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## Report on Questionnaire Answers

Questionnaire: TMBC Local Plan - Regulation 18

Question: [Question 6] What are your reasons for selecting this particu...

### User Response: Text

bjbkjbb

As I have said throughout there is a shocking under resourcing of affordable homes be those rented or priced accordingly our younger generation cannot get on the housing ladder and rent is so high they cannot afford this either the current developments are being bought not by local people but by investment companies including asset stripping buy to rent conglomerates the unmet need I'd for good quality social housing. As a responsible council there needs to be ring fencing of homes for rent managed by not for profit housing associations .

What the hell is this?

Historically demand always outstrips growth

The borough is full. Our villages and settlements cannot cope with more houses. If more are to be built, build a new town, plan it and get it right. By planning what will effectively be a new town we can allow for growth, unlike Kings Hill which has been enlarged piece meal without thought for access, schools or shopping.

Housing provision should be based on need not greed. The Government has promised to level up the country, investing in less affluent areas, and there should be less immigration into the South East from other regions in the years ahead.

I don't want either. I had to select one, I selected the least destructive one

If there are unbuilt on sites that already have planning permission, they will provide any extra housing. How accurate are the government figures? The new government is quite likely to change the numbers.

Contingency is needed for the timeline which is being considered.

It is sensible to have some 'reserve' as we don't know what future housing needs will be

In line with the NPPF (para 61) we suggest that as an absolute minimum TMBC should be aiming to meet the figure of 839 dwellings per annum based on the 2021 standard method calculation. In practice, the Council should be aiming to meet the assessed housing need with an additional 10% supply. This would provide flexibility and resilience into the housing supply. A buffer would help ensure a reliable supply in the event of potential non-implementations, delays to delivery (including beyond the plan period), and economic factors within the market. A buffer would also be seen as an effective method of ensuring security within the supply against future changes to the local housing requirement within the methodology, for example in case of new affordability data that increases the requirement. However, the selection of 10% as the buffer figure would benefit from further justification for this to be a sound approach.

It is likely that a buffer is needed to account for non-delivery of certain sites within anticipated timescales. It is sensible to plan for this as a sudden drop in housing supply could undermine the whole plan and risk speculative development.

I think that the forecast numbers for housing need are over-exaggerated and date from a time when there was large number of EU citizens living in the county, many of whom have returned to their countries of origin.

It's bad enough trying to find the room for the assessed housing need, without adding more housing voluntarily.

More houses in the South East are not going to solve the issues. All they will do is push the existing housing stock prices up further, as they will be more expensive and will set a new norm.

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**User Response: Text**

Until the government succeeds in levelling up the rest of the country (not looking likely any time soon) the draw of living close to London in the south east will remain high.

If the needs are assessed accurately and are updated post Brexit/pandemic, including much more emphasis on affordable housing (flats) including for the elderly thus allowing for ease of downsizing, rather than the needs of Greater London or aspirations of folks wanting to access our schools, there will be less need for more upscale, expensive new housing in rural locations.

Assad housing needs may change

Too much housing already therefore try and reduce increases to minimum

There is already too much house building in our borough .

The current formula used by central government to assess local housing targets is flawed and doesn't relate to the situation on the ground. The pandemic has changed property markets. London cannot keep emptying out into the neighbouring counties and a mass of empty properties in London will, I think, reverse the trend in future. Property prices in the South East are artificially inflated and some 'levelling up' should mean housing moving into less populated counties instead of stuffing more and more into one corner of the country.

less

Meeting the need is satisfactory. Exceeding it is not necessary as there will undoubtedly be a new or revised plan again in 2040

There is no need to increase our housing allocation beyond that which is required. The sustainability appraisal findings show significantly poorer results against most of the criteria for Option B compared with Option A.

We don't believe that the infrastructure for this need will ever be put in place by the Government to enable basic needs of all the houses to be met. See Kingshill as an example.

As a finance officer I always believe in a 10% excess for unforeseen changes to the plan.

The council must continue to challenge the housing targets set by gov which seem wholly excessive and appear to fail to take into account the size and unique mix of land including AONB historic settlements prime agricultural land and restrictive supporting infrastructure outside of the councils control.

Plan for the future

Neither really

Not sure if +10% relates to housing only. If so, then I don't like either of these options. The future proofing should relate not only to housing but also to possible increased need for medical, educational and infrastructure matters.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and high-quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested. We are 70% Green Belt; much of our area is flood plain; roads are highly congested - hard to absorb more housing.

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**User Response: Text**

I do not believe the quota is suitable for our area. It is far to high.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorb CO2, provide wildlife habits and prevent the town from flooding. Skilful and high-quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic on roads that are already congested.

I think that building up to 10% extra housing will undermine the stated principles of the Local Plan.

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Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

Again please use plain English what does this mean? I have a degree but this is impenetrable!

Fulfills the need whilst limiting loss of environment.

I question the need or indeed advisability of the quoted figure of 15,000 (approx) new houses. Such development in this borough would dramatically change the character of the area from semi-rural / rural (in the main) to urban in many locations.

Clearly, the country has a severe housing need but this figure about 25% of the existing housing in the borough. Apparently the government is aiming to build 300K homes per year to meet the national need. Given the nature of TMB, I think what we are being required to build is seriously excessive.

Government should be asked to explain why it thinks we need such drastic growth.

This is Hobsons choice!

Why accept more than is quoted. Home counties as a whole are over developed.

The fewer new developments the better

We can always build more.

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The office of national statistics disputes the housing numbers advocated by the government.

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**User Response: Text**

If you're meeting assessed housing needs why would you need to add 10% more? Housing demand is like lanes on the M25, there will never be enough as demand always matches supply.

The aims of this Local Plan should be realistic and not take into account unknown requirements.

I believe assessed housing should be deducted by 50% at least!

There is no reason in wasting land building houses to attract people who already have houses.

We should build only affordable housing or replacing poor housing.

While I accept that there is a shortage of housing, particularly affordable housing, it is difficult to see how we are going to accommodate even the assessed housing need without completely wrecking the neighbourhoods we live in.

In line with the NPPF (para 61) we suggest that as an absolute minimum TMBC should be aiming to meet the figure of 839 dwellings per annum based on the 2021 standard method calculation. In practice, the Council should be aiming to meet the assessed housing need with an additional 10% supply. This would provide flexibility and resilience into the housing supply. A buffer would help ensure a reliable supply in the event of potential non-implementations, delays to delivery (including beyond the plan period), and economic factors within the market. A buffer would also be seen as an effective method of ensuring security within the supply against future changes to the local housing requirement within the methodology, for example in case of new affordability data that increases the requirement. However, the selection of 10% as the buffer figure would benefit from further justification for this to be a sound approach.

Para 4.2.17 is in error - the options are reversed. Does this invalidate the entire consultation?

We are being asked to choose between A) A number we don't understand, and B) A slightly bigger number we don't understand. So I'll choose the smaller number.

Government housing targets may reduce

The +10% will most likely end up being unaffordable, non-council housing that only goes to benefit the developers whilst killing off more of our green spaces.

I don't support either quantum option. I reject the premise that we need to meet the assessed housing need in the borough. Why is it necessary to provide housing for everyone who wants to live here? It is a beautiful part of the country, naturally many people will want to come. That doesn't mean we have to accommodate them.

There has to be a figure for general population growth. Any attempt to restrict growth would lead to house price over-inflation as households sell at a premium. Local schools will also have to restrict 'new-to-area' applications unless growth (even if arbitrarily set at +10%) is restricted.

Plan for what is required, there may be a plus or minus, but over the course of 15 years it should net out to the plan. Hence what is the logic in creating a +10% option - it implies a lack of faith in the basic planning assumptions!

Also, it appears that the outcome of this question has been pre-judged seeing as the SA has been done at the +10% option.

There are office buildings in the borough which will increasingly become redundant to 2040 - Kings Hill for example . Change planning use and free these up for residential development

The Plan will not be accepted unless the Government's housing target is met.

TMBC has already notified the Government why the housing target is unrealistic given that 77% of the Borough have AONB or Green Belt protection. It is therefore illogical for TMBC to plan for a 10% higher target.

I believe the Assessed Housing Need is ambitious in itself and I hope that TMBC will be much more timely in producing the next Local Plan so that we do not run up against a further problem with land supply.

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**User Response: Text**

I agree with the Option 1 findings from the ISA Table 4.1 findings.

It is evident from the Sustainability Appraisal that these proposed developments require major work to infrastructure, to protect water courses and water supply, to control contaminants such as sewage and chemicals, to defend against the impact of climate change and to achieve zero carbon. It is not clear to me that TMBC has taken on board the gravity of the Sustainability Appraisal, or intends to do anything about it. Public opinion is ahead of institutions and perhaps the council will offer more ambitious and credible solutions in years to come with houses and places designed to cope with climate change and full redress to the extreme pressure on nature.

Understanding there is a need for more housing, but does this housing all have to be in the South East? There is no way to satisfy the assessed housing needs without significant damage to the existing neighbourhoods.

Make use of old derelict buildings in towns instead of building new homes

Housing supply is needed to bring the cost down.

I believe that the identified need for 16000 dwellings is far too large. Given it represents nearly 1 in 3 new dwellings in a period of just 15 years, it will be impossible to provide the infrastructure to support this scale of change.

Plus as noted above will we have 30% more surgeries, local transport, schools, car parks.

Will the electricity, gas, sewage infrastructure, roads cope with 30% bigger loads. These will also need to be in place before the majority of the development.

Again I believe this target of 16000 is frankly ludicrous.

We are already being required to meet a disproportionate housing target, (a 28% increase if I understand it). We should not go beyond that.

While there is a need for housing for Borough residents, especially for affordable housing, the area is already over populated compared with the rest of England outside of the cities, with inadequate infrastructure of all types. Excess housing is likely to be for yet more expensive 'executive homes' and will attract still more very affluent people while doing nothing for the housing of lower paid local residents and making the problems of health care and schools even worse as potential employees cannot afford to live here.

If you go above and beyond, the larger number you achieve will simply become the case upon which to grow. So you're shooting yourself in the foot.

I prefer there to be fewer houses and to only keep up with the minimum amount of development required in order to protect our green spaces

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**User Response: Text**

To avoid additional harm to the Green Belt, biodiversity, and pressure on infrastructure - particularly on roads in the Borough that are already congested, but also pressure on schools and medical facilities. Also, agree with TMBC's assessment that there are likely to be more negative outcomes from Option B.

I anticipate housing needs will slow as a result of Brexit and more distributed workforces

If we build 10% more houses that needs 10% more infrastructure which will probably be difficult to finance, and if there are houses they will eventually be taken if only by private landlords and encourage people to come to the area which we do not want.

There should be a drive to refurbish/repurpose offices and homes that are unused and have been vacant for some time to accommodate some of the housing need. The government should make laws to enable fair private rentals for all and offer less chance to buy at significantly reduced rates from housing associations etc which takes those properties out of the housing needs market.

The South East of the country is already too congested with insufficient infrastructure in place. To add an additional 10% of housing in excess of need will add further pressure which cannot be sustained.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

There is no sense in wasting land building houses to attract people who already have houses elsewhere

Do not plan to build more than the allocation. In fact you should be challenging the allocation and setting precedent that it is extremely difficult to meet it in the first place.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

The level of house building has been too low for decades so we need to rectify that and also to address future need.

Primarily the cost of land is very expensive in our community, therefore any developer would shy away from developing low- cost community homes, or investing in the necessary infrastructure.

Equally the cost to the Council of contributing towards these developments would be prohibitive in view of diminishing

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funds available to Local Government. Also the home- owners in many of the sites in the Borough wish to protect the value of their homes, quite rightly.

In addition, it is essential (and will probably become mandatory) that there is Local Government investment in Green Technology. This is highly desirable for current and future residents who hope to live longer in an environment free of pollution e.g., extra traffic, waste etc.

Also fundamentally important, before adding to existing housing needs is a funded legal commitment from all utility companies to provide the investment in infrastructure particularly water, power and broadband to rural areas. We have seen this summer that there is no capacity to meet increased need if there is an issue, for example, with lack of rainfall.

NO new building, (and particular not an extra 10%) should take place without this investment FIRST.

Finally, development in addition to that of assessed need should consider the probability of a falling population nationally, and be targeted at areas in the country which are suffering denuded populations i.e. levelling up.

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Development should be concentrated in urban areas and built on brownfield sites rather than spread more diffusely

I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads in and around Tonbridge.

To avoid indiscriminate housing sprawl.

To ensure green spaces and AONB are maintained and over development does not occur within the borough.

I hope that more opportunities will become available in other regions in the time period and would not wish to deter people from choosing to live there.

We are running out of green space in the East of the Borough and we must preserve and protect what little remains.

It's important that people and their communities are considered, alongside the need for increased housing. We need well connected public transport, sustainable energy generation, schools, arts, NHS healthcare, community spaces and all of the other things that people need in order to form communities.

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While the quantum options are objectively assessed, this does not mean that they are correct.

It is not clear that the options factor in changes in behaviour that have resulted from the pandemic. In particular, the ability to work from home for many people has allowed them to consider living in other areas of the UK where there is a cheaper supply of housing, rather than needing to be in commuting distance of London.

The Housing Needs Assessment that is used to drive the two quantum simply ducks this issue. It says "This report has been prepared during the COVID-19 pandemic. The impact this may have on population projections, the economy and dwelling need will emerge in due course." The only real assessment it makes on the impact of the pandemic and the rapid shift to working from home is in paragraph 5.10, which explores the type of house people are seeking, rather than what part of the country they wish to move to. Data in paragraph 5.10 are based on an online survey with a 12% response rate - these are poor quality data to be basing important decisions on.

It is surprising that Option C Quantum 2 - Meeting Assessed Housing need minus up to 10% has not been considered as plausible.

A 20 year plan that does not properly consider the impact of the most dramatic and sudden shift in working patterns in living memory is not an appropriate plan.

I do not believe the assessed housing need is valid for the area, I believe it is too high, so have chosen the option to limit it to the extent that I can. Following this need will increase the strain on local infrastructure and services, including road congestion and healthcare services.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Northeast area of Borough. Already within the Medway Gap and Valley there are a number of developments with outline planning permission that will adversely affect Aylesford Parish communities and increase the density of housing and create



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additional transport congestion.

The local plan baseline assumes that the Medway Gap and Valley has the required local infrastructure and current services available, as it suggested theses will play a key role in further development plans and transport requirements. These assumptions in the local plan are inaccurate.

Quantum plus 10%. Figure 10. Potentially this will identify the area situated between the Medway Gap and Kings Hill incorporating East Malling and Ditton to increase in size!

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Housing needs should be restricted on green belt land and areas of outstanding natural beauty.

I think there is very little land suitable for building and so it will be challenging to meet assessed housing need. Even harder to meet 10% more

Plan to build only what we need

Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty.s

Reluctantly accepting Option 1. I believe that the assessed need is already too high. The Borough is already overcrowded - it will lead to more stress on already overstretched local services health and educational and more congestion on roads in and around Tonbridge.

Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty

At present, I am unclear about the actual assessed housing needs and who the main target groups are - those on the housing register, first time buyers, affordable housing etc. I would like to see a greater level of detail regarding the projected housing targets and who the provision is actually for.

Given that T&M are currently appealing against the assessed housing need, and that this figure is already challenging and excessive, adding a further 10% seems unnecessary. It would be better to model a scenario based on a figure that the current infrastructure, especially roads and healthcare, can support, and that will not adversely impact on air quality.

Selecting option 1 was a fait accompli. 4 options should be presented.

Option 3 - Return to the assessed need prior to the 20% penalty imposed due to the last plans withdrawal.

Option 4 - Reject central governments figures entirely.

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**User Response: Text**

Assessed Housing need is a minimum standard required and this should be increased by +10% to allow more choice, increases deliverability and would provide a range of different developments to come forward - squarely meeting key SA Objective 14. TMBC acknowledges that the borough has high house prices and increased supply will help to deliver more affordable choices.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge

Development within the commuter belt in which T&M falls, has consistently provided housing for residents from London. This has had several effects on local housing: 1) as we try to build for the local community, we still have a housing shortage 2) our housing prices become inflated 3) our transport systems, both public and private vehicles, become more congested & suffer more demand by commuters.

