

# Regulation 18 Local Plan

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DERBIE draws MAPS

September 2022







## Local Plan Infographic

The below image is a summary of some of the key themes for exploration as part of the Local Plan. For illustrative purposes only.





## Foreword

We are starting to develop Tonbridge and Malling's new Local Plan which will shape our community until 2040. This is a key document that builds our borough's future and identifies how we can provide affordable homes, safeguard green spaces and deliver local jobs in our towns and villages.

Our requirement from Government is to identify sites for 15,941 new homes within the boundaries of Tonbridge and Malling during this time. This is an average of 839 homes each year in our community. Our Local Plan must meet this figure, and this is why we are asking for your thoughts now on the best way to approach this.

While a number of sites have been put forward to the council for development, no sites have yet been committed in developing our new Local Plan. Instead, at this stage, we are first asking you for your thoughts on the principles that should determine where these homes should be built, and how we can deliver much needed infrastructure improvements across Tonbridge and Malling.

Please do answer the questions presented over the course of the document so, during the next stages, we can bring forward a Local Plan which is in line with the priorities of all of us across Tonbridge and Malling.

From reducing traffic to providing better public transport options, allowing for better access to GPs and schools, to increasing biodiversity – we have the opportunity through this Local Plan to deliver sustainable improvements in every town and village. While meeting our housing and employment needs will be difficult given how much of our beautiful landscape is protected, we are determined to do so in a way which improves infrastructure.

We will continue making the case to Government that our need ought to be reduced but, in the meantime, we welcome all your thoughts on how we can best overcome these challenges. A robust Local Plan allows us to protect our borough from inappropriate development that places a significant burden on Tonbridge and Malling's infrastructure and enables us to best control where and how new homes are built.

Councillor Matt Boughton, Leader of the Council

Councillor Dave Davis, Cabinet Member for Strategic Planning and Infrastructure







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# Tonbridge & Malling Borough Local Plan

## Regulation 18 Consultation

### 1. Introduction

#### 1.1. What is the Local Plan?

- 1.1.1. The Local Plan is a strategy document that will provide a positive vision for the future of Tonbridge & Malling borough. It includes a framework for addressing assessed development needs and environmental and social priorities.
- 1.1.1. A Local Plan should be prepared in accordance with national planning policy within the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). On adoption, the Local Plan will form the development plan for the borough, and will be at the heart of the planning system. It will represent the starting point for decision-making on planning applications within the borough. This is why it is important to have an up-to-date Local Plan in place.
- 1.1.2. The Plan needs to include a vision for the place we would like Tonbridge and Malling to be by the end of the plan period (2040). This needs to be aspirational but deliverable. It should contribute to realising the vision, values and priorities of the council's Corporate Strategy, which includes a commitment to delivering innovation and change to meet the needs of the borough. Our Corporate Strategy recognises that the Local Plan can lead on valuing our environment and encouraging sustainable growth by planning for our future homes and jobs.
- 1.1.3. It also needs to include strategic policies that address assessed development needs and respond to other local evidence. This includes how we expect the borough to grow, spatially, over the coming years.
- 1.1.4. In addition, it needs to include policies on non-strategic matters relating to how development is managed and delivered, reflecting local priorities and being mindful of the impacts on viability and therefore deliverability of development.

## **1.2. Why do we need to review and refresh the Local Plan?**

- 1.2.1. We need to review and refresh the Local Plan because the Council does not have an up-to-date Plan in place. The current suite of adopted development plan documents that make up the Local Development Framework (LDF) date back to 2007-10 and have a time horizon of 2021. These plans pre-date current national policy and practice guidance and local evidence. This does not mean that all policies in the adopted development plan are out-of-date. Policies are regularly checked for their conformity with the Government’s current National Planning Policy Framework (NPPF) to determine the weight they should be afforded during decision-taking on planning applications.
- 1.2.2. The Council did prepare a detailed Local Plan which was submitted for examination back in January 2019. However, following the Inspectors’ final report, the council withdrew this Plan and took the decision to commence a review and refresh process.
- 1.2.3. We need an up-to-date Local Plan because it is at the heart of decision-taking on planning matters. A current Plan that responds positively to our assessed needs and priorities provides greater certainty for how the borough will grow and evolve, resulting in more democratic local control over the process.

## **1.3. What are the expectations of the Government?**

- 1.3.1. The Government’s planning policies for England are set out in the National Planning Policy Framework (NPPF)<sup>1</sup>. This is supported by Planning Practice Guidance (PPG)<sup>2</sup> that explains in more detail how to achieve national policies.
- 1.3.2. National policy is very clear that the planning system should be genuinely plan-led, hence the need to get an up-to-date Local Plan in place.
- 1.3.3. Section 3 on ‘Plan-making’ in the NPPF<sup>3</sup> sets out the Government’s expectations for Local Plans. This is supported by planning practice guidance on ‘Plan-making’<sup>4</sup>. The Plan should:
- contribute to the achievement of sustainable development
  - be as focused, concise and accessible as possible

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<sup>1</sup> <https://www.gov.uk/guidance/national-planning-policy-framework>

<sup>2</sup> <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>3</sup> [National Planning Policy Framework - 3. Plan-making - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/national-planning-policy-framework-3-plan-making-guidance)

<sup>4</sup> <https://www.gov.uk/guidance/plan-making>

- be prepared positively, in a way that is aspirational but deliverable
- be clear and unambiguous
- avoid unnecessary duplication of existing policies, including those in the NPPF.

1.3.4. Together the NPPF and the NPPG set out expectations around the assessment of objectively assessed need for housing, and for other economic development needs, at paragraph 11 “strategic policies should, as a minimum, provide for objectively assessed needs for housing<sup>5</sup> and other uses, as well as any needs that cannot be met within neighbouring areas”.

## **1.4. What are the risks of not having an up-to-date Local Plan?**

1.4.1. An up-to-date Local Plan would provide a high degree of certainty about how Tonbridge & Malling would grow and evolve over the coming years. It would also ensure a high degree of local democratic control over decisions about planning matters in the borough.

1.4.2. The absence of an up-to-date Local Plan increases the chances of planning by appeal where decisions are not made locally by representatives of the community. Furthermore, the risk of intervention by the Government would increase, where plan-making would be managed by individuals not local to Tonbridge & Malling.

## **1.5. What is the timeframe for the Local Plan?**

1.5.1. The NPPF requires Local Plans to include strategic policies and proposals addressing assessed development needs and other priorities over a minimum 15-year period from adoption. The current programme for plan production, the Local Development Scheme<sup>6</sup>, identifies adoption of the Plan in 2025. This means that in order for the Local Plan to respond effectively to national policy, it needs a time horizon of 2040. 2040 is considered a reasonable time horizon for the Plan because it provides conformity with national policy and a degree of confidence about effective planning for the future of the borough. The base date of the plan period is

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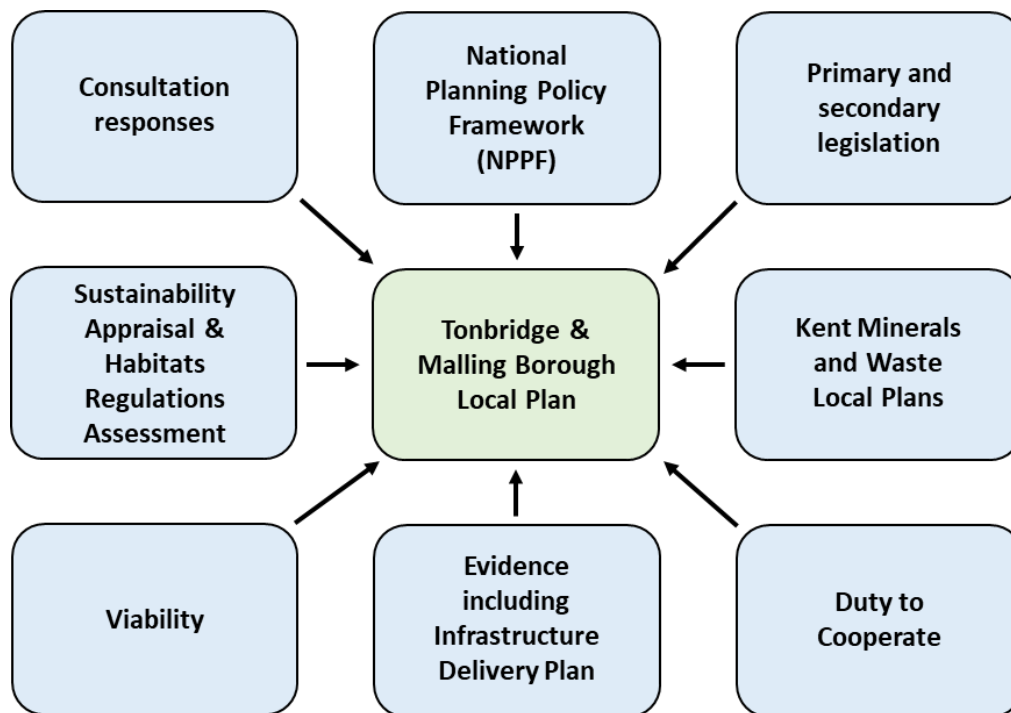
<sup>5</sup> Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations...The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need...” (gov.uk guidance on assessing housing need, updated December 2020)

<sup>6</sup> <https://www.tmbc.gov.uk/local-plan/local-development-scheme>

2021, which is when the council took the decision to withdraw the previously submitted Local Plan from examination.

## **1.6. What are the influences on the Local Plan?**

- 1.6.1. There are many influences on the preparation of the Local Plan. As well as national policy and local evidence, feedback received during consultation exercises needs to be considered when developing detailed policies that will shape the future of local places. Understanding the infrastructure that needs to be in place (and by when) to support development, such as schools and roads, is important. We also need to be mindful of their viability, i.e. ensuring that developments are realistically deliverable from a financial perspective once the costs of a range of local policy requirements on matters such as affordable housing, education and highways have been addressed. This is crucial because unviable development means that much needed homes will not be delivered and opportunities for providing additional schools, healthcare and green and digital infrastructure will be lost. This must be avoided.
- 1.6.2. Furthermore, it is essential that plan-making is fully informed by the Sustainability Appraisal process, which assesses the performance of policies and proposals against a set of locally derived sustainability objectives. Active, on-going engagement with neighbouring councils is essential to address strategic matters that may have cross-boundary implications. This is because these matters do not stop at administrative boundaries; development and issues in other places can impact on TMBC and vice versa. The influences on the Plan are summarised in figure 1.

**Figure 1. Influences on the Plan**

## 1.7. How does neighbourhood planning relate to the Local Plan?

1.7.1. The council understands the interest in planning at the local level, and the importance of engaging communities about where they live and what matters to them. We also recognise that the Government expects neighbourhood plans to support the delivery of strategic policies contained within a Local Plan. With this in mind and given that this Plan represents the first stage of the process, we would like to work with local communities, including parish councils, and focus our energies on getting the strategic policies right.

## 1.8. Why is it important to be involved with the making of the Local Plan?

1.8.1. Engagement with local communities and other parties and people with an interest in planning matters in Tonbridge & Malling is a vital part of plan-making. To make the Plan locally distinctive, it is important that opportunities are provided for local people to help shape their surroundings and voice their priorities. This can help generate a wider sense of ownership of the Plan.

1.8.2. This Plan represents the beginning of the formal process. The council wants to know your views on the key issues and understand what you consider the priorities to be. There will be an opportunity to comment on the Plan as it progresses to the more detailed stage. Further details on this Local Plan consultation and how you



can take part are available on the council's website<sup>7</sup> [and within section 7](#). The website also contains a more detailed timetable for the production of the Plan, known as the Local Development Scheme<sup>8</sup>.

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<sup>7</sup> <https://www.tmbc.gov.uk/localplan>

<sup>8</sup> <https://www.tmbc.gov.uk/local-plan/local-development-scheme>

## **2. Local Context**

### **2.1. What is the spatial portrait of the borough?**

- 2.1.1. The borough of Tonbridge and Malling is a diverse and characterful place. Located in west Kent, the borough stretches to the north to include areas of Walderslade and the Kent Downs Area of Outstanding Natural Beauty (AONB), and to the south to Tonbridge and the High Weald AONB. From the historic village of Ightham in the west, to the urban area of the Medway Gap in the east. Tonbridge is the principal town in the borough and offers a wide range of services and facilities. However, the majority of the borough is rural in nature, with villages and small towns of varying size and character supporting a range of communities and businesses. The borough benefits from proximity to London and the South-East coast, making it an attractive place to live.
- 2.1.2. The borough includes areas of recent development and growth together with historic and pre-historic environments. Its geography is varied, and the physical characteristics have and will continue to impact patterns of land use and activity. The underlying geology has resulted in extensive areas of quarrying in the Borough, some still active. It is a place where traditional and modern businesses thrive, where established and new communities have flourished but where pressures on infrastructure and the diverse natural environment are challenging.
- 2.1.3. The majority of the borough is covered by Green Belt. There are also several international, national and local environmental designations. Key constraints, along with the distribution of existing settlements and key infrastructure in the borough, are illustrated in the Key Diagram (Appendix A).
- 2.1.4. Table 1 below, sets out key characteristics of the borough.

**Table 1. Spatial Portrait**

Spatial Element	Details
Area:	24, 013 ha
Strategic Location:	<p>West Kent.</p> <p>Bordered by: Sevenoaks District (to the west); Tunbridge Wells Borough (south); Maidstone Borough (east); Medway (north); Gravesham Borough (north-west).</p>
Transportation links:	<p>Three motorways (M20, M26 and M2) cross the borough in the north. The A21 trunk road passes by the south and west of Tonbridge.</p> <p>Three train lines providing links to London and the north Kent line.</p> <p>Channel Tunnel Rail Link (channelled under the Kent Downs, no stations).</p> <p>High Speed 1 services stop at Snodland station</p>
Population:	<p>Total: 132,600 (mid-2020 estimate)</p> <p>Split: 49% Male; 51% Female</p> <p>Average age: 40.9 years</p> <p>Aged 0-15: 21%</p> <p>Aged 16-64: 61%</p> <p>Aged 65+: 18%</p>
Urban/Rural Split:	<p>Most of the borough is rural in character.</p> <p>Largest rural settlements are West Malling, Borough Green, Hadlow, Hildenborough and East Peckham.</p> <p>Principal town: Tonbridge, located in the south-west of the borough.</p> <p>Other built-up urban areas: Kings Hill, Snodland, Aylesford/Ditton/Larkfield/Leybourne (known as the Medway Gap) and Walderslade (part) located in the north-east of the borough.</p>

Spatial Element	Details
Assets & Constraints:	<p>Special Areas of Conservation: North Downs Woodland; Peter’s Pit (3.54% of the borough)</p> <p>Sites of Special Scientific Interest (SSSIs): 11 (1.32% of the borough)</p> <p>Areas of Outstanding Natural Beauty: Kent Downs and High Weald (26.84% of the borough)</p> <p>Ancient Woodland: 2,621 ha (11% of the borough)</p> <p>Conservation Areas: 61</p> <p>Scheduled Monuments: 25</p> <p>Listed Buildings: Approx. 1,300 listed buildings or structures</p> <p>Green Belt: Approx. 70% coverage of the borough</p>
Rivers:	<p>River Medway and its tributaries pass through the borough in the south and south-east (fluvial) and in the north-east (tidal stretch north of Allington Lock).</p> <p>River Bourne passes through the borough from the south-east to the north-west.</p>
Dwelling Stock:	<p>Total: 56,096 (as at 1 April 2021)</p> <p>Private sector: 47,594</p> <p>Private registered provider: 8,481</p> <p>Other public sector: 11</p> <p>Local Authority: 10</p>

### 3. Vision

#### 3.1. What kind of place do you want Tonbridge & Malling to be in 2040?

- 3.1.1. When reading and responding to this draft Plan, it is important to bear in mind the future of the borough and what kind of place you would like it to be by the end of the plan period in 2040. This may reflect your personal or professional circumstances and goals or wider objectives and priorities related to groups of which you are part. However you approach this, it is important to remember that the vision needs to be aspirational but deliverable.
- 3.1.2. To help the drafting of a vision for Tonbridge & Malling, we need to understand what matters most to you. It is important to bear in mind that as we move forward with plan-making there will be further evidence produced that will inform decisions on policies and proposals. We also need to be mindful of any changes to national policy that the Local Plan may need to respond to.

#### Key elements – what matters to you

- 3.1.3. We would like to understand which of the following elements you believe should form an integral part of the vision for Tonbridge & Malling in 2040. Please indicate three elements you believe should form the core of the vision for the Plan – see question 1 below. If you believe the vision should be balanced, addressing the full range of elements as far as possible, please select ‘All’.

#### Q.1. Which elements should feature in the vision for the borough in 2040?

Element	Select (no limit)
A place where the range of housing needs are being met in full and affordability is much improved.	
A place where there are plentiful jobs opportunities, both within the rural and urban economies, to meet the needs of local communities.	
A place with well-designed, accessible, homes and neighbourhoods that are safe, legible, energy efficient and respect the local character.	
A place where people and communities are connected digitally in an effective and reliable way.	
A place where biodiversity thrives alongside communities.	

Element	Select (no limit)
A place where landscapes and open countryside are respected and can be easily accessed and enjoyed.	
A place where there are plentiful opportunities to enjoy the borough safely and healthily by cycling and walking.	
All are equally important	

## **4. Spatial Distribution of Development**

### **4.1. What is the hierarchy of settlements across the borough?**

- 4.1.1. Tonbridge and Malling borough includes a diverse range of settlements. This includes built-up urban areas such as Tonbridge, large rural settlements including Borough Green and West Malling, as well as many smaller settlements such as Golden Green and Burham. Beyond these settlements, there are significant areas of open countryside. We have used this structure, or hierarchy, of settlements to guide decisions on where development should be focussed. Those settlements at the top of the hierarchy, i.e. urban areas, have been the focus for a significant amount of development because they contain an array of services including schools, shops and healthcare, and are well connected in terms of public transport and opportunities for active travel such as cycling and walking to destinations. They also contain opportunities for making use of previously-developed land. Essentially, they are most likely to provide opportunities for sustainable development.
- 4.1.2. Settlements further down the hierarchy, such as ‘other rural settlements’ are much smaller in size and either have limited services or are remote from places with services, such as the urban areas and the rural service centres. Development has been limited at these locations to minor projects, proportionate to the character and scale of the existing settlement. Beyond the other rural settlements is the open countryside where development has been restricted.
- 4.1.3. We have used this settlement hierarchy to not only inform decisions on planning applications that have come forward but to inform the spatial strategy in the adopted development plan. This settlement hierarchy has been updated with the addition of Peters Village and Leybourne Chase as other rural settlements. It is the intention to continue with this approach in this Local Plan because it can provide a framework to deliver sustainable development.

**Figure 2. Existing Settlement Hierarchy**



**Q.2. Do you agree that this settlement hierarchy should be retained and inform the spatial strategy for the Local Plan? Yes/No Please explain**

## **4.2. How should development be distributed across the borough?**

- 4.2.1. Development must seek to balance the need to support sustainable patterns of growth with the need to protect natural and heritage assets as far as possible, and ensure the necessary infrastructure is in place. In order to conserve and protect the environmental and heritage assets in the borough, the following designations, as far as possible, should be avoided: Special Areas of Conservation, Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty, Ancient Woodland, areas at high risk of flooding for more vulnerable uses such as housing, Conservation Areas, Listed Buildings, Scheduled Monuments, Historic Parks and Gardens, and Grade 1 agricultural land.
- 4.2.2. In addition to these designations, c. 70% of the borough is designated as Green Belt. Land can only be removed from the Green Belt where exceptional circumstances can be demonstrated, to help deliver a sustainable pattern of development.

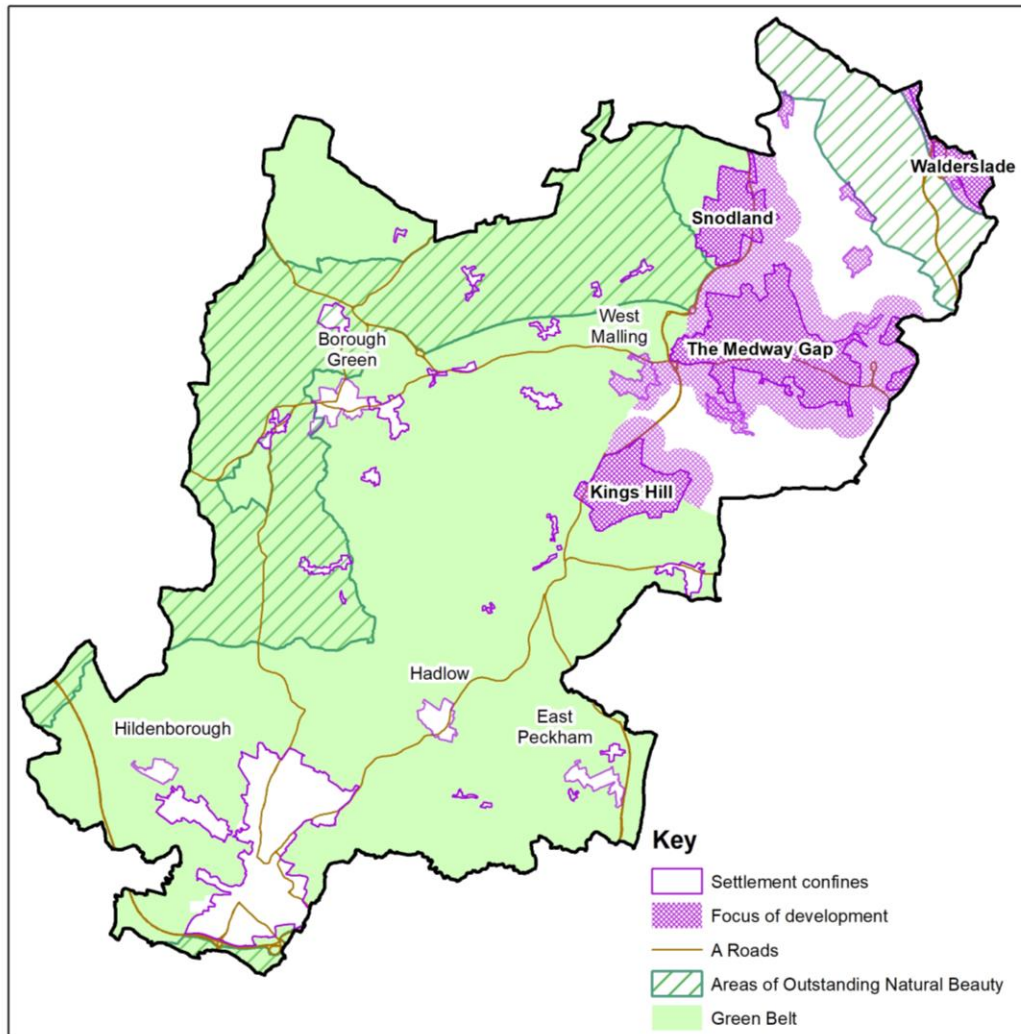


- 4.2.3. Within Tonbridge & Malling there are two Housing Market Areas (HMAs) that exert an influence across the borough: the Sevenoaks/Tonbridge/Tunbridge Wells HMA; and the Maidstone HMA. A HMA defines a geographical area within which there is a significant amount of self-containment in terms of the movement of people and activity on a regular basis, eg commuting to and from work or travelling to services and shops. A sustainable pattern of development should seek to address the need where it arises.
- 4.2.4. To date, the council has endeavoured to make best use of previously-developed land in built up areas such as Tonbridge for many years now including developments at Medway Wharf Road, Cannons Wharf and Sovereign Way. However, these types of sites are becoming less common as many have already been developed, and so the council will need to consider the use of greenfield sites in order to meet its objectively assessed need.
- 4.2.5. Ensuring a mixed portfolio of sites of varying sizes should ensure opportunities for small and medium developers. Sites within or adjacent to settlements across the settlement hierarchy could provide opportunities for a range of communities, as well as support local services and facilities.
- 4.2.6. Having regard to meeting assessed need, the constraints in the borough, as well as the two HMAs, making best use of previously-developed land, as well as the range and character of existing communities and settlements as set out by the Core Strategy in the adopted settlement hierarchy, the following potential spatial strategy options have been identified. Indicative maps are included, illustrating each option. It is important to appreciate that these maps are a broad representation of the option; they are not to scale and their purpose is to give an indication of the distribution of development and where it would be focussed.

