 units (excluding double-counting where there is an overlap between the building blocks). It is questionable whether the portfolio is sufficiently mixed to meet the short, medium and long-term assessed needs. A basic assessment discounting high level constraints and designations means that there is limited potential from this source.
Which Plan Objectives does this respond to?	Partially Objectives 1 and 2. Objective 3.
Sustainability Appraisal (Interim Assessment)	Although avoiding areas of high environmental value and flood risk, making use of existing brownfield land, and supporting local economies, the quantum of development will be insufficient to meet identified need. The small sites are likely to result in short-term small scale impacts which could be mitigated where necessary. However, a large strategic site may have a long lead in time which means that it is more likely to begin delivery in the medium to long-term, and therefore any impacts are also likely to see a similar time frame.
Would this achieve a sustainable pattern of development?	To a degree, yes. The combination of the building blocks would generate opportunities at locations in each Housing Market Area. However, it is highly questionable whether this distribution is adequately balanced across the two HMAs with a significant amount of potential focussed in the Maidstone & Tonbridge & Malling area (north-east part of the borough). Opportunities to support and sustain a range of communities across the borough would be limited. Furthermore, the majority of the potential is on a couple of large sites which means that there would be a limited range of opportunities to address needs throughout the plan period (short, medium and long-term).

<p>Building Blocks A, B and C</p>	<p>Combination of all 3 (Addressing assessed needs on brownfield land within the built-up confines of settlements, addressing assessed needs on land safeguarded in the existing Development Plan for future development, including the area of opportunity and addressing needs on land at low risk of flooding within existing settlements)</p>
<p>What are the risks of pursuing a combination of these building blocks?</p>	<p>A risk of pursuing a combination of these building blocks is that the assessed needs may not be fully addressed which could have negative consequences on affordability, although not as severe if only one building block underpinned the new Local Plan. There is also the risk that the imbalance of suitable and deliverable sites across the two HMAs could result in unsustainable patterns of development emerging with the generation of new, long trips by the car between people living in one HMA (Maidstone and Tonbridge & Malling) and commuting to places of work in the other HMA (Sevenoaks, Tunbridge Wells and Tonbridge & Malling). This could have negative impacts on the environment (air) and, at times, on the economy (traffic delays). In addition the long-term sustainability of some local communities is at risk because they would not benefit from the opportunities presented by this approach. Furthermore, there is the risk that the needs throughout the plan-period are inadequately addressed as a result of a limited mix of sites.</p>

Appendix E: Potential Development Strategy

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Legend

-  Housing Market Area
-  Train stations
-  A Roads
-  Motorways
-  Potential new road
-  Railway lines
-  Site outlines
-  Potential employment/other site outlines
-  Building Blocks
-  Potential developable areas
-  Potential addition to Green Belt
-  River Medway
-  Confines of built up areas