No option to object

Kings Hill over developed, infrastructure does not service the local need causing local flooding of roads during inclement weather and traffic jams in peak periods

I see no reason to add additional housing stock on top of the assessed need which in itself as a modelled calculation is not precise and the data supplied will not be 100% accurate for various reasons. Therefore the assessed need is a best guess and will be +/- and I know factor of actual need. Adding 10% merely screws this error factor one way and is a sop to demand which is not the same as need,

Reluctantly accepting Option 1 I believe that the assessed need is already too high - it is based on an out of date pre 2014 population figures and makes no allowance for changes brought about by covid and brexit. The Borough is already overcrowded. this addition will lead to more stress on already overstretched local services such as health care and education and more congestion on the roads into and around Tonbridge

Don't see a need to build more than we think we'll need and it's going to be hard enough to do that.

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The Local Plan will need to seek to Standard Method in full. The Government's present "capped" figure for this amounts to 839 dwellings per annum. The Local Plan should have regard to potential for meeting "uncapped" needs (above the capped figure) to respond to potential unmet need from neighbouring authorities.

Reluctantly accepting question 1 I believe that the assessed need is already too high. It is based on an out of date pre 2014 population figures and makes no allowance for changes brought about by covid and brexit. The borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as health care and education and more congestion on the roads into and around Tonbridge

We recognise there is a need for more housing throughout the UK but it needs to be done sympathetically to suit the area where the building is to be carried out.

Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty

West Kent is already saturated. There are vast areas of unpopulated land further north in the UK

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The least amount of new houses as possible. We have enough, leave green sites and woodlands alone!!

Plus a lot of the reason people accept smaller gardens with relatively high house prices is because we are surrounded by woods and green space. That offset justification just won't be there and I think it could affect the value of houses.

Obviously it's option A but I don't agree that the assessed housing need is appropriate. The government has lots of options of lots of different areas to develop around the UK and constantly chooses to over populate and ruin the South of the country. There are lots of amazing opportunities near cities up north such as Manchester, Birmingham etc. It is no longer all about London. Development should be UK wide, not just over populating the South but trying to invest in the North also.

The quantum given already appears to high for the geography and demographics of the area (ie. Very rural, little local industry). With the economic outlook as it is and the strong possibility that there will be a fall in house purchases with rising interest rates it would be imprudent to over-estimate that requirement.

Need to protect the green belt land and avoid building in the smaller villages.

Housing need in this area needs to be reassessed to reflect the fact that the borough is 70% greenbelt. The numbers are

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inflated by the 23% uplift so are inaccurate anyway.

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The housing quota under discussion will already put significant pressure on current resources and the landscape of the borough. I think it would be better to increase the percentage of affordable housing within the assessed housing need total, and to ensure this percentage is enforced, as that is where the greatest need lies.

Need another choice ....so that housing is built with a view to local needs, affordable and replacing poor housing ...not with a view to attract more people moving into the area from places where they already have houses.

If anything this is still too high a figure, adding 16% to the housing stock in this region does not appear to reflect the HMG aspirations for "levelling up" the country.

Wateringbury has the worst pollution at the crossroads ( at rush hour) in all of KENT. Therefore ANY, extra housing is a threat to the residents of Wateringbury, we will be a burden to the NHS ,every additional home will mean another vehicle. Pollution is a serious worry, there is a school, & a nursery school, a village hall at the crossroads, many young & older people coming & going at the cross roads, so children would be affected by the health risks , all ages affected.

WE should be keeping building volumes as low as practicable

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Keep the numbers manageable as possible to ensure quality of life for your residents.

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The plan already seems ambitious enough. Identify empty properties and bring these into available stock.

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**User Response: Text**

All development should be outside the greenbelt and AONB. Once it is gone it is gone forever. We must preserve the green open spaces between our adjacent villages to keep their individual identity.

we will struggle to find enough houses with current figures which are questionable

It appears that if a local authority has any overage in housing allocation it is constantly challenged by Neighbouring LPA's .

Given the policy that has been adopted by TWBC to elect to allocate almost 50% of its total housing allocation on TMBC borders leaving all revenues within TWBC and all the costs to TMBC . until neighbouring authorities start to think outside the box and collectively working together to solve the housing issues that are not just in their own Borough but understand the need and requirement of all neighbouring LPAs such as transportation, flooding, education, infrastructure employment we will sadly continue to see the demise of these wonderful communities .

i think the need is already too high. It is based on pre 2014 population figures and makes np allowance for changes brought about by Covid and Brexit

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Quantum 3	- Housing need MINUS 50%, no allowance for "Internal Migration"
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There is no sense in wasting land building houses to attract people who already have houses elsewhere

We should be building only for international migration, and for affordable, replacing poor housing, and not market

I feel that our region is already highly over-pressured in terms of services & infrastructure. As such I feel that meeting our requirements rather than exceeding makes most sense.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

I do not believe the allocation of c 15400 houses is appropriate and so do not opt for either option.

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**User Response: Text**

Cost of housing etc in the area is making it less affordable all the time for more and more people.

My preference is to minimise the amount of development as we have sufficient housing in TMBC and infrastructure is already stretched to the limit. Therefore any future development should be kept to a minimum and much less than the c16,000 proposed.

The known significant planning developments c6,000 that are already being submitted for consideration or have been passed would allow for any current housing needs.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

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The increased need for housing is currently driven by immigration. This will hopefully reduce once the war in Ukraine is finished

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

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Too many houses for this site as it will not cope with the drainage and infrastructure.

It is understood that the Government's top-down target of 15,941 is to be challenged and if successful, the target will

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reduce; therefore why would you consider an additional 10% at this stage. The Interim Sustainability Appraisal report, Ch 4: 4.6 - 4.10 states that the proposed target would have a negative result on nearly all of the SA objectives (1-13) and a target plus 10% would be significantly worse in some cases.

Local services especially healthcare and education cannot deal with the existing demand. Anything more than the assessed need will cripple services in the borough.

The borough is already very populated so it is important to limit development

A decision has to be made about how developed TM area is to become; meeting identified needs is expansion enough. Additional development may well happen, in any case, from individual planning requests.

*QUANTUM 3 - Housing need MINUS 50%, no allowance for "Internal Migration"*

There is no sense in wasting land building houses to attract people who already have houses elsewhere.

Meeting the immediate need -not for the unknown.

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Because I do not feel much more development within Kings Hill residential areas would be conducive to good clean living which I understand KCC are aiming for. We cannot continue to develop KH and surround the area with dwellings. I should be interested to know who is going to buy said dwellings when the starting price for a house on KH is approximately £450,000! This is not in the sphere of first time buyers or for those people born within KH /West Malling / East Malling & Leybourne. One has to have a very well paid job in the City and not in Kent, in order to be able to purchase a property.

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I believe that the Council has a hard job trying to identify land for housing targets set by Government, but I do feel it should be up to each Council to identify land in their areas only as long as the Councils ensure green belt land is preserved and previously developed land is used. If Option B was to be adopted then other Councils who do not know anything about neighbouring Council areas/land could try to pass some of their housing quota to those areas when they do not have the knowledge of that area to ensure it is capable of dealing with more development in that areas. The sensible solution would be for Government to allocate reasonable targets in the first place to each Council. Not everyone needs to live in the South East of England anymore, we have seen since Covid that people can live in other parts of the Country and work in the South of England now that we have such good online facilities.

With climate change, Brexit, home working after covid etc - I'd imagine that living in the South east will gradually become less attractive, certainly over a 20 year time horizon. So even meeting up hat is currently assessed as required might be too much.

There are more than two answers to question 5. Why should Kings Hill (which has already been heavily developed) have to support yet more housing? Targets for even more development are unreasonable and, in the case of the 20% uplift, punitive for local residents

I believe that the calculated need (OAN?) is too high as it is based on outdated (2014) population data.

There is no allowance for changing demographics due to home working, re-location and the ageing population of the area.

Health, education and social services are already overstretched.

option A may well need to be met but not in some of the totally inappropriate areas proposed. Option B is unnecessary and excessive.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

I don't see the requirement for either quantum option. The whole plan is complicated enough with out adding this facet.

The Borough is already overcrowded, and additional building will add to already overstretched education and healthcare services. The congestion on roads will be horrific.

There is already a huge amount of unoccupied dwellings and redundant commercial property in the UK and no doubt within the borough which which could be renovated and made habitable. These and the already approved planning applications that are not being executed would no doubt meet a significant proportion of the housing need. These should be factored in and an allowance should not be made for second homes or internal migration (which should net-out across the country)



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Government (Westminster) has set National country wide targets - Assessed Housing Needs -which do not seem to take into consideration local conditions i.e. three close proximity/linked commuter towns - Tonbridge, Sevenoaks and Tunbridge Wells. These three towns are all trying to meet the same targets which will inevitably lead to adjacent developments on either side of the shared borders.

There should be no voluntary offer to increase the Assessed Housing Need that will only increase local planning problems.

It will already be difficult to find the houses required in this Borough

The housing needs are laid out in the Local Plan, housing built beyond the set-out need is surplus to requirement (or if it is not surplus, the need stated is not correct). Building beyond the need unnecessarily risks the natural environment.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habitats and prevent the town from flooding. Skilful and high- quality development and refurbishment of existing buildings and brown field areas could provide additional housing while preserving greenbelt and wetlands

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

We only need to meet the assessed housing need

we need to meet the housing need but avoid over development

Option 1 is the lesser of two evils. The infrastructure and resources of the borough are insufficient to deal with an increased demand.

I am a little dubious about your phrasing of "objectively assessed need" - I thought the 15k+ houses target had come from National Govt. I shall carry on reading the documents and perhaps the answer will be in there. But frankly my view on extra housing is that if you build it people will move in. TMBC's location so close to London and (historically) Europe makes it a desirable location. I would like to know more about how this need has been assessed - and if some of the figure is to provide what is effectively temporary housing for non-UK residents.

If this has been objectively assessed, it should be followed.

We need to meet the housing need but avoid over development

The requirement should be met, which includes a buffer. However, much of the increase is associated with the high house

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price / earnings ratio, which will not be affected by the proposed development and as such, the local plan should reflect the government guidance on the location of the required development, ie. in brownfield sites in urban areas, especially where there is a locally high house price / earnings ratio. Housing assessed need is warped by the high price in the green belt areas, and this needs to be addressed.

Requirement should be met including a buffer. Housing assessed need is warped by the high price in the green belt areas, and this needs to be addressed. Local plan should reflect government guidance on the location of planned development ie in brownfield sites in urban areas.

One would assume that assessed needs already factor in anticipated growth over coming years and should be assessed on an ongoing basis to ensure that they remain fit for purpose. To plan at this stage for incremental need beyond the currently assessed level would only serve to unnecessarily add pressures to the planning process and potentially earmark sites for development that will not ultimately be required.

Because I do not believe that much more development within Kings Hill's residential areas would be conducive to the clean environment that is apparently KCC's aim. We cannot sustain this endless development in Kings Hill without detriment to the whole environment!

It would be interesting to know who is going to purchase these affordable!! and unaffordable!! dwellings when the starting price for a Kings Hill house is around £450,000!!! There must be a queue of well-to-do buyers for these homes!!

It is difficult to fully assess the requirements based on the numbers provided but the 'Assessed Housing Need' already appears to cater for a c.30% increase in housing stock that would contemplate a potential population increase of up to 40% for the borough. This is significant given the strain already on some urban and rural areas of the borough. Moreover, seeking options for potentially 17,500 dwellings might unnecessarily force the decision to select and develop, particularly green belt, land across the borough. It might also give a false sense of capacity (that does not exist) for neighbouring borough councils to seek to exploit for overspill for their own development plans. Again, Tonbridge is already facing negative consequences from the development of Capel and Tudeley, which we should not seek to add to, even as a risk, in this Local Plan.

TMBC's Housing Need assessment ought to be minus 50%. What is the migratory data of home owners at Kings Hill, Lancaster Park, Hermitage Lane and other recent similar developments? TMBC will be aware of the increased population within the region and of course new homes will attract some buyers from outside the locality? The focus here should be to provide for the majority of people already living in the area. In case I have missed the document, where in the Local Plan is provision made for independent living, supported living, and convalescence homes?

I prefer Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge. Also it is not clear on what basis the +10% is factored in.

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**User Response: Text**

Due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

The evidence shows this area does not require more housing and others should take first place

Increased density of development will create a more sustainable future, and reduce travel and commuting by infrastructure upgrades and technology changes which will remove car ownership, and make sure mobility asset such as cars are shared and effectively used, reducing congestion and wasted investment resource.

With a much reduced birth rate in the UK, are we likely to see a decline in population? Will the population want to continue living in the South East? We cannot tell, so why build more houses than are needed? Once green space is gone, it is gone for good.

As earlier explained, the projected "housing need" is misleadingly high, mainly because it uses the wrong measure of affordability. In addition, more building will not reduce house prices at all significantly, as was shown by the research for the official Barker Report on housing supply of 2004.

The assessed housing need probably won't actually be met through this plan due to planning barriers, NIMBYs, legal challenges etc. Planning for the extra may make it more likely that the original target will be met. Also, we don't know what will happen over the next 18 years. Increasing the housing stock +10% will help to maintain affordability.

Of the two Quanta suggested I have indicated a preference for Option A but believe that T&M residents should have been given the opportunity to give the Borough Council a mandate to set the new housing figure lower than the Assessed Housing need, either at the level of the last local plan (prior to the arbitrary 20% uplift) or even something less than that. The Office of National Statistics (ONS) - Population Increase Projection gives an anticipated population increase of 5.7% for England between 2020 and 2040. The Assessed Housing Need currently requires a massive 30% increase in dwellings over approximately the same period. This is so worrying and not supported by ONS projections. Even taking into account the continuing move away from the nuclear family, the only way a 30% increase in housing supply would be required would be for continuing significant migration into the Borough from London and its suburbs, which would be to the significant detriment of existing communities. There are many people wishing to move out to "the country" from higher cost housing areas to somewhere like Tonbridge and Malling where their housing budget money, be it as a home owner or renter, can go much further. This both worsens the housing affordability crisis for existing local families and squeezes the availability of housing for existing residents.

There is no point in building houses to attract additional people to the area who already have houses in other areas.

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**User Response: Text**

Levelling Up may mean that other parts of the UK are in higher demand than the South East.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Whilst I understand it is good to be prepared we have no idea what our needs will be going forward so don't believe the additional 10% to be necessary

none of the above we should only accept building on land that has had factories, warehouses, car parks not farms as they are needed for food production.

Don't understand the difference between the two options, however, the less additional house, the better.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

I fundamentally do not believe that the projected housing need number is creditable

To minimise the amount of development in TMBC as infrastructure is already stretched to the limit.

The known significant planning developments of c6,000 that are already being considered or have passed planning, would allow for any current housing needs.

The infrastructure cannot support further overcrowding ; schools, doctors, schools and in particular traffic congestion

There is a limit to the number of dwellings that can be built due to the limited infrastructure which is already overstretched.

If a housing need has been assessed then why add a further buffer of 10% especially as tmcb has so little land available outside the green belt and doesn't have the "luxury" of over build.

I think that TMBC need to be very transparent about what they are aiming for. Are you working to meet the ongoing needs of an existing population, or building to attract more people to an area, the infrastructure of which is already struggling to deal with its current population? If you build houses, or course people will come and live in them, but there are plenty of

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**User Response: Text**

other regions within the UK where population is far less dense than it already is in the South East. Resources are already stretched within our local area – water supplies, availability of doctors' appointments, the fact that at rush hour it takes 45 minutes to drive 5 miles to Sevenoaks railway station (and there is no commuter bus service available) to name but a few. Why exacerbate that situation with speculative development?

I think meeting housing need should be enough as there will almost certainly be some windfall sites in addition to those planned.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Local services are hugely overstretched already and the borough is overcrowded. All infrastructure is suffering, particularly local healthcare and education, with too many patients for medical practises, and pupils for the existing schools. Congestion on local roads deteriorates year on year. Reluctantly therefore, accepting option 1.