**Option 1**

- 4.2.7. This Option seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape. An indicative map illustrating this option is set out in Figure 3.

**Figure 3. Spatial Strategy: Option 1**

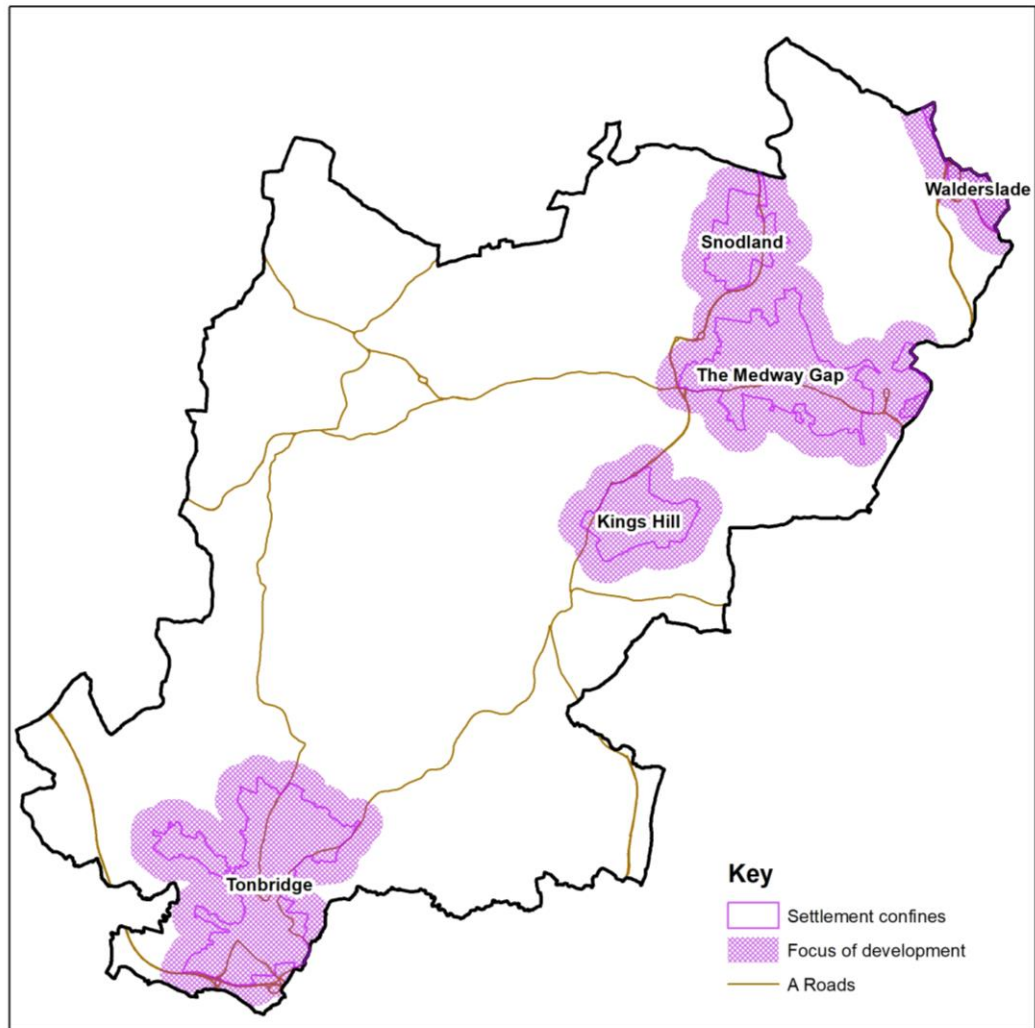


**Option 2**

4.2.8. This Option has an urban focus. In this instance development would be focussed on greenfield and previously-developed land within the urban areas<sup>9</sup> as well as land adjacent to these settlements. This seeks to locate development in areas with good access to existing services and facilities. An indicative map illustrating this option is set out in Figure 4.

<sup>9</sup> Core Strategy (2007), Policy CP11 settlements: Tonbridge, Medway Gap, Kings Hill, Snodland, Walderslade

**Figure 4. Spatial Strategy: Option 2**

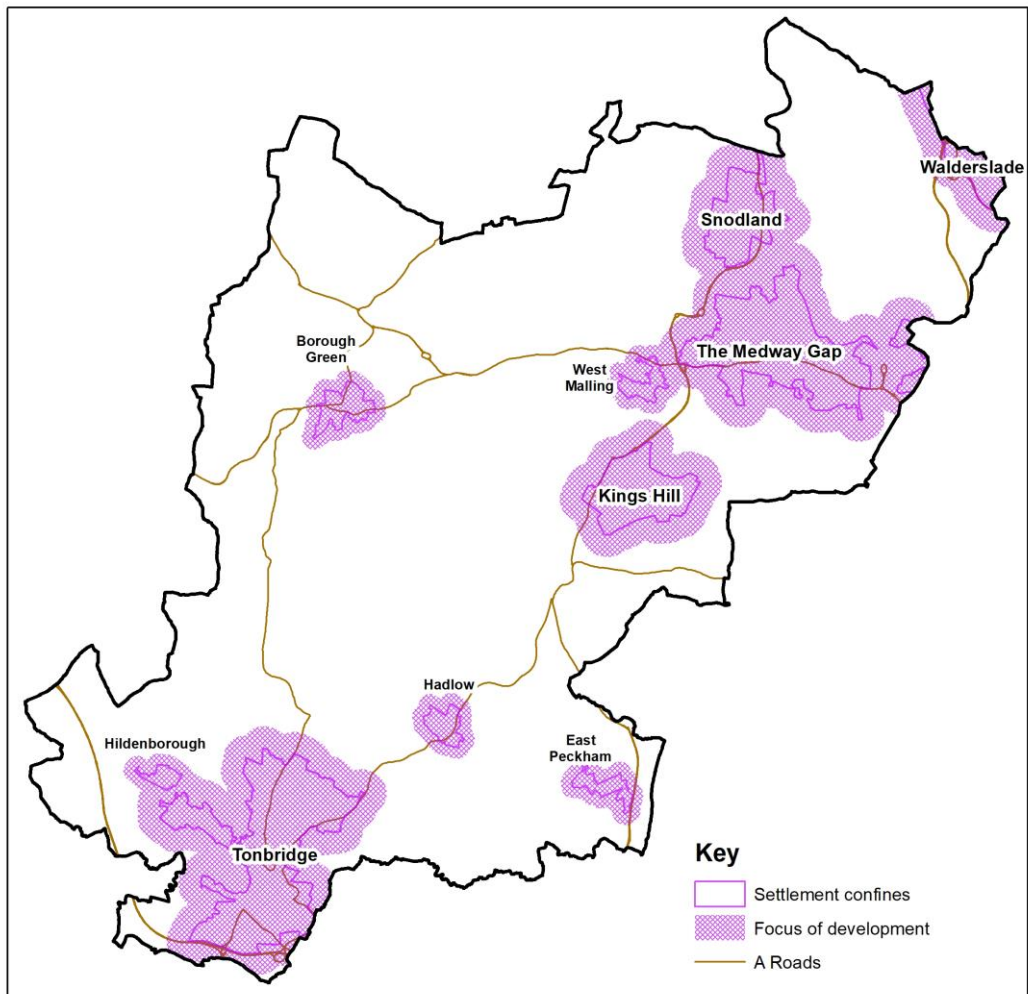


**Option 3**

4.2.9. This Option is focussed on settlements near the top of the settlement hierarchy. In this instance development would be focussed on greenfield and previously-developed land within the urban areas and rural service centres<sup>10</sup>, as well as land adjacent to these settlements. This seeks to locate development in areas with good access to existing services and facilities, as well as meeting the needs of a wider range of communities in accessible locations. An indicative map illustrating this option is set out in Figure 5.

<sup>10</sup> Core Strategy Policy CP12 settlements: Borough Green, East Peckham, Hadlow, Hildenborough, West Malling

**Figure 5. Spatial Strategy: Option 3**

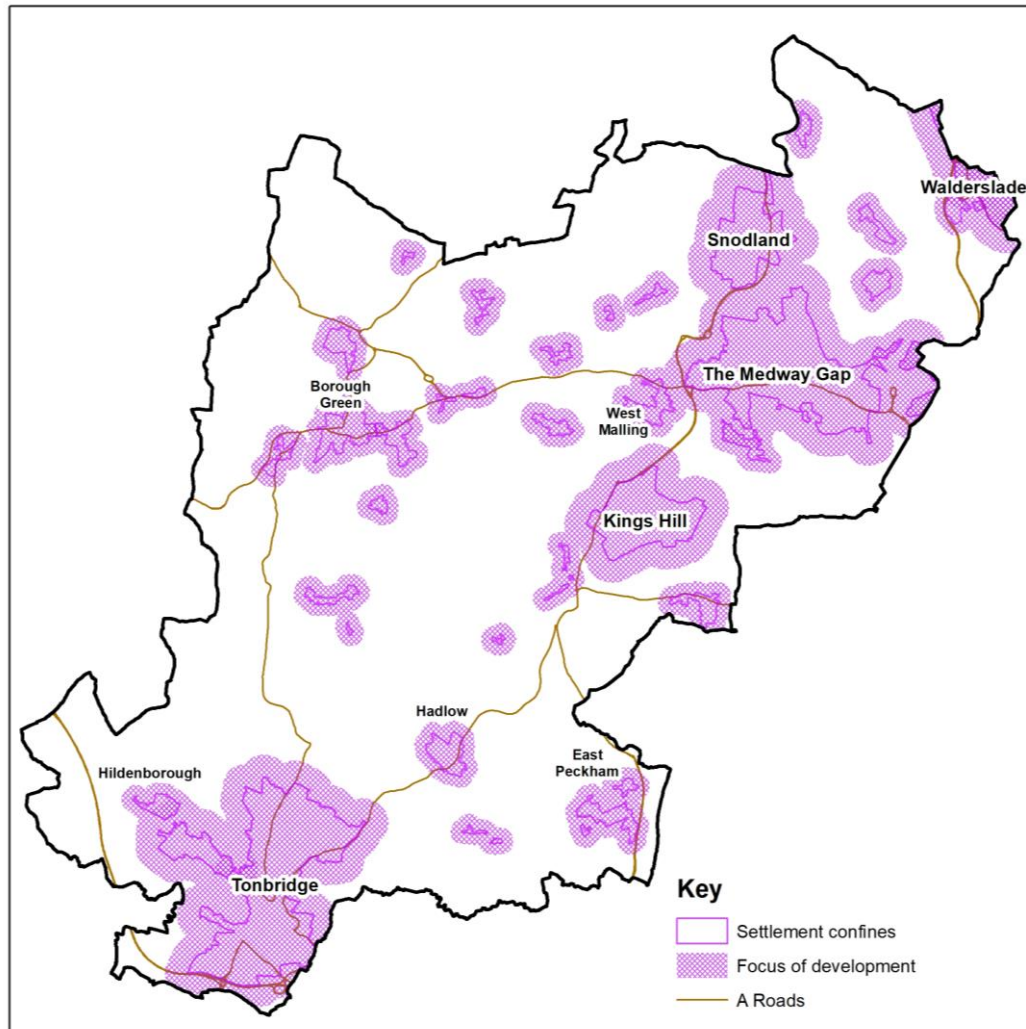


**Option 4**

4.2.10. This Option facilitates a distributed pattern of development across the borough. Development would be focussed on greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements<sup>11</sup>, as well as adjacent to these settlements. Thereby seeking to maximise the use of previously-developed land in the borough, as well as supporting a wide range of communities. An indicative map illustrating this option is set out in Figure 6.

<sup>11</sup> Core Strategy Policy CP13 settlements: Addington, Addington Clearway, Aylesford Village, Birling, Blue Bell hill, Crouch, Dunks Green, East Malling Village, Eccles, Fairseat, Golden Green, Hale Street, Ightham, Leybourne Chase, Mereworth, Offham, Peters Village, Platt, Plaxtol, Ryarsh, Snoll Hatch, Trottscliffe, Wateringbury, West Peckham, Wouldham, Wrotham Heath

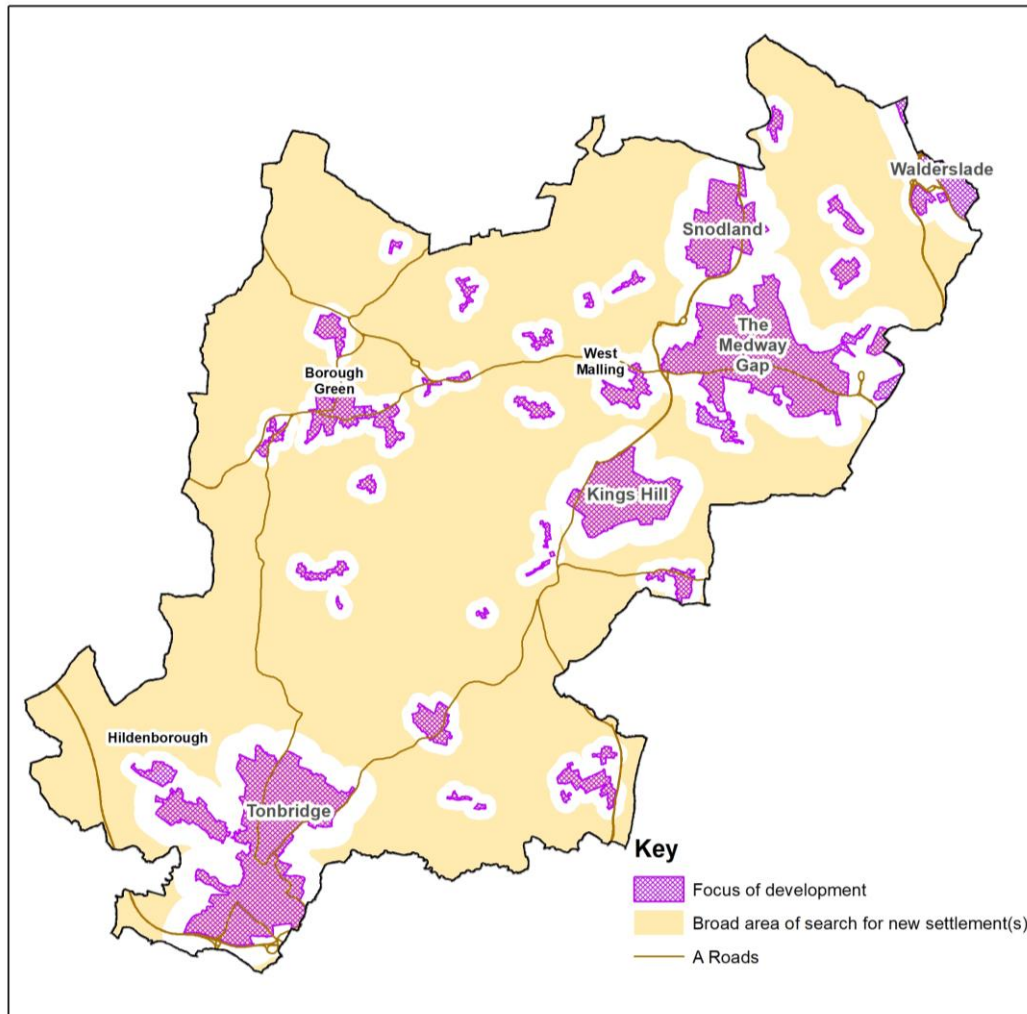
**Figure 6. Spatial Strategy: Option 4**



**Option 5**

4.2.11. This Option considers the potential for a new settlement/s in the borough in principle. Development would be focussed on greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements, thereby seeking to maximise the use of previously-developed land in the borough, as well as a new settlement/s remote from existing towns and villages. An indicative map illustrating this option is set out in Figure 7. In order to provide distinct, reasonable alternative spatial strategies in this Plan, it makes sense to assess the notion of a new settlement(s) once, as we have done so with this option.

**Figure 7. Spatial Strategy: Option 5**



4.2.12. A summary of the potential spatial strategy development options is set out below in question 5. Each Option is individually assessed against the Sustainability Appraisal objectives in Chapter 4 of the Interim Sustainability Appraisal Report.

**Strategy – quantum options**

4.2.13. In addition to the spatial distribution of development across the borough, we need to consider the strategic options for the amount, or quantum, of development that the Local Plan addresses.

4.2.14. The expectation of national policy is that Local Plans should as a minimum provide for objectively assessed needs for housing and other uses, including retail, leisure,

office and other main town centre uses<sup>12</sup>. Where these needs relate to housing these needs should be assessed using a clear and justified method as set out within the framework<sup>13</sup>. In the case of Tonbridge & Malling borough these needs are 839 dwellings per annum or 15,941 dwellings (gross) across the plan period up to 2040. Of course, some of this will be addressed by existing commitments and a projection of supply from windfall developments.

- 4.2.15. In determining the quantum options, we need to be mindful that two Housing Market Areas exert an influence across the borough and that neighbouring authorities are facing similar challenges to addressing their assessed needs. We also need to appreciate the capacity of the local housing markets to absorb growth, taking account of what they have supported before and the economic outlook. Furthermore, given the time horizon of 2040, we should consider the need for flexibility to be built into the strategy so that it can be resilient to unforeseen changes that may occur during the latter years of the plan period.
- 4.2.16. On the basis of meeting all objectively assessed needs for housing and other uses as a minimum, two distinct quantum options have been identified: meeting assessed needs; and meeting assessed housing need + up to 10%. For the purposes of the SA process, the maximum of +10% has been appraised.

**Spatial strategy – preferred option**

- 4.2.17. Please identify, in question 3, your preferred quantum option (A or B). Please identify, in question 5, your preferred spatial strategy option for the Local Plan (1-5).
- 4.2.18. Each of the reasonable alternative strategic policy options have been subject to Sustainability Appraisal, the results of which can be found in Chapter 4 of the Interim Sustainability Appraisal. At this stage, preferred options are not identified from the suite of reasonable alternative options. These will be set out at the next stage of plan-making, and the council will draw on the SA findings and consultation responses, as well as other information, to inform the preferred option.

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<sup>12</sup> Unless particular circumstances set out in paragraph 11 (b) of the NPPF apply

<sup>13</sup> Unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals (see NPPF paragraph 61)The Interim SA explains (at paragraph 4.5 ) why the council considers that meeting less than objectively assessed needs would not be reasonable

**Q.3. Which quantum option for the spatial strategy do you prefer?**

Strategy	Title and description	Preferred strategy – indicate with an 'X' below
<b>Option A</b>	Quantum 1 – Meeting Assessed Housing Need	
<b>Option B</b>	Quantum 2 – Meeting Assessed Housing Need + up to 10%	

**Q.4. What are your reasons for selecting this particular quantum option for the Local Plan (outline briefly)?**

**Q.5. Which spatial strategy option do you prefer?**

Strategy	Title and description	Preferred strategy – indicate with an 'X' below
<b>Option 1</b>	Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty	
<b>Option 2</b>	Urban: Development focussed on sites within (greenfield as well as previously-development land) as well as adjacent to urban settlements.	
<b>Option 3</b>	Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements.	
<b>Option 4</b>	Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities.	
<b>Option 5</b>	New Settlement: Development focussed on sites within (greenfield as well as PDL) urban areas, rural service	



Strategy	Title and description	Preferred strategy – indicate with an ‘X’ below
	centres and other rural settlements, as well as a new settlement/s.	

**Q.6. What are your reasons for selecting this particular spatial strategy option for the Local Plan (outline briefly)?**

### 4.3. Where should development be located in the borough?

- 4.3.1. At this stage in the Local Plan process the Call for Sites exercise and Urban Capacity Study have identified a range of sites across the borough that could be considered for development. These, coupled with sites that have been allocated for development in the adopted development plan and the withdrawn Local Plan but have not already been granted planning permission, form a pool of sites from which allocations can be chosen. A full list of these sites can be found in Appendix B.
- 4.3.2. Appendix B provides a unique reference number for each site, that remains consistent throughout the Local Plan and the evidence base (where relevant) to facilitate cross referencing. Information is also provided on the site area, proposed use, ward and the potential yield (for residential sites only). ‘To be confirmed’ (TBC) is inserted for those sites promoted for employment or mixed uses, because further information and evidence is needed before a reasonable assessment can be made of their potential. The methodology for calculating the potential optimised yield for residential is set out in the Urban Capacity Study.
- 4.3.3. **No decision has yet been taken on which of these sites should be taken forward and assessed further as an allocation for development.** All of the sites listed in Appendix B have been subject to the Sustainability Appraisal, with each site assessed against the Sustainability Appraisal Objectives. The results of these assessments are set out in Chapter 5/Appendix D of the Interim Sustainability Appraisal Report (2022). These results, along with other pieces of evidence and the responses to consultation, will inform decisions on allocations. We welcome your views on these sites, in particular your responses to the following questions.

**Q.7. Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.**

**Q.8. Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number**

**If you have a site that was not submitted during the Call-for-Sites exercise that you would like the council to assess for development potential, please provide details online using the PlaceMaker software.**

## 5. Strategic Matters

### 5.1. What are the strategic matters that the Plan needs to address?

5.1.1. The Local Plan needs to identify the strategic planning matters that need to be addressed across the period up to 2040. As well as identifying these matters, we need to understand what the priorities are for Tonbridge & Malling. This will inform the preparation of the relevant policies in the Plan.

5.1.2. We have identified the following list of strategic matters that we think are relevant to Tonbridge and Malling and need to be addressed in the Local Plan. Let us know if you think this is the right set of strategic matters that the Plan needs to address.

- Housing
- Economic development
- Transport
- Tonbridge (as the borough's principal town centre)
- Retail
- Community facilities and infrastructure
- Natural environment
- Built and historic environment
- Green Belt
- Climate change

**Q.9. Do you agree with this set of strategic matters? Yes/No. Please explain**

**5.2. What are the priorities for Tonbridge & Malling?**

- 5.2.1. We would like to understand which of these strategic matters, in your view, are priorities for the Local Plan, moving forward.
- 5.2.2. In question 10, please select the three strategic matters which mean the most to you in terms of what the priorities should be for the Local Plan. You do not need to order this in terms of importance.

**Q.10. Which strategic matters should be priorities in the Local Plan?**

Strategic Matters	Select (3 in total)
Housing	
Economic development	
Transport	
Tonbridge (as the borough’s principal town centre)	
Retail	
Community facilities and infrastructure	
Natural environment	
Built and historic environment	
Green Belt	
Climate change	
Other – please state and include in ranking	

**Q.11. What are your reasons for selecting these particular strategic matters as priorities for the Local Plan (outline briefly)?**

### 5.3. Housing – what are the issues?

#### **National – boosting housing supply**

- 5.3.1. One of the Government’s key objectives for planning is to significantly boost the supply of homes. This includes not just market housing but also housing to meet the needs of different groups in society.
- 5.3.2. To determine the minimum number of homes needed for each area the Government has set out that local plans should be informed by local housing needs assessment, using their own ‘standard method’ set out in national planning guidance. Based upon this standard method, the housing need for Tonbridge & Malling is 839 dwellings per annum (dpa) (2021). This translates to a gross need across the plan period of 15,941 dwellings.

#### **National – standard method for assessing need**

- 5.3.3. To help achieve this objective the Government has devised a standard method for calculating housing need. This is a formula based upon household projections that also takes account of affordability of homes at the local level. What this means for Tonbridge & Malling is set out below.

#### **National – affordable housing**

- 5.3.4. As well as addressing the overall need for housing, the Government expects the Local Plan to identify and address the need for affordable homes for those people who are unable to access open market housing. This includes the provision of First Homes<sup>14</sup> (25% of affordable housing provision) for first time buyers that meet specific criteria, and a requirement for at least 10% of the total number of homes planned for to be available for affordable home ownership.

#### **National – needs of different groups**

- 5.3.5. Assessing and responding to the housing needs of different groups in the community, including the elderly, people with disabilities and Gypsies and Travellers are important issues that the Government expects the Local Plan to address.
- 5.3.6. The Government is also mindful of the desire of some individuals/small groups for self-build and custom housebuilding projects, and for smaller house builders to be involved in providing homes locally. This is best achieved by ensuring an adequate

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<sup>14</sup> [First Homes - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

supply of small and medium sized sites, which can help with the supply of new homes in the short-medium term.

**National – quality place-making**

- 5.3.7. In terms of housing, the Government is not just concerned about the number of homes that are provided but the way they are delivered. Quality place-making is an important national objective as demonstrated by the National Model Design Code<sup>15</sup> and the garden communities programme supported by the Government. The garden communities programme is focussed on supporting the development of new settlements, or large extensions to existing settlements, that provide a mix of homes, job opportunities, community facilities connected with safe walking, cycling and public transport routes with attractive, generous and accessible green space and public realm areas. As recognised by the Government in the NPPF, the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as a garden community.
- 5.3.8. It is envisaged that these garden communities are designed and delivered with the engagement and involvement of the existing local community, and future residents and businesses. The issue of design is addressed in a later section in this Plan.

**National – Modern Methods of Construction (MMC)**

- 5.3.9. The role of Modern Methods of Construction (MMC) in delivering affordable and sustainable new homes is increasing and receiving support from the Government. Due to the factory-based nature of MMC, homes can be assembled on-site more efficiently with fewer delays and disruption caused by weather, transportation and labour and material supply. These efficiencies can translate to a more affordable product. It can also be designed and constructed with factory quality control which means that waste can be reduced, higher levels of air tightness can be achieved and fewer transport loads to development sites are needed, i.e. homes built using MMC can be more sustainable than traditionally built homes. We welcome your views on the level of support for MMC in the Local Plan (see table 10).

**Local – housing need (overall)**

- 5.3.10. As highlighted above the housing need within the borough has been determined by the Government’s standard method. In determining the net need, we need to take account of existing commitments (as at 31 March 2021), i.e., sites that currently have planning permission that are expected to be built-out during the early years of

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<sup>15</sup> [National Model Design Code - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

the plan period. This pipeline of sites needs to be discounted from the gross (overall) need. In addition, we need to discount completions that have taken place since the base date. The completion data relating to 2021/22 is in the process of being gathered and analysed and will feed into the Local Plan process as and when it is validated and published.

- 5.3.11. As well as commitments and completions, we also need to consider a windfall allowance. Windfall sites are sites that are not allocated in the Plan but come forward for development during the plan period. Given that the time horizon of the Plan is 2040, it is reasonable to expect a supply of homes from this source, certainly in the medium to long-term when it is challenging to predict future economic conditions and national policies. Taking account of a projected supply from this source, which is a sensible thing to do given the likelihood of these coming forward, would have the effect of reducing the need to allocate land in the Plan to address our assessed needs for new homes. The windfall allowance methodology is explained in more detail later in this chapter.
- 5.3.12. The gross need for housing is checked significantly by these sources of supply. Table 2 highlights that the net need (2021-2040) is 9,245 dwellings.

**Table 2. Housing need (net) (as at 31 March 2021)**

Need and Supply - Description	Need and Supply - Number
<b>Housing need (gross) 2021-2040:</b>	15,941 dwellings (839 dpa)
<b>Extant planning permissions:</b>	3,594 dwellings
<b>Small sites windfall allowance:</b>	1,050 dwellings (70 dpa from 2025/26)
<b>Large sites windfall allowance</b>	2,052 dwellings (114 dpa <sup>16</sup> between 2027/28 and 2034/25 and 228 dpa between 2035/36 and 2039/40)
<b>Housing need (net) 2021-2040:</b>	9,245 dwellings

**Local – housing affordability**

- 5.3.13. An important local factor to appreciate when considering how to address our assessed housing needs is affordability. This can be defined by comparing house

<sup>16</sup> 50% discount of trend data

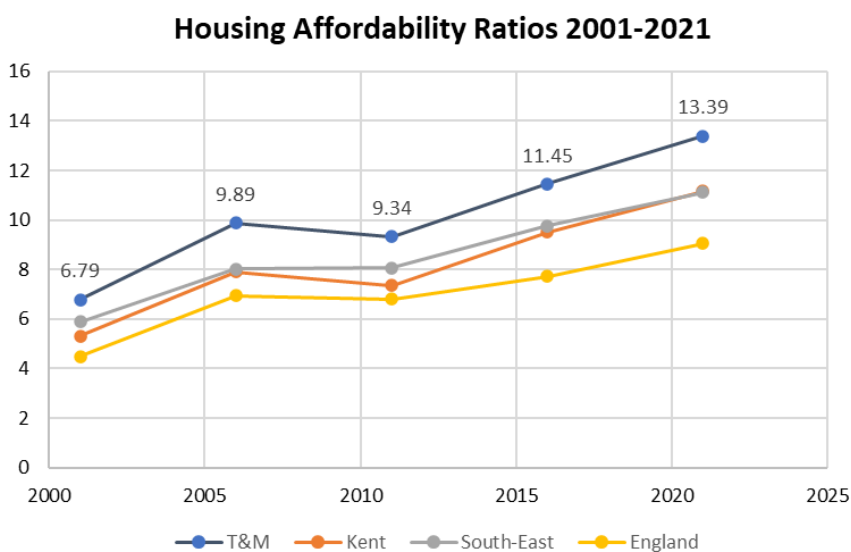
prices with household earnings. The gap, or ratio between the two, is the housing affordability. The larger the ratio, the worse the affordability is.

5.3.14. Table 3 sets out the housing affordability ratios produced by the Office for National Statistics (ONS). This is the ratio of median house price to median workplace-based earnings. The data for Tonbridge & Malling is set within the county (Kent), regional (South-East) and country (England) context. Figure 8 highlights trend data.

**Table 3. Housing affordability ratio (median) 2021**

Geography	Affordability Ratio
Tonbridge & Malling	13.39
Kent	11.16
South-East	11.12
England	9.05

**Figure 8. Housing affordability ratios (median) (2001-2021)**



5.3.15. It is evident that housing affordability is a significant issue that has worsened over time. In 2021, full-time employees could typically expect to spend over 13 times their workplace-based annual earnings on purchasing a home in Tonbridge and Malling. This compares to over 6 times their workplace-based annual earnings in 2001. This is an indicator that the supply of homes in the borough is not keeping pace with demand.



5.3.16. To put this into context, housing affordability in Tonbridge & Malling has, and continues to be, worse than the position at the county, region and national level. The gap has widened over the last twenty years. This worsening affordability will make it increasingly challenging for younger households to get their foot on the first step of the property ladder. This is a concern because an injection of first-time buyers is vital to allow existing homeowners to move up the property ladder to meet their changing needs. The Local Plan can make a difference by making adequate provision to address assessed needs.

**Local - housing requirement**

5.3.17. In determining the housing requirement for the Local Plan, the council has taken account of currently available local evidence and national policy. The council is mindful of the worsening housing affordability in the borough and what this means for households trying to access as well as move up the property ladder. In addition, the council recognises that boosting housing supply and addressing assessed needs are key objectives of national planning policy.

5.3.18. With these matters in mind, and notwithstanding the constraints within the borough, the council considers that the only reasonable approach to take is to meet the assessed need for housing in full, as directed by the NPPF<sup>17</sup>. This should be the minimum position because anything less would have the effect of worsening housing affordability and run the risk of not delivering key national planning policy objectives. Please also see paragraphs 4.2.13-16.

**Q.12. With reference to your answers to questions 3 and 4, do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum? Yes/No Please explain**

**Local – housing need (different groups)**

5.3.19. The council has commissioned evidence on housing need at the local level, looking at different groups and different products. This includes recommendations to be considered as part of the plan-making process, as set out below in table 8. In addition, the study includes recommendations on dwelling types (house/flat/bungalow/level access) and sizes (1/2/3 or more bedrooms) across the borough which need to be reflected in planning policies, as made clear in the

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<sup>17</sup> See NPPF paragraph 11 (b)

NPPF<sup>18</sup>. Part of this process will involve an assessment of the impact of these recommendations on the viability, and therefore deliverability of development.

**Table 4. Housing Need Study (2022) Recommendations**

Category of Need	Recommended Need
<b>Affordable housing need</b>	283 dpa across the plan period
<b>Affordable housing tenure split</b>	63% rented, 37% affordable home ownership inc. First Homes
<b>Accommodation for older people</b>	38 older persons C3 units per annum across the plan period. 13 C2 bed spaces per annum,
<b>Wheelchair accessible homes</b>	3.6% of new dwellings to be M4(3) wheelchair accessible, all affordable and 20% of market dwellings to be M4(2)
<b>First Homes</b>	40% discount

#### **Local – Travellers and Travelling Showpeople needs**

- 5.3.20. As well as market and affordable housing, the Local Plan needs to make provision to address the needs of Gypsies, Travellers and Travelling Showpeople. An assessment of the needs of Gypsies, Travellers and Travelling Showpeople has been prepared. This has responded to the Government’s expectations as set out in the Planning Policy for Traveller Sites<sup>19</sup> (PPTS) (2015) and local evidence. The key findings are set out in table 5 below.
- 5.3.21. There are well-established Gypsy and Traveller communities living in Tonbridge and Malling Borough. There are 73 Gypsy and Traveller pitches across 20 sites, there are two council sites (40 pitches), seven private authorised sites (12 pitches), one private temporary authorised site (2 pitches) and ten unauthorised sites (19 pitches). There are two Travelling Showperson’s yards in the borough (4 plots).
- 5.3.22. Government policy requires authorities to meet the needs of all Gypsies and Travellers. The PPTS is used to plan for the accommodation needs of those Gypsies and Travellers who continue to lead a nomadic habit of life, even if they are

<sup>18</sup> [National Planning Policy Framework - 5. Delivering a sufficient supply of homes - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/national-planning-policy-framework-5-delivering-a-sufficient-supply-of-homes-guidance)

<sup>19</sup> <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

temporarily not travelling. The NPPF is used to plan for the accommodation needs of those Gypsies and Travellers that no longer lead a nomadic habit of life.

**Table 5. Gypsy and Traveller pitch need: 2021/22 to 2039/40**

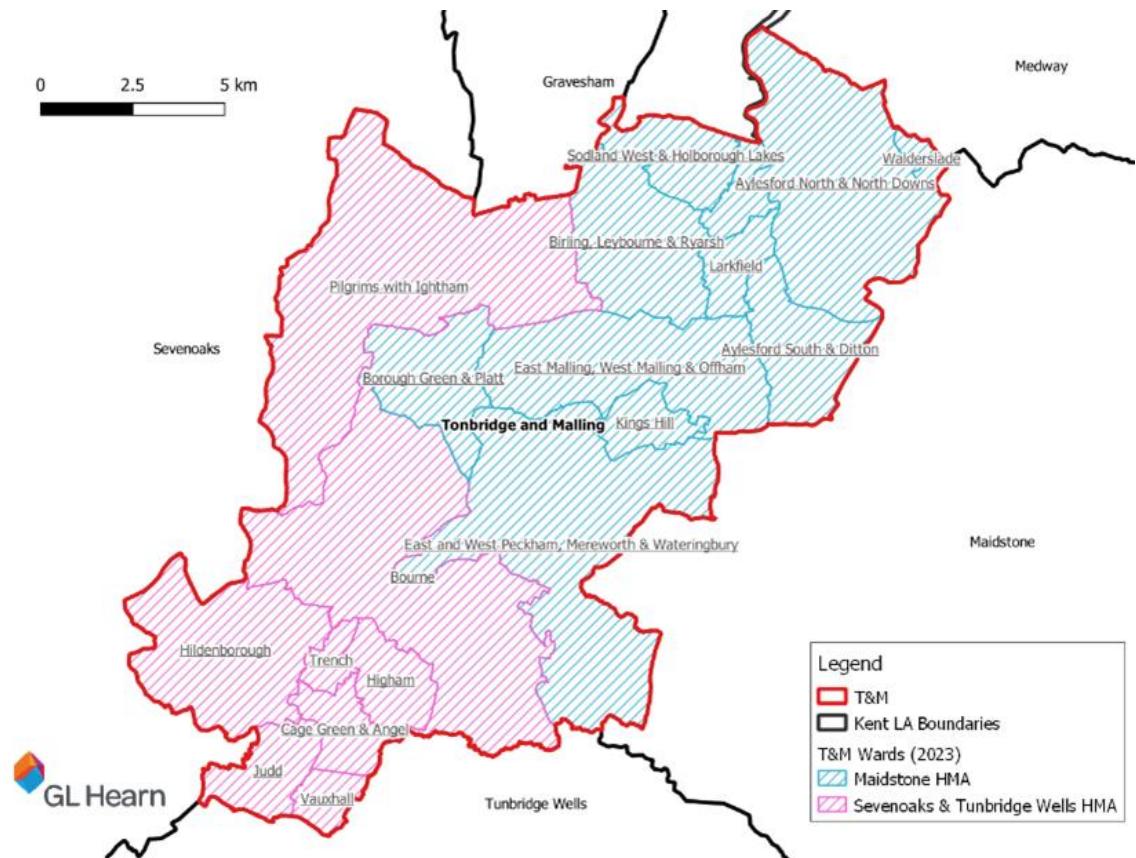
<b>Gypsy and Traveller pitch need: 2021/22 to 2039/40</b>		
<b>Tonbridge and Malling Borough</b>	<b>Cultural need</b>	<b>of which: PPTS NEED</b>
<b>Short-term need TOTAL - 2021/22 to 2026/27</b>	<b>20</b>	<b>13</b>
<b>Longer-term need - 2027/28 to 2031/32</b>	7	4
<b>Longer-term need - 2032/33 to 2036/37</b>	12	7
<b>Longer-term need - 2037/38 to 2039/40</b>	2	1
<b>Longer-term need TOTAL</b>	<b>21</b>	<b>12</b>
<b>TOTAL NET SHORTFALL 2021/22 to 2039/40</b>	<b>41</b>	<b>25</b>
<b>Annualised need</b>	<b>2.1</b>	<b>1.3</b>

**Local – Housing Market Areas (HMAs)**

5.3.23. As well as identifying need, it is important to understand the Housing Market Areas (HMAs) that exert an influence across the borough. An HMA 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. It represents an area where there is a high degree of containment in terms of the movement of people for work, services and homes.

5.3.24. The Housing Market Delivery Study (July 2022) has confirmed our existing understanding of the dominant HMAs that exert an influence across Tonbridge & Malling. Principally, there are two HMAs: the Maidstone HMA (across the north-eastern and eastern parts of the borough); and the Sevenoaks/Tonbridge/Tunbridge Wells HMA, aka the West Kent HMA, (across the north-western, south-western and south-eastern parts of the borough). This split is highlighted by figure 9 below.

**Figure 9. HMAs across the borough**



*Extract from Housing Market Delivery Study prepared by GL Hearn*

5.3.25. This understanding of the HMAs is important when considering how best to distribute housing across the borough in order to achieve sustainable development.

**Local – Wider housing needs**

5.3.26. We need to be mindful that the HMAs span more than one local authority area. It is important that we understand how assessed housing needs in neighbouring authorities are being addressed through their respective plan-making processes and what this might mean for our Local Plan. Given the influences of the two HMAs across our borough, it is important that we continue to engage, in an active and on-going basis, with our neighbouring authorities so that we can understand this issue better and how it can be tackled in a reasonable, consistent, and sustainable way that meets the expectations of national policy. A range of factors will need to be considered and understood as part of this process including the coverage of high-level constraints such as the Green Belt and Areas of Outstanding Natural Beauty, as well as local evidence on matters such as transport and the capacity of local infrastructure.

**Local – supply opportunities (Call for Sites and Urban Capacity Study)**

- 5.3.27. The earlier part of this section has highlighted the various housing needs that have been assessed and identified. It is the role of the Local Plan to address these assessed needs.
- 5.3.28. The council conducted a Call-for-Sites exercise between December 2021 and February 2022. We received a positive response with 291 sites being submitted for assessment. These sites are listed in Appendix B to this Plan. They have been subject to the Sustainability Appraisal (SA) process. The outcomes of these assessments are documented in the Interim SA Report, which has been published alongside this Plan – please see section 3.3 in this Plan for more details on how you can review and comment on these assessments. Section 3.3 also highlights that the Call-for-Sites exercise is open for the duration of the consultation on this Regulation 18 Plan, to allow for the submission of sites for assessment which were not made during the initial exercise. The assessment of these sites will feed into the Strategic Land Availability Assessment (SLAA) which will be published after the Regulation 18 Plan consultation has concluded. This will allow the SLAA to take account of responses and comments made on the sites and the SA process.
- 5.3.29. It is important to bear in mind that the Call-for-Sites exercise is evidence that will be used to inform plan-making but does not in itself determine whether a site should be allocated for development. Allocation of land for development will depend upon the extent of policy and practical constraints identified in the assessment and the choices ultimately made by the council following public consultation on the strategy options available. The assessment provides information on the range of sites which are available to meet need, but it is for the Local Plan itself to determine which of those sites are the most suitable to meet those needs.
- 5.3.30. The council will consider the range of opportunities identified through the Call-for-Sites exercise and how these can respond to the expectations of national policy.
- 5.3.31. In addition to appraising sites promoted to the council, we have also assessed the potential for residential development in the urban areas and the larger rural settlements as part of the **Urban Capacity Study (UCS)**. This is focussed on a range of potential sources including previously-developed vacant and derelict land and buildings, car parks and vacant land not previously-developed. It also includes a handful of sites (nine in total) from the Call-for-Sites exercise that met the relevant criteria. The prevailing density of surrounding areas has been used to guide the

calculation of the optimised density of development that could be achieved. It is important to appreciate that the UCS is focussed on identifying potential for residential development. Further work needs to be undertaken to determine availability. It is the Local Plan process, and not the UCS, that will determine whether a site should be allocated, having regard to other evidence and responses to consultation.

- 5.3.32. The UCS concluded that the urban areas and the rural service centres have the potential to deliver over 1,900 homes, if densities are optimised within the prevailing character of the local area. This relatively small amount is not a surprise given that the council has pursued for many years a strategy of making the best use of previously-developed (brownfield) land within existing areas to meet housing and other development needs, as highlighted by the high density developments at Medway Wharf Road, Cannons Wharf and Sovereign House in central Tonbridge. This potential represents 21% of the net need for housing, which leaves a shortfall of 7,299 units.
- 5.3.33. Given that the net need for housing is in excess of 9,000 units, it is evident that consideration of sites beyond the confines of the urban areas and larger rural service centres needs to be considered if we are to meet our assessed needs in full. The potential spatial strategy options are detailed in section 4 of this plan and are assessed as part of the Sustainability Appraisal process. The list of sites identified through the Call-for-Sites exercise and in the UCS, as well as those housing allocations from the withdrawn Plan which were not submitted during the Call-for-Sites exercise and do not have planning permission, are set out in Appendix B to this Plan. The site ID allows the reader to cross-refer to the Sustainability Appraisal (SA) where the assessments against the SA objectives can be reviewed (see Appendix D in the Interim SA Report).

**Local – diversity of supply**

- 5.3.34. One of the key soundness tests for the Local Plan is whether it is ‘effective’, i.e. deliverable over the plan period. The council is mindful that one way of building resilience into the supply of new homes across the whole of the plan period is through diversity. This can be diversity in terms of the size of sites, tenure of homes and the types and sizes of homes provided. This is recognised in national policy and in the Housing Market Delivery Study.
- 5.3.35. When considering diversity, we need to be mindful of evidence on housing affordability, as outlined above. This indicates that it is becoming increasingly

challenging for households to access open market housing and move up the property ladder. As a consequence, more and more households are turning to the private rented sector as the only realistic option for finding a home for themselves. In this respect, products such as Build to Rent may have a role to play, certainly for those local households whose prospects of becoming homeowners in the near future are slim. In addition, we need to recognise that some households are turning to self-build and custom housebuilding projects as a way of providing an affordable home that meets their requirements. The Housing Needs Study provides evidence on the need for a mix of house types, being informed by local evidence including engagement with members of local communities.

**Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period? Yes/No Please explain.**

**Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (eg flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain**

**Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain**

**Q.16. Do you agree that the Local Plan should require a proportion of homes on large development sites to be Build-to-Rent products? Yes/No Please explain**

#### **Local – windfall allowance: methodology**

- 5.3.36. The council has published a [windfall allowance methodology paper](#) that explains the process for determining a reasonable and realistic allowance that has been informed by compelling local evidence. Given local trend data, the long time horizon of the Local Plan and the recent changes to permitted development rights allowing commercial buildings to convert into homes without planning permission, subject to the prior approval process, it is reasonable to include a windfall allowance form small sites (a yield of fewer than five units) and large sites (a yield of five units or more).
- 5.3.37. Table 2 (above) highlights the outputs from the application of the windfall allowance methodology. This has been informed by a long trend data period which indicates that supply from windfall sites shows no signs of diminishing. Discounting of trend data by 50% in the windfall allowance for large sites has been applied for

the middle period of the Plan because there is a greater degree of certainty about the supply from larger sites during this time as a result of the Call-for-Sites exercise and Urban Capacity Study which will feed into the allocation of sites process. The council's methodology has also been informed by recent practice that has been examined and found sound.

**Q.17. Do you agree with the windfall allowance methodology? Yes/No Please explain**

**Local – housing: supporting infrastructure**

- 5.3.38. Delivering homes needs to be done in a way that can achieve quality, well connected places where people are happy and proud to live. For places to function properly, it is critical that new homes are served by supporting infrastructure such as schools, health care centres, open spaces, and opportunities for active travel such as walking and cycling. This is important for the health and well-being of the new residents. We understand the importance of not just the amount of supporting infrastructure but also when it is delivered to meet the needs of the new communities. Through the making of this Plan, the council will endeavour to engage and work closely with the various providers of infrastructure to ensure that the sites that come forward are planned for in a sustainable way.

**Local – housing: other issues**

- 5.3.39. We would like to understand if there are other pressing housing issues that the Local Plan needs to consider and address. We are mindful of how the recent COVID-19 pandemic brought about transformational change to our working habits, with many people now working from home. Interest has grown in making homes more fit for work purposes which raises the question of whether a positive response needs to be examined as part of the plan-making process.

**Risks – not positively addressing housing needs**

- 5.3.40. A significant consequence of not positively addressing our assessed needs is that housing affordability worsens. This would make it very challenging for younger households (first-time buyers) to get their foot on the property ladder or to find cost effective rental options locally. This lack of injection of first-time buyers will make it difficult for existing home-owners to move up the property ladder to meet their changing needs. In addition, a constrained supply of new homes would put upward pressure on private rental values, making it very challenging for younger households to save a deposit for their own home.



5.3.41. Furthermore, supporting the growth of local communities with new homeowners is important to the long-term future of local facilities and services. Schools, shops and pubs can only be sustained if enough people are using or need them. If communities are not allowed to grow, not only would this put at risk these much-valued facilities but also push many people with local ties to look elsewhere to live.

**Housing – what matters to you**

5.3.42. This section has highlighted the broad range of issues relating to housing need, requirement, and supply. Question 18 (below) sets out specific matters relating to these broad issues.

5.3.43. We appreciate that not all matters are equally important to everyone. We would like to understand what matters most to you, in terms of the focus of this Local Plan.

5.3.44. In question 18, can you please select five matters that are most important to you. We do not expect you to rank these in order of importance. This does not mean that the remaining issues are not relevant; however, the Local Plan will need to set some priorities and give guidance on where the focus should be, bearing in mind the issue of viability and the cumulative impact of requirements on the delivery of development.

**Q.18. Which housing matters are most important to you?**

Housing Matter (alphabetical order)	Select (5 in total)
Accessible housing (eg for wheelchair users)	
Affordable housing – to buy	
Affordable housing – to rent	
Build to Rent	
Density of housing development	
Distribution of housing across the borough (taking account of where the needs are generated)	
First-time buyers’ housing	
Garden communities	
Gypsy and Traveller accommodation	

Housing Matter (alphabetical order)	Select (5 in total)
Home-working opportunities	
Infrastructure (schools, roads, healthcare, open space etc) supporting new homes delivered in a timely fashion	
Modern Methods of Construction (MMC)	
Self-build and custom housebuilding	
Size of housing (1-bedroom, 2-bedrooms, 3+ bedrooms)	
Size of housing sites	
Specialist housing for people with particular care needs	
Tenure of housing (market purchase/private rent/affordable rent)	
Travelling Showpeople accommodation	
Type of housing (flat/house)	
Other – please state and include	

**Q.19. What are your reasons for selecting these particular housing matters as priorities for the Local Plan (outline briefly)?**

## 5.4. Economic development – what are the issues?

### National

5.4.1. In terms of building a strong and competitive economy, the NPPF states that:

*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”. (paragraph 81)*

5.4.2. Planning policies are therefore required to:

- set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period
- seek to address potential barriers to investment, such as inadequate infrastructure

- be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances.
- 5.4.3. Planning policies and decisions should recognise and address the specific locational requirements of different sectors that are present and growing locally, including for example storage and distribution operations which have seen significant growth in the borough recently.
- 5.4.4. Supporting the rural economy is also important. The NPPF requires that planning policies enable:
- the sustainable growth and expansion of all types of business in rural areas
  - the development and diversification of agricultural and other land-based rural businesses
  - sustainable rural tourism and leisure developments, and
  - the retention and development of accessible local services and community facilities, such as shops, meet, sport and cultural buildings.