Why add 10%, when the assessed need is enough

A consequence of proposing higher housing numbers is potential development being proposed in areas outside of but close to the boundary of AONBs. This includes significantly expanding existing towns and villages and new settlements, such as the proposals put forward in the last iteration of the draft Local Plan at Borough Green and Eccles, both of which lie in the setting of the Kent Downs AONB. The Section 85 'Duty of Regard' in the 2000 CRoW Act requires all relevant authorities to have regard to the purpose of AONBs when coming to decisions or carrying out their activities relating to **or affecting** land within these areas. The PPG advises in respect of AONBs that "Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account" (Paragraph: 042 Reference ID: 8-042-20190721, revised 21 07 2019). The NPPF as amended now includes reference to development in the setting of AONBs, advising ' The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.'

Impacts will not just be confined to the visual or physical effects such as on habitats or watercourses connecting the AONB with its surroundings but will also add to the visitor numbers using the AONB and the traffic travelling through it, affecting the sense of naturalness, remoteness, tranquillity and dark skies.

Therefore, we consider that Quantum 2 would only be appropriate if it can be demonstrated that the numbers involved can be provided with no adverse impact to recognised constraints, including the AONB designation and its setting.

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**User Response: Text**

The Council has continuously under-delivered as regards its housing supply for a number of years. By meeting its assessed housing need only puts at risk meeting this target as sites inevitably do not come forward as they are meant or expected to. Therefore, a buffer needs to be applied to allow for this circumstance.

Planning permission already granted must be taken into account

Tonbridge requires very small incidents on the roads for the to be gridlock and considerable congestion. The infrastructure now serves the maximum occupation.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Rather than building in contingency to the plan it should be kept fresh and regularly updated with the current view of housing needs. I would make the same point about the whole Local Plan. Any plan needs to evolve rather than being started from scratch every 10 years. I assume there is a demand forecasting process which is regularly repeated.

No point in exceeding assessed need which is already being met.

Infrastructure and services are not sufficient for large, proposed development.

Development in Borough Green will more than satisfy demand.

Housing built beyond the set-out need is surplus to requirement and unnecessarily risks the natural environment.

current identified target is challenging enough!

I don't agree with either, why is there no option for this???

The existing development plans are challenging and will have significant impact - TMBC should not plan for additional development beyond that which is necessary.

With the Government's current thinking of Levelling Up we should not be looking at building all over the southeast of England.

An extra 10% would put even more pressure on the already stretched Public services and would have an even greater environmental impact

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**User Response: Text**

Changing environment. Assessed Housing Need is an informed guess. Best to use this as a best case but build in ability to flex either way.

The South East is full enough as it is.

Given the quantum government target for additional housing Option B is unrealistic. The current infrastructure does not meet the needs of the current population. Other agencies are responsible to deliver infrastructure and there is no guarantee that this will be achieved. There is also a lack of Brownfield sites.

Need by 2040 is ill defined. Stick to assessed housing need and no more

no option C

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Hildenborough area roads and vital services are already inadequate for the volume of traffic and population as are other areas in the borough. It will be difficult enough to cope with the assessed housing need let alone Option Quantum 2 unless full forward planning is undertaken regarding the infrastructure development.

Population growth is expected

I think we should do the minimum requested by Government as I feel there are significantly more opportunities to develop in areas in the UK with a lesser population density and better infrastructure which is not creaking as ours is locally.

The saturation of developments will have a negative effect on the quality of life for residents. There is also a real risk of a losing our rural heritage. Also, by using farmland, food production is lost.

I feel that option b would encourage greater movement from more expensive London boroughs and therefore would not necessarily help address local housing needs.

None of the above. The assessed need is already too high as it is based on out-of-date pre 2014 population figures and

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**User Response: Text**

makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

The assessed housing need is already accommodating unused planning permissions. Completions have trailed behind release of planning permissions: this is normal and likely to continue in the current economic situation. The target figure has already been inflated by the government by 23%.

I think it is difficult for a borough like T&M to take on additional housing needs because of the large amount of ANOB and Greenbelt - housing needs do need to be met but additional housing is probably better accommodated in areas a bit further from London or within London. Sprawl where one place merges into another (and London sprawling out) can distort character of each local town as they get subsumed into generally built up commuter belt- T&M is lucky to have a certain character that is separate from a general London suburban conurbation and has preserved its own identity.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge

Meeting assessed needs should be specific and related to the ability to meet the needs of the community. Applying an in built 10% growth factor is not the best way to provide resilience for "unforeseen changes", rather it is recipe for potential unrequired development.

Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside the area of Outstanding Beauty.

The assessed housing need already accommodates unused planning permissions. Completions have run behind the release of planning permissions. This is traditional and is likely to continue with the current economic conditions. The government already add 23% to the assessed housing requirement.

It's important not to build more houses than are needed.



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**User Response: Text**

We are only required to meet housing needs

I cannot agree with either option as I believe the government's overall assessment is tragically flawed.

We don't need more housing here with all the additional infrastructure that would be required that goes around it. Our schools and medical centres already can't cope, and the roads are already clogged. The recent closure of the A21 has caused absolute misery and chaos on the B245. Some of us aren't go out at the weekend as it took an age to make it back home.

I think Option A is already a significant increase. Plus this is an "assessed" increase, so we do not need to exceed our assessment if the assessment is correct, do we?

The targets are already very ambitious and will be difficult enough as it is to achieve, without setting even higher targets than currently assessed as being required.

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

I think it likely that in the not too distant future any additional housing need might be met by conversion of unused retail and office premises as more shopping is online and more persons work from home.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge

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Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

It will not be easy to find housing required in this borough

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**User Response: Text**

As outlined in a previous comment, I do not understand how the Assessed Housing Need has been set at such a high figure relative to the current housing need and the population of the Borough. In addition the Assessed Housing Need already accommodates unused planning permissions. Given the work done on the Assessed Housing Need and the difficulties surrounding land development, adding a random 10% quantum would be unjustified and, frankly, bizarre.

I do not feel that 16,000 dwellings are necessary in the borough if 1200 households are on the waiting list, therefore it is unnecessary to add 10%

I think the assessed need is too high so reluctantly accept Option 1. It is based on out of date figures and makes no allowance for changes that have been brought about by Brexit and Covid. Already overcrowded, the additions will cause more stress on overstretched local services such as healthcare and education and even more congestion on the roads in and around Tonbridge.

It doesn't overburden the need to take green belt land and expand weak infrastructures.

We live in an already overcrowded corner of the country. Supply will never outstrip demand regardless of what figure is agreed, so by providing the option for +10%, this inevitably will be what happens. Aiming low and encouraging a "levelling up" across less overcrowded areas of the country sounds a more sensible strategy.

I'm sorry I don't understand the options - I just know that we don't need anymore incursion on our green spaces

The assessed need is already too high and makes no allowance for the changes of Brexit and Covid. The Borough is overcrowded and to increase it will over put stress on healthcare .and education services. Not to mention the additional congestion to Tonbridge roads.

With the current cost of living crisis, cuts in budgets across the board throughout government including spending on the NHS, withdrawal of funding of public transport like buses etc, surely the council should be considering the minimum requirements it will need to meet the housing needs of the borough. It's important that existing budgets are not overstretched by too many additional houses building built which means the infrastructures cannot cope with increased demand and no additional funding to be put into them.

The assessed housing need is already accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to the current economic conditions. 23% is already added to the assessed housing need by the government requirement

I believe that we are not that far away from saturation point, roads in the area are already subject to traffic road blocks each day. The Hadlow road is often backed up going into Tonbridge and also in the other direction at the roundabout to Kings Hill, Wrotham and 7 mile Lane. Creating any significant increase in housing within this area will simply make the situation worse.

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**User Response: Text**

Assessing housing need for the future is a 'black art'.

Adding 10% to this guesswork is pure madness.

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO<sub>2</sub>, provides wildlife habits and prevent the town from flooding. Skilful and high- quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

People from outside the area should find less encouragement to move in to Tonbridge and Malling, or indeed in to Kent.

We hope that 'Leveling Up' will make more people want to stay in their own local area, and leave room for those of us that belong locally here

As the assessed need already includes 23% added by the government, there seems no need to increase it. Also, I believe there are a number of developments currently in progress or recently completed that are not included.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorb CO<sub>2</sub>, provide wildlife habits and prevent the town from flooding. Skilful and high-quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic on roads that are already congested.

**User Response: Text**

The NPPF advises that local planning authorities should identify and update annually a supply of deliverable sites sufficient to provide a minimum of five years' worth of housing when set against their housing requirement as established in their adopted Local Plans.

In our view, if the Council decides to pursue those development options which entails major urban extensions or a new settlement then we consider that the Council should be planning to meet their assessed housing need plus 10%. The reason for this is that larger complex developments take a lot longer to come to fruition because of complexities with land assembly, planning and infrastructure provision.

If, on the other hand, the Council decide to pursue a more dispersed strategy involving a range of sites in different locations then we believe that there would be an argument for only meeting the assessed housing need of 839 dwellings per annum

I dont believe building more houses will solve the problem of housing need. I am sceptical that housing supply and value are affected by the supply of new housng. I think interest rates, the state of the economy etc are more likely to solve the problem of lack of housing.

It's not that there aren't enough houses in the area, it's that people with big budgets are moving down from London and pricing locals out of the areas they grew up in. I cannot afford a house in the village I grew up in at all. Putting in more housing 'affordable' or otherwise, will still attract and assist city workers with larger budgets rather than the locals.

It's not about the number of homes, it's about affordability for local residents, many of whom rent and won't be able to buy these new houses anyway. So who exactly do these homes benefit, other than quota numbers?

If more houses were built in my childhood village of Hildenborough, I, a home owner and full time employee, still wouldn't have anywhere near enough to even buy a new build 2 bed. So again, who are these houses for?

Avoid Green & agricultural belt development, avoid harm biodiversity and more pressure on infrastructure.( roads , schools ,medical facilities as well).

Assessed needs seem very high so would like to see this as the absolute maximum (and ideally driving for a maximum below this)

We do not know how much we will need.

None of the options are ideal, but Option 1 would have the least negative effect. The figures quoted seem to be at least seven years out of date. Any additional large scale developments would put more stress on education, healthcare and more traffic on already busy roads.

There is already pressure for more and more development in the South East and I see no reason to add to that pressure

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**User Response: Text**

The assessment of housing need at National and Regional Planning level is based on a wide range of factors, including economic growth forecasts, projections of birth and death rates and both in-and out-migration. The process inherently recognises that it is not a precise science, but it follows a well-rehearsed systematic analysis to come to a realistic target. There is therefore no need for the Council to add an arbitrary 10% of its own accord. To do so, is likely to amount to no more than an open invitation to neighbouring authorities to seek housing sites within their own boundaries with less rigour. "Over-provision" also has a cumulative effect, with the "extra" families adding to the natural demands for more space, larger houses, new houses for children of elderly parents, demands on schools and social services in future years.

Providing just the assessed housing need will have significant impact on borough, believe that should be set as the maximum

Not exceed levels needed

No response

Housing register requirements indicate that we do not need to build so many houses in and around Hildenborough

Reluctantly choosing Questions 1 i believe that the assessed need is already high. The borough is already overcrowded. It will put more stress on services that are fit to burst already.

The assessed housing need is the outcome of some Central Government mathematical formula which it could be argued has little consideration for local need. The idea of compounding a figure that seems to be plucked out of the air by a further 10% would be irresponsible.

The South East of England is already heavily populated.

housing number already almost unattainable

The government plan to force even more housing in Kent when the whole infrastructure is already overwhelmed and crumbling is wrong. Concreting over Kent is wrong. If we can't change the government plan to foist more houses on Kent then we shouldn't go beyond the bare minimum in their dictat.

In this area exceeding the assessed housing need would lead to further pressure on the infrastructure and land supply.

Option A is bad enough with 830/year required. This is 16000 dwellings to be added which is 29% uplift and will require significant additional built up area, as well as necessitate a comparable increase in infrastructure and services. As we know money is tight, we are under no illusion that the required investment will lag behind the planned provision, so as existing residents, the levels of development will be detrimental to our living conditions and cause additional stress. 10% in addition

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**User Response: Text**

would be even less tollerable and unviable. The quantum is handed down by central government based on pre- Brexit and Covid projections for growth, which are not realistic. They also oversress the SE, rather than equally spreading the development across the whole country, and just add to the north south divide instead of levelling up. They do not address the actual local needs, which are based more on affordability, than the quantum of houses available.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

The borough should certainly not seek to exceed the assessed housing need which is already excessive.

we need bare minimum of additional homes.

My preferred quantum option is **OPTION 3**

There is no sense in wasting land building houses to attract people who already have houses elsewhere.

We should be building **only** for international migration, for affordable housing, for a sustainable amount of growth and/or replacing poor, existing housing.

Meeting the assessed housing need will be difficult enough without going beyond, if the character and scale of the area, its open spaces, green spaces, historic heritage is not to be negatively impacted as it is beginning to be at present. Coupled with stretched infrastucture, roads water supply, drainage flooding risk, reduced healthcare services, strained schools.... all that makes the area so desirable to live in.

Meeting assessed housing need should be sufficient and development restricted.

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

The Borough will struggle to find enough houses for current needs

This is Hobson's Choice - you are presenting the appearance of choice without any real choice there at all. It's a bit like saying, would you like me to a) steal your car, or b) steal your car and punch you in the face? Obviously I'd choose a) but that doesn't remotely mean I think it's a good idea.

I don't agree that the assessed housing need is appropriate. The government has lots of options of lots of different areas to develop around the UK and constantly chosed to over populate and ruin the South of the country. There are lots of amazing

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**User Response: Text**

opportunities near cities above London, such as Manchester, Birmingham etc. It is no longer all about London. Development should be UK wide, not just over populating the South but trying to invest in the North also.

Development in this country is over-concentrated on the south-east - development should be encouraged where possible in areas that need, to use the Govt buzzword "levelling up".

15941 is quite enough and will bring great pressures on infrastructure and amenities/ health services and education with the number of people and their cars this figure will entail

Even Option A I consider excessive

Out of the Options given, Option A is the preferred option as the Assessed Housing Need already is +/-10% of needs.

Given that the borough has had additional dwellings numbers imposed on it by Government due to a lack of an approved Local Plan, and the overall agenda to "Levelling Up", I believe TMBC should be looking to reduce the number of dwellings built, and put political pressure on government to get the outdated Assessed Housing Need calculations changed.

It will be difficult to find housing needed in this borough

No response

Traffic within the borough is already congested at peak times and the road network doesn't appear to have the capacity to expand with the housing numbers (based solely on my opinion).

If this is a government assessed housing need, do local authorities have the right to question it? This area of the south-east already lacks the necessary facilities in terms of schools, medical and dental practices. Increasing the housing density will simply compound the problem. Transport is over-stretched currently, and roads are becoming dangerously busy.

CPRE Kent would like to see a third option of not meeting the full housing requirement being explored, to reflect the fact that:

- (a) the standard methodology calculation is flawed – it creates a scenario that addresses housing demand, rather than need
- (b) there is a question mark over the continued use of the standard method now that the government has stated that it wants to move away from the culture of top-down housing targets
- (c) the housing requirement should be reduced – in accordance with paragraph 11(b) of the NPPF – to reflect the fact that the borough is enhanced by having land designated as green belt and AONB

It should be noted that the SA confirms that of the two quantum options meeting assessed need (only) performs best in terms of the sustainability objectives.

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**User Response: Text**

I really want quantum 3 but you haven't given me that option

History has shown us that aspirations for housing development are never achieved in reality and thus it would be more sensible to base the plan on the assessed housing need which will be a significant challenge in itself.

It's difficult to find the houses required in this Borough

At a local meeting on this planning decision it was noted that there are currently 1500 people awaiting social housing. The current target of 16k new homes far exceeds the needs of the local population so it makes no sense to then add an additional 10%

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

It can be a challenge to predict the future. It makes sense to build in some prepared resilience should additional housing be needed (but not to build additional houses where neighbouring authorities do not meet their targets).

No Comment

Housing need will already put pressure on infrastructure, public services and greenfield land.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Building on land to attract people who have house elsewhere is a waste of land and needless destruction.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Local services are already stretched. It would require additional facilities to be build . Additional housing will make problems from global warming more difficult to ameliorate .



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**User Response: Text**

Reluctantly accepting option 1, I believe that the assessed need is already too high - it is based on out of date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education and more congestion on the roads into and around Tonbridge.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

I would have no objection to the plus 10% if development was on brownfield sites but I fear this is not on TMBC agenda therefore object to anything more.

We understand that the assessed housing need already accommodates unused planning permissions (and completions are expected to continue to run behind the release of planning permissions).

Furthermore, we are informed that the assessed housing need has already had 23% added to it by dint of a Government requirement.

Impact should be minimised

I do not believe Kings Hill should be included in expansion plans given that it has taken 58% of the total development of the borough.

Whilst I understand the need for housing in these areas, especially in times where housing is in short supply, I must express my concerns about where/how this additional housing will be built, and the lack of any actual planning behind the construction of said housing. Constraints on road access, and lack of both public services and facilities on these new estates must be taken into account. For example, the Leybourne Chase Estate (which had planning permission granted in 2004, had construction start in the early-mid 2010's, and was intended to have it's own GP surgery in 2016) only had a single shop open within the last year or so, with other public facilities only opening up in more recent times. I have concerns that the lack of facilities to these new estates, as well as lack of easy access to public transport like in more established estates may cause problems for the future growth and development of these areas.

need housing but on restricted basis

- already consider the quantum to be a stretch on the borough to absorb, the target in itself could increase the size of dwellings in the borough by a third in just 16 years, feels like a rapid scale of development

Increasing housing will increase population rather than responding to an existing need.

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**User Response: Text**

None of these. Please leave alone.

Local services especially healthcare and education cannot deal with existing demand. any more than the assesses need will cripple services in the borough.

See above. Again, I think the intent is to obtain a conclusion that 'the majority of Tonbridge & Malling residents prefer to meet the Assessed Housing Need' i.e. for substantial growth of the housing stock. I DO NOT agree with either of these 'quantum options' and I believe that that the majority of Tonbridge & Malling residents are AGAINST the substantial growth in housing set out in both options A and B.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded.

Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO<sub>2</sub>, provides wildlife habits. Skilful and high-quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt.

Our Prime Minister, Rishi Sunak's tweeted during his campaign to promise to reduce the annual house building target of 300,000 p.a., and to not allow building on the Green Belt.

This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

23% is already added to the assessed housing need by the government, so any increase on this figure is unnecessary.

Option 1 of two bad choices, the assessed need is out-of-date & too high. It is based on pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. In addition the Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Demand for housing is going to fall if, it has not already. The data used to calculate this 'need' is very old and needs to be challenged. The South East is already overpopulated and this 'need' should be spread more to other parts of the country.

I am in favour of fewer houses to avoid an urban sprawl

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**User Response: Text**

no comment

To avoid additional harm to the Green Belt, biodiversity, and pressure on infrastructure - particularly on roads in the Borough that are already congested, but also pressure on schools and medical facilities. Also, agree with TMBC's assessment that there are likely to be more negative outcomes from Option B.

I assume the need was assessed correctly and therefore why would you need a 10% cushion?

This is a forced choice because the plan is using out of date (pre-2014) population figures. It does not consider changes resulting from Brexit & COVID since then. Without accurate data there will be unnecessary development into areas of essential wet land and green belt that absorbs CO2, provides wildlife habitats and prevent the town from flooding. Skillful and high quality developments and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving green belt and wetlands. Additionally due to Tonbridges geography it is not possible to build additional road infrastructure to reduce traffic which is already congested.

At this point in time I see no justification to build more than the minimum requirement as this will only prolong the building process and encourage more people to the area which is already becoming overpopulated with respect to what the borough has to offer other than cheaper housing than London primarily for commuters. The borough has some significant natural beauty which is already being lost through significant housing developments.

Local plan should allow to only meet the projected housing need, in order to protect greenfield, Greenbelt and open spaces

Building new homes in a sustainable way will take time and must balance the need for housing with the need to maintain our beautiful county and therefore we must strive at best to meet the government target whilst also meeting our environmental target to limit new houses.

Option A is preferred. If option B was chosen and other neighbouring boroughs went with option A, greater housing capacity (+10%) in Tonbridge and Malling could lead to a reliance on our borough to house the growing population of other boroughs.

Reluctantly accepting Option 1, I believe that the assessed need is already too high - it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already over overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge

The south is already overpopulated, we should build the bare minimum.

There are, according to CPRE, more than sufficient brown field sites in the UK to provide for short, and medium, term housing needs across the country. Forced development of productive farmland and other green spaces enjoyed by the

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**User Response: Text**

residents of the borough flies in the face of stated government policy to prioritise brown field sites for future development.

There is little room for more housing as it is, with the existing infrastructure. There is already quite a high imbalance between the number of inhabitants and services such as health (GPs, dentists etc.) and also sports and leisure. For example there is no major sports and leisure centre offering a multitude of sports like, for example, the one in Surrey, near Guildford (Guildford Spectrum). More housing means more people putting pressure on the already meagre offering of sports centres in the borough.

So as not to lose greenbelt land, and put added pressure on already gridlocked roads.

A Borough housing need assessment may be lower than the Government requirements of 16,000 housing units and the Borough quantum should apply. Government imposed targets and Option B are likely to attract higher numbers from outside the Borough, particularly new commuters, exacerbating building density and transportation problems, particularly access to trains, and developments may not be a good fit for the assessed future needs of existing Borough residents particularly for the rising local need for affordable homes; housing for the aged or for particular needs. These categories particularly need to be near the Service Centres where land is already difficult.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Adding an arbitrary 10% to a calculated figure of need seems wrong. It is likely to lead to land being offered for development that may not be required.

I have not selected any

I have no choice as i dont support either - push back as we dont have the space for these houses.

I selected Quantum 1 as I see no reason to exceed the onerous housing targets set by the current government in the South East

If the Government pursues it's levelling up agenda and creates opportunities in Northern England, pressure for housing in the South East should ease. Many people in the South East are economic migrants, chasing jobs that historically were always located here.

There is no justification for elevated levels of development

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**User Response: Text**

We will struggle to find enough houses for current needs which is questionable

we will struggle to find enough houses for current needs which is questionable

The assessed housing need already is accommodating unused planning permissions. Completions have to run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Why increase the number of houses when there is already stress on the system?

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the Government requirement.

6,000 home is a 28% increase on the existing number of dwellings in the borough. Even more would create unsustainable need for facilities.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Reluctantly accepting Option 1, I believe that the assessed need is already too high - it is based on out of date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

It will already be difficult to find the houses required in this borough and improve the infrastructure to accommodate additional stress placed on it by additional housing.

Most development should be away from the south-east with genuine levelling-up.

The assessed housing need already is accommodating unused planning permissions. Completions have to run behind

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**User Response: Text**

release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

To minimise the amount of development.

The target is already onerous to meet, there is no need to exceed it.

Finding even 10% more would be an increasingly difficult step, so I would prefer the focus to be on assessed need itself. A 10% increase would overload existing services in health and education particularly. It would create a higher land take especially of green field sites and such strategy would risk breaching the green belt even more than the current proposal will. there would be greater traffic congestion and overall a more negative effect on climate change.

We have NOT selected a quantum option because We believe that further distinct quantum options need to be identified given Housing Market Areas exert an influence across the borough and that neighbouring authorities are facing similar challenges to addressing their assessed needs.

To maintain quality of life, physical & mental health of borough residents in Tonbridge & Malling, across Kent & save areas currently in decline such as Tonbridge - urban areas need to be the focus to get people to help with regeneration rather than adding to transport quadmire & causing gridlock.

Best use of finite brown field land for denser dwellings should be promoted by the Council as oppose to wide spread executive housing (that benefits developers profits?).

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

No reason to exceed the existing assessed housing need.

It will be difficult to find the houses required in this borough let alone more!

The infrastructure must be improved before any significant housing development takes place

This is a forced choice because the plan is using very dated population figures prior to 2014. As such, it does not take into account significant changes in recent years as a result of Brexit and Covid. Without up-to-date, accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that currently absorbs carbon dioxide, provides habitation for wildlife and crucially prevents the town from flooding. Sympathetic and considered development along with refurbishment of existing buildings and brownfield areas could provide additional housing whilst preserving greenbelt and wetlands. Furthermore, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already severely congested.

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**User Response: Text**

I believe that the expected increase in population figures is grossly overestimated and that focus should be given to trying to educate the population to reduce population increase as the economical, environmental and infrastructure resources are not available to support future large increases in population growth. We should not be actively trying to encourage population migration from other parts of the country into T&MC as we are currently unable to support the residential numbers that we currently have.

Neither are appropriate here, the demand of the plan far exceeds that which will not harm the environment and quality of life of current residents. If housing needs are met the infrastructure of the Boro will fail to cope.

Only minimum development

It will change the area dramatically.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO<sub>2</sub>, provides wildlife habits and prevent the town from flooding. Skilful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and Option A Quantum 1 – Meeting Assessed Housing Need Option B Quantum 2 – Meeting Assessed Housing Need + up to 10% wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic which is already congested.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures.

It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO<sub>2</sub>, provides wildlife habits and prevent the town from flooding.

Skilful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

For example during rush hour the queues from the intersection with the Shipbourne Road and the High Street already tail back to Dry Hill Road and this will only cause further congestion backing up through the village and Shipbourne Road causing more pollution and for the local residents and school children. Over 450 children live during term time in the boarding houses on these main roads and they will be directly affected by the pollution caused by any increase in traffic in the North Tonbridge/ South Hildenborough area. The adverse health effects of such pollution on children and the links to asthma are well documented. As well as Tonbridge boarding school there are 2 primary schools on Dry Hill Road which will also be affected by pollution should traffic increase.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO<sub>2</sub>, provides wildlife habits and prevent the town from flooding. Skilful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing

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**User Response: Text**

while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

The requirement of housing can change with government plans and the argument should be made for a lower amount of housing in this area. Areas that have not made significant housing developments (Like Sevenoaks Council) should be working to make up shortfalls from previous building plans.

To reduce the quantum of development in the district as far as possible to protect the environment, air quality and quality of life for existing residents. Due to the large proportion of greenbelt the amount of development should be kept to a minimum. Additional pressure on infrastructure would limit the quantum of development such as the highway network which is proven to be over capacity at key locations.

Don't see the need in going beyond the assessed housing need

The housing needs are not as stated but are government controlled numbers, the borough has a number of empty large buildings which could be converted into flats making them affordable first time properties but this option is not one that TMBC seem to regard as practicable.

- Reluctantly accepting Option 1 , I believe that the assessed need is already too high - it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

The target is already in excess of the needs of the area, its the lessor of the two evils

Development in this Rural area should only be replacement for building that have been demolished.

Quantum 3 - Housing need MINUS 50%, no allowance for "Internal Migration" as this is a bottomless pit. We are mainly rural villages in Greenbelt land, the local plan is not fit for purpose. Build in other areas on brownfield sites, it's well known that developers try to push for development on Greenbelt because they make more profit. We must not allow this.

I personally believe the Government targets for the housing developments in the area and in the South East are ludicrously high. While I understand the need for local people to be able to buy houses, and support that aim, I also believe the country should be and could be doing more to honour the levelling up pledges for other parts of the country, building more houses and creating jobs away from the South East so that we wouldn't need to keep building so many homes here.

Also, we need to ensure houses built in the area are affordable for those local people and not the five bed executive homes that have been built in the area in recent years that typically cost circa £900k plus.



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**User Response: Text**

Housing needs can be met in many ways, not just new developments.

In TMBC there is significant under occupation because of a poor mix of housing stock.

It will be a struggle to achieve even this.

The assessed housing need is, in all probability, wrong. The government methodology for calculating housing need was changed 12-18 months ago and it is far from certain that the government target for TMBC is correct.

We should always plan for the worst case whilst aiming for the best case or less!

With greater use of working from home/digitally, I believe TMBC will experience less demand on its housing in the future, as people can live further from London but still be employed by London-based organisations. People will be able to migrate to cheaper areas further from the capital.

There is a fundamental question about the validity of the need 15941 dwellings over the period. This appears to be a generic formula rather than local specific.

Simplistic calculations based on your figures show that the 15941 represents 28.4% growth over current levels of homes (56096). The populations growth is forecast to be 14% (132k to 152k). While there may currently be some shortfall to also meet - it seems excessive to suggest that the growth in dwellings required is double the growth in population anticipated.

There appears to be no consideration to potential long term implications of changes in lifestyle and ways of working post covid. While I appreciate this is still unclear it is apparent we are in a paradigm shift that could have a major impact.

The Sustainability report demonstrates that there are very few positive benefits and a significant number of negative implications from both the overall and the individual site assessments - beyond simply meeting the goal of having more houses.

We need to be more innovative in our approach to the challenge than simply saying only answer is to build more homes.

The Assessed Housing Need is currently accommodating unused planning permissions. Current economic conditions suggest completions will continue to run behind release of planning provisions. 23% is already added to the Assessed Housing Need by the government requirement.

Frankly, the requirements of option 1 are too high.

With reservation option 1 . It is generally believed the assessed need is already too high based on outdated 2014 population figures , not taking into account the effects of Brexit and covid . We are already overcrowded and this will further stretch health care (try getting a dentist appointment ) and education . Not to forget the additional conjection which will result .

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**User Response: Text**

Please ensure you make a very careful assessment of housing need with a focus upon housing for lower income families and single people. It seems pointless to me to add 10% to a figure that is based upon educated guesswork. Also it would be an environmental disaster to build houses that were not needed and that would stand empty. A situation that I believe has occurred in the USA and Ireland.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habitats and prevent the town from flooding. Skilful and high- quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habitats and prevent the town from flooding. Skilful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

Flexibility

Is the housing needs assessment accurate - it seems a lot of houses are "required" and it will be difficult to meet the current target without affecting TMBC let alone plus 10%

Quantum 1 is more than enough houses in this area and it needs to be exactly that and "assessed" for the relevant needs of the area.

Option A – meeting Assessed Housing Need

It's realistic

As your brochure suggests, if there is more housing supply in the borough then the prices for these dwellings will decrease and make a home affordable for those who live and work locally (and don't commute to London)

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and

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greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Thoughtful, high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested. I am also very concerned about the capacity of our water infrastructure to cope with additional sites.

839 homes per year will have a significant impact on the borough. I don't feel it is appropriate to add further development in the coming years to go beyond the housing need assessment as this will detrimentally affect many aspects of borough life.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

If stick to plan quota, then focus can be made on ensuring new houses up to optimal standard; corners will not be cut to fill extra 10%.

No not want to build any more than truly needed - including some affordable housing please

I have not answered question 5 because the answer I wish to give is for TMBC to reassess the housing need by reference to the people who live or need to live in TMBC, not on the basis of central government diktat. Forcing unreasonable numbers of houses on Borough and District councils is the wrong way to improve housing provision. It usually results in houses nobody wants because they are in the wrong places and have the wrong mix of housing types and tenures. Decisions of this sort should be made locally with local data to ensure that the houses built are actually needed.

The SA has many assumptions and unknowns. The additional burdens of B seem too risky for limited defined benefit. Major concerning of overwhelming already overwhelmed services in some areas

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the Government requirement.

question 5 is restrictive

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It is essential that TMBC seeks to address local housing needs and by providing a buffer of around 10% this will reflect the intentions of the NPPF to boost housing supply. Furthermore, there are many neighbouring authorities who have not progressed an up to date plan and as a result are not providing sufficient housing to meet local needs in their area. an additional buffer will ensure that some of these needs can be met and help to ensure affordability and choice of homes throughout the borough. It is important that a range of housing sites are allocated to enable the delivery of homes at all stages of the plan period, and smaller sites such as Land east of Bull Lane, Eccles (SA ref 59831) can provide a good opportunity for potential early housing delivery.

In my opinion, neither is correct. Housing should be for replacing poor housing, repairing unused buildings and using brown field sites for affordable housing.