**Local**

- 5.4.5. Tonbridge and Malling borough remains part of the West Kent functional economic market area, which comprises the boroughs of Tunbridge Wells and Tonbridge & Malling and Sevenoaks District (Economic Development Needs Study (EDNS) 2022, para 6.3). West Kent plays a vital role in sustaining the Kent economy as a whole.
- 5.4.6. Future growth in the West Kent economy is constrained by high land values and a shortage of available development land, full employment and a lack of available skilled staff, insufficient investment in infrastructure, congestion on local transport networks and in some areas limited broadband and mobile connectivity. *“Whilst the West Kent economy is one of the best performing sub-regions of Kent, it underperforms compared to many other areas adjacent to the M25”* (West Kent Economic Priorities for Growth p6).
- 5.4.7. The West Kent economy both benefits and suffers from its proximity to London. A large number of residents commute to London taking high level skills away from the local economy. However, local businesses benefit from the additional spending power and operating costs are lower than in central London. House prices are amongst the highest in Kent too, reflecting easy access to London, but many younger and lower wage local employees are priced out of the market.

- 5.4.8. Tonbridge & Malling borough “has recorded good levels of job growth over the last 10 years (+10.2%), which is above the regional and national comparable of 9.2% and 9.5%, respectively. These trends are also reflected in job growth recorded for employment uses with an absolute increase of 4,500 jobs (+12%) in office, industrial and distribution sectors over the last 10 years. The largest employment sector in Tonbridge and Malling in 2021 is wholesale and transport” (EDNS 2022 para 6.3).
- 5.4.9. The local business base is dominated by Small and Medium Enterprises (SMEs) which are distributed across the borough but are concentrated in Tonbridge, Kings Hill and Aylesford. In recent years Tonbridge & Malling borough has been impacted by the economic shocks of Brexit, the COVID-19 pandemic and instability arising from the war in Ukraine. The Covid-19 pandemic in particular had a significant impact upon the local economy, with 12% of local working residents being furloughed through the Coronavirus Job Retention Scheme (JRS Q3 2021). *“The latest claimant figures (May 2022) show that there are still more claimants in the Borough compared to pre-pandemic, but compared to Kent and the South East, the Borough has shown a faster recovery.”* (EDNS 2022 para 6.3). This is encouraging; however the economic outlook remains uncertain with concern about inflation during 2022/23 and the impact this will have upon business costs.
- 5.4.10. The council recognises its key role in helping the local economy to recover, both in terms of setting a strategic framework for its approach as well as through the various initiatives it undertakes in order to contribute towards the creation of a better economy. The council has published an Economic Recovery Strategy<sup>20</sup> to assist with this. This identifies the importance of housing and commercial development as well as infrastructure investment to support economic resilience and growth. The council is mindful that the COVID-19 pandemic resulted in transformational change to the working habits of many people, most notably working from home remote from places of work. We need to consider how the Local Plan can respond positively to this change, which has become the norm for many workers, and what this means for planning for housing and transport as well as economic development.
- 5.4.11. Notwithstanding recent economic shocks, economic productivity in Tonbridge and Malling borough has increased over recent years, most notably in the wholesale and logistics sectors, this has offset declining productivity in manufacturing. This

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<sup>20</sup> <https://www.tmbc.gov.uk/business/read-economic-recovery-strategy>

sector remains a growth opportunity as the economy continues to recover and moves beyond the pandemic. In addition, *“the pandemic has triggered an increase in home-working and there is currently an evolving structural change in business operations with emphasis on those sectors relating to office space”* (EDNS 2022 para 6.3). These ongoing structural changes present both challenges and opportunities for Tonbridge & Malling in terms of provision of sufficient and suitable employment land and premises.

- 5.4.12. Tonbridge and Malling has one of the largest stocks of employment space across Kent, however, this has been reduced significantly over the last few years. *“Over the last five years there has been a decrease of its industrial stock by 6.5%, while the longer-term equivalent is -9.5% according to the Valuation Office Agency (VOA)”*. *“The Council’s monitoring data indicates losses of office space since 2011/12; however, there were mixed B and B1 schemes delivered that partly balance the losses”* (EDNS 2022 para 6.3). Prior approvals from office to residential have contributed to this. Most of the losses, however, relate to industrial stock which has seen a decrease of 20% since 2010/11. Some key industrial redevelopments have been constructed to replace this, including ARC Logistics and Panattoni Parks.
- 5.4.13. Tonbridge and Malling has a strong land based and rural economy with very well established and diversifying agricultural businesses that produce, meat, fruit, grain and salad crops. The borough is home to both the National Institute of Agricultural Botany (NIAB) East Malling Research Station, the UK’s largest horticultural research and development organisation, as well as Hadlow College which specialises in land-based education. Recent growth has been seen amongst viticulture businesses which are producing sparkling wine and gin in addition to beer and cider.
- 5.4.14. Attracting and retaining staff to support our land based and agricultural businesses is vital. In a borough where the cost of living is relatively high the availability of linked agricultural dwellings and other affordable housing, is essential for those working in the sector. The provision of new built facilities to support business diversification remains important to ensure that the sector is competitive.
- 5.4.15. There is currently strong demand for new industrial and warehouse premises in the borough, reflecting the structural change in consumer spending on-line in recent years, and the strategic position of the north-east of the borough especially to the M2 and M20 motorways, which provide access to the channel ports. Kings Hill

remains a prominent high quality business park with a range of A grade office accommodation available.

- 5.4.16. In recent years employment land and premises have been lost, predominantly due to the conversion of offices to residential development in Tonbridge town centre, as well as the loss of industrial floorspace and designated employment land at Kings Hill to residential and other uses. The council is also mindful of recent regulatory changes resulting in certain uses such as shops, offices, restaurants and gyms being grouped together for planning purposes (known as Use Class E), with permitted development rights now in place allowing these uses to change to dwellings, subject to a prior approval process. These changes are covered by regulations that the Local Plan has no control or influence over. We need to consider what these changes might mean for some existing employment premises and the opportunities they present for achieving positive outcomes for the benefit of residents and the local economy.
- 5.4.17. The council has commissioned a new Economic Development Needs Study which has identified a range of future employment land scenarios over the plan period 2021-2040. The labour demand scenario appears to provide the most balanced view of future requirements, indicating *“a need for 296,260 sq.m (69.8ha) across the Plan period”* (EDNS 2022 para 6.4). This work is to be refined to support the Regulation 19 Local Plan, as the council considers the range of potential site opportunities that are available to meet future growth.

**Risks – not positively addressing employment needs**

- 5.4.18. The lack of available and affordable premises is a reason that businesses either don't expand and invest locally or relocate to areas outside of Tonbridge & Malling and more widely West Kent. A sufficient supply of employment land and premises is therefore required to support business and jobs growth, support rural diversification, balance housing growth and limit unsustainable patterns of out-commuting.

**Key economic development issues which the Local Plan can help to address**

- High land values and a shortage of employment land and premises for established and growing businesses as well as those looking to locate in the borough.
- Lack of investment in strategic infrastructure and congestion on local transport networks.

- Supporting land based and agricultural diversification.

**Q.20. Do you agree with the key economic development issues identified above?  
Yes/No Please explain**

## 5.5. Transport – what are the issues?

### National

- 5.5.1. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
- the potential impacts of development on transport networks can be addressed
  - opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised
  - opportunities to promote walking, cycling and public transport use are identified and pursued
  - the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account, and
  - patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. (NPPF, paragraph 104)
- 5.5.2. The planning system is required to actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, improve air quality and public health. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas.
- 5.5.3. In accordance with the NPPF, planning policies prepared by the council should:
- support an appropriate mix of uses, to minimise the number and length of journeys needed for employment, shopping, leisure, education, and other activities
  - be prepared with the active involvement of Kent County Council and other transport infrastructure providers and operators, so that strategies

and investment for supporting sustainable transport and development are aligned

- identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development
- provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans - LCWIP)
- provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.

5.5.4. Where setting local parking standards for residential and non-residential development, policies should take into account:

- the accessibility of the development
- the type, mix and use of development
- the availability of and opportunities for public transport
- local car ownership levels; and
- the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. (NPPF, paragraph 107)

5.5.5. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in locations that are well served by public transport.

5.5.6. The NPPF also requires that planning policies should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.

#### **Local**

5.5.7. Tonbridge and Malling borough faces significant transport challenges, particularly in terms of managing congestion on local roads, supporting future growth, as well as needing to respond to the impacts of air quality and climate change. The council



has declared six air quality management areas due to nitrogen dioxide emissions. Both KCC and TMBC have declared a climate emergency and have set ambitions to reduce carbon emissions in the coming years.

- 5.5.8. KCC is the Local Highway Authority for Kent and is responsible for the management and maintenance of all adopted roads in the County, other than motorways which are the responsibility of National Highways (formerly Highways England). KCC is the Local Transport Authority for Kent and therefore has responsibility for procuring some public and school bus services. KCC also has a role in maintaining cycle routes, promoting cycling and maintaining public rights of way.
- 5.5.9. KCC is in the process of preparing a new Local Transport Plan (LTP) for Kent. It is expected that this will have a greater focus upon improving sustainable travel modes, including infrastructure for walking and cycling, in line with government policy.
- 5.5.10. TMBC is the Local Planning Authority, it also has delegated responsibility for Civil Parking Enforcement under the Traffic Management Act 2004. The council also undertakes the licensing of taxis and private hire vehicles, the provision of some bus shelters as well as the monitoring and improvement of air quality.
- 5.5.11. Approximately 25 per cent of bus services in Tonbridge and Malling are operated on a commercial basis and do not require local authority support. The remainder are either wholly or partly subsidised, to provide 'socially necessary' services, particularly in rural areas. Bus patronage has not recovered to pre-pandemic levels and there is concern at this time regarding the ongoing viability of many bus services, which could be lost if patronage does not improve, or if government funding is reduced or withdrawn. This is concerning given the reliance on bus services in supporting access to existing and new developments. Such services are not always financially sustainable in the long term.
- 5.5.12. Rail services in the borough are operated by Southeastern which is now wholly owned by the Department for Transport (DfT). Tonbridge is a significant transport interchange, with good rail connections to surrounding towns including Tunbridge Wells. The fast and frequent rail services to London attract a lot of rail commuters from outside the town and can overcrowd trains.
- 5.5.13. Rail services have an important role to play in supporting growth and sustainable travel in the future. The LTP identifies the potential to enhance Medway Valley rail services to improve connectivity between Tonbridge and the Medway Towns,

which will be of benefit to growing communities in the north of the borough. Both KCC and TMBC work closely with the train operating companies to secure station and rail service improvements and will continue to do so in the future, to support growth and to improve access especially for walking and cycling.

- 5.5.14. A new Active Travel Strategy (LCWIP) is being prepared to support existing and new communities. This will identify cycling and walking infrastructure priorities to support existing and new communities. This is essential to help tackle congestion, respond to climate change and to provide local people with transport mode choice.
- 5.5.15. Tonbridge has a lot of through traffic and as with other parts of the borough currently has poor connectivity for cyclists which will be improved through the implementation of the Active Travel Strategy. Tonbridge could benefit from an equivalent of Public Transport Accessibility Levels (PTALs) which are used within Greater London. These are a measure of public transport accessibility and could help to identify opportunities for network improvements.
- 5.5.16. In the north of the borough capacity issues on the road network are closely tied to growth and travel demand arising from Maidstone. Congestion occurs on the A20, A26 (particularly at Watlingbury) and the A228 and A229 corridors. If approved the delivery of the Lower Thames Crossing project will consume capacity on key routes linking the M20 and M2, requiring mitigation including junction improvements which are not currently funded. The presence of strategic roads in the borough does bring pressure for additional lorry parking. Currently lay-bys and wide slip lanes are used by hauliers, which is not always appropriate.
- 5.5.17. Both KCC and TMBC continue to work in partnership to identify local infrastructure requirements to support growth and to secure funding for these, which primarily comes from new development. A strategic transport model (known as VISUM) has been developed for Kent and will be used to identify existing baseline information and the potential impacts of growth options upon the local road network, in particular local junctions. The outputs from the modelling will assist in identifying road improvements including junctions, that will be required to support future growth identified in the Local Plan and accompanying Infrastructure Delivery Plan. A micro simulation model (known as VISSIM) has been developed for south and central Tonbridge, to more specifically look at junction capacity, to identify the impacts of growth and improvements that are needed.
- 5.5.18. Whilst the spatial strategy for future growth and development in the borough has yet to be confirmed, focusing development within and adjacent to the main urban

areas in the borough will help to reduce the need to travel and desire for multiple car households. The extent, design and enforcement of parking in new developments remains a contentious matter, especially in urban areas. Parking guidance is provided by the highway authority, where there are specific local circumstances there is potential to set parking policy at a local level in the Local Plan.

- 5.5.19. High quality place making remains key to the design of new developments, which will need to prioritise walking and cycling for local journeys and ensure that resident and visitor parking is adequate and well designed. Not only will this support sustainable living but benefit the health and well-being of residents.
- 5.5.20. It is recognised that there is no single solution to resolving complex transport challenges. With fuel prices increasing there is growing pressure upon residents and businesses to reconsider their travel and transport choices, indeed the extent to which they travel. It is recognised that it is not always possible to change travel behaviour without adequate infrastructure, in for example electric vehicle charging points and cycle routes. The achievement of genuine mode choice and better accessibility into urban areas by non-car modes is central to resolving these challenges.

#### **Baseline transport modelling**

- 5.5.21. To help our understanding of existing and future conditions on the highway network, the council commissioned baseline transport modelling work. The purpose of this work is to understand the current situation and identify potential transport challenges and opportunities that could help inform the plan-making process. This has been undertaken in conjunction with Kent County Council and utilises the Kent Transport Model. The initial modelling focussed on the existing baseline (as at 2019) and the future baseline of 2040, being the time horizon of the plan period. The future baseline modelled what would happen to the highway network without the Local Plan in place but with existing commitments (permissions) factored in.
- 5.5.22. The modelling identifies that the existing hotspot areas (2019-based), where there are concerns about junction performance and the capacity of the network, are located at these broad areas in the borough:
- A20 corridor in the Medway Gap urban area
  - A229, and M2, junction 3 in the Walderslade area

- M26 junction 2a with the A20 and A25, in the Addington and Wrotham area
- around Tonbridge Town Centre.

5.5.23. In terms of the future baseline (as at 2040) the same hotspots are identified, where significant increases in traffic is predicted. In addition, a hotspot area around Kings Hill is identified.

5.5.24. We need to be mindful of these outputs as plan-making progresses and how the spatial strategy can respond positively to the challenges presented. The next stage of the process will involve more detailed modelling, once further evidence has been gathered and feedback on the consultation on this Plan has been considered.

**Risks - not providing sufficient supporting transport infrastructure and promoting opportunities for sustainable active travel**

5.5.25. Not addressing known transport challenges could lead to a worsening of congestion and air quality, which has implications for local economic growth and quality of life including public health. A failure to shift towards sustainable transport modes also presents challenges for the design of new developments, where car use and inappropriate parking can dominate and lead to highway safety issues. Furthermore, not planning adequately for safe and attractive active travel opportunities, such as walking and cycling, will mean that opportunities to help benefit the health and well-being of residents will be lost.

5.5.26. Climate change ambitions could also not be achieved if low carbon transport options are not rapidly adopted in both existing and new communities.

**Key transport issues which the Local Plan can help to address**

- Bus - Provide funding to establish new bus services which can become commercially sustainable.
- Rail - Improve access to and facilities at local stations, especially for cycling, walking and disabled passengers.
- Cycling - Improve the availability of dedicated and segregated cycle routes across the borough.
- Walking – Improve the footpath network especially in rural locations where pavements may be inadequate and provide safe crossings.

- Roads - Provide additional road and junction capacity only where this is necessary.
- Parking – The provision of sufficient parking in residential developments and urban areas.

**Q.21. Do you agree with the key transport issues identified above? Yes/No Please explain**

**Where should transport investment be prioritised locally?**

- 5.5.27. We would like to understand where, in your view, transport investment should be prioritised, moving forward.
- 5.5.28. In question 22, please prioritise the transport issues by selecting three issues which matter the most to you.

**Q.22. Which transport issues matter the most to you?**

<b>Transport issue (alphabetical order)</b>	<b>Select (3 in total)</b>
<b>Bus services – linking developments to services and places</b>	
<b>Cycle routes – safe links between homes and schools, other service, places and public transport</b>	
<b>Pedestrian infrastructure – safe links between homes and schools, other services, places and public transport</b>	
<b>Rail – improving station access and links with cycling and walking routes</b>	
<b>Roads including junction improvements</b>	

**Q.23. What are your reasons for selecting these particular transport issues as priorities for the Local Plan (outline briefly)?**

**Q.24. Would you support the implementation of cycling and walking schemes where a reduction in road space including on-street parking may be required in some instances, to provide a network of high-quality urban cycle routes?**

## 5.6. Tonbridge – what are the issues?

### National

- 5.6.1. NPPF sets out the government’s policy on planning for town centres. This includes making sure that the Local Plan recognises town centres as the heart of their communities and that it contains policies that support their vitality and viability, allocate a range of suitable sites to meet the scale and type of development needed in the town centre and set policies that make clear which uses will be permitted in such locations.
- 5.6.2. Further guidance is provided in National Planning Practice Guidance (NPPG). This sets out the need for the Local Plan to contain a “strategic vision” for the town centre and a town centre strategy that should identify the town centre’s role, address the key issues facing the town centre and identify sites for town centre uses.
- 5.6.3. The NPPF stipulates that for town centres, a Local Plan must identify primary shopping areas and a wider town centre area that identifies suitable development sites to accommodate the development of appropriate town centre uses (i.e. retail, leisure, commercial, office, tourism, cultural, community and residential). The Local Plan will need to set policies that make clear which uses will be permitted in such locations.

### Local

- 5.6.4. Tonbridge is the principal town centre for the Borough and the primary focus for the development of town centre uses (retail, leisure, commercial, office, tourism, cultural and community). Venuescore (an annual survey compiled by Javelin Group, which ranks the UK's top 3,500+ retail venues), identifies Tonbridge as a regionally important town centre occupying a ‘middle’ market position classification - on a par with Maidstone, Crawley, Hastings and Ashford.
- 5.6.5. The town already benefits from outstanding assets that should be recognised and built on as the council and it’s partners including the Tonbridge Town Team, seek to support and promote new opportunities to support its regeneration and popularity.
- 5.6.6. These assets include:
- the quantity and quality of the natural environment in close proximity to the town centre, including the river as a leisure and tourist attraction

- green spaces such as the Racecourse Sports Ground and easy accessibility to the surrounding landscape and Haysden Country Park.
- heritage assets, including Tonbridge Castle.
- education facilities, including schools that often rank highly on national league tables and attract students and families as residents and commuters.
- leisure facilities which include Tonbridge Pool, the Angel Centre and Longmead Sports Ground which is home to the Tonbridge Angels football and cricket clubs.
- good public transport interchange facilities, providing rail connectivity to London and regional towns, and local bus services.

5.6.7. The town has challenges that include:

- physical barriers to connectivity and movement including the river and rail bridges.
- traffic on the high street and A26 Cannon Lane resulting in poor air and noise quality.
- the gradual loss of older office premises through the conversion of these premises, primarily to residential.
- the provision of sufficient affordable housing.
- improving access by non car modes including the delivery of high quality walking and cycling infrastructure.
- making better use of sites which are predominantly used for car parking and low rise buildings, adjacent to the station and at Sovereign Way, including the Sainsburys and Angel Centre site.

5.6.8. It is important to recognise the opportunities to change and enhance the town centre, and ensure that that the policy framework continues to support a strategic vision for the future and specific redevelopment and regeneration proposals.

5.6.9. There have been rapid changes to the retail environment in recent years. The council is considering undertaking further evidence base work including in relation to retail requirements to better understand the local impact and future needs. There may be some need for additional retail and leisure floorspace in the town centre, and understands the need to identify and allocate suitable sites in the Local

Plan within the town centre and on the edge of centre should such sites within the town centre not be available.

- 5.6.10. Due to a lack of available town centre sites, in recent years there has been an expansion of convenience and food retail through the change of use of existing edge of centre sites at Cannon Lane, including Marks & Spencer, Aldi and Iceland stores. Proposals to provide better pedestrian and cycle access to Cannon Lane via Town Lock will be included in the council's Active Travel Strategy.
- 5.6.11. In recent years, a number of major planning applications for developments outside of the town centre have come forward and been implemented. In line with the NPPF the Local Plan will seek to identify sites within the town centre and on the edge of the town centre for a mix of appropriate uses that complement and contribute to the vitality and viability of Tonbridge.
- 5.6.12. The increase in the residential town centre population creates need for additional community facilities and the council is seeking to address this with the relevant partners. Nationally, retail patterns have changed with online sales growth especially since the pandemic.
- 5.6.13. Tonbridge like other centres needs to continue to adapt and to provide a good visitor experience. e.g. ease of access by non-car modes, parking, ability to move around the town centre, a attractive environment, leisure opportunities and places to eat, drink and socialise.
- 5.6.14. The council owns and manages assets in Tonbridge town centre which include built facilities, parks and green spaces, as well as most of the surface level car parking. As a landowner the council is able to use these assets more effectively in collaboration with other landowners, including Great British Railways (formerly Network Rail) to maximise the development and regeneration potential of previously developed sites.
- 5.6.15. Given the development pressures upon the town and aspirations for sustainable options to be pursued, the Local Plan offers an opportunity to consider bespoke policies for the town centre area, or sub-areas within it, to provide a range of housing and mixed-use development opportunities. Complimentary parking and asset utilisation / optimisation studies could assist in defining available opportunities, this was a recommendation in the town centre asset review that a council commissioned (June 2022).



**Risks**

5.6.16. Not responding positively to the evolving role of the High Street and optimising potential for development in the wider urban area of Tonbridge puts at risk the future popularity of the town as a destination for retail as well as leisure and social activities.

**Future development options**

5.6.17. Moving forward, two broad options for the future development of Tonbridge have been appraised as part of the Sustainability Appraisal process (see Chapter 4 of the Interim Sustainability Appraisal Report). These are set out in question 25 (below).

5.6.18. These options set out different approaches to the density of development in the town and what the consequences are for the need for additional development land. We are mindful that making effective use of land in meeting the need for homes and jobs, including optimising the density of development within town centres and other locations well served by public transport, are key objectives of national planning policy<sup>21</sup>. To truly make effective use of land, it is likely that some existing uses of land will need to change or be reconfigured to facilitate development to address assessed needs. In the table, the term ‘optimise densities’ means making the best use of land, taking account of accessibility to local services and the prevailing density range of the local character area. This is explained in more detail in the Urban Capacity Study. In order to deliver appropriate densities it is important that making optimal use of the potential of each site fits in with the local character.

5.6.19. Please can you indicate your preferred option by placing an ‘X’ in the appropriate cell.

**Q.25. What is your preferred strategy option for Tonbridge?**

Strategy	Description	Consequence for the need for additional development land	Select preferred strategy
<b>Option 1</b>	Optimise densities on development sites within Tonbridge, particularly on those sites within the town centre, maximising their potential for residential and mixed-use development.	Minimise the need for the release of green field sites beyond the outer edge of Tonbridge, in the Green Belt, primarily for residential development.	

<sup>21</sup> NPPF (July 2021), section 11. Making effective use of land and para. 141 b)

Strategy	Description	Consequence for the need for additional development land	Select preferred strategy
<b>Option 2</b>	Conservative densities on development sites within Tonbridge, minimising the intensification of existing built-up areas for residential and mixed-use development.	Increase the need for the release of green field sites at and beyond the outer edge of Tonbridge, in the Green Belt, primarily for residential development.	