That target is quite challenging enough.

The Standard Method for Calculating Housing Need (the Standard Method) sets a minimum housing requirement to accommodate growth. It is not a limit on the quantum of development that could be planned for over the Plan Period. To plan positively for growth, particularly in light of past failures to deliver sufficient housing to meet needs which have resulted in unplanned windfall development on greenfield land, a 10% buffer should be included as a minimum to the quantum of development to be delivered over the Plan Period.

Tonbridge and Malling Borough Council is consulting on the proposal to alter Green Belt boundaries to accommodate housing need over the Plan Period. The NPPF (section 13) is clear that in redefining Green Belt Boundaries policies need to take account of longer term needs which extend beyond the Plan Period in order that revised Green Belt boundaries can be maintained. It is therefore important that the Council plans for needs beyond the minimum requirements detailed in the Standard Method which should be for a minimum of 10% addition to ensure there is no requirement to further change the Green Belt boundaries after the next Plan Period.

There will always be 'creep' and the start point should be the minimum to avoid excessive destruction of communities, wildlife and habitat.

It will be a challenge to meet the assessed housing need given the restrictions on development due to the green belt and AONB

unused planning consents are included in the assessment.

Development always runs behind consents. If current lack of finance opprtunities at acceptable levels of interest continue housing development will be very slow.

Who assesses the housing need?

we need our countryside for our future generations

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why go beyond the existing need when the infrastructure is not there for existing residents let alone new ones.

Additional housing planned now in appropriate urban locations should help to attract urban investment in relevant services in advance of the required need.  
such an approach should also help to manage inappropriate development requests in green belt/protected areas and ensure these are not granted permission.

I do not see why an additional 10% should be built, we should build to the quota required only. From previous data we should be able to plan strategically the number of houses required. By building above this quota it will leave many properties empty and the council will miss out on valuable funds such as council tax.

There are already planning permissions that are unused or are running late, and these will fill part of the gap.

I support neither because both envisage Kings Hill expanding exponentially further with no proper examination of other areas in the borough.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

The Borough is predominantly rural and I'd like to keep it that way. I feel development should be limited to the minimum strictly necessary to meet local needs - not to allow others from other areas to relocate.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge. Also, flooding and increased pollution.

It would be good to meet the known need where there has just been failure in the past. The current demand from the government is quite enough without exceeding that level.

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**User Response: Text**

The assessed housing need is already accommodating unused planning permissions. completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

as in q5

option B adds more stress on the need to find land to build on

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habitats and prevent the town from flooding. Skilful and high- quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Further houses should be built to help the government's levelling up agenda - in counties in the north or west of England - NOT in the South East.

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

Reluctantly option 1. The borough is already overcrowded and resources over stressed.

The assessed housing need is already accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

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**User Response: Text**

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

Need to aim for flexibility in the future.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and Option A Quantum 1 – Meeting Assessed Housing Need Option B Quantum 2 – Meeting Assessed Housing Need + up to 10% wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

The assessed housing need is already accommodated through unused planning permissions. Completions have run behind release of planning permissions.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

I'm not clear that the housing need has been properly assessed or whose need it is supposed to be meeting. It is based on out of date (pre-2014) population figures which take no account of Brexit and COVID. Yet the impact on our town and borough could be adverse and far reaching, with homes we don't need or that may not be built sustainably encroaching on

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valuable areas such as woodland which have an important role in absorbing CO2. Our wetlands and greenbelt are also critical for wildlife. We have had a huge decline in species in the UK - 41% according to the The State of Nature 2019 report. That is a shocking figure. Yes, people need homes but these need to be the right homes in the right places with a supportive infrastructure. Tonbridge's roads are already congested and its geography limits the building of additional ones.

There us far too much hosing in the south east, much more than in other parts of the country

I do not think any more houses than necessary should be built in the South East of England. Levelling up can only be achieved by building further North and West.

I consider the definition of "assessed need " to already be excessive given falling birthrates and falling immigration, Brexit, covid and the fact that out of date figures have been used.

House prices are unlikely to be positively affected (for buyers) by new development so should not be a consideration.

Extra housing only seems to benefit the building firms at the expense of borough residents and green space.

Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from Tooding. Skilful and highquality development and refurbishment of existing buildings and brownSeld areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, with roads that are already operating at and beyond capacity causing increased pollution.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

I think it is entirely reasonable for the Local Plan to Meet Assessed Housing Need and not provision for 10% more at this stage, e.g. for a contingency.

I consider that a more sensible time to review the assessment of housing need will be at the next update of the Local Plan. I would not expect the Assessed Housing Need to be fully delivered within a 5 year timeframe, given that an overarching Vision for 2040 is what is being outlined. I would expect a review of the Housing Need Assessment to be done within 5 years, taking account of any changes in housing stock and an updated view of user needs in the interim ( 5 year) period.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from Tooding. Skilful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and Option A Quantum 1 – Meeting Assessed Housing Need Option B Quantum 2 – Meeting Assessed Housing Need + up to 10% wetlands. Additionally, due to Tonbridge's geography it is not possible to build



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**User Response: Text**

additional road infrastructure to reduce traffic, which is already congested.

As few new housing developments as possible.

Unused planning permissions are already incorporated in the assessed housing need. 23% is already added to the assessed housing need by the government requirement.

I chose Neither.

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by government requirement.

Our area is already overcrowded and further development of the Grange Farm and Greentrees area will worsen traffic congestion, car parking and the demand on local services.

We really need to better develop existing housing and include smaller developed / sub-divides into the total housing need

The targets are already too high. Looking to add further to quantum by 10% will increase pressure on local communities even further. Increased land requirements, increased pressure on green belt and AONBs; greater traffic congestion, climate change pressure; increased pressure on main infrastructure - power networks, sewers; increased risk of water poverty, Pressure on health, education and retail services. Clearly an unacceptable level of harm would result.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Option A Quantum 1 – Meeting Assessed Housing Need

Option B Quantum 2 – Meeting Assessed Housing Need + up to 10%

wetlands.

**Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.**

We need to plan and design any new building works carefully and thoughtfully, with regards to the nature of existing settlements and the environment. Unnecessary over-development should not be built in to any plan.

As stated above in Q4.

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**User Response: Text**

If there is to be major development in the area, then it would make sense to build an additional number of houses if the land is available to future proof our housing stock.

Assessed housing need is already accommodating unused planning permissions. Completions run behind planning permissions, which is not likely to change in the present economic circumstances.

I am not in favour at all of any changes and therefore I am not answering question 5.

Quantum 1 as the housing targets are onerous enough without a further percentage.

Option B has more negative outcomes and would put more pressure on the Green Belt and local infrastructure

The borough does not have the infrastructure to support any more than the minimum.

TMBC is already overpopulated and has inadequate infrastructure if the AONB and Green Belt are respected as they should be . Expansion should be as limited as possible consistent with legal obligations

TMBC is a largely rural authority and yet the draft plan includes a disproportionate amount of suggested potential development sites beyond the urban centres some of which would encroach upon greenbelt and burden already overstretched public services and infrastructure. Development and housing provision obligation should be directed to and shared with other authorities with larger established populations

To ensure that we plan for the future

Option A is preferred. If option B was chosen and other neighbouring boroughs went with option A, greater housing capacity (+10%) in Tonbridge and Malling could lead to a reliance on our borough to house the growing population of other boroughs.

Local facilities and structures are struggling to cope with the population we have now. Until this is sorted, the luxury of developing for future need can't be included. That doesn't mean that it shouldn't happen organically across the time frame set out here and local planning decisions should be mindful of this.

It's realistic.

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**User Response: Text**

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

It is a shame there is not the option of rejecting the spatial strategy entirely, which would be my preferred choice. The South East already over-developed and over-populated.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habitats and prevent the town from flooding. Skilful and high-quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

The Government number of 15,941 new homes within the boundaries of Tonbridge and Malling up to 2040 is too great. The requirement set by the Government should be challenged and with this in mind we should only be planning to meet the assessed need.

It's realistic

It's the realistic approach.

Question 5 is a "least-worst" scenario! To garner the actual opinions of existing residents, this questionnaire should ask whether we should completely reject the government's target as unrealistic and totally unachievable.

Kings Hill has already been over-developed and my understanding is that the original plan required a certain percentage of the land to be retained for sporting amenities and brown field sites. Please do not renege on this original agreement.

Additionally, Watlington cannot do not need any more traffic!

Why have an extra 10%, who is that going to benefit but the developers.

Tonbridge is already congested and due to its geography, it's not possible to build additional road infrastructure.

The south east of England continues to draw people from around the country as the Government's levelling up program is not delivering. If the council wants to meet the needs of the local community but not put in protections for local community members then they must add capacity for people moving from elsewhere.

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**User Response: Text**

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habitats and prevent the town from flooding. Skilful and high-quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

The data being used by the plan is out of date as it comes from before 2014 and several things have changed since then including Brexit and Covid which have impacted the way people live and their priorities

Why build in excess of the need, based on old data possibly leading to unnecessary development with all the likely negatives this entails in terms of pollution and congestion.

The quota set by government is already unrealistic

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habitats and prevent the town from flooding. Skilful and high-quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

Many of the premises used for the second option are likely to be proved incorrect.

The borough is in need of increased quantum as a whole.

Population projections are likely to be unreliable and the data is outdated.

This is why local consultation is important. Assessing housing need sounds like some discredited central planning philosophy which sets unrealistic or unachievable targets which are in no-one's interest.

Neither of the options are appropriate and the council should be aiming for meeting the assessed housing need plus 20%.

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**User Response: Text**

This would be in line with NPPF para 74 'maintaining supply and delivery of housing'. The councils Housing Land Supply position statement 2021 identifies at para 4.1 that the council currently has a 3.17 year supply of housing and at para 2.4 states that '*As a consequence of this HDT measurement, a 20% buffer must be applied to the housing need for the five-year period 2021-2026. This means the need against which the projected supply is assessed increases from 4,195 dwellings to 5,034 dwellings*'. This 20% buffer should be applied to the housing needs identified within the local plan to ensure delivery within the early part of the plan, this should be as a minimum for the first 5 years, given the shortfall of housing delivery currently and that this shortfall is likely to continue for the next few years given that the existing adopted Core Strategy only met the timescale from 2007-2021.

the assessed housing need is the key calculator for working out the housing need, so developing over the assessed need will have detrimental effect on future housing numbers

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilfully designed and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, our town centre is already massively congested.

I believe we should focus on meeting the needs, rather than adding additional housing based on a speculative estimation.

Do the minimum to meet the need and, as the need was based on potentially out of date assessments (e.g. preBrexit), there will be the opportunity to review

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and high-quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

Don't believe the current need is an accurate representation and we shouldn't be using land to build houses to attract buyers who have houses elsewhere so I don't agree with either option A or option B

You have only given two options hence my answer. I would like to know who are you building the houses for? Where are the people coming from? Is the data/ are the figures from the Office of National Statistics who I have been informed have used incorrect modelling in the past. What is the ratio of existing commercial property to residential property in the areas specified on the plans? Can we not repurpose empty commercial property ie build on existing footprints? Thereby retaining our valuable and much-needed rural areas.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014

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**User Response: Text**

population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Housing affordability is clearly a significant issue for the Borough with the property price to earnings ratio sitting at 13.4 in 2021, compared to 11.6 in the southeast and 9.1 nationally. Consequently, if the Council is to increase supply in order to help tackle the housing crisis then it needs to plan for above just meeting the minimum housing need identified by the standard methodology.

Indeed, an uplift of other levels over 10% should also be considered as reasonable alternatives.

Medway Council supports the objective of meeting OAN - notes option A and B - but is not putting a preference forward as to whether up to an extra 10% is required. Could we ask for clarification that the 10% extra is not meant as the 'buffer' beyond LHN in the event some sites do not come forward.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and highquality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

Not enough information here.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Option B is purely speculative. We need to limit the impact of building development and contain it outside of the Greenbelt to protect the environment and live within the support resources available to us. Overdevelopment will just create more

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problems, increase risks from flooding, power 'brownouts', and further stretch and dilute essential requirements such as schools, hospitals, sewage, water supply, energy supply etc.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and highquality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

With Green Belt considerations in mind, the borough is not a location that should bear more housing than necessary.

The population figures are out of date (2014) and as such doesn't take into account recent developments from Brexit and the Covid pandemic.

You can't manage what you can't measure and without the correct data this could lead to unnecessary developments that compound the pre existing issues of flooding in Tonbridge, and without the space to develop the necessary supporting infrastructure such as roads it could worsen the already increasing traffic issues.

This is a choice being forced upon the area and although I understand some growth is necessary, I do not believe the quantity being driven is currently sufficient to current population expectations. Also, as mentioned before my primary drive is securing the local ecosystems from the damage development inherently inflicts.

Quantum 1 has more than enough houses in this area. and it needs to be exactly that and assessed for the relevant needs of the area. Development should be outside of the Greenbelt. Once the greenbelt is developed it is gone forever. PLEASE DON'T DO THIS. lets retain the uniqueness of our village and not lose our villages identity by proposing to join up with other villages.

How has the assessed need for housing within the borough has been arrived at? Does this take demographic trends into account and consider the relatively recent impact of Brexit and Covid?

Rather than solely relying on an assessed need being met by conventional housing models, a housing strategy needs to include the needs of everyone in the community, including the provision for elderly accomodation.

A new generation of high-quality, carefully thought through third-age housing options would inspire older people to depart from the norm and 'right-size', which, in turn, would free up the housing chain for younger home buyers in established locations, helping to address the chronic housing supply shortage we face. Currently, we have more than five million homes in the UK that are under-occupied and nearly half of all people over the age of 75 live alone. While many older homeowners consider downsizing, very few are enticed to do so.

The cascade of benefits to users and the wider community that flow from a new generation of well-designed specialist housing for older people are wide reaching: improving lives, encouraging residents to be socially and physically active, helping to pool services where they are needed most, and mitigating pressure on the NHS and local authorities. To read more about this see thisarticle in Architecture Today: 'Third Age Housing'

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**User Response: Text**

<https://architecturetoday.co.uk/third-age-housing/>

The requirement already seems in excess of the actual need within this location. Market conditions mean that affordable housing is not best located in the south east. There is insufficient infrastructure to support the level of housing. Once the greenbelt is gone it will be irreversible.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit.

The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habitats and prevent the town from flooding. Skilful and high- quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

Please push back the HM Government on this - Quantum 1 is too high to start with

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

At our members meeting there was much debate about the number of 15,941 from the Government to plan for new homes within the boundaries of Tonbridge and Malling up to 2040. Leader of TMBC, Matt Boughton believes this number to be too high and is actively challenging it alongside MP Tom Tugendhat. We understand that there are approx. 1500 families on the housing register across the borough which suggests a need for homes exists but not to the scale set by the Government.

With Green Belt considerations in mind, the Borough is not a location that should bear more housing than necessary.

The country is facing a financial crisis at the moment and must keep within its means.

Because we are already being asked to provide an unsustainable amount of new housing in the borough



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**User Response: Text**

Only supply new housing for the young and low paid.

This must be proven by their job

No second home owners or million pound properties offered to the rich please.

The low paid and young have been priced out of this area and that is not fair.

839 dwellings per annum or 15,941 dwellings (gross) across the plan period up to 2040 is more than enough as currently the infrastructure is insufficient and I doubt it will grow sufficiently to support the developments. Are Tonbridge and Malling having to provide additional housing due to the previous local plan being thrown out. Also, we should not have to increase the numbers if a neighbouring council (Sevenoaks) cannot provide the required number of dwellings and the government need to consider this

I would rather not over build in Hildenborough but happy to meet housing need

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge

Green spaces are so important to protect, and I feel that if there is any building developments, then these are lost forever. Therefore, it seems sensible to continue the successful redevelopment of brownfield spaces and ex-industrial sites and/or to change the use of existing buildings, in order to ensure that these green spaces are protected. The opportunity to escape to natural spaces proved essential since the start of the Covid pandemic. It feels that priority should be maintained on re-purposing existing building and the redevelopment of commercial and/or retail spaces for housing should be prioritised, over building any new homes on greenfield.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from Tooding. Skilful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

As a young family living in the local area, I have to drive to my children's school. The lack of infrastructure already in place has resulted in not being able to get a place at the primary school within a very short walking distance. The traffic along Brook Street and Lower Haysden Lane is already unacceptable, a neighbour of ours had to give birth alone in her home due to the midwife being stuck in standstill traffic on this road during school hours. Adding further households to this area just seems completely unrealistic.