**Q.26. What are your reasons for selecting this particular strategy option for Tonbridge (outline briefly)?**

**Q.27. What should be the main role of Tonbridge Town Centre moving forward? Should the priority be for shopping or for leisure, social and cultural uses or a balance of these?**

**Q.28. Should the Local Plan include a more flexible policy framework for Tonbridge to allow the Town to respond to future market investment opportunities for a range of land uses and developments? Yes/No**

**Q.29. Do you have other thoughts about how planning policy should guide development in and around the town centre?**

## 5.7. Retail – what are the issues?

### National

- 5.7.1. The NPPF seeks to support the vitality of town centres and requires that “Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”<sup>22</sup>. This includes promoting their long-term vitality and viability by allowing them to grow and diversify, including through the provision of new housing and allocation of suitable retail sites.

### Local

- 5.7.2. Tonbridge and Malling has some well-established town and retail centres, which include Tonbridge, the district centres of West Malling, Snodland, Borough Green and Martin Square/Larkfield, and then further down the retail hierarchy other local centres, out of centre retail facilities and individual local shops within other more rural settlements. Each of these centres serve different catchment areas, and

<sup>22</sup> NPPF, section 7: Ensuring the vitality of town centres, para.86: <https://www.gov.uk/guidance/national-planning-policy-framework/7-ensuring-the-vitality-of-town-centres>

provide a mix of convenience and comparison goods retail, as set out in the table below.

**Table 6. Town and retail centres/retail hierarchy**

Centre	Location
Town Centre	Tonbridge
District Centres	Borough Green, Kings Hill, Martin Square/Larkfield, Snodland and West Malling
Tonbridge Urban Local Retail Centres	Martin Hardie Way York Parade
Medway Gap Urban Local Retail Centres	Twisden Road, East Malling Premier Parade, Aylesford Woodlands Parade, Ditton Little market Row, Leybourne
Rural Local Retail Centres	East Peckham Hadlow Hildenborough
New Local Retail Centres	Leybourne Grange Peters Village
Out-of-Centre Retail Facilities	Lunsford Park Quarry Wood, Aylesford Cannon Lane, Tonbridge
Individual Local Shops	Within existing rural service centres/settlements

- 5.7.3. The borough does not have any higher tier urban or edge of centre sites with a substantial sub-regional catchment, which are able to offer a broad range of comparison goods and department store retailers, such as neighbouring Tunbridge Wells, Maidstone and Bluewater. Therefore, residents in the borough tend to travel to these centres for higher order retail spending.
- 5.7.4. As with other sectors, national and local retailers have been impacted by the economic shocks of Brexit, the COVID-19 pandemic and instability arising from the war in Ukraine. The economic outlook remains uncertain with concern about inflation during 2022/23 and the impact this will have upon business costs and retail spending. Notwithstanding, at a borough level trading conditions are relatively positive and there is optimism that Tonbridge & Malling is well-placed to thrive going forwards.

- 5.7.5. Whilst our town and retail centres have been evolving for a number of years, the Covid-19 crisis has greatly accelerated these transformative changes. With an increased number of transactions online, our High Streets are no longer just ‘retail centres’, but will need to evolve into destinations where people go to get an ‘experience’, be it going to a park, having a coffee, visiting the gym or enjoying a meal out. Whilst some of this change is happening organically, it is important that the council continues to support change which makes these places attractive to support local communities and to visit.
- 5.7.6. The more limited representation of national multiple comparison goods stores in the borough has limited the local impact of restructuring from chain stores over the past decade. The shift to on-line spending has however been universally felt, especially for comparison goods. Food retail growth has been seen strongly in out of centre locations in recent years, in response to local housing and population growth.
- 5.7.7. Whilst the town and district centres at Tonbridge, West Malling, Snodland, Martin Square/Larkfield and Borough Green differ significantly in their spatial characteristics, local demographics, and catchment areas, they also present some similarities. Independent shops dominate across each of the centres, which is positive but can leave retail centres vulnerable to economic change as smaller, independent businesses do not usually have the financial reserves to withstand economic shocks. The presence of national supermarket chains is however growing in Larkfield and Kings Hill.
- 5.7.8. The town and district centres have a strong foundational offer, meeting many of the economic, social and civic needs of their local catchments; this has been extremely important to local social and economic well-being especially during the pandemic, where many were forced to live and work locally which has supported local retail spending. With now established mixed patterns of commuting and working from home the increase in local retail spending is likely to continue, thus supporting retail centres at all levels as consumers limit their travel and look for convenience. In the circumstances there is a generally low level of retail vacancy across the borough.
- 5.7.9. Regardless of the position in the retail hierarchy, permitted development rights rules introduced by government in recent years allow for greater flexibility between some commercial, business and service uses which fall within Class E of the use classes order, e.g. shops, hot food take-aways and betting shops, without

requiring planning permission. These changes also include the conversion of premises to residential development (up to 1,500 sqm) subject to prior approval i.e. planning permission is not required. The floorspace of most retail premises is below 1,500 sqm. These changes were introduced to primarily reuse vacant premises and boost housing supply across the country but will inevitably change the character of our high streets if they are utilised to any significant extent.

- 5.7.10. Many properties within Class E of the Use Classes Order will be able to change to residential without consideration of the impact on established retail areas, if the premises are outside of a conservation area whilst limited consideration is required if situated within a conservation area, listed buildings are exempt. The council, therefore, now has less planning control over future changes of use within existing premises.
- 5.7.11. In preparing the new Local Plan, Tonbridge and Malling Borough Council is considering commissioning of further evidence including retail needs assessment, this has yet to be completed.
- 5.7.12. The differences in the nature of the retail locations identified in the retail hierarchy means that the Local Plan needs to provide flexibility to support the challenges and opportunities faced by each of these. Alongside the business support activities of the council, the aim where possible is to support retail spending, business retention, growth and therefore resilience in the long-term, through the provision of appropriate Local Plan policies.
- 5.7.13. The council will continue to welcome investment in retail uses across its defined centres and other rural service centres and adopt a flexible approach in seeking to maintain and enhance the role of these locations. The council will encourage related developments and change of use applications, so long as these are appropriate in planning terms. This is the approach that the council has adopted in recent years, in granting planning consent for new development and change of use of district and edge of centre sites, for convenience retail uses at, Cannon Lane - Tonbridge, Hermitage Lane - Aylesford, Alexander Grove - Kings Hill (Aldi Stores) and at London Road - Ditton (Lidl).

#### **Risks**

- 5.7.14. Not responding to growth and changing retail requirements could lead to a decline in the attractiveness of the borough's retail centres. In particular a lack of appropriate convenience store provision especially for local residents and those

working in the borough, and therefore a loss of consumer spending to retail centres outside of the borough. This puts at risk the sustainability and growth of local retail businesses and related employment.

**Key retail issues which the Local Plan can help to address:**

- Positively support change which supports the role of the borough’s retail centres and rural service centres, making them attractive places to visit.
- Provide policy flexibility to support the challenges and opportunities faced by each retail centre and the rural service locations.
- Consider how land can be allocated for retail and mixed-use development to meet identified needs.

**Q.30. Do you agree with the key retail issues identified above? Yes/No Please explain**

**Q.31. Is there anything more that the council could do to make the borough’s retail centres more attractive and successful? Yes/No Please explain**

## **5.8. Community facilities and infrastructure – what are the issues?**

### **National**

5.8.1. The provision and delivery of community facilities and infrastructure is vital for the achievement of sustainable communities. It is important as part of our Local Plan that we understand the needs arising from new development so that we can effectively plan for them. In Tonbridge and Malling, the key priorities are ensuring that the right infrastructure is provided in the right place, in a timely manner to support thriving communities and places.

5.8.2. Infrastructure planning is concerned with identifying and planning for future requirements. Whilst there is no definition within the National Planning Policy Framework (NPPF, updated July 2021), the Planning Act 2008 Section 216 (2) defines infrastructure as:

- roads and other transport facilities,
- flood defences,
- schools and other educational facilities,
- medical facilities,

- sporting and recreational facilities
- open spaces, and
- affordable housing

5.8.3. For the purposes of the Local Plan we will be defining infrastructure as above, with the additional inclusion of public services and utility infrastructure. Transport is dealt within Section 5.5 above. The NPPF states at paragraph 11 that plans should align growth and infrastructure, and within paragraph 16 (c) that plans should be shaped by early, proportionate and effective engagement, including with infrastructure providers.

5.8.4. The NPPF at paragraph 34 also states that Local Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management and green infrastructure). However, such policy requirements should not undermine the deliverability of the Plan, which means that requirements need to be proportionate to development to ensure that development can take place.

5.8.5. Paragraph 84 of the NPPF states that planning policies and decisions should support the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship. Section 5.7 above deals with providing appropriate retail provision within the borough's identified retail centres and rural service locations, however to meet the everyday needs of the borough's communities, including in the rural service centres, a wider definition of supporting infrastructure may need to be applied to ensure meeting spaces, public houses and other valued community services and functions.

#### **Local**

5.8.6. The council is required to plan positively to ensure that development and infrastructure needs are met, and that there is a reasonable prospect that planned infrastructure is deliverable in a timely manner. As part of our evidence base, the council is preparing an updated Infrastructure Delivery Plan (IDP), in liaison with various providers, companies and groups. This is a vital piece of work because there are significant risks associated with failure to adequately plan for infrastructure to support communities. If we don't take the time to understand the existing capacity or demand for services, to understand details of existing committed infrastructure

delivery, or the impact of potential development on services and infrastructure, we cannot plan positively for our borough and positively plan for the locations of new developments.

- 5.8.7. The updated IDP will further set out what will be needed and where, the lead delivery body/bodies, delivery timescale, cost and source of funding, where this information is available. For example, the requirement for a new 6 Form-Entry (FE) secondary school in the north-east of the borough, identified in the previous IDP is likely to remain in response to our development needs and the current level of provision.
- 5.8.8. Healthy, safe and prosperous communities are key for the vision of the borough, supported by the right infrastructure in the right places. Early consideration of equalities issues in relation to the provision and access to services is also vital to securing the health of the borough’s urban and rural communities. Future policy approaches relating to the provision of infrastructure and services should respond positively to location specific factors. To assist in identifying and providing for sport and social infrastructure requirements across the borough’s communities, the council is currently considering further evidence base work in relation to requirements for open space, and indoor sports and recreation facilities.
- 5.8.9. The council seeks funding for infrastructure where required for individual developments through Section 106 agreements (also known as planning obligations). New developments are expected to meet their needs generated either through this means or by delivery on site. The council is mindful of the Government’s intention to introduce a new mandatory infrastructure levy to replace the existing Community Infrastructure Levy to help deliver local infrastructure. This will be monitored as plan-making progresses and the council will respond when necessary.
- 5.8.10. The duty for statutory agencies and infrastructure providers to meet their obligations through their own funding sources and investment plans remains.

**Key priorities for the Local Plan:**

- Identifying the required infrastructure to support the scale and locations for growth within the Borough
- Aligning infrastructure provision in line with this growth
- Maintaining and enhancing the existing provision of infrastructure that communities rely upon



**Q.32. Do you agree with this set of community facilities and infrastructure priorities? Yes/No Please explain**

## **5.9. Natural environment – what are the issues?**

### **National**

- 5.9.1. The protection and enhancement of the natural environment is a key aspect of sustainable development. This includes making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change.

### **National – designated sites and protected landscapes**

- 5.9.2. Sites designated for their biological or geological value, support a diverse range of habitats and species. These sites, along with valued landscapes such as National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB) and the wider countryside, contribute to a network of green infrastructure which can help provide for biodiversity and support the health and well-being of communities, as well as delivering wider benefits to the environment and economy.
- 5.9.3. The NPPF makes provision for the designation of Local Green Spaces through local and neighbourhood plans, as a way of providing special protection for green areas of particular importance to local communities, where certain criteria<sup>23</sup> are met.
- 5.9.4. The NPPF states that local planning authorities should protect and enhance valued landscapes, sites of biodiversity or geological value or soils, that plans should distinguish between the hierarchy of international, national and locally designated sites, and allocate land with the least environmental or amenity value for development. The scale and extent of development within protected landscapes should be limited, whilst development in their setting should be sensitively located and designed.

### **National – Biodiversity Net Gain**

- 5.9.5. The NPPF also seeks measurable net gains for biodiversity. The Environment Act (2021), has subsequently introduced the specific requirement to provide 10% net

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<sup>23</sup> NPPF 2021, Para 102: The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land

gain in biodiversity for all new developments from late 2023 in response to the government’s goal to leave the environment in England in a better state than it is found over the next 25 years.

**National - pollution**

- 5.9.6. Another key aspect of the natural environment is ground conditions and pollution. The NPPF states that local planning authorities should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.

**Local**

- 5.9.7. The council is required to plan positively to ensure that natural environment is conserved and enhanced. Within the borough there are a range of important designated areas, including international, national and local designations. These are set out below in table 7 and illustrated on the Key Diagram (see Appendix A). The development strategy of the borough, and individual allocations, need to ensure conservation and enhancement of these sites, both from individual developments and cumulative impacts.

**Local - Habitats Regulations Assessment**

- 5.9.8. In accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), a Habitat Regulations Assessment Screening will be undertaken and the appropriate nature conservation body (Natural England) will be consulted. The Screening Report will identify whether the Local Plan risks having any potential significant effects on a European site<sup>24</sup> on its own or in combination with other plans or projects, both within the borough, and in neighbouring boroughs. If a risk of a likely significant effect on a European site is identified, or there is insufficient evidence to rule out a risk, then an Appropriate Assessment will also be undertaken.

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<sup>24</sup> Special Area of Conservation (SAC), Special Protection Area (SPA), proposed SAC/SPA, Ramsar sites or areas secured as sites compensating for damage to a European site

**Table 7. Designated Sites in the Borough**

Hierarchy	Designation	Site
<b>International</b>	Special Area of Conservation (SAC)	North Downs Woodland Peters Pit
<b>National</b>	Site of Special Scientific Interest (SSSI)	Wouldham to Detling Escarpment (part) Peters Pit, Wouldham Holborough to Burham Marshes Houlder to Monarch Hill Pits, Upper Halling Halling to Trottiscliffe Escarpment (part) Trottiscliffe Meadows Oldbury and Seal Chart (part) Bourne Alder Carr One Tree Hill and Bitchet Common (part) Ayelsford Pit Wateringbury
<b>Local</b>	Local Wildlife Sites	42 sites
	Local Nature Reserve	2 sites (Ditton Court Quarry Nature Reserve and Haysden Nature Reserve)

**Local - Areas of Outstanding Natural Beauty**

5.9.9. In addition to these sites, there are parts of two AONBs in the borough; the Kent Downs AONB in the north and west and High Weald AONB south of Tonbridge. These are illustrated on the Key Diagram (see Appendix A). Combined, the two AONBs cover 29.84% of the borough. The adopted Kent Downs AONB Management Plan 2021-2026, and the High Weald AONB Management Plan 2019-2024, form part of the evidence base for the Local Plan as they identify the key issues, opportunities and threats facing these landscapes and set out aims and principles for their positive conservation and enhancement. The topography of the North Downs and Bidborough Ridge means that there are views both into and out of the AONBs from the borough. The sensitive location and design of development is paramount to avoid or mitigate any impacts on the AONBs and their settings. The council is considering commissioning evidence to better understand the potential landscape impact of possible future strategic scale allocations, and to inform site specific policies.

**Local - Ancient Woodland**

- 5.9.10. The Ancient Woodland Inventory identifies that approximately 11% of the borough is ancient woodland. Development resulting in the loss or deterioration of irreplaceable habitats, such as ancient woodland and ancient and veteran trees, should be avoided. Therefore, the location and distribution of this irreplaceable habitat is an important consideration for the development strategy and individual allocations.

**Local - Local Green Space**

- 5.9.11. Local Green Space can be designated in a Local Plan or Neighbourhood Plan where the objectives of the NPPF are met, where such a designation has been promoted by the local community and will be consistent with planning for sustainable development in the area. The Local Green Space Designation should not be used in a way that undermines this aim of plan making. The Local Plan process provides an opportunity to consider potential designations of Local Green Space in the borough.

**Local - Habitats, Species and Biodiversity Net Gain**

- 5.9.12. The Kent Habitat Survey<sup>25</sup> (2012) provides data on the location and distribution of habitats across the county, including priority habitats, which should be conserved, restored and enhanced. The Kent Nature Partnership Biodiversity Strategy 2020 to 2045<sup>26</sup> identifies that Kent is home to 36 priority habitats and 387 priority species. The Kent Local Nature Partnership (KLNP) has identified a number of Biodiversity Opportunity Areas (BOAs) across the county where biodiversity enhancements, restoration or creation could be targeted in order to reinforce habitat connectivity, to improve resilience to climate change and secure measurable net gain for biodiversity.
- 5.9.13. The Environment Act (2021) has introduced the requirement to provide a minimum 10% net gain in biodiversity for all new developments from late 2023; however local authorities are able to consider a higher target if it is viable to do so in order to provide even greater gains. The Kent Local Nature Partnership (KLNP) promotes the adoption of a 20% net gain target in Kent, and the Viability Assessment of

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<sup>25</sup> [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0007/95317/Kent-land-cover-change-analysis-1961-2008.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0007/95317/Kent-land-cover-change-analysis-1961-2008.pdf)

<sup>26</sup> <https://democracy.kent.gov.uk/documents/s96710/20-00025%20-%20Kent%20Biodiversity%20Strategy%20March%202020.pdf#:~:text=The%20Kent%20Biodiversity%20Strategy%20aims%20to%20deliver%2C%20over,and%20marine%20environments%20regain%20and%20retain%20good%20health.>

Biodiversity Net Gain in Kent (June 2022<sup>27</sup>) identifies that a shift from 10% to 15% or 20% BNG will not materially affect viability in most instances within county. Focussing these net gains on development sites themselves rather than off-site wherever possible, will help support biodiversity within the borough. In addition to biodiversity net gain associated with new development, other specific sites within the borough can be identified where biodiversity enhancements can be provided directly to support species and habitat networks, including the potential for the council, on its own land or in partnership with landowners, to deliver net gain.

#### **Local - Agricultural land**

- 5.9.14. Tonbridge and Malling borough is predominantly rural in character and has large areas of land outside of the settlements in agricultural use. The Agricultural Land Classification Grades, published by Natural England and most recently updated in 2020, identifies that most of the agricultural land in the borough is classified as Grade 3: ‘Good to Moderate’. However, there are also some areas of Grade 2: ‘Very Good’ with areas of Grade 1: ‘Excellent’ agricultural land predominantly around West Malling and Waterringbury (as illustrated on the Key Diagram in Appendix A). The Local Plan should seek to avoid allocating sites or development on land, that would result in significant development of high-quality agricultural land.

#### **Local - Pollution**

- 5.9.15. To ensure that new development is appropriate for its location, it is important to consider the likely effects of pollution on health, living conditions and the natural environment. This includes air, light and noise pollution. Potential land instability and contamination also need to be taken in to account.
- 5.9.16. Air pollution is associated with a number of adverse health impacts, as well as having potential impacts on sensitive habitats and species in close proximity. The main source of air pollution generated in Tonbridge & Malling is NO<sub>2</sub> from road traffic. The Tonbridge and Malling 2020 Air Quality Annual Status Report<sup>28</sup> which looks at NO<sub>2</sub> levels in 2019 identified seven Air Quality Management Areas (AQMAs) in the Borough, all related to emissions from motor vehicle exhausts. All AQMAs are monitored annually, and in late 2020, based on pre pandemic levels the council revoked the Ditton AQMA and reduced AQMA boundaries for Larkfield, Aylesford and Borough Green due to improving air quality. The council has also published its 2021 Annual Status report, however due to the impact of pandemic

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<sup>27</sup> <https://kentnature.org.uk/nature-recovery/biodiversity-net-gain/>

<sup>28</sup> <https://www.tmbc.gov.uk/downloads/file/135/air-quality-report-2020>

lockdowns on road traffic it is advised that this report and that for 2022 when it is published are treated as outliers and not used as the basis for air quality assessments for new developments.

- 5.9.17. In late 2021 the council's updated Air Quality Action Plan<sup>29</sup> was approved by members. This plan will guide the council's actions on improving air quality for the next five years, and includes actions associated with the planning regime.
- 5.9.18. The Local Plan should seek to avoid wherever possible locating development in areas of poor air quality and should explore opportunities to improve air quality or mitigate impacts, such as through traffic and travel management, and green infrastructure provision and enhancement. The potential impact of air pollution on international wildlife sites (Special Areas of Conservation, Special Protection Areas and Ramsar sites) will be considered through a Habitats Regulations Assessment to be carried out during the preparation of the Local Plan.
- 5.9.19. The rich history of the borough often means that development sites require assessment for Contaminated Land due to historical use, in order to ensure the risks to health of future residents are minimised. The council has developed a Contaminated Land Inspection Strategy<sup>30</sup> to aid in this process and ensure suitable mitigation is achieved on development sites.

**Risks – not planning positively to protect and enhance the natural environment**

- 5.9.20. By not planning positively to protect and enhance the natural environment, by not seeking to locate development in areas of least environmental or amenity value, existing natural environment assets are likely to come under pressure. Habitats and species within designated sites may deteriorate due to potential impacts from increased pollution, recreation, and predation, or become fragmented. This in turn may reduce the ability of local habitat networks to be able to adapt to climate change, which may result in a loss of species. In addition, development of Grade 1 Agricultural Land will result in the loss of the most valuable soils that currently provide multifunctional benefits to the local and wider community and economy.
- 5.9.21. Locating development on land outside of the AONBs will help to conserve and enhance these protected landscapes. However there is potential both, individually and cumulatively, to negatively impact on the setting of these areas and this in turn

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<sup>29</sup> <https://www.tmbc.gov.uk/downloads/file/2052/air-quality-action-plan>

<sup>30</sup> <https://www.tmbc.gov.uk/downloads/file/1578/tmbc-contaminated-land-strategy-2016-final>

could impact on the designated areas themselves. The sensitive location, scale and design of development is essential to avoid or mitigate any impacts.

- 5.9.22. Seeking a higher target for Biodiversity Net Gain will need to be viability tested to ensure the delivery of a higher target does not put at risk the delivery of other local standards in the Local Plan e.g. affordable housing, open space etc.
- 5.9.23. Understanding the location of areas of existing poor air quality will enable new development to be directed away from such locations. However, development may increase traffic on the road network in other parts of the borough, potentially resulting in deterioration of air quality elsewhere. This in turn may result in the creation of new AQMAs.

**Q.33. Should Local Green Space be designated in the Local Plan? Yes/No**

**Q.34. If yes, do any potential sites meet all of the criteria set out in NPPF?**

**Q.35. Should the council be seeking more than 10% Biodiversity Net Gain, if viable? Yes/No**

**Q.36. Should the council allocate sites specifically for Biodiversity Net Gain within the Local Plan? Yes/No**

## **5.10. Built and Historic environment – what are the issues?**

### **National**

- 5.10.1. National planning policy is clear that the protection and enhancement of our built and historic environment is fundamental to the achievement of sustainable development and is embedded within the overarching objectives of the planning system (chapter 2, Paragraph 8 (c) of the NPPF). The importance of the built and historic environment is further strengthened in chapter 3 of the NPPF which requires Local Plans to contain strategic policies that (amongst other material planning issues) make sufficient provision for the conservation and enhancement of the built and historic environment.
- 5.10.2. National policy (chapter 12 of the NPPF) also requires the creation of high quality, beautiful and sustainable buildings and places which are fundamental to what the planning and development process should achieve. Good design creates better places to live and work and helps make development acceptable to communities.

Therefore, national policy requires Local Plans to set out a clear vision and expectations about what is likely to be acceptable.

**National – Design guides**

- 5.10.3. To achieve this and provide maximum clarity about the built environment, national policy in the NPPF requires Local Planning Authorities to prepare design guides or codes consistent with the principles of the National Design Guide and National Model Design Code which reflect local character and design preferences. It is the intention of the council to produce a Design Guide/Code that will sit alongside the Local Plan to inform future decision-making regarding design and visual impact issues.
- 5.10.4. Design guides or codes should be informed by the 10 characteristics of good places set out in the National Design Guide and in doing so, take account of baseline studies such as Conservation Area Appraisals (CAA). Therefore, when producing a design guide or code for a particular area an existing Conservation Area Appraisal and/or management plan should be taken into consideration and feed into the relevant part of the guide/code. Equally, in the event of reviewing or drafting a new Conservation Area Appraisal, a design guide or code can provide valuable information on the character and appearance of the area as well as any management recommendations that may form part of the review or new Conservation Area Appraisal.
- 5.10.5. By using design guides/codes and good policies, developments should therefore function well, be visually attractive and sympathetic to local character and history including the surrounding built environment and landscape setting. Developments should also establish or maintain a sense of place, optimise the potential of the site and create places that are safe, inclusive and accessible and promote health and well-being with a good standard of amenity.