Quantum 3 - Housing need MINUS 50%, no allowance for "Internal Migration"

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**User Response: Text**

There is no sense in wasting land building houses to attract people who already have houses elsewhere

This is a forced choice because the plan is using out of date (pre 2014) population figures. This could cause unnecessary development.

Due to Tonbridge geography, it is not possible to build additional road infrastructure, Tonbridge is already over congested.

The South East is already heavily populated.

Why take another 10% when the assessed need already has a buffer?

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the Government requirement.

I think empty properties have been completely overlooked. Could more of the housing need be met if the council were to purchase empty properties and develop these?

The assessed housing need already is accommodating unused planning permissions completions have run behind release of planning permissions and this is traditional and liable to continue due to current economic conditions, 23% is already added to the assessed housing need by the government requirement.

Because Option B risks overcrowding and over development of existing overstretched settlements, while option A minimises that. Essentially, our island of Great Britain is over populated - migration will be a natural consequence.

To keep development to a responsible level.

Lack of Brownfield sites and lack of infrastructure to meet needs of existing population.

The housing needs are already quite challenging so no point in adding to them.

After Brexit there are reports that the housing need is not as high as originally calculated

Question 5 is also fundamentally flawed. See answer to question 2.

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**User Response: Text**

I don't believe we need as many houses as we are being told we have to build let alone 10% more

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habitats and prevents the town from flooding. Skilful and high-quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to the geography of Tonbridge it is not suitable to build additional road infrastructure to reduce traffic, which is already congested.

The South East is already over populated and the North of England needs more jobs and more housing, not the rich south east.

I believe that the starting figure of homes needed is currently less than stated as the figures are two years out of date, during this period many developments and new home have been provided in the Borough.

I believe that reuse of now redundant office accommodation, which has been released due to remote working for residential purposes will, over time solution a significant amount of housing requirements, therefore preventing the need to over deliver on the frankly unreasonable government targets.

Actual need cannot be known with any degree of accuracy, so better to update the plan at, say, 5 yearly intervals.

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

ri would not want to see an increase of uoto 10+

Given the strain on infrastructure such as schools and medical facilities that is currently the case, certainly in Hildenborough, I consider that the Assessed Housing Need is already very high for the area. There is a desperate need for affordable housing but I doubt that it would be possible to build enough to bring general prices down unless the area was made so unattractive that people would not want to live here.

There is a need to think through the mix of types of development though. I understand there is currently a real problem with 'retirement' flats where there is little demand and excess supply and I have a friend who has been trying to sell a flat in Tonbridge for many months and is desperate enough to consider giving it away.

This is a forced choice because the plan is using out-of-date (pre 2014) population Sgures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and

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**User Response: Text**

high-quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

The requirement of delivering 839 dpa should be clearly recognised as a minimum requirement as set out at paragraph 11b of the NPPF which states, "*strategic policies should, as a minimum, provide for objectively assessed needs for housing*".

Thus, in ensuring the 839 dpa or indeed 923 dpa is a minimum (+10%), this will provide the basis to allow affordability to improve across the Borough which currently sits at 13.39 (property price to earnings ratio). The Council therefore needs to do everything it can to ensure the target used is the minimum and that there is "*a sufficient supply and mix of sites*" (NPPF, paragraph 68) allocated which are deliverable across the Plan period to improve affordability. This is vital.

We do not need to have more than needed and we are limited on space already

Kings Hill is already over developed. The original approval was that 40% of the area should remain green space and within confines of brownfield space within the airfield. Why is this not being honoured?

These options are not fair there should be other options.

This is a forced choice and actually I feel less than this is required because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then with far less immigration, plus a recession on the horizon. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and high-quality development and refurbishment of existing buildings and brownfield sites areas could provide additional housing while preserving greenbelt and

I do not agree with either options above and I think you may have removed a third option from your list.

I choose Quantum 3 - Housing need MINUS 50%, no allowance for "Internal Migration"

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

We believe that attaining the current Assessed Housing Need will probably prove to be a challenge and that until that can be clearly achieved within the Local Plan any work for Option B would be a distraction. We have heard of some instanced

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where the validity of some of the figures produced as a future housing requirement have been challenged and been found to be wildly inaccurate. We have no knowledge about how they are formulated or the level of confidence everyone has in them. It should be recognised that, within the overall national plan, there is going to be a finite limit to the number of people living on our island, if those who do live here are going to be able to travel easily, live in a nice property and enjoy a good rounded life with access to leisure facilities and beautiful countryside. All these factors should be taken into consideration from the national level down.

If we are trying to "level up" the country, we should be doing no more than we have to in the South East, and focus investment in other areas of the country.

Do not agree that an additional 15,941 dwellings should be required for the borough.

I agree that we need more housing but not to the extent that is being forced on us by government.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO<sub>2</sub>, provides wildlife habits and prevent the town from flooding. Skilful and highquality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traUc, which is already congested.

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wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traUc, which is already congested.

The assessed needs represent a significant increase on existing housing stock, with it's associated impact on infrastructure. Given the confines of the area, including AONBs and important greenbelt land, there seems to be limited scope to increase this by a further 10%. Presumably the 'assessed needs' are just that, and should therefore form the basis of development (otherwise, what is the purpose of assessing needs?).

Assessed housing need is already likely to put a strain on the local area; there is no need to go beyond this.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and

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Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

**Neither Option A OR B. Option 3 Housing need less 10% to discourage internal migration. There is no sense in wasting land building houses to attract people who already have houses elsewhere.**

**Greenbelt is sacrosanct, it is not a reusable commodity - once it has gone, that is forever**

The requirement for the additional 10% is not clear particularly when the data used to drive these assessed needs is stale.

Our community is semi rural. I cannot see the logic in attempting to surpass the legal minimum.

This depends on the nature of the assessed housing need. The priority should be to make affordable homes for families, younger renters/buyers and replace existing poor quality housing.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

The assessed housing need already is accommodating unused planning permissions. Completions have run behind release of planning permissions, and this is traditional and liable to continue due to current economic conditions. 23% is already added to the assessed housing need by the government requirement.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more

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**User Response: Text**

congestion on the roads into and around Tonbridge.

This is a false choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and high-quality development and refurbishment of existing buildings and brown field areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traUc, which is already congested.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

I am unhappy about any further development in the borough given that the borough seems to be expanding year on year with essential infrastructure failing to keep pace with the proliferation of housing. I am therefore reluctant to opt for any option that further increases the councils commitment to building more homes

an additional 1600 dwellings plus healthcare, educational and leisure facilities requires a huge amount of land and infrastructure that simply is not available.

The proposed development of 15,941 new homes will already put a massive infrastructure strain on the Tonbridge and Malling district when considering the limitations of developing on the green belt, without adding an additional 10% on top of this.

Meeting assessed housing need is enough; to do more would be detrimental to the rural nature of the district and risk turning it into another Sevenoaks - essentially a continued outward sprawl of London.

We feel the housing needs are not as stated, but are government-controlled numbers. The borough has a number of large, empty buildings which could be converted into flats for first time owners. But this option is one that TMBC seem to have dis-guarded in their preamble to this consultation

In the period to 2040, the minimum requirement using the standard methodology generates a requirement for 15,941 homes (839 dwellings per annum) . An option of providing an uplift of 10% is presented but this appears to be an arbitrary figure. The minimum is clearly a starting point and there are a number of factors to determine what the actual requirement might be. government guidance indicates that these factors could include: Meeting unmet need from a neighbouring authority; where strategic infrastructure improvements increase need or for those authorities with a growth deal. other circumstances

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will be where housing delivery has historically been greater than the outcome from the standard method.

A review of the Housing Land Supply Position as at March 2021 reveals that an average of 839 dwellings per annum has only been exceeded twice between 2011 and 2021. An average of 622 was achieved. This has clearly been influenced by a lack of housing land supply shown by the fact that the Council can only demonstrate a 3.17 years supply.

It is unclear where the 10% increase figure has been derived from. In order to support the Government objective of significantly boosting the supply of homes, it will not be sufficient for Tonbridge and Malling to aim for the minimum number of homes needed. An average of 839 dwellings per annum will not be achieved using this approach. Given historical delivery rates (which are consistently below this level) FECL feel a target of +20% is fully justified in order to broaden the amount of land available and accelerate build rates.

In terms of delivery rates, a stepped trajectory could be considered to boost delivery in the early years of the plan through the identification of smaller sites to support immediate growth whilst strategic sites are progressed.

our area is already over capacity with insufficient local health care etc.

See response to Q2

The target is forced on the council by the Government. The council should not over deliver because I have doubts that infrastructure and capacity of local services will be adequately considered and no doubt some other councils will worm out of their targets or be like TWBC and dump a load of houses on the edge of TMBC, creating issues within this borough (passenger flow through to Tonbridge station for example).

Until the infrastructure is improved in the borough an additional 10% is not practical

TMBC are already struggling to find land suitable for the assessed need. To find 10% more in this area would mean encroaching onto Green Belt or AONB.

There are other areas within the south east that could better meet additional housing needs and be more affordable in the longer term. Additionally, recent changes to working practises have shown that housing stock no longer needs to be within the 1 hour commuting distance of central London and housing can be more evenly distributed throughout the UK, including development of more deprived areas where new housing could bring growth and money to an area.

As with answers given to earlier questions, I do not assess the present Housing Need Assessment to be reliable. I regard the numbers as distorted by our nearness to London where the Green Belt has always protected this area from over-development. In these circumstances Option A Quantum 1 is the only possible answer to Question5 but that should not be taken as an endorsement of that Option.

The housing need should only apply to local families. I do not agree with option A or B as it is looking to provide far to many new homes within beautiful villages with good communities. the plans are detrimental to current families and their enjoyment of the countryside and village life.



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## User Response: Text

We need better, updated data as the plan uses population figures that are almost 10 years old (pre Brexit and Covid). This could lead to unnecessary development in protected wetlands, Green Belt, and AONBs that are crucial to flood protection, biodiversity and climate change mitigation. The focus should be on brownfield sites.

Option B will, without question, lead to decimation of the Green Belt and AONBs.

1. As the Council is aware, the current Core Strategy was adopted in 2007 and the Site Allocations DPD in 2008. These documents are significantly outdated and as a result of the decision to withdraw the previous local plan review, by the time any new plan is adopted it will have been approximately 18 years since an up to date plan has been in place.
1. In the absence of an up to date plan housing delivery in the Borough has been poor in recent years. The April 2021 housing land supply paper published by the Council places this at just 3.17 years and a Housing Delivery Test result of just 63%, well below the benchmark of 95%.
2. As a result, housing affordability in the Borough is poor. Paragraph 5.3.14 and table 3 of the draft plan note that this is now at a ratio of some 13.39 in terms of median house prices to median earnings. This compares to 11.16 within Kent and 9.05 across England as a whole. The problem is therefore clear and acute.
1. Importantly, the draft plan states:

*“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**”*

1. Providing for the identified need plus an allowance of 10% will have a greater impact upon the affordability issue than simply planning for the minimum necessary under the standard methodology.
1. In addition to the need to tackle the issue of affordability generally there is a need to address affordable housing provision. Affordable housing provision (save for very limited Rural Exceptions sites) will only be delivered as part of market housing developments.
1. The Boroughs Affordable housing need is estimated in the draft plan as being 283 new affordable homes each year over the plan period from 2021 to 2040.
1. Affordable housing will not be sought on smaller windfall sites / sites of less than 10 units as per the NPPF definition of major development. Very broadly the plan suggests that 1,050 dwellings are estimated as likely to come forward on small sites of 5 units or less, clearly these will not deliver affordable homes.
1. This reduces the potential from which affordable dwellings could be delivered from 15,941 to 14,891. (There is also likely to be delivery on sites of between 5 and 9 units which similarly would not provide affordable homes although exact numbers are unknown).
1. Taking the 14,891 figure as being the potential dwelling number from which a proportion will be affordable (albeit in reality likely to be less), to meet identified needs (283pa) 5,377 units or 36% would need to be affordable.
1. Clearly final viability and affordability assessment will determine the percentage figure which the Council includes as part of the plan. However, it is likely that due to infrastructure requirements on larger sites and existing use values on urban sites that not all sites will not deliver at this rate.

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**User Response: Text**

1. By adding 10% to the overall target this at least builds in some flexibility to take account of under provision as a result of viability issues on some sites that will be delivered.
1. More generally the addition of the 10% would provide some contingency within the overall local plan housing strategy making it more likely that it will deliver the housing requirement set by the standard methodology i.e. taking account of the fact that it is generally the case that some allocated sites do not deliver as hoped.
1. Whilst the Interim Sustainability Appraisal highlights some minor concerns regarding the impact of Option 2 in terms of pressure on local facilities and infrastructure (SA2 and SA3), it is of course relevant to note that new development would be expected to provide new facilities and / or at least contributions towards improved capacity.

15. These matters should not therefore weigh against Option 2 as they can be planned for and built into planning policy as part of development allocations.

Option A is adequate

If the government levelling up process is successful then there is likely to be reduced pressure in the south of England as more jobs and better communications are provided in the north.

The housing need could be increased if the area of land stays the same. Is build more flats - in Social Care there is a high need for flats.

Because it seems like the less invasive option to me. Our secondary school age children are able to get to their schools using the buses. My husband can commute to London from Hildenborough train station although he gets there by bicycle. I can commute to Tonbridge for work also.

I am concerned with the amount of traffic on the roads which will only get worse with new houses.

While the quantum of housing is important, we consider that the provision of a balanced housing mix that meets the needs of residents is equally important.

The plan is not using up to date data.

We should focus on existing buildings and brownfield areas to preserve the unnecessary development into greenbelt.

The geography or Tonbridge means its not possible to build further road infrastructure to reduce traffic which is already congested..

I don't understand the questions here but clearly my priory is to retain the green spaces, keep the Green belt areas we have. Retain our villages and the gaps between. The South east is over developed, we don't want the villages to become an urban/ suburban sprawl. Offham is very small village, a historic setting, with only one farm shop, no Post office, no shops, one very small over subscribed Primary school and one pub. The character and charm of the village would change with new housing, lose the green spaces, and open fields which are crucial for the bio-diversity and sustainable of our nature, if

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**User Response: Text**

all the green spaces are built over we will have more issue with flooding and upsetting the local natural ecosystems.

The 15,941 is excessive. Only approx 1,500 are on the housing register and 3,100 are in the Windfall Allowance. Do not increase the suggested number!

Allow flexibility to adapt to varying demand over time.

There is no need to increase our housing allocation beyond that which is required. The sustainability appraisal findings show significantly poorer results against most of the criteria for Option B compared with Option A.

As outlined in the document, meeting the assessed housing needs will be a 'stretch', with suitable sites in short supply, and will necessarily place more demands on the local transport system and recreational facilities. Therefore it seems reasonable to cater for the assessed needs only.

Given the value of housing in the area and lack of large industry in Kent, as opposed to Thames Valley corridor, home counties, etc. I believe the housing need in Kent, and in particular Tonbridge and Malling, has been grossly overstated. Consequently, the predictions I have been party to through my work, indicate that numbers may be reduced in subsequent parliaments so it is not necessary to front load the house building targets,.

The NPPF (para 61) sets a minimum requirement for LPAs to meet their identified Local Housing Needs, unless in exceptional circumstances. This equates to 839 dwellings per annum based on the 2021 standard method calculation. An additional 10% supply would provide flexibility into the housing supply for the local plan to address market or site specific changes to the delivery of allocated sites. However, the selection of 10% as the buffer figure would benefit from further justification.

Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty

Prepare Urban Areas now for more housing to meet the needs of future growth

The Local Plan refers to the requirement for 15,941 new homes in the period up to 2040. As was noted in the HVPA meeting to discuss the situation, currently there are 1,500 families on the Council Housing register across the Borough. This suggests that the housing need is not as great as the requirement set by Government. This needs to be challenged by TMBC. It is understood that local MP Tom Tugendhat is also challenging this requirement.

Neither option

Wrotham Parish Council ("WPC") would like to see a third option being tested - one that does not meet the full housing requirement to reflect the fact that:

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**User Response: Text**

1. the standard methodology calculation is flawed because it uses the metric of housing cost and seeks to reduce this by increasing the quantum of development. In effect this is a measure of demand rather than need.
2. the government has stated it wants to move away from the culture of top-down housing targets which would indicate it also seeks to move to an assessment of need.
3. Para II (b) of the NPPF states that housing need should be reduced where an LPA has a significant quantum of Green Belt and AONB which are over arching policies that restrain development.

The fact that people are badly housed in Britain has more to do with adverse policies after 1979 than the numbers built. Improvements require national legislation to end right to buy, build council housing, end buy to let landlordism and restrict second homes. I cannot see any advantage to increasing the number of homes when so many are left empty.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from Tooding.

Skilful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

The MGB around Tonbridge fulfills all of the requirements laid down by the \nppf

This is a forced choice because the plan is using out of date (pre 1914) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data there will be unnecessary development into areas of essential wetlands and Green Belt that absorb CO2, provide wildlife habitats and prevent the town from flooding. Skillful and high quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving Green Belt and wetlands.

Additionally, due to Tonbridge's geography, it is not possible to build additional road infrastructure to reduce traffic, which is already extremely congested.

I have deliberately not answered Q5 as I believe that the target for TMBC passed down from central government is too high and should be challenged and reduced. Building more houses in the South East does nothing for levelling up.

Two key reasons, firstly that the data used for modelling housing demand is based on assumptions for housing pre covid and the changes in people's working habits. Secondly the constraints of road network and impact of river flooding means there are very few options . I do not want to see Green belt eroded.

The plan uses pre 2014 population figures and has not taken into account Brexit and Covid. The data is out of date and any planning based on these incorrect data which will lead to disproportionate new housing development and without proper infrastructure will be harmful to the community already residing here in Tonbridge.

Other significant areas to consider will be the already rising air pollution as with encroachment of green belt will result in less absorption of CO2. Risks of flooding will be greater without essential wildlife habitats.

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**User Response: Text**

As Tonbridge residents we are already suffering from extreme traffic congestion in the main and even arterial roads. However, the geography of the town does not facilitate building of new roads which will be essential for new infrastructure.

If we have to build as many houses as is being proposed, then this should be kept to a minimum. 15,000+ houses in this Borough is a huge number to build without destroying the nature of the area, let alone the damage it will do to the environment.

- We recommend Option 2 (meeting assessed housing need + 10%) is the preferred quantum option for the spatial strategy.
- National policy states that “as a minimum” strategic policies should provide for their objectively assessed need (Para.11b of the NPPF) with Para.22 of the NPPF also stating that strategic policies should anticipate and respond to long term requirements and opportunities. As such, the starting point should be local development needs, as a minimum, are addressed in full.
- We recommend that the Council should seek to provide at least 10% more than their requirement of 839 dwellings per annum (dpa) (15,941 dwellings across Plan Period) for a number of reasons including:
  - Ensuring sufficient flexibility to the Council’s supply of new homes;
  - Persistent under-delivery in the Borough e.g. Housing Delivery Test Score of 63% which has fallen from 91% in 2020;
  - Impact of two Housing Market Areas (‘HMA’s’) in the Borough – need to try to satisfy the needs of both;
  - Reduces risk of speculative / unplanned / unintended future development; and
  - Provides increased level of certainty to communities.
    - We also suggest that the percentage increase would be more suitable to be 20% (rather than 10%) to ensure a more consistent and varied amount of sites coming forward throughout the Local Plan.
    - Furthermore, whilst we acknowledge that discussions with neighbouring authorities have not yet been undertaken on whether the Borough can accommodate some of their housing and employment needs, we consider an additional of at least 10% (or preferably 20% more) would allow sufficient capacity to accommodate any further need, should it be required, through the Duty to Cooperate. We recommend these discussions commence as soon as possible.
    - In summary, we recommend a buffer of at least 10% be added to the quantum of housing and this should be in place for whatever spatial strategy option is pursued.

No response

I disagree with the numbers put forward by Government and would deem the minimum number of new houses within the green Belt and AONB to be the most that were built to deflect the effects on original population and environment.

It's best not to overcommit to housing needs as I feel it'll lead to rushed decisions. Developers will drip feed housing stock anyway so as to not flood the market and suppress property prices.

We support Option B (Quantum 2) as being the preferred Local Plan strategy for meeting the demonstrable needs of the Borough and its residents. We particularly support the Council’s decision not to consider a policy option to deliver a lower level of growth than required by the evidence – doing so would not be justified by evidence, nor would it be in the wider interests of those residents affected by housing affordability or inequalities and deficiencies in housing stock.

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The Council's evidence is compelling in justifying Option B.

The Housing Needs Assessment ('HNS') provides wide-ranging analysis of relevant housing factors. Specifically, the HNS demonstrates that:

- Housing affordability represents a significant impediment to home ownership and private renting, with unfeasible income multipliers necessary to allow access into the housing market.
- There are significant imbalances in the existing housing stock, with tenures, sizes and housing standards mismatched against need, particularly at the sub-area level.
- There is considerable need for specialist housing meeting specific needs, including in relation to mobility, age and medical considerations.
- Historic under-delivery of new housing means that the above needs are significant and can only be addressed by increasing the supply of new dwellings.

The housing Market Delivery Study (HMDS') also demonstrates that housing delivery can be maximised through a combination of larger sites on unconstrained land. Focussing growth in fewer larger opportunities well-related to existing settlements offers the opportunity to secure those higher rates of delivery which ensure that wider social objectives can be met.

The interim Sustainability Appraisal Report ('iSA') comparatively assess the two options. Option 2 scores less well in relation to Objectives 1, 2 and 3, driven primarily by uncertainty regarding the ability of existing facilities to absorb higher levels of growth. Whilst a reasonable concern, it is one which can be readily addressed in the planning system through planning obligations. Our responses to other questions sets out that retaining the existing settlement hierarchy and focussing new growth on larger urban centres (Spatial Strategy Option 2) provides the best opportunity for sustainable development, including ensuring that new development can benefit from the existence of existing facilities and sustainable transport choices. Strategic scale development is also well placed, by virtue of development economics and the increased likelihood of securing a critical mass of population, to deliver new or expanded infrastructure to serve new residents and to the benefit of existing residents. For that reason, we consider that the iSA analysis of Option B is potentially pessimistic, and can be prevented as an outcome by use of planning obligations at the time of securing planning permission for development.

We therefore consider that making provision for at least the assessed housing need, and aiming beyond that, will ensure that the emerging Local Plan meets the wider needs of the Borough, in accordance with the provisions of the National Planning Policy Framework.

Tonbridge has seen a lot of development which has not been for local residents and being in the Flood Risk area should not have anymore development than is required locally.

Not in favour of any great expansion in this area for reasons outlined in the answer to question 4.

We should be seeking actively to encourage development (economic. and housing) outside the SE of England.

No Response

It seems that none of the past planning have met there targets - +10% is too ambitious.

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According to reports, housing needs are already overestimated, especially in the South East.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from Tooding. Skilful and high-quality development and refurbishment of existing buildings and brownSeld areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

If I have understood the question it is between building the minimum or frontloading the building plans. I am against frontloading because much is uncertain in the next 18 years and the more you build (the +10% allows for a compounding effect) the more 'gravitational' force the urban areas you have will exert on the options and challenges that have yet to be revealed. You need as free a hand as possible at this stage.

We appear to constantly focus on more, more, more. In real terms, if we require more properties in 10-20 years time, then we can always address it then. If you start with the correct requirement, then homes will be built to facilitate the requirement of the people and take in to account the services that they will require. Once you set the number, people will work towards it and try not to exceed, therefore, the larger that number is the more developers will try to squeeze in. Many new developments fail to offer sufficient outdoor space for the volume of proposed occupants of the properties (tiny gardens, limited off road parking, etc)

Why won't you let us inform strategy ? Instead you give a Hobson's choice.

This is not a consultation.

How can you consider this questionnaire fit for purpose?

Do you think you will convince the public that you chose our preferred option?

It's predicted that population growth rates will decline, given the environmental impact caused by over population, therefore, it's a risk that in the next 30 years, there could be surplus housing needs following the end of the 'baby boomer' generation.

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The assessed housing need which appears to increase the area housing stock by about a third in 20 years is clearly nonsense when compared to the likely change in the UK population as a whole which is going to increase little if at all.

The plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then.

Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and high quality development of existing brownfield areas could provide additional housing while preserving greenbelt

Also, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

My view is new housing development should be kept to a minimum. If there is a future requirement for additional housing needs then that should be assessed and evaluated once it is confirmed. Particularly given the likely challenges that the housing market is likely to face given the economic outlook.

The Council identifies its housing need as being 15,941 homes across the plan period (2021-2040). This is based on the Council's local housing need figure of 839 dpa calculated using the standard method (with a 2021 base date). This figure is, in accordance with the NPPF (2021), the minimum number of homes needed that the Borough needs to plan for. However, there are clear reasons for going above the minimum level of housing required in Tonbridge and Malling:

- **Expression in national policy and guidance as a 'minimum'**: Government guidance reiterates throughout that the standard method produces a 'minimum' starting point in determining the number of homes needed in an area (for example see PPG ID 2a:010). This is also reiterated in paragraph 61 of the NPPF. Local authorities nationally will need to exceed their minimum local housing need figure in order to deliver at least 300,000 homes per year nationally.
- **Uncapped standard method**: The Council's local housing need figure (839 dpa) is 'capped' at 40% above its household projections. A cap is applied in the standard method to help ensure the minimum local housing need figure is as 'deliverable as possible' but does not 'reduce housing need itself' (PPG ID:2a-007). As a result, the PPG sets out that strategic policies adopted with a cap may require early review to ensure that 'any housing need above the capped level is planned for as soon as is reasonably possible'.

The uncapped standard method figure for the Borough is 946 dpa; a figure which fully accounts for the uplift applied owing to the Borough's high median affordability ratio. Applying this figure over the plan period generates a need for at least 17,974 homes: 13% more homes than the capped standard method. The PPG states that 'where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered. This may help prevent authorities from having to undertake an early review of the relevant policies.'

- **Affordability and past delivery**: As shown Table 3 of the draft Reg.18 plan, the Council's median affordability ratio has increased to 13.39 in 2021 (the latest figure). Affordability tends to worsen where housing growth fails to meet demand, pricing out newly forming households and young families.

Notwithstanding, affordability has worsened in Tonbridge and Malling significantly despite the Borough delivering more homes since 2011/12 than its housing requirement at the time (as shown in Table 2.10 in the 'Housing Needs Assessment (2022) report). However, the Council's housing requirement was only 425 dpa across most of this period (a requirement derived from the regional South East Plan, which was not based on an objective assessment of housing need). The significant difference between the current local housing need figure now and the



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former requirement suggests the real demand for homes was far in excess of past housing requirements. Therefore any housing target in the emerging plan should not be arbitrarily reduced on the basis that it might be well in excess of historic housing requirements.

- **Support working age populations:** Lichfields analysis of the 2021 Census shows that all HMAs in England (bar one) which delivered housing growth at or above the national average saw their working age population grow over the last 10 years. This highlights the key role that housing growth plays in attracting and maintaining a workforce, which in turn also helps support local economies and sustainable commuting patterns.
- **Unmet needs:** There are likely to be significant unmet housing needs from neighbouring authorities; particularly Sevenoaks given its levels of constraints. The NPPF tests of soundness include that plans are ‘positively prepared’, in that they provide a strategy which, as a minimum, seeks to meet the area’s need so that unmet need from neighbouring areas is accommodated where it is practical to do so and consistent with sustainable development (NPPF para 35a).
- **Buffer for flexibility:** To ensure housing needs are addressed, a sufficient buffer of sites should be identified above and beyond the minimum number of homes required (NPPF Para 15). A buffer of at least 10% would provide some flexibility to cover for non-delivery in the event sites (particularly those with higher risk delivery assumptions) do not come forward.

In the context of the above, Tonbridge and Malling should be planning for at the very least 10% above its minimum local housing need. It should also test the delivery of the uncapped standard method and identify a buffer of sites to provide flexibility as the plan develops.

Do not agree with mandated development and especially do not support spoiling rural , country , green fields and areas of natural beauty

Old disused existing buildings should be refurbished/rebuilt before developing new areas

The quantities being asked to build is too high in a borough which is the majority greenbelt and rural. So the lesser is the only viable option if we are to keep TMBC from being over developed.

contingency plan

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

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Whilst all areas need some development, Green Belt was initially set up to legally protect these areas. It is sacrosanct.

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We do not need to build additional capacity at this stage. If the assessed need changes (up or down) then the plans can be altered accordingly. The assessed need should cater for local needs and not 'urban migration to the countryside'. It would seem reasonable that national population growth could be spread proportionally across all areas (eg if population increase is 1% then London and TM increase in housing could both be 1%) but migration into TM over and above this would not be desirable.

Each additional percentage gives developers the opportunity to take more of the green belt.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from Tooding. Skilful and high- quality development and refurbishment of existing buildings and brownSeld areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge’s geography it is not possible to build additional road infrastructure to reduce traffic which is already congested.

Since Brexit housing requirements have dropped, this combined with the reduced birth rates means that housing requirement calculations are outdated and over inflated.

The requirement of housing can change with government plans and the argument should be made for a lower amount of housing in this area. Areas that have not made significant housing developments (Like Sevenoaks Council) should be working to make up shortfalls from previous building plans.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and South East Water supply as well as more congestion on the roads into and around Tonbridge.

The Standard Method determines “***the minimum number of homes needed***”. This is a minimum not a maximum. As a minimum, TMBC should plan to meet its needs in full and we fully support Paragraph 4.5 of the Sustainability Appraisal that states: “*No option has been considered or assessed that promotes development below the 839 dwellings per annum as it is considered an unreasonable alternative in the context of national policy and local evidence on housing affordability. In addition, given the large pool of sites currently identified and their potential yield, the borough will likely have sufficient available land to deliver the amount of development that the evidence shows is needed. In these circumstances, the Council considers that any option which did not deliver as a minimum the identified housing need does not constitute a reasonable alternative.*”

We agree a sufficient pool of sites exists to deliver the minimum requirement of the Standard Method.

We prefer Option B: to exceed the minimum by up to 10% (or more) because:

- Delivering 10% more will provide more surety that the needs of the Borough are met i.e should allocated sites fail or be slow to deliver. 10% could act as a contingency to ensure that the minimum is at least met.
- The Stage 2 Green Belt Assessment Exceptional Circumstances (Strategic) Note (July 2022) states TMBC has a high housing demand and acute affordability challenges. It has an undersupply of housing which is worsening. To

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significantly boost the supply of housing in line with para 60 of the Framework, and in order to meet the needs of different groups of people, and to achieve the first 3 visions and objectives outline in Q1, it is essential that a sufficient supply of sites comes forward over the plan period.

- The Housing Needs Study states there is an annual net shortfall of 283 dwellings for affordable housing needs. Whilst the PPG does not require TMBC to plan to meet this need in full, economic viability can be a reason why 40% affordable housing might not be delivered. We consider that planning for a higher level of growth is more likely to ensure that the affordable housing needs are met. Site ref. 59842 is put forward on the basis that 40% affordable housing, together with the other benefits of Phase 1 (including flood betterment and 20% biodiversity net gain) is economically viable.

Table 4.1 in the Sustainability Appraisal compares Option A (meet minimum) to Option B (minimum+10%). Para 4.6 suggests that Option B could have a minor negative effect in relation to SA objective 1 *“as delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.”* This misses the fact that as part of the preparation of a Local Plan, an Infrastructure Delivery Plan should be prepared to identify the infrastructure needed to support development. Planning policies should be drawn to either require infrastructure to be delivered as part of proposals (i.e on major sites) or to seek contributions towards infrastructure provision via CIL and s106 payments. We consider that the effect in SA terms should be adjusted to reflect that Local Plan 2040 should be effectively planning for infrastructure needs.