**National – Historic environment**

- 5.10.6. The historic environment and heritage assets are also integral to our built environment. Chapter 16 of the NPPF sets out national policy on conserving and enhancing the historic environment. Heritage assets are considered to be an irreplaceable resource which should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.



- 5.10.7. The NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay, or other threats. The NPPF also requires Local Planning Authorities to maintain or have access to a historic environment record about the heritage assets in their area. The Kent Historic Environment Record (Kent HERS) held by Kent County Council fulfils this role within the county.
- 5.10.8. In addition to the national requirements of the NPPF, when determining planning and listed building consent applications the council is also placed under a legal duty by Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building or its setting and any features of architectural and historic interest as well as pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas when exercising its planning functions.

#### **Local – built and rural environment**

- 5.10.9. The borough of Tonbridge and Malling has a rich and diverse urban and rural environment containing many established and attractive places and buildings with distinctive architecture worthy of protection and enhancement. Such examples are the vibrant and modern garden village settlement of Kings Hill built on a former WW II airfield that provides a high quality environment for homes and businesses, the unique Grade I listed Victorian Gothic Hadlow Tower locally known as “May’s Folly” and the numerous traditional oast houses of the historic hop industry, built of Kentish vernacular design and materials.
- 5.10.10. The council therefore aspires to achieve high quality design throughout the borough that responds positively to its built environment as well as encouraging innovative, modern and contemporary design. As a borough that is predominantly rural in character, to achieve well designed places, developments should also respond positively to the borough’s landscape characters and settings as informed by the Landscape Assessment of Kent (2004). Development proposals which therefore fail to take opportunities to secure high-quality well-designed places will be resisted.
- 5.10.11. Currently, when assessing the appropriateness of design the council is informed by the Kent Design Guide and a suite of Character Area Appraisals as well as the Kent Downs AONB Management Plan 2021-2026<sup>31</sup> and the High Weald AONB Management Plan 2019-2024<sup>32</sup> that are all adopted supplementary planning

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<sup>31</sup> <https://kentdowns.org.uk/management-plan-2021-2026/>

<sup>32</sup> <https://www.highweald.org/high-weald-aonb-management-plan.html>

documents. The council will look to replace the Kent Design Guide and Character Area Appraisals with up-to-date local design guides and codes that are tailored to the distinctiveness of Tonbridge and Malling Borough that are consistent with the principles set out in the National Design Guide<sup>33</sup> and National Model Design Code<sup>34</sup>. This work would take place after the adoption of a Local Plan.

5.10.12. In addition, to set the foundations of well-designed places the development strategy will also be informed by other core pieces of evidence such as the Urban Capacity Study, Strategic Flood Risk Assessment and Heritage Strategy. These will ensure developments are located in sustainable locations, make efficient use of land and visually respond to the borough’s differing environments.

**Local design – what matters to you**

5.10.13. We would like to understand what your priorities are when it comes to managing the built environment and what you value the most in new developments. Question 37 (below) highlights the range of potential matters that design policies and decisions should address.

5.10.14. We appreciate that not all matters are equally important to everyone. We would like to understand what matters most to you, in terms of the focus of this Local Plan.

5.10.15. In question 37, can you please select three design matters that are most important to you. We do not expect you to rank these in order of importance. Please indicate the three most important issues by placing an X against each design matter in the table below.

**Q.37. Which design matters are most important to you?**

Design matter (in no particular order)	Select (3 in total)
Developments that will function well and add to the overall quality of the area for the lifetime of the development	
Developments that are visually attractive	
Developments that are sympathetic to local character, history and landscape settings	

<sup>33</sup> <https://www.gov.uk/government/publications/national-design-guide>

<sup>34</sup> <https://www.gov.uk/government/publications/national-model-design-code>

Design matter (in no particular order)	Select (3 in total)
Developments that establish a strong sense of place and identity	
Developments that optimise appropriate density and scales	
Developments that create safe, inclusive and accessible places that promote health, well-being and have good facilities	
All are equally important	

**Q.38. What are your reasons for selecting these particular design matters as priorities for the Local Plan (outline briefly)?**

**Local – Historic environment**

5.10.16. The borough also has a rich history which extends back thousands of years with evidence of life in the stone age, bronze age and iron age. The borough, formed in 1974 has a wide range and considerable number of heritage assets including:

- 61 Conservation Areas
- 1318 Listed Buildings
- 25 Scheduled Monuments
- 23 Historic Parks and Gardens (5 of which are registered)
- 12547 ha of archaeological potential areas

5.10.17. Examples of historically significant heritage assets include the Kits Coty House in Aylesford and the Coldrum Stones in Trottiscliffe both of which are Neolithic Monuments. Other notable assets include, Tonbridge Castle -a Motte-and-Bailey Castle (c.13C), Tonbridge School (c.1553), the Aylesford Bridge spanning across the River Medway (c.14C) and St Leonard’s Tower in West Malling (c. 11C). In addition to historic buildings, the borough is also characterised by its impressive array of registered parks and gardens such as Oxen Hoath (grade II\*) and historic market towns such as West Malling that are all set within picturesque landscapes.

5.10.18. The borough’s rich history has also been characterised by its various industries such as hop production and agriculture and is heavily influenced by the River Medway that brought huge opportunities for trade and prosperity and played a major role in

shaping the development of the borough and its identity. The borough’s military history should also be recognised whereby the RAF fighter stations at West Malling played a significant role in the Battle of Britain with one of the defensive towers and gun emplacements is now a scheduled monument.

**5.10.19.** The preparation of the Local Plan provides an excellent opportunity to review the evidence base for the historic environment and deepen the understanding and appreciation for the borough’s assets. The council intends to do this through the preparation of a Heritage Strategy that will set out a positive strategy for the conservation and enjoyment of the historic environment and aids the inclusion of the borough’s heritage within the Local Plan. This will serve as a principal piece of evidence for the Local Plan to inform potential policies, strategies and other pieces of evidence.

**Risks – not planning positively to conserve and enhance the built and historic environment**

5.10.20. The result of not planning positively for our built and historic environment would be visually unattractive and incongruous developments lacking in a sense of place and identity. It would result in a loss of desirable and prosperous places to live, work and visit as well as opportunities to regenerate parts of the borough.

5.10.21. There would be the risk that places are not inclusive and accessible and therefore fail to promote health and well-being. There are also risks that developments do not deter crime and disorder and fail to create safe and resilient communities. Poor quality developments and a lack of management would also mean our built and historic environment would be less resilient to the effects of climate change.

5.10.22. The failure to not properly plan for the built and historic environment would also result in lost opportunities to contribute towards tourism and economic development as well as the cultural and social cohesion within communities.

5.10.23. Currently, Historic England’s Heritage at risk register identifies only four heritage assets to be at risk within the borough. By not producing a positive strategy for heritage assets potential management strategies would not be identified, the condition of these and other heritage assets would continue to deteriorate, and future generations will not be able to enjoy these irreplaceable assets.

**Q.39. Are there any other locally significant built, historic issues or sites which you consider are important to the borough and should be addressed in the Local Plan? Yes/No Please explain**

## 5.11. Green Belt – what are the issues?

### **National - openness**

- 5.11.1. The NPPF is very clear that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open.

### **National – review of boundaries through the Local Plan process**

- 5.11.2. The policy allows for Green Belt boundaries to be reviewed through the updating of plans. Alterations can be made in exceptional circumstances where evidenced and justified. It is for the Local Plan process to establish the need for any changes. The expectation is that all other reasonable options for meeting assessed needs for development are examined first before concluding that exceptional circumstances exist to justify any changes. Pieces of evidence and processes that can inform this include the Urban Capacity Study, the outputs from the Call-for-Sites assessment, discussions with neighbouring authorities and feedback from consultations on the Plan.

### **National – consequences for sustainable patterns of development**

- 5.11.3. The need to promote sustainable patterns of development should inform the review process. This means we need to be mindful of the potential consequences for sustainable development of channelling development towards locations beyond the outer Green Belt boundary away from centres of work, education and shopping. This would have the consequence of generating new, long trips by unsustainable transport modes as residents go about their daily business. The evidence on the Housing Market Areas and their influences across the borough will help inform these judgements. We also need to be confident that at the end of the process, the outcomes can endure for the long-term.

### **Local – Green Belt coverage**

- 5.11.4. Over 70% of Tonbridge & Malling is covered by the Metropolitan Green Belt surrounding London – see key diagram in Appendix A to this Plan.

### **Local – exceptional circumstances case (strategic) for change**

- 5.11.5. In response to national policy, the council has commissioned a [Green Belt Study](#). This will review the existing Green Belt boundaries according to the expectations of the NPPF and the supporting planning practice guidance as well as local evidence. The first part of the study has assessed the exceptional circumstances case, at the strategic level, taking account of national policy, case law and local evidence. The first stage (strategic case) has concluded that there are exceptional circumstances,

at the strategic level, which justify alterations of the Green Belt boundaries (in principle) to help address assessed development needs. This conclusion was based upon the following evidence:

- A high housing demand and acute affordability challenges
- An undersupply of housing which appears to be worsening
- A borough heavily constrained by policy and environmental constraints
- Limited opportunity to accommodate its needs within existing built-up areas
- Limited ability to export housing need to neighbouring authorities.

**Local – evidence to inform review of boundaries**

5.11.6. We need to be mindful of local evidence including Housing Market Areas (HMAs) and housing affordability when reviewing the existing Green Belt boundaries. For example, that part of the borough falling within the West Kent HMA (see housing section) is covered by the Green Belt, except for the defined settlements set within it, eg Tonbridge. Given that the HMA is a geographical area where there is a high degree of containment of people in terms of where they live and work, we need to consider the consequences for sustainable patterns of development of not delivering homes where the needs are generated; these consequences are likely to include the generation of new, long, and regular trips by unsustainable modes of transport as residents go about their daily business. We know that housing affordability is already bad and worsening which is a clear indicator that supply is not keeping up with demand. We need to be mindful of the negative consequences of constraining supply for affordability, and what this means for households trying to access, as well as move up, the property ladder.

5.11.7. This section highlights a set of factors that need to be taken into account when reviewing the existing Green Belt boundaries to determine if exceptional circumstances exist to justify local alterations. These are:

- National policy (purposes of the designation and the need to promote sustainable patterns of development)
- case law
- Housing Market Areas
- housing affordability

- policy and environmental constraints
- assessed development needs
- housing supply
- potential for development in the built-up areas (Urban Capacity Study).

5.11.8. We would like to understand if you agree with this set of factors and whether any have been omitted that are relevant to this review process.

**Q.40. Do you agree that there are exceptional circumstances, at the strategic level, for altering Green Belt boundaries (in principle) to help address assessed development needs? Yes/No Please explain**

**Q.41. Do you agree with that the set of factors listed in para. 5.11.7 should be used to determine if exceptional circumstances exist to justify alterations to Green Belt boundaries? Yes/No. If no, please explain, highlighting additional/alternative factors that you consider need to be included in the review process.**

**Local – area immediately beyond the outer boundary**

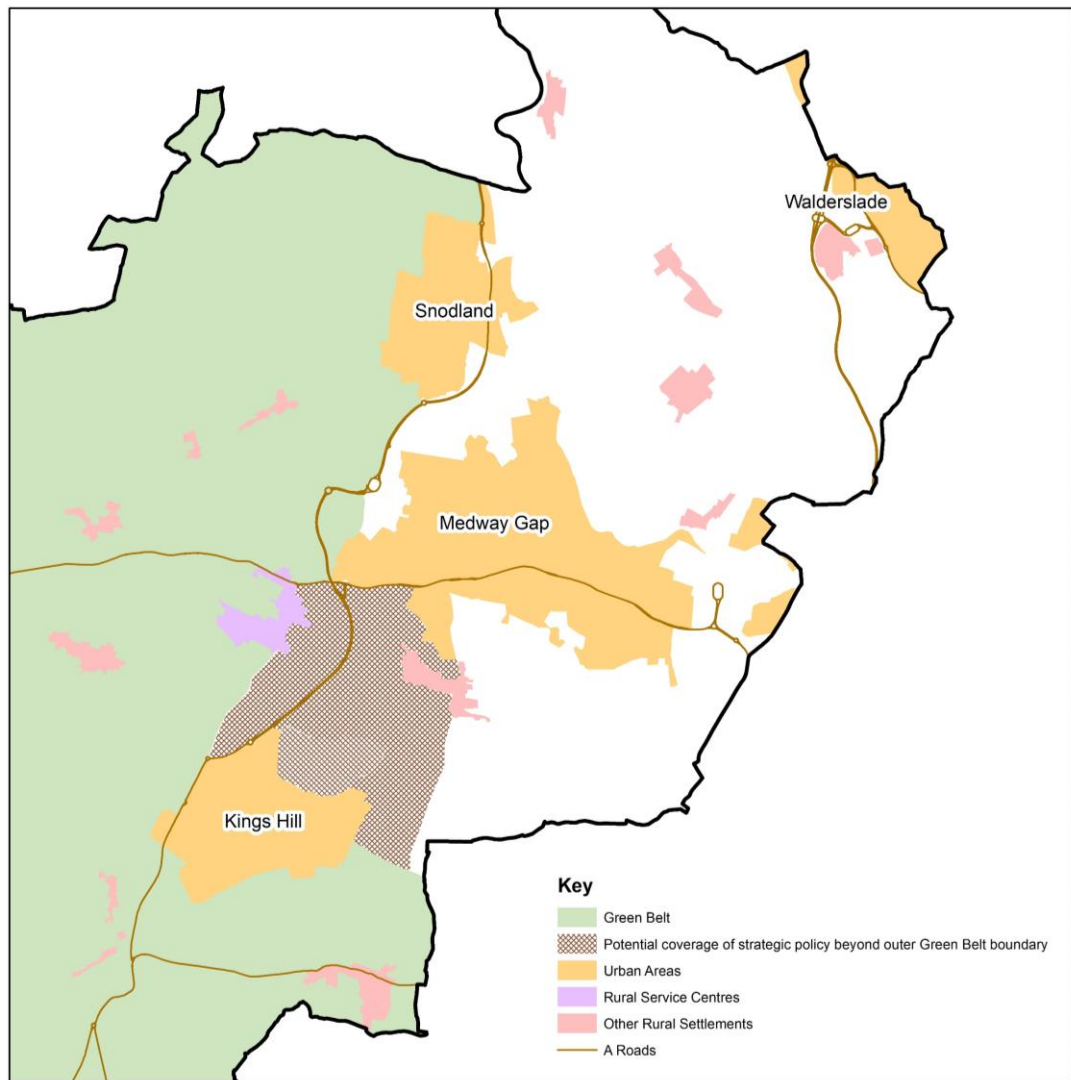
5.11.9. As part of the review we need to consider the outer boundary of the Green Belt in the north-east part of the borough. In particular, the character of the area beyond the outer boundary in terms of the defined rural settlements and historic and natural assets. The process needs to consider the most effective way of preventing the coalescence of these settlements and preserving the setting of historic places such as St Mary’s Abbey, in the context of the development pressures arising from the assessed needs.

5.11.10. As well as reviewing the alignment of the outer Green Belt boundary, we also need to explore and appraise other reasonable alternative policy options. For example, a strategic policy aimed at protecting the clear separation, and therefore identity, of local settlements, also known as an anti-coalescence policy. This consideration of alternatives is necessary to determine what is the most justified, proportionate and robust response, that can endure for the long-term.

5.11.11. These options are set out in question 42 below. The location of the outer Green Belt boundary is highlighted on the Key Diagram in Appendix A to this Plan and in Figure 10.

5.11.12. These three options have been appraised as part of the Sustainability Appraisal process (see Chapter 4 of the Interim Sustainability Appraisal Report). Figure 10 illustrates, in indicative terms, the broad area beyond the outer Green Belt boundary where the strategic policy could be applied.

**Figure 10. Broad area for potential strategic policy beyond the outer Green Belt boundary**



5.11.13. In question 42, can you please indicate your preferred strategic policy option for the area beyond the outer Green Belt boundary.

**Q.42. Area beyond outer Green Belt boundary – strategic options**

Strategy	Description	Preferred option – please select
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<b>Option 1</b>	Extend the outer boundary of the Green Belt	
<b>Option 2</b>	Anti-coalescence/strategic gap policy	
<b>Option 3</b>	No change – leave existing outer Green Belt boundary unaltered.	

**Q.43. What are your reasons for selecting this policy option for the area beyond the outer Green Belt boundary (outline briefly)?**

**Risks – not positively assessing existing Green Belt boundaries against the purposes the designation serves**

5.11.14. If we do not undertake a comprehensive review and take decisions that respond to the evidence, national policy and case law, there could be negative consequences for sustainable development, especially if the homes are not provided where the needs are generated. Furthermore, constraining supply will have the effect of worsening housing affordability, making it increasingly challenging for young households to access the property ladder. We also need to be mindful that extending the outer Green Belt boundary would reduce the amount of unconstrained land available to address our assessed development needs now and in the long-term. The NPPF is clear that any changes to Green Belt boundaries must have regard to their intended permanence in the long-term, so that they can endure beyond the plan period<sup>35</sup>.

**5.12. Climate change – what are the issues?**

**National – mitigation and adaptation**

5.12.1. At the national level, one of the key priorities is the lowering of carbon emissions from developments, to help achieve wider climate change mitigation objectives including the UK’s commitment of net zero carbon by 2050. This means supporting development that uses significantly less fuel and power to function including harnessing energy from zero carbon sources, and where possible making best use of existing resources, including the reuse of buildings and materials, to reduce the reliance on new materials which can embody significant carbon through their production. The NPPF also promotes planning for adaptation, in respect of flood risk, biodiversity and water supply, to build in resilience and avoid increased

<sup>35</sup> [National Planning Policy Framework - 13. Protecting Green Belt land - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework)

vulnerability to property and people. The expectation is that plans should take a proactive approach to addressing these matters.

**National – lowering carbon emissions**

5.12.2. The Government has taken positive steps this year to help achieve the objective of lowering carbon emissions from developments. On 15 June 2022, changes to the Building Regulations (conservation of fuel and power) came into effect which require the CO<sub>2</sub> emissions from new homes to be around 30% lower than the previous standards. In addition, emissions from other new buildings, including offices and shops, are required to achieve a 27% reduction. These changes are part of the Government’s road map to deliver the **Future Homes and Buildings Standards** by 2025. The Future Homes Standard will ensure that the average home from 2025 onwards will produce at least 75% lower CO<sub>2</sub> emissions than one built to the Building Regulations, pre-June 2022 changes. Homes built under the Future Homes Standard will be, in effect, ‘zero carbon ready’, which means that in the longer term, no further retrofit work for energy efficiency will be necessary to enable them to become zero-carbon homes as the electricity grid continues to decarbonise.

5.12.3. In addition, the Government made changes to the Building Regulations in June 2022 that require every new home, including those created from a change of use, with associated parking within the site boundary to have an electric vehicle charge point installed. The provision of this infrastructure will help encourage and enable future ownership of electric vehicles, which have zero emissions.

**National – Modern Methods of Construction (MMC)**

5.12.4. We are also mindful of the growing role of Modern Methods of Construction (MMC) in delivering homes efficiently, affordably, and sustainably, which is being recognised by the Government. As well as achieving efficiencies in terms of cost, transportation and time spent on site assembling homes and offices etc, the factory-controlled nature of MMC means that sustainable materials and energy efficiencies such as air tightness can be effectively integrated within the fabric of buildings, before they are then assembled on-site. In addition, the factory-controlled enclosed environment, and the efficiencies it can achieve, unaffected by weather, can result in less waste being produced. Energy can also be saved through fewer transport loads to development sites. It is evident that MMC can have a role to play in mitigating the impacts of development on climate change through reduced energy consumption. The council would like to know your views on how the Local Plan should respond to the opportunities presented by MMC.

**Q.44. Do you agree that the Local Plan should set requirements for a certain proportion of development on major sites to be built using MMC? Yes/No  
Please explain**

**National – flood risk**

- 5.12.5. In terms of flood risk, assessments at the strategic level should take account of all sources of flood risk and the current and future impacts of climate change. It is important to appreciate that homes built during the plan period will endure for many decades after 2040 and we need to ensure flood risk to these properties and the people living in them is avoided, where possible, in the long-term.
- 5.12.6. National policy requires Local Plans to apply a sequential, risk-based approach to the location of development, the basis of which should be the Strategic Flood Risk Assessment (SFRA). The objective of the Sequential Test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. If it is not possible for development to be located in areas with low flood risk it is required that the Exceptions Test be applied – a second tier test. The Exceptions Test considers wider sustainability benefits to the community that may outweigh flood risk and if the development will be safe for its lifetime.

**Local – mitigation and adaptation**

- 5.12.7. The Local Plan can provide a positive, supportive framework for development that can help lower carbon emissions. This can be achieved at the strategic level through the spatial strategy by supporting development at locations close to services and jobs where there are opportunities for sustainable active travel including cycling and walking to destinations. At the local, site-specific level, this can include policies that support low carbon design through the layout, building orientation, massing and landscaping.
- 5.12.8. The Plan will aim to address and, where possible, contribute to the goals and objectives of the council’s Climate Change Strategy (2020-30) and associated action plans, which includes an aspiration for Tonbridge & Malling to be carbon neutral by 2030. It will also be informed by the council’s Tree Charter.

**Local – tree canopy coverage**

- 5.12.9. The council are considering the preparation biodiversity evidence which will look at tree canopy coverage and the role this can have within new developments. This will

be informed by Kent County Council’s Plan Tree Strategy<sup>36</sup> which has an ambition of extending the county’s tree cover by 1.5 million, establishing one new tree for every resident living in the county. As well as providing habitats for an array of flora and fauna, the right trees at the right places can provide shade to buildings – reducing the need for mechanical air cooling – and act as carbon sinks. The Government recognises that trees can help mitigate and adapt to climate change. This biodiversity work will build upon existing evidence, including the Green Infrastructure and Ecological Network Report (2018) which identified principal green corridors along which species can migrate as they adapt to the changing climate and the impact this has on existing habitats. As well as boosting tree coverage, we understand that other forms of vegetation and landscaping, e.g. hedgerows, can play an important role in supporting biodiversity and allowing species to adapt to the effects of climate change. We are also mindful of the need to consider how the fabric of new buildings can make space for nature through opportunities for habitat creation for wildlife such as migratory birds.

5.12.10. We recognise the potential multi-functional role of green infrastructure and how it can make a positive contribution to mitigating and adapting to climate change as well as being part of well-designed, attractive places. Green infrastructure can help manage flooding through sustainable drainage and attenuation and help species adapt to climate change. Furthermore, making space for nature by boosting habitat creation and, therefore, biodiversity can benefit the well-being of residents by allowing them to connect with nature.

**Q.45. Do you agree that the Local Plan should set a minimum requirement for tree canopy coverage on new developments? Yes/No Please explain**

**Q.46. Do you agree that new developments should integrate into the fabric of buildings habitat space for wildlife, such as migratory birds?**

5.12.11. One of the Sustainability Appraisal (SA) objectives is ‘to reduce greenhouse gas emissions to minimise climate change’ (objective 10). This forms part of the SA framework that is and will be used to appraise spatial strategy and policy options for the Local Plan, ensuring that the implications for climate change are understood.

5.12.12. However, it is important to bear in mind that it is not the role of the Local Plan to replicate the requirements of other regimes such as the Building Regulations. This

<sup>36</sup> [Plan Tree: Kent County Council's Tree Establishment Strategy 2022-2032 | Let's talk Kent](#)

means the Plan should not include policies that address matters that are already covered by other requirements such as secondary legislation. We are mindful that by the time the Local Plan is adopted (2025) the Future Homes and Buildings Standards will be in place and the requirement for the installation of charge points for electric vehicles would have been long established.

**Local – flood risk**

- 5.12.13. The risks of flooding from rivers (fluvial flooding) are pertinent to Tonbridge and Malling owing to the Rivers Medway, Bourne and Hawden Stream and their tributaries which flow through the borough. In response to past incidents there has been substantial investment in major infrastructure projects such as the Leigh Barrier and East Peckham flood mitigation scheme to reduce the risk of flooding.
- 5.12.14. The council has commissioned a new Level 1 Strategic Flood Risk Assessment (SFRA) to inform plan-making. This will inform decisions on the location of future development and the preparation of policies for the long-term management of flood risk within the borough so development is safe over the intended lifetime.
- 5.12.15. The council, through the SFRA, will work with statutory consultees such as the Environment Agency and Kent County Council as the Local Lead Flood Authority to ensure all sources of flooding are taken into account as well as the appropriate future climate change allowances.
- 5.12.16. To inform the spatial strategy and future locations of development the sequential test will be applied taking account of all sources of flood risk relevant to the borough. The Level 1 SFRA will also include a cumulative impact assessment that considers the potential effects of locally planned development on locations susceptible to flooding. Where it is not possible to locate development in areas at low risk, the council will apply the Exceptions Test informed by a Level 2 Strategic Flood Risk Assessment.

**Risks – not positively planning to address climate change mitigation and adaptation**

- 5.12.17. If the Local Plan does not include positive, effective mitigation policies to facilitate sustainable living, there is the risk of increased CO<sub>2</sub> emissions in the atmosphere which could result in negative consequences for climate change, including extreme weather events.
- 5.12.18. Worsening climate change would increase the likelihood in the future of more and greater flooding events, including flash flooding. The risks of not properly planning for flooding would be an increased threat to people's lives, their homes and businesses. The emergency services would be placed under greater pressure and there would be a significant economic cost in terms of the impact on the local economy and increased insurance premiums.
- 5.12.19. The loss of habitats as a result of extreme weather events, including droughts as well as flooding, would inevitably impact on biodiversity as certain species are unable to sufficiently adapt to survive. This biodiversity loss, which is likely to include both flora and fauna, would impact on the quality of our lives and the local environments.

**Climate change – what matters to you**

- 5.12.20. This section has highlighted the range of climate change issues that the Local Plan needs to consider and address. Potential measures to respond to these issues are set out in question 47.
- 5.12.21. We appreciate that not all measures are equally important to everyone. We would like to understand what matters most to you, in terms of the focus of this Local Plan.
- 5.12.22. In question 47, can you please select three measures that are most important to you. We do not expect you to rank these in order of importance.

**Q.47. Which climate change measures are most important to you?**

Climate change measures (alphabetical order)	Select (3 in total)
Active travel opportunities (eg cycling and walking)	
connecting developments with other places and public transport	

Climate change measures (alphabetical order)	Select (3 in total)
Decentralised renewable and/or low carbon energy generation (photovoltaic cells, wind turbines etc)	
Energy efficient, future-proofed buildings	
Habitat creation – built fabric (eg swift bricks)	
Habitat creation – natural (eg meadows, hedgerows)	
Modern Methods of Construction (MMC)	
Multi-functional green infrastructure (recreation, carbon sinks and biodiversity net gain)	
Passive design (orientation, layout, landscaping)	
Sustainable drainage systems (SuDS) (eg green roofs, water butts, retention ponds)	
Tree coverage - increased	
Other – please state and include	

**Q.48. What are your reasons for selecting these particular climate change measures as priorities for the Local Plan (outline briefly)?**

## 6. Other Matters

### 6.1. How should development be managed?

- 6.1.1. As well as addressing the amount and distribution of development, the Local Plan also needs to consider how development is managed, i.e. delivered.
- 6.1.2. How development is managed is very important for good quality place-making and our well-being. It is not just about the number of homes but also about the types of homes, layout and design, accessibility, and connectivity with the surrounding environments and services. We also need to be mindful of how developments can provide opportunities for nature to thrive. This can be achieved through innovative solutions such as multifunctional green spaces that can help boost biodiversity as well as provide quality open spaces for residents to enjoy. Furthermore, we need to consider how developments can be efficient in their consumption of fuel and power, to mitigate impacts on climate change.
- 6.1.3. At the national level, changes to the Building Regulations introduced in June 2022 already determine how some of these issues must be addressed, including the conservation of fuel and power and the installation of charge points for electric vehicles. These are requirements that have to be met and should not be replicated in the Plan. In addition the Government requires 25% of the affordable housing provision to be First Homes, which is a specific discounted product targeted at first-time buyers.
- 6.1.4. Optional technical standards on accessibility, water efficiency and internal space standards have been produced by the Government, which exceed existing mandatory requirements. These can be introduced through the Local Plan process, providing they are supported by local evidence and have been subject to the whole plan viability assessment. We can also expect developments to deliver at least a 10% Biodiversity Net Gain, which needs to be factored in when considering the cumulative costs of national and local requirements.
- 6.1.5. At the local level, it is important to appreciate that various infrastructure providers such as education, healthcare, and highways will have their own standards that need to be addressed when delivering development to make it acceptable.



### **Viability**

- 6.1.6. When considering the various requirements that could be introduced, we have to be mindful of the impact on viability, and therefore deliverability, of development. If the economic cost is too high the development is likely to be unviable, which means that no homes would be provided. That is an outcome that must be avoided if we are to positively address our assessed development needs. While the recent changes to the Building Regulations will make a positive contribution to mitigating impacts on climate change, there will be an economic cost of achieving them.
- 6.1.7. The Government recognises the significance of viability. It stresses that the role for viability assessment is primarily at the plan making stage. The objective is to ensure that sustainable development is realistically achievable and planned for in advance of the site-specific application stage.
- 6.1.8. The council will commission a whole plan viability assessment to understand this issue better. This will look at recent requirements that have been introduced/will be introduced at the national level as well as local requirements, including the expectations of infrastructure providers. These include changes to the Building Regulations relating to the conservation of fuel and power and the installation of charging points for electric vehicles that came into effect on 15 June 2022. In addition, the impact of introducing First Homes on delivery needs to be assessed. We also need to be mindful of the Government’s intentions for an infrastructure levy on development. The whole plan viability assessment will be set within the local context, examining market, build and land values and assessing if differences exist across the borough. The outputs and options analysis from consulting on this Reg 18 Plan will be utilised to inform the whole plan viability assessment.

### **Local requirements – priorities**

- 6.1.9. We would like to understand what your priorities are when it comes to managing development.
- 6.1.10. Question 49 (below) highlights the range of potential requirements.
- 6.1.11. We appreciate that not all requirements are equally important to everyone. We would like to understand what matters most to you, in terms of the focus of this Local Plan.
- 6.1.12. In question 49, can you please select five requirements that are most important to you. We do not expect you to rank these in order of importance. This does not mean that the remaining issues are not relevant; however, the Local Plan will need

to set some priorities and give guidance on where the focus should be, bearing in mind the issue of viability and the cumulative impact of requirements on the delivery of development.

**Q.49. Which local policy requirements are most important to you?**

<b>Local requirement (alphabetical order)</b>	<b>Priority (please identify 5)</b>
Accessible and adaptable housing (disabled and elderly)	
Active travel (cycling and walking)	
Affordable housing – to buy	
Affordable housing - for rent	
Biodiversity & Ecology	
Energy efficiency	
First Homes	
Indoor recreation facilities	
Internal space standards	
Modern Methods of Construction	
Parking	
Public open space	
Renewable energy generation (eg photovoltaic cells)	
Safety and security	
Self-Build and/or Custom Housebuilding	
Specialist housing (elderly, eg care homes)	
Sustainable Drainage (eg water butts and green roofs)	
Water efficiency (consumption within the home)	
Other – please state	

**Q.50. What are your reasons for selecting these particular local requirements as priorities for the Local Plan (outline briefly)?**

## 7. Further Information

### 7.1. How can I find out more about the Local Plan?

7.1.1. More details on the Local Plan, including details on the consultation documents and the timetable for production are available from the council’s website:

[www.tmbc.gov.uk/localplan](http://www.tmbc.gov.uk/localplan). This also includes links to the following evidence base documents:

Externally produced reports

Evidence Base Documents	Consultant	Link
Interim Sustainability Appraisal Report	LUC	<a href="#">Insert link</a>
Interim Sustainability Appraisal Report: Annex 1	LUC	<a href="#">Insert link</a>
Interim Sustainability Appraisal Report: Non-Technical Summary	LUC	<a href="#">Insert link</a>

External evidence base documents

Evidence Base Documents	Consultant	Link
Green Belt Study: Exceptional Circumstances (Strategic) Note	Arup	<a href="#">Insert link</a>
Housing Needs Study	Arc4	<a href="#">Insert link</a>
Urban Capacity Study Report	UI	<a href="#">Insert link</a>
Urban Capacity Study Appendices	UI	<a href="#">Insert link</a>
Housing Market Delivery Study	GL Hearn	<a href="#">Insert link</a>
Gypsy and Traveller Accommodation Assessment	arc4	<a href="#">Insert link</a>
Transport Baseline Modelling	Jacobs	<a href="#">Insert link</a>
Economic Development Needs Study	Lichfields	<a href="#">Insert link</a>
Strategic Flood Risk Assessment (Level 1): Site Screening	JBA	<a href="#">Insert link</a>

Internal papers

Evidence Base Documents	Link
Windfall Allowance Methodology paper	<a href="#">Insert link</a>

7.1.2. You can also contact an officer in the Planning Policy team: [localplan@tmbc.gov.uk](mailto:localplan@tmbc.gov.uk).

## 7.2. How to respond to this consultation

- 7.2.1. The Local Plan will be out for consultation between **15 September and 27 October 2022**. You can make your comments directly via the council’s consultation portal at this link: <https://tmbc.inconsult.uk/>
- 7.2.2. Alternatively, please complete the consultation form available on the council’s website at [xxx](#) and send it to [Local.Plan@tmbc.gov.uk](mailto:Local.Plan@tmbc.gov.uk).
- 7.2.3. Paper copies of responses can also be sent to:

Regulation 18 Local Plan consultation,  
Gibson Building,  
Gibson Drive  
Kings Hill  
West Malling  
ME19 4LZ

## **8. Next Steps**

### **8.1. What happens after this stage of plan-making?**

- 8.1.1. Once the consultation period has concluded, we will carefully consider your responses. The outputs will feed into the next, more detailed stage of plan-making, which will also be informed by other evidence that will be produced over the coming months.
- 8.1.2. As we advance through the plan-making process and more details emerge, consideration will be given to the formulation of a monitoring framework to measure the performance of the policies and proposals in the Plan.
- 8.1.3. The detailed work programme for the Local Plan, also known as the Local Development Scheme, can be found on the council's website:  
[www.tmbc.gov.uk/local-plan/local-development-scheme](http://www.tmbc.gov.uk/local-plan/local-development-scheme).

## Glossary of Terms

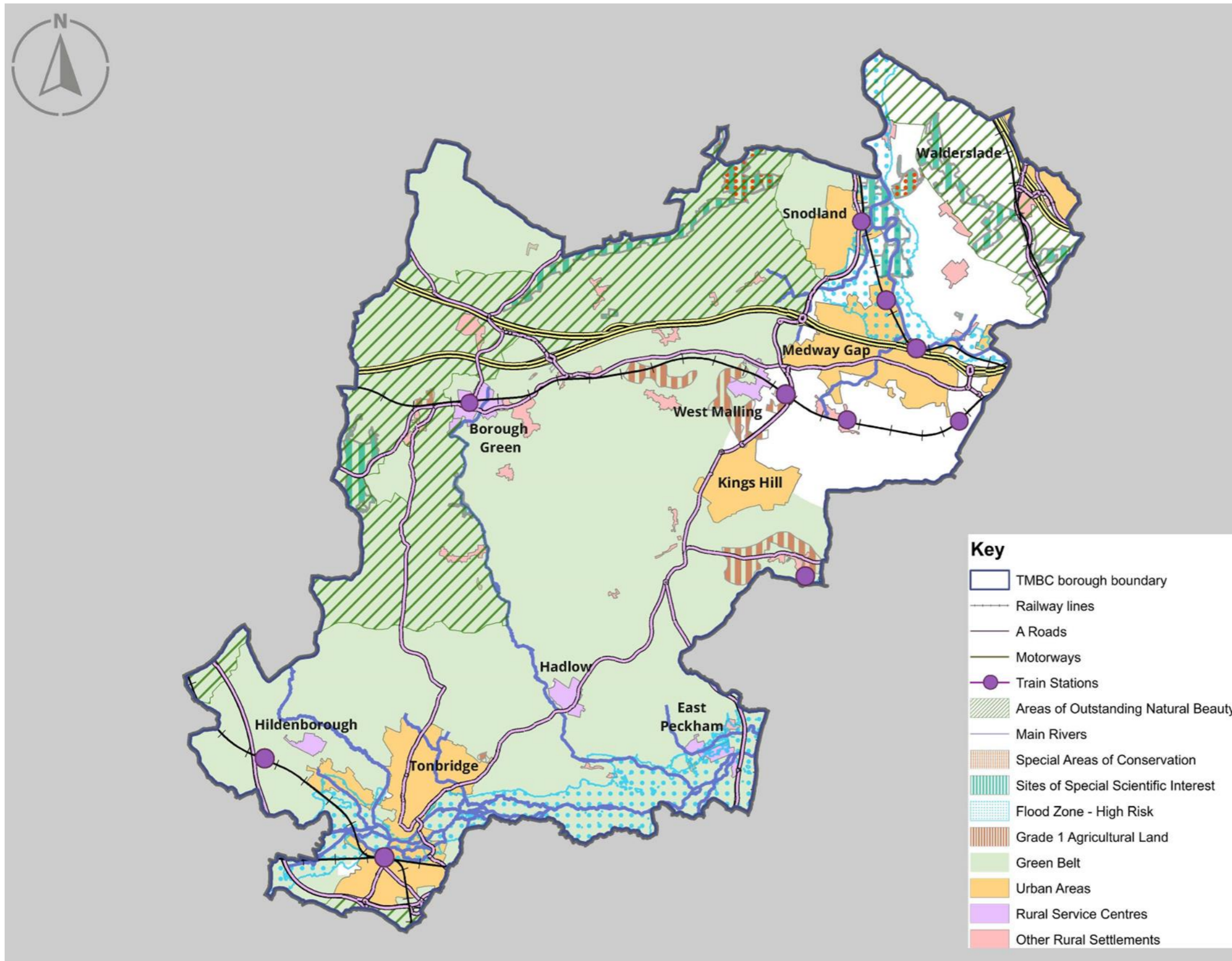
Below is a glossary of terms referred to in the Local Plan.

**Table 8. Glossary of terms**

Abbreviation	Definition
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BOAs	Biodiversity Opportunity Areas
CAA	Conservation Area Appraisal
CO <sub>2</sub>	Carbon Dioxide
DPA	Dwellings Per Annum
EDNS	Economic Development Needs Study
HMA	Housing Market Areas
HRA	Habitat Regulations Assessment
IDP	Infrastructure Delivery Plan
KCC	Kent County Council
KHERS	Kent Historic Environment Record
KLNP	Kent Local Nature Partnership
LNR	Local Nature Reserve
LTP	Local Transport Plan
LWS	Local Wildlife Site
MMC	Modern Methods of Construction
NIAB	National Institute of Agricultural Botany
NO <sub>2</sub>	Nitrogen Dioxide
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Needs
ONS	Office for National Statistics

Abbreviation	Definition
PDL	Previously Developed Land
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
RAMSAR site	Wetland site of international importance
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SLAA	Strategic Land Availability Assessment
SME	Small and Medium Enterprises
SPA	Special Protection Area
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System
UCO	<p><a href="#">Use Classes Order</a>, in particular,</p> <p><i>C2 Residential institutions</i> - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres</p> <p><i>C3 Dwellinghouses</i> - This class is formed of three parts:</p> <p>C3 (a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees, a carer and the person receiving the care and a foster parent and foster child</p> <p>C3 (b) covers up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems</p> <p>C3 (c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger</p>
UCS	Urban Capacity Study
VISSIM	Micro-simulation transport model
VISUM	Strategic transport model
VOA	Valuation Office Agency

## Appendix A: Key Diagram







## Appendix B: List of Sites

The table (below) includes the following sites:

- **Call for Sites submissions** – these are sites that were submitted during a public exercise that took place over eight weeks concluding on 7 February 2022.
- **Urban Capacity Study (July 2022) sites** – these are sites identified in the Urban Capacity Study (UCS) as having potential for residential development. The focus being on the urban areas and rural service centres. Those Call for Sites submissions that feature in the UCS (nine in total) are not included, to avoid duplication.
- **Withdrawn Local Plan allocations** – Those housing and employment allocations in the withdrawn Local Plan which were not submitted during the Call for Sites exercise, do not feature in the UCS and do not enjoy planning permission.

**Potential Yield** – The potential yield is only displayed for those sites promoted for residential use. This potential optimised yield is based upon the methodology set out in the UCS. To be confirmed (TBC) is inserted for those sites promoted for employment or mixed uses, because further information and evidence is needed before a reasonable assessment can be made of their potential.

**Ward order** – The sites are grouped according to the ward (existing) they are located in. Wards are listed alphabetically.

**Sustainability Appraisal** – To view how the sites have been assessed as part of the Sustainability Appraisal (SA) process, use the Site ID in the table below and cross-refer to the [Interim SA Report](#), Chapter 5 and [Appendix 1](#).



**Table 9. List of Sites**

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Aylesford North and Walderslade	Aylesford North & North Downs	ME14 3DW	59618	2.18	Residential	56	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 6WT	59766	8.12	Residential	195	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 6WT	59851	72.38	Mix	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7AZ	59674	2.01	Mix	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7BY	59670	3.21	Mix	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7DA	59678	30.80	Mix	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7DA	59847	168.87	Mix	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7DD	59666	9.53	Mix	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7DH	59828	6.95	Employment	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7DQ	59633	1.21	Residential	31	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7DX	59676	54.12	Mix	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7FN	59768	0.19	Residential	6	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7FN	59831	8.07	Residential	194	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7HE	59675	8.02	Mix	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7HE	59684	93.60	Mix	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7HE	59763	9.74	Residential	234	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7HE	59826	59.87	Mix	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7HT	59702	6.20	Mix	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7HT	59790	1.09	Mix	TBC	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME20 7HU	59841	0.91	Residential	26	Call for Sites
Aylesford North and Walderslade	Aylesford North & North Downs	ME5 9QJ	59810	0.68	Residential	19	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Aylesford South	Aylesford South & Ditton	ME16 0FH	59852	15.51	Residential	372	Call for Sites
Aylesford South	Aylesford South & Ditton	ME16 0LE	59694	20.76	Employment	TBC	Call for Sites
Aylesford South	Aylesford South & Ditton	ME16 9NS	59839	13.67	Residential	328	Call for Sites
Aylesford South	Aylesford South & Ditton	ME16 9NS	59867	0.07	Mix	TBC	Call for Sites
Aylesford South	Aylesford South & Ditton	ME16 9NT	59713	2.57	Residential	66	Call for Sites
Aylesford South	Aylesford South & Ditton	ME16 9NT	59738	2.28	Mix	TBC	Call for Sites
Aylesford South	Aylesford South & Ditton	ME20 6FH	59861	69.20	Residential	1621	Call for Sites
Aylesford South	Aylesford North & North Downs	ME20 7FH	59392	0.17	Residential	0	Withdrawn Allocations
Aylesford South	Aylesford South & Ditton	ME20 7FU	59780	9.75	Mix	TBC	Call for Sites
Aylesford South	Aylesford South & Ditton	ME20 7FW	59472	1.57	Residential	40	Urban Capacity Study
Aylesford South	Aylesford North & North Downs	ME20 7JJ	59391	0.41	Residential	0	Withdrawn Allocations

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Aylesford South	Aylesford South & Ditton	ME20 7JT	59464	0.29	Residential	8	Urban Capacity Study
Aylesford South	Aylesford North & North Downs	ME20 7NS	59772	7.74	Employment	TBC	Call for Sites
Aylesford South	Aylesford South & Ditton	ME20 7NU	59668	3.97	Mix	TBC	Call for Sites
Aylesford South	Aylesford South & Ditton	ME20 7NX	59781	3.96	Mix	TBC	Call for Sites
Aylesford South	Aylesford South & Ditton	ME20 7PL	59469	0.81	Residential	23	Urban Capacity Study
Aylesford South	Aylesford South & Ditton	ME20 7PX	59868	4.26	Mix	TBC	Call for Sites
Aylesford South	Aylesford South & Ditton	ME20 7RE	59399	0.14	Residential	4	Withdrawn Allocations
Barming and Teston	Aylesford South & Ditton	ME16 9HR	59425	10.44	Residential	251	Withdrawn Allocations
Borough Green and Long Mill	Bourne	TN11 9PA	59779	1.48	Residential	38	Call for Sites
Borough Green and Long Mill	Bourne	TN11 9PH	59825	2.06	Mix	TBC	Call for Sites
Borough Green and Long Mill	Bourne	TN11 9PP	59827	3.43	Residential	82	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Borough Green and Long Mill	Bourne	TN15 0QL	59774	0.62	Residential	18	Call for Sites
Borough Green and Long Mill	Bourne	TN15 0QL	59778	1.29	Residential	33	Call for Sites
Borough Green and Long Mill	Bourne	TN15 0QL	59862	0.76	Mix	TBC	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 7SD	59725	2.42	Residential	62	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8BB	59492	0.19	Residential	6	Urban Capacity Study
Borough Green and Long Mill	Borough Green & Platt	TN15 8DD	59732	0.51	Residential	15	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8DJ	59493	0.35	Residential	11	Urban Capacity Study
Borough Green and Long Mill	Borough Green & Platt	TN15 8DZ	59829	1.88	Mix	TBC	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8FH	59632	1.24	Residential	31	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8FY	59767	0.24	Residential	6	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8HR	59489	0.19	Residential	6	Urban Capacity Study



Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Borough Green and Long Mill	Borough Green & Platt	TN15 8JL	59822	4.64	Mix	TBC	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8JL	59830	130.10	Mix	TBC	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8JR	59717	0.54	Residential	15	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8LB	59737	2.20	Residential	56	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8LX	59724	0.05	Residential	1	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8NJ	59617	0.73	Residential	21	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8NJ	59703	0.70	Residential	20	Call for Sites
Borough Green and Long Mill	Bourne	TN15 8PS	59677	0.21	Residential	6	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8PZ	59773	0.78	Residential	22	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8RL	59407	0.24	Residential	8	Withdrawn Allocations
Borough Green and Long Mill	Borough Green & Platt	TN15 8RQ	59877	6.23	Residential	117	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Borough Green and Long Mill	Borough Green & Platt	TN15 8SG	59748	7.73	Residential	181	Call for Sites
Borough Green and Long Mill	Borough Green & Platt	TN15 8SL	59843	3.16	Residential	76	Call for Sites
Burham and Wouldham	Aylesford North & North Downs	ME1 3GP	59791	6.64	Residential	159	Call for Sites
Burham and Wouldham	Aylesford North & North Downs	ME1 3GP	59792	7.21	Residential	173	Call for Sites
Burham and Wouldham	Aylesford North & North Downs	ME1 3RH	59787	1.47	Mix	TBC	Call for Sites
Burham and Wouldham	Aylesford North & North Downs	ME1 3RR	59818	41.12	Residential	739	Call for Sites
Burham and Wouldham	Aylesford North & North Downs	ME1 3SJ	59784	6.10	Residential	147	Call for Sites
Burham and Wouldham	Aylesford North & North Downs	ME1 3SY	59819	2.12	Residential	54	Call for Sites
Burham and Wouldham	Aylesford North & North Downs	ME1 3SY	59832	3.74	Residential	90	Call for Sites
Burham and Wouldham	Aylesford North & North Downs	ME1 3XY	59820	3.18	Residential	48	Call for Sites
Burham and Wouldham	Aylesford North & North Downs	ME1 3YN	59891	1.27	Employment	TBC	Withdrawn Allocations
Cage Green	Cage Green & Angel	TN10 4NU	59515	0.15	Residential	5	Urban Capacity Study

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Cage Green	Cage Green & Angel	TN10 4PB	59516	0.75	Residential	22	Urban Capacity Study
Cage Green	Trench	TN11 9NH	59735	8.67	Residential	131	Call for Sites
Castle	Cage Green & Angel	TN10 3DH	59821	7.62	Mix	TBC	Call for Sites
Castle	Cage Green & Angel	TN10 3JF	59683	21.92	Mix	TBC	Call for Sites
Castle	Cage Green & Angel	TN10 3TA	59417	1.46	Residential	38	Withdrawn Allocations
Castle	Judd	TN9 1HR	59588	0.20	Residential	24	Urban Capacity Study
Castle	Judd	TN9 1HX	59586	0.21	Residential	26	Urban Capacity Study
Castle	Judd	TN9 1JB	59587	0.09	Residential	11	Urban Capacity Study
Castle	Cage Green & Angel	TN9 1NE	59623	0.17	Residential	5	Call for Sites
Castle	Cage Green & Angel	TN9 1PZ	59591	0.38	Residential	11	Urban Capacity Study
Ditton	Aylesford South & Ditton	ME19 6BH	59856	39.13	Employment	TBC	Call for Sites
Ditton	Aylesford South & Ditton	ME19 6BQ	59870	0.56	Residential	16	Call for Sites
Ditton	Aylesford South & Ditton	ME19 6BQ	59873	0.40	Residential	11	Call for Sites
Ditton	Aylesford South & Ditton	ME20 6AZ	59398	0.20	Residential	6	Urban Capacity Study

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Ditton	Aylesford South & Ditton	ME20 6BX	59397	0.26	Residential	7	Urban Capacity Study
Ditton	Aylesford South & Ditton	ME20 6SZ	59393	0.30	Residential	8	Urban Capacity Study
Ditton	Aylesford South & Ditton	ME20 6SZ	59460	0.23	Residential	7	Urban Capacity Study
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5JD	59750	16.14	Residential	380	Call for Sites
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5JE	59749	34.61	Residential	828	Call for Sites
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5JF	59599	1.25	Employment	TBC	Call for Sites
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5JQ	59597	1.77	Mix	TBC	Call for Sites
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5JS	59595	1.09	Residential	28	Call for Sites
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5LR	59752	61.38	Residential	1390	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5NA	59816	4.28	Mix	TBC	Call for Sites
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5NE	59598	1.50	Mix	TBC	Call for Sites
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5QE	59760	9.20	Residential	221	Call for Sites
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5QG	59759	13.76	Residential	330	Call for Sites
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5QJ	59755	5.30	Residential	127	Call for Sites
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5QJ	59758	14.41	Residential	345	Call for Sites
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5QY	59754	5.23	Residential	125	Call for Sites
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME18 5QZ	59757	2.33	Residential	59	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Downs and Mereworth	East and West Peckham, Mereworth & Wateringbury	ME19 4RE	59761	5.94	Residential	86	Call for Sites
Downs and Mereworth	Pilgrims with Ightham	ME19 5AL	59604	2.26	Residential	58	Call for Sites
Downs and Mereworth	Pilgrims with Ightham	ME19 5BA	59628	0.20	Residential	6	Call for Sites
Downs and Mereworth	Pilgrims with Ightham	ME19 5BH	59610	1.12	Residential	29	Call for Sites
Downs and Mereworth	Pilgrims with Ightham	ME19 5DF	59850	13.75	Mix	TBC	Call for Sites
Downs and Mereworth	Pilgrims with Ightham	ME19 5DN	59730	3.61	Residential	86	Call for Sites
Downs and Mereworth	Pilgrims with Ightham	ME19 5DN	59736	3.64	Mix	TBC	Call for Sites
Downs and Mereworth	Birling, Leybourne & Ryarsh	ME19 5HW	59691	7.07	Residential	170	Call for Sites
Downs and Mereworth	Birling, Leybourne & Ryarsh	ME19 5HW	59840	36.98	Mix	TBC	Call for Sites
Downs and Mereworth	Birling, Leybourne & Ryarsh	ME19 5JG	59708	0.09	Residential	3	Call for Sites
Downs and Mereworth	Birling, Leybourne & Ryarsh	ME19 5LS	59777	0.53	Residential	15	Call for Sites
Downs and Mereworth	Birling, Leybourne & Ryarsh	ME19 5LW	59744	0.87	Mix	TBC	Call for Sites
Downs and Mereworth	East Malling, West Malling & Offham	ME19 5PH	59406	0.69	Residential	20	Withdrawn Allocations

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Downs and Mereworth	East Malling, West Malling & Offham	ME19 5PH	59596	1.09	Residential	23	Call for Sites
Downs and Mereworth	Pilgrims with Ightham	ME19 5PL	59812	0.61	Mix	TBC	Call for Sites
Downs and Mereworth	East Malling, West Malling & Offham	ME19 5PP	59648	0.61	Residential	17	Call for Sites
Downs and Mereworth	East Malling, West Malling & Offham	ME19 5PP	59649	0.32	Residential	9	Call for Sites
East Malling	East Malling, West Malling & Offham	ME19 4FT	59630	5.85	Mix	TBC	Call for Sites
East Malling	East Malling, West Malling & Offham	ME19 6AA	59824	7.13	Residential	171	Call for Sites
East Malling	East Malling, West Malling & Offham	ME19 6BS	59450	0.73	Residential	21	Urban Capacity Study
East Malling	East Malling, West Malling & Offham	ME19 6BU	59673	0.14	Residential	4	Call for Sites
East Malling	East Malling, West Malling & Offham	ME19 6EP	59449	0.42	Residential	19	Urban Capacity Study
East Malling	East Malling, West Malling & Offham	ME19 6HR	59740	112.74	Mix	TBC	Call for Sites
East Malling	East Malling, West Malling & Offham	ME19 6HX	59698	3.72	Residential	89	Call for Sites
East Malling	East Malling, West Malling & Offham	ME19 6HY	59743	1.48	Residential	38	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
East Malling	East Malling, West Malling & Offham	ME19 6JE	59715	4.95	Residential	119	Call for Sites
East Malling	East Malling, West Malling & Offham	ME19 6JG	59726	5.33	Residential	128	Call for Sites
East Malling	East Malling, West Malling & Offham	ME19 6JH	59631	5.66	Residential	136	Call for Sites
East Malling	East Malling, West Malling & Offham	ME19 6JP	59636	6.38	Residential	153	Call for Sites
East Malling	East Malling, West Malling & Offham	ME19 6QB	59448	0.32	Residential	9	Urban Capacity Study
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	ME18 5JF	59747	9.40	Residential	210	Call for Sites
Hadlow and East Peckham	Bourne	TN11 0DP	59647	5.59	Residential	134	Call for Sites
Hadlow and East Peckham	Bourne	TN11 0DU	59635	2.38	Residential	61	Call for Sites
Hadlow and East Peckham	Bourne	TN11 0EF	59601	1.05	Residential	16	Call for Sites
Hadlow and East Peckham	Bourne	TN11 0EJ	59859	3.03	Mix	TBC	Call for Sites
Hadlow and East Peckham	Bourne	TN11 0HA	59776	5.16	Residential	124	Call for Sites



Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Hadlow and East Peckham	Bourne	TN11 0HB	59410	0.82	Residential	30	Withdrawn Allocations
Hadlow and East Peckham	Bourne	TN11 0HP	59637	7.70	Residential	185	Call for Sites
Hadlow and East Peckham	Bourne	TN11 0HP	59638	1.70	Residential	40	Call for Sites
Hadlow and East Peckham	Bourne	TN11 0HP	59686	1.04	Residential	26	Call for Sites
Hadlow and East Peckham	Bourne	TN11 0JA	59842	13.83	Residential	329	Call for Sites
Hadlow and East Peckham	Bourne	TN11 0JD	59605	0.14	Residential	4	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN11 0JL	59806	150.77	Residential	3289	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN11 0JL	59846	8.38	Mix	TBC	Call for Sites
Hadlow and East Peckham	Bourne	TN11 0RF	59853	7.37	Mix	TBC	Call for Sites
Hadlow and East Peckham	Bourne	TN11 0RF	59857	7.46	Mix	TBC	Call for Sites
Hadlow and East Peckham	Bourne	TN11 9QU	59795	0.92	Residential	26	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Hadlow and East Peckham	Bourne	TN11 9SS	59811	194.46	Residential	2362	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5DF	59525	0.21	Residential	6	Urban Capacity Study
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5DJ	59613	5.60	Residential	131	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5DX	59837	3.01	Residential	72	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5EE	59876	4.63	Mix	TBC	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5EJ	59616	1.50	Employment	TBC	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5HX	59782	5.32	Mix	TBC	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5JB	59650	0.62	Mix	TBC	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5JB	59855	6.20	Employment	TBC	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5JG	59742	9.05	Mix	TBC	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5JH	59682	3.32	Mix	TBC	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5JH	59813	18.29	Mix	TBC	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5LL	59640	0.83	Residential	24	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5LL	59753	0.30	Residential	9	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5LN	59639	1.11	Residential	28	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 5PB	59789	7.10	Residential	165	Call for Sites
Hadlow and East Peckham	East and West Peckham, Mereworth & Wateringbury	TN12 6PZ	59646	146.22	Mix	TBC	Call for Sites
Higham	Higham	TN10 4AN	59524	0.30	Residential	8	Urban Capacity Study

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Higham	Higham	TN10 4EZ	59657	0.66	Residential	19	Call for Sites
Higham	Higham	TN10 4HN	59693	13.90	Residential	239	Call for Sites
Higham	Higham	TN11 0AB	59607	0.34	Residential	10	Call for Sites
Higham	Higham	TN11 0AE	59629	0.27	Residential	8	Call for Sites
Higham	Higham	TN11 0AG	59685	15.48	Mix	TBC	Call for Sites
Higham	Higham	TN11 9QP	59721	5.39	Residential	129	Call for Sites
Higham	Higham	TN11 9QR	59690	42.34	Mix	TBC	Call for Sites
Higham	Higham	TN11 9QR	59805	78.38	Mix	TBC	Call for Sites
Higham	Higham	TN11 9QR	59809	19.49	Mix	TBC	Call for Sites
Hildenborough	Hildenborough	TN10 3DH	59823	4.03	Mix	TBC	Call for Sites
Hildenborough	Hildenborough	TN10 3QZ	59801	17.14	Mix	TBC	Call for Sites
Hildenborough	Hildenborough	TN11 8LX	59688	11.03	Mix	TBC	Call for Sites
Hildenborough	Hildenborough	TN11 8LX	59704	3.69	Residential	89	Call for Sites
Hildenborough	Hildenborough	TN11 8ND	59669	11.45	Residential	258	Call for Sites
Hildenborough	Hildenborough	TN11 8ND	59679	10.95	Mix	TBC	Call for Sites
Hildenborough	Hildenborough	TN11 8NJ	59627	0.45	Residential	0	Call for Sites
Hildenborough	Hildenborough	TN11 8PB	59783	7.13	Residential	167	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Hildenborough	Hildenborough	TN11 9AD	59615	2.70	Residential	69	Call for Sites
Hildenborough	Hildenborough	TN11 9AD	59692	3.49	Residential	83	Call for Sites
Hildenborough	Hildenborough	TN11 9DB	59745	2.81	Residential	72	Call for Sites
Hildenborough	Hildenborough	TN11 9EL	59592	1.06	Residential	28	Call for Sites
Hildenborough	Hildenborough	TN11 9ES	59808	9.39	Residential	222	Call for Sites
Hildenborough	Hildenborough	TN11 9HL	59656	12.09	Residential	289	Call for Sites
Hildenborough	Hildenborough	TN11 9HN	59653	9.30	Residential	214	Call for Sites
Hildenborough	Hildenborough	TN11 9LE	59771	3.24	Residential	74	Call for Sites
Hildenborough	Hildenborough	TN11 9LN	59775	0.54	Residential	13	Call for Sites
Hildenborough	Hildenborough	TN11 9NB	59667	2.20	Mix	TBC	Call for Sites
Hildenborough	Hildenborough	TN11 9NG	59609	1.54	Residential	38	Call for Sites
Hildenborough	Hildenborough	TN11 9NG	59625	2.06	Residential	46	Call for Sites
Hildenborough	Hildenborough	TN11 9NG	59804	101.75	Mix	TBC	Call for Sites
Hildenborough	Hildenborough	TN11 9NH	59798	22.37	Residential	458	Call for Sites
Hildenborough	Hildenborough	TN11 9NH	59835	28.22	Mix	TBC	Call for Sites
Judd	Judd	TN11 8AA	59695	4.49	Residential	105	Call for Sites
Judd	Judd	TN11 8AA	59764	11.06	Residential	265	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Judd	Judd	TN11 8AA	59765	13.66	Mix	TBC	Call for Sites
Judd	Judd	TN11 9BE	59641	1.15	Residential	29	Call for Sites
Judd	Judd	TN4 0UH	59838	18.18	Mix	TBC	Call for Sites
Judd	Judd	TN9 1EP	59815	0.06	Mix	TBC	Call for Sites
Judd	Judd	TN9 1TU	59576	0.07	Residential	9	Urban Capacity Study
Judd	Judd	TN9 2PL	59869	9.33	Mix	TBC	Call for Sites
Judd	Judd	TN9 2QA	59571	0.20	Residential	6	Urban Capacity Study
Judd	Judd	TN9 2QA	59572	0.46	Residential	13	Urban Capacity Study
Judd	Judd	TN9 2SN	59796	0.42	Mix	TBC	Call for Sites
Judd	Judd	TN9 2YS	59550	0.24	Residential	8	Urban Capacity Study
Judd	Judd	TN9 2YS	59552	0.21	Residential	7	Urban Capacity Study
Kings Hill	Kings Hill	ME19 4BP	59884	0.64	Residential	21	Urban Capacity Study
Kings Hill	Kings Hill	ME19 4BQ	59547	0.20	Residential	6	Urban Capacity Study
Kings Hill	Kings Hill	ME19 4BX	59534	0.64	Residential	18	Urban Capacity Study
Kings Hill	Kings Hill	ME19 4GE	59544	0.18	Residential	5	Urban Capacity Study
Kings Hill	Kings Hill	ME19 4GW	59424	6.11	Residential	164	Withdrawn Allocations
Kings Hill	Kings Hill	ME19 4GW	59655	6.29	Residential	143	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Kings Hill	Kings Hill	ME19 4NP	59531	0.47	Residential	13	Urban Capacity Study
Kings Hill	Kings Hill	ME19 6HR	59634	8.12	Residential	104	Call for Sites
Larkfield North	Larkfield	ME20 6GZ	59494	0.28	Residential	20	Urban Capacity Study
Larkfield North	Larkfield	ME20 6RH	59437	0.31	Residential	9	Urban Capacity Study
Larkfield North	Larkfield	ME20 6TW	59436	0.38	Residential	17	Urban Capacity Study
Larkfield North	Larkfield	ME20 6TY	59718	1.88	Residential	48	Call for Sites
Larkfield North	Larkfield	ME20 7GP	59438	0.19	Residential	14	Urban Capacity Study
Larkfield South	Larkfield	ME20 6LS	59433	0.86	Residential	25	Urban Capacity Study
Larkfield South	Larkfield	ME20 6QL	59457	0.25	Residential	13	Urban Capacity Study
Medway	Vauxhall	TN11 0LZ	59696	1.99	Residential	51	Call for Sites
Medway	Vauxhall	TN11 0NA	59697	0.38	Mix	TBC	Call for Sites
Medway	Cage Green & Angel	TN11 0QU	59834	63.39	Mix	TBC	Call for Sites
Medway	Cage Green & Angel	TN11 0QX	59661	7.11	Mix	TBC	Call for Sites
Medway	Cage Green & Angel	TN9 1FW	59885	0.99	Residential	100	Urban Capacity Study
Medway	Cage Green & Angel	TN9 1QA	59644	1.78	Residential	10	Call for Sites
Medway	Cage Green & Angel	TN9 1QH	59562	0.18	Residential	22	Urban Capacity Study
Medway	Cage Green & Angel	TN9 1RA	59892	1.70	Employment	TBC	Withdrawn Allocations

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Medway	Cage Green & Angel	TN9 1RF	59660	1.12	Residential	112	Call for Sites
Medway	Cage Green & Angel	TN9 1RS	59560	0.49	Residential	57	Urban Capacity Study
Medway	Cage Green & Angel	TN9 1SF	59559	0.30	Residential	35	Urban Capacity Study
Medway	Cage Green & Angel	TN9 1SF	59561	1.07	Residential	111	Urban Capacity Study
Medway	Cage Green & Angel	TN9 1SG	59879	1.88	Residential	197	Call for Sites
Medway	Cage Green & Angel	TN9 1SH	59563	0.10	Residential	12	Urban Capacity Study
Medway	Cage Green & Angel	TN9 1TB	59701	10.79	Employment	TBC	Call for Sites
Medway	Cage Green & Angel	TN9 1TE	59581	0.56	Residential	65	Urban Capacity Study
Medway	Vauxhall	TN9 2JW	59554	0.28	Residential	8	Urban Capacity Study
Medway	Vauxhall	TN9 2JW	59555	0.24	Residential	7	Urban Capacity Study
Snodland East and Ham Hill	Snodland East & Ham Hill	ME6 5AA	59505	0.21	Residential	11	Urban Capacity Study
Snodland East and Ham Hill	Snodland East & Ham Hill	ME6 5BB	59727	0.34	Employment	TBC	Call for Sites
Snodland East and Ham Hill	Snodland East & Ham Hill	ME6 5FB	59512	0.27	Residential	12	Urban Capacity Study
Snodland East and Ham Hill	Snodland East & Ham Hill	ME6 5HW	59502	0.16	Residential	8	Urban Capacity Study



Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Snodland East and Ham Hill	Snodland East & Ham Hill	ME6 5SL	59836	2.80	Employment	TBC	Call for Sites
Snodland East and Ham Hill	Snodland East & Ham Hill	ME6 5ST	59874	2.34	Mix	TBC	Call for Sites
Snodland West and Holborough Lakes	Snodland West & Holborough Lakes	ME2 1JS	59864	203.38	Mix	TBC	Call for Sites
Snodland West and Holborough Lakes	Snodland West & Holborough Lakes	ME2 1JY	59858	64.34	Mix	TBC	Call for Sites
Snodland West and Holborough Lakes	Snodland West & Holborough Lakes	ME6 5DR	59866	289.87	Mix	TBC	Call for Sites
Snodland West and Holborough Lakes	Snodland West & Holborough Lakes	ME6 5NR	59511	0.34	Residential	16	Urban Capacity Study
Snodland West and Holborough Lakes	Snodland West & Holborough Lakes	ME6 5NX	59510	0.21	Residential	10	Urban Capacity Study
Snodland West and Holborough Lakes	Snodland West & Holborough Lakes	ME6 5RA	59507	0.21	Residential	6	Urban Capacity Study
Snodland West and Holborough Lakes	Snodland West & Holborough Lakes	ME6 5RQ	59509	0.79	Residential	36	Urban Capacity Study
South Aylesford	Aylesford South & Ditton	ME16 0YE	59390	3.47	Residential	83	Withdrawn Allocations
Trench	Trench	TN10 3NT	59522	0.29	Residential	8	Urban Capacity Study
Trench	Trench	TN10 3QP	59521	0.94	Residential	27	Urban Capacity Study

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Trench	Trench	TN11 9NG	59612	8.02	Residential	179	Call for Sites
Trench	Trench	TN11 9NG	59746	11.21	Residential	255	Call for Sites
Vauxhall	Vauxhall	TN11 0NQ	59848	5.69	Employment	TBC	Call for Sites
Vauxhall	Vauxhall	TN9 2AD	59568	0.20	Residential	25	Urban Capacity Study
Vauxhall	Vauxhall	TN9 2AQ	59878	1.19	Residential	124	Call for Sites
Vauxhall	Vauxhall	TN9 2BE	59428	1.68	Residential	74	Urban Capacity Study
Vauxhall	Vauxhall	TN9 2FE	59553	0.15	Residential	7	Urban Capacity Study
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5BP	59700	1.24	Residential	0	Call for Sites
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5BS	59845	4.61	Residential	0	Call for Sites
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5HX	59624	16.97	Residential	185	Call for Sites
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5HZ	59723	0.55	Mix	TBC	Call for Sites
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5HZ	59799	16.83	Residential	0	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5LW	59797	80.32	Residential	1228	Call for Sites
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5NN	59664	1.93	Residential	21	Call for Sites
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5NN	59728	7.40	Residential	0	Call for Sites
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5NN	59729	20.02	Mix	TBC	Call for Sites
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5NW	59654	1.37	Residential	4	Call for Sites
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5NW	59803	14.23	Residential	331	Call for Sites
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5PJ	59800	12.02	Residential	275	Call for Sites
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5PJ	59802	27.52	Residential	644	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Wateringbury	East and West Peckham, Mereworth & Wateringbury	ME18 5PS	59722	0.50	Mix	TBC	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 4PB	59733	1.06	Residential	27	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 4PL	59602	0.66	Residential	19	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 4PL	59603	4.25	Mix	TBC	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 5AD	59658	0.67	Residential	19	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 5AD	59672	0.60	Residential	17	Call for Sites
West Malling and Leybourne	Birling, Leybourne & Ryarsh	ME19 5EU	59756	2.96	Residential	75	Call for Sites
West Malling and Leybourne	Birling, Leybourne & Ryarsh	ME19 5EU	59844	2.29	Residential	58	Call for Sites
West Malling and Leybourne	Birling, Leybourne & Ryarsh	ME19 5HP	59833	0.07	Residential	2	Call for Sites
West Malling and Leybourne	Birling, Leybourne & Ryarsh	ME19 5HQ	59441	1.78	Residential	45	Urban Capacity Study
West Malling and Leybourne	Birling, Leybourne & Ryarsh	ME19 5HX	59863	5.53	Employment	TBC	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
West Malling and Leybourne	Birling, Leybourne & Ryarsh	ME19 5LB	59762	2.25	Residential	57	Call for Sites
West Malling and Leybourne	Birling, Leybourne & Ryarsh	ME19 5LZ	59445	0.60	Residential	19	Urban Capacity Study
West Malling and Leybourne	Birling, Leybourne & Ryarsh	ME19 5QH	59442	0.49	Residential	14	Urban Capacity Study
West Malling and Leybourne	Birling, Leybourne & Ryarsh	ME19 5QH	59443	0.54	Residential	15	Urban Capacity Study
West Malling and Leybourne	Birling, Leybourne & Ryarsh	ME19 5QP	59456	0.24	Mix	TBC	Urban Capacity Study
West Malling and Leybourne	Birling, Leybourne & Ryarsh	ME19 5QU	59432	0.53	Residential	15	Urban Capacity Study
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6HL	59807	2.94	Residential	34	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6HL	59814	1.26	Residential	0	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6HL	59860	3.50	Residential	41	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6HN	59854	0.69	Residential	20	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6NA	59488	0.36	Residential	16	Urban Capacity Study

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6NN	59699	13.68	Mix	TBC	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6PD	59594	5.48	Residential	35	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6QP	59447	0.30	Residential	14	Urban Capacity Study
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6RD	59714	2.71	Residential	69	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6RE	59645	1.66	Residential	42	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6RF	59716	3.62	Residential	28	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6RW	59619	4.21	Residential	30	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6RW	59620	1.96	Residential	7	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6RW	59621	2.17	Residential	27	Call for Sites
West Malling and Leybourne	East Malling, West Malling & Offham	ME19 6RW	59622	0.28	Residential	0	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 0NY	59608	1.44	Residential	37	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7AF	59593	2.38	Employment	TBC	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7AF	59600	0.84	Employment	TBC	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7BT	59707	4.37	Residential	105	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7BT	59731	4.32	Residential	104	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7BZ	59881	9.92	Residential	238	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7DT	59751	1.34	Residential	34	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7ER	59671	3.02	Residential	73	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7PB	59882	0.08	Residential	2	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7PB	59883	0.32	Residential	9	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7RD	59711	0.27	Mix	TBC	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7RD	59712	3.08	Residential	73	Call for Sites

Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7RF	59880	5.49	Residential	132	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7RJ	59611	3.22	Employment	TBC	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7RJ	59681	3.18	Employment	TBC	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7RJ	59705	0.48	Employment	TBC	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7RR	59643	0.61	Mix	TBC	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7RR	59665	15.42	Mix	TBC	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7RR	59706	0.21	Mix	TBC	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7RW	59680	6.48	Employment	TBC	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 7SG	59788	7.20	Employment	TBC	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 8AP	59794	0.90	Residential	26	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 9AJ	59770	1.83	Mix	TBC	Call for Sites



Ward (existing)	Ward (May 2023 onwards)	Postcode	Site ID	Site Area (ha)	Proposed Use	Potential Yield	Source
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 9HS	59709	12.39	Mix	TBC	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 9HS	59720	8.27	Residential	198	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 9HS	59793	0.12	Residential	4	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 9JD	59872	0.09	Residential	3	Call for Sites
Wrotham, Ightham and Stansted	Pilgrims with Ightham	TN15 9JE	59871	1.10	Residential	28	Call for Sites