We agree with Para 4.9 that there would be a significant positive effect through delivering a higher level of housing through Option B. However, we disagree with the remainder of Para 4.9 which states: *“However, this level of housing delivery would be in excess of what the local housing markets have supported over the past decade, as demonstrated by the Housing Market Delivery Study. Therefore, there is uncertainty attached to this option as there is a question mark around its deliverability.”*

Whilst the HMDS does raise this uncertainty, the HMDS also reports that the latest median workplace-based affordability ratio indicate that the balance between supply and demand is worsening. The HMDS recommends TMBC intervene in the market to accelerate the supply of new homes by ensuring that planning policy reflects the current and emerging demand and supply balance for homes. The HMDS is therefore advising the Council to develop planning policy that guide development to maintain mixed and balanced communities to provide a greater diversity of supply which is likely to lead to faster rates of market absorption.

The SA therefore should not at this stage rule out Option B. Option B may be the best way of enabling TMBC to achieve a balanced and mixed community since it will significantly boost the supply of homes and by allocating more land within the Tier 2 Rural Service Centres (RSCs). If growth were focused to the urban area such as around Tonbridge Town alone, this will naturally mean a higher yield of flatted homes i.e. not creating a mixed community and not creating a diverse supply of unit types.

Apportioning part of the housing requirement to the RSC of Hadlow, which has historically seen a very low level of growth, will add diversity to the supply of homes at Hadlow, and would also ensure the delivery of a mix of tenure including affordable housing. This would contribute to the creation of a more balanced community.

In conclusion, land at Maidstone Road (Site ref 59842) can deliver a mix of property types and sizes and affordable housing as demonstrated through the Site Promotion Document. The site is also shown to come forward in 2 phases as required to ensure that the local market can absorb the supply at a steady rate over the plan period.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skillful and high-quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands. Additionally, due to Tonbridge’s geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

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**User Response: Text**

the quotas are already too high

No more housing Wouldham has enough .  
as a village we can't cope with the amount of traffic & parking is bad . No bus service .  
Wouldham should be green belt

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

We note that both options could harm biodiversity and reduce natural resilience by building on greenfield sites. We therefore prefer the option that takes least land.

There is no option for fewer so this is the only answer I can give.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO<sub>2</sub>, provides wildlife habits and prevent the town from Tooding. Skilful and high quality development and refurbishment of existing buildings and brown field areas could provide additional housing while preserving greenbelt and Option A Quantum 1 – Meeting Assessed Housing Need Option B Quantum 2 – Meeting Assessed Housing Need + up to 10% wetlands. Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

The requirement of delivering 839 dpa should be clearly recognised as a minimum requirement as set out at paragraph 11b of the NPPF which states, “strategic policies should, as a minimum, provide for objectively assessed needs for housing”.

Thus, in ensuring the 839 dpa or indeed 923 dpa is a minimum (+10%), this will provide the basis to allow affordability to improve across the Borough which currently sits at 13.39 (property price to earnings ratio). The Council therefore needs to do everything it can to ensure the target used is the minimum and that there is “a sufficient supply and mix of sites” (NPPF, paragraph 68) allocated which are deliverable across the Plan period to improve affordability. This is vital.

- The Assessed Housing Need is itself a challenging target, and in our view represents more than share for the natural need of the area
- Standard Method is a flawed methodology
- There is policy uncertainty at national level over the future of Standard Method targets

I have selected Option B, because I understand this is the **minimum** statutory requirement, but I know that this may need to rise to + 20% if particular circumstances arise.

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**User Response: Text**

We have enough housing development in the TMBC borough already

We are already looking at huge numbers to increase the number of dwellings by 25% over 18 years is a shocking number.

I genuinely believe the housing targets imposed by the government are unrealistic and will cause untold strain on public services including the transport network and access to everyday and critical services. I moved into the Borough in January 2021 and there were no spaces at Doctors Surgeries so one had to be allocated to me by a Central Body. The Services and Infrastructure need to be in place to support so many more households and I do not see how that is going to be possible.

We also need to act as custodians of the countryside for future generations.

I feel the need for housing isn't as steady. More notice should be taken of local knowledge.

The fewer houses being built in the area the better. None at all would be my preference. Already, too many people, too much pollution, too much rubbish, too many cars. The area is being ruined.

There is no need to increase our housing allocation beyond that which is required. The sustainability appraisal findings show significantly poorer against most of the criteria for Option B compared with Option A.

Berkeley believes that the local housing need (LHN) figure arrived at using the standard method should be a minimum requirement for the new Local Plan.

A 10% uplift to the LHN would allow for some flexibility in plan making at this stage, would help to meet additional affordable housing need, and the need of specific parts of the community. This option could therefore be supported. However, it is difficult to ascertain from the evidence published to date (including the Housing Needs Assessment), why 10% has been alighted upon and so the level of uplift requires clarification and justification to garner full support.

To determine the number of homes for which to plan, Tonbridge & Malling Council will need to start from the **minimum** local housing need arrived at using the Standard Method. The Council's evidence suggests the following:

*“The latest standard method calculation results in a minimum need of 839 dwellings each year. This compares with delivery of an annual average of 591 over the 5 years to 2020/21.”* Berkeley agrees that this quantum of growth is a reasonable starting point. However, as is set out in guidance for the Standard Method, when considering its own needs, the Council will need to carefully assess economic growth both expected, and aspired to, in Tonbridge & Malling and what this means for the housing requirement. It is not clear from the evidence published to date whether any implications of economic strategies have been considered. The Housing Needs Assessment only references the effects of the current economy – house prices, activity on the high street etc. There is limited assessment of job growth and what this might mean for housing needs.

Moreover, the Council will also need to assess the specific needs for certain parts of the community, such as the elderly, disabled people and those who do not live in ‘bricks and mortar’ homes. The Housing Needs Assessment does consider these matters, and summarises its conclusions as follows:

*“...there are three main policy areas that require particular attention from both a planning policy and social policy perspective:*

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- *the challenge of enabling the quantity and mix of housing that needs to be delivered, including an appropriate level of affordable housing;*
- *the challenge of ensuring that the housing and support needs of older people are met going forward; and*
- *the challenge of ensuring that the needs of people with disabilities is appropriately addressed.”*

On the face of it, it would appear that there is some evidence here to include an uplift from the LHN to reach an appropriate housing requirement in the Local Plan. The justification for choosing a 10% uplift is currently unclear, however, and requires further explanation.

The Council will also need to keep in mind that from this starting point it will need to consider whether there are any unmet needs in neighbouring areas that also need to be included in the housing requirement. The Council will need to clearly demonstrate cooperation on strategic matters including potential unmet housing needs with neighbours.

I suspect we will start to see twin pressures of population decline and lack of affordability by 2040 pulling back demand.

No need to exceed housing need

The current level of need must be re-assessed against the target. It must not be greater

I do not see the need in increasing beyond anticipated requirement outlined.

It will already be difficult to find the houses required in this Borough. if there was option for -90% i would have selected that.

The government needs to stop this countries population increasing by 400 plus thousand each year in order to relieve the obvious pressure on this small islands limited space.

Prevent over develop enemy

If the housing need is met there is no reason for an increase

The current need is already too great. The addition will lead to extreme stress on local services, healthcare and road congestion even worse than present.

Because the other option is worse for Hildenborough, as more housing will exacerbate the current state of schools and GP surgery at capacity/under pressure, the main road through Hildenborough already at 85-100% of capacity and many areas at serious risk of flooding

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014

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**User Response: Text**

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Additionally, due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

The plan is using out of date data. Without accurate data, there will be unnecessary development into areas of essential

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**User Response: Text**

wetlands and Green belt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Due to Tonbridge's geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

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- The borough is already overcrowded.
- Schools and healthcare are already stretched and there is no need for the extra congestion that further expansion would bring.

Option B is unrealistic and Option A is optimistic at best as places like Hildenborough have become a magnet for people moving out of London in search of greener, open space since COVID, not to mention the shift since BREXIT. Therefore the population figures have increased and continue to increase since the original plan was put in place based on figures from 2014.



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Tonbridge and Malling Borough Council adopted its last Local Plan (the Tonbridge and Malling Core Strategy) in 2007, i.e. 15 years ago. The Core Strategy covered the period up to 2021. The new Local Plan is not intended to be adopted until 2024 by which time the previous plan will be 17 years old and 3 years beyond its Plan Period. The Council has therefore not planned positively for ongoing growth and has allowed the Plan to expire without producing a replacement. As a consequence, the Council has found itself failing in its delivery of its 5-year housing land supply and performing poorly in relation to the Housing Delivery Test. The presumption in favour of sustainable development has therefore applied to the determination of planning applications for several years and the Council is currently required to apply a 20% buffer to its 5-year housing land requirement.

The Standard Method for Calculating Housing Need (the Standard Method) sets a minimum housing requirement to accommodate growth. It is not a limit on the quantum of development that could be planned for over the Plan Period. To plan positively for growth, particularly in light of past failures to deliver sufficient housing to meet needs which have resulted in unplanned windfall development on greenfield land, a 10% buffer should be included as a minimum to the quantum of development to be delivered over the Plan Period.

Tonbridge and Malling Borough Council is consulting on the proposal to alter Green Belt boundaries to accommodate housing need over the Plan Period. The NPPF (section 13) is clear that in redefining Green Belt Boundaries policies need to take account of longer term needs which extend beyond the Plan Period in order that revised Green Belt boundaries can be maintained. It is therefore important that the Council plans for needs beyond the minimum requirements detailed in the Standard Method. This should be for a minimum of 10% addition to ensure there is no requirement to further change the Green Belt boundaries after the next Plan Period.

Quantum 3 - House need MINUS 50%, no allowance for "Internal Migration".

**There is no sense in wasting land building houses to attract people who already have houses elsewhere.**

**No, we should be building only for international migration, and for affordable housing for local first time buyers.**

As set out in NPPF, the standard method figure is a minimum starting point. In this case the baseline minimum has been capped to 839pa, rather than the actual need for 891pa (uncapped as of 2021), or 946pa (uncapped as of 2022). In accordance with NPPG, consideration should therefore be given to whether the uncapped minimum need could realistically be delivered. This may help avoid the need to undertake a further early review of the LP to address such needs. There may also be a need for an upward adjustment to the minimum assessed housing need figure, to fully address the boroughs need for affordable housing, if, as seems the case at present, current policy options are insufficient to meet such needs from qualifying sites alone.

Similarly, further upward adjustments may well be required to assist adjoining LPAs with proven unmet housing needs. Sevenoaks DC for example has previously sought assistance, and are at a similar stage in their LP review. The need or otherwise to assist adjoining LPAs is therefore likely to be confirmed well in advance of the formal submission of TMBC Local Plan for examination. It will be important therefore for TMBC to have demonstrated it has been proactive in assessing the contribution it could make to assist such LPAs, and accord with NPPF paragraph 35. This includes the testing of further reasonable alternatives through the SA process, rather than limiting this to the two stated at present.

Once the housing requirement is established, it will be important to ensure sufficient land is identified to meet this within the

plan period. In this respect it is reasonable and indeed established practice to instill a contingency or slippage allowance of at least the 10% stated in Option B. For all these reasons we would advocate TMBC adopting a positive and proactive stance

to such matters. Option 2 should therefore be regarded as a minimum at this stage until further assessments are completed on the need for further upward adjustments. Additional quantum options, including uncapped need, should then be assessed

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through the SA.

Rydon advocates a further Option C - Meeting LHN plus 20%

In line with the NPPF (para 61) we suggest that as an absolute minimum TMBC should be aiming to meet the figure of 839 dwellings per annum based on the 2021 standard method calculation. In practice, the Council should be aiming to meet the assessed housing need with an additional 10% supply. This would provide flexibility and resilience into the housing supply. A buffer would help ensure a reliable supply in the event of potential non-implementations, delays to delivery (including beyond the plan period), and economic factors within the market. A buffer would also be seen as an effective method of ensuring security within the supply against future changes to the local housing requirement within the methodology, for example in case of new affordability data that increases the requirement. However, the selection of 10% as the buffer figure would benefit from further justification for this to be a sound approach.

The current methodology determines that TMBC must deliver 839 dwellings per annum or 15,941 dwellings (gross) across the plan period up to 2040. Gladman consider that Option B, meeting assessed housing need with an additional 10% is the most suitable quantum of growth for the borough. Accounting for an additional 10% ensures that neighbouring authorities with similar pressures on housing needs are considered and provides the necessary flexibility to be resilient to unforeseen changes that may occur during the latter years of the plan period.

- None of the options are supported as each assumes expansion of Kings Hill
- Kings Hill should remain within the confines of its airbase brownfield site as per previous plans.
- Any further expansion would intrude upon valuable natural assets and contribute to the coalescence of communities.
- No building on valuable green spaces within existing areas should be considered as they are too valuable to the local population. NPPF Green Space Policy ref 99 states that "Existing open space, sports and recreational buildings should not be built on."
- We believe the development of brownfield is preferable to destroying open countryside, valuable farmland and green spaces.

No need for meeting more than assessed needs.

WMPC and TMBC believe the Housing Targets are already too high. Beyond meeting assessed need using the government method of calculation, allowing for a further 10% would result in an unacceptable level of harm.

The Council should aim to meet the assessed housing need for the borough plus 10% given the previous under delivery across the borough, in neighbouring LPAs and more widely. This will result in greater annual delivery across the borough which is an important consideration beyond just allocation of sites. The need to ensure that the housing market areas are met fully and delivered is crucial. The under delivery of housing across the majority of LPAs is well documented so the Council is better to be realistic of a situation so that it can be more proactive in its approach rather than reactive. More holistically (as is evident with other LPAs), this should also reduce the need to review Local Plans as regularly which should free up

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LPA resource to deliver other concentrated services in a timely fashion.

The requirement should be met, which includes a buffer. However, much of the increase is associated with the high house price / earnings ratio, which will not be affected by the proposed development and as such, the local plan should reflect the government guidance on the location of the required development. Housing assessed need is warped by the high price in the green belt areas, and this needs to be addressed.

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We recommend Option 2 (meeting assessed housing need + 10%) is the preferred quantum option for the spatial strategy.

3.69 National policy states that “as a minimum” strategic policies should provide for their objectively assessed need (Para.11b of the NPPF) with Para.22 of the NPPF also stating that strategic policies should anticipate and respond to long term requirements and opportunities. As such, the starting point should be local development needs, as a minimum, are addressed in full.

3.70 We recommend that the Council should seek to provide at least 10% more than their requirement of 839 dwellings per annum (dpa) (15,941 dwellings across Plan Period) for a number of reasons including:

- Ensuring sufficient flexibility to the Council’s supply of new homes;
- Persistent under-delivery in the Borough e.g. Housing Delivery Test Score of 63% which has fallen from 91% in 2020;
- Impact of two Housing Market Areas (‘HMA’s’) in the Borough – need to try to satisfy the needs of both;
- Reduces risk of speculative / unplanned / unintended future development; and
- Provides increased level of certainty to communities.

3.71 We also suggest that the percentage increase would be more suitable to be 20% (rather than 10%) to ensure a more consistent and varied amount of sites coming forward throughout the Local Plan.

3.72 Furthermore, whilst we acknowledge that discussions with neighbouring authorities have not yet been undertaken on whether the Borough can accommodate some of their housing and employment needs, we consider an additional of at least 10% (or preferably 20% more) would allow sufficient capacity to accommodate any further need, should it be required, through the Duty to Cooperate. We recommend these discussions commence as soon as possible

In summary, we recommend a buffer of at least 10% be added to the quantum of housing and this should be in place for whatever spatial strategy option is pursued.

The Government target figures for the South East should be reduced with a view to supporting the declared UK-wide levelling-up strategy.

Trenport support Option B – meeting housing need as a minimum with a flexibility addition of up to 10%. Given the challenges to delivering the quantum of housing to meet need, the additional flexibility allowance will allow a greater range of site size, location and type to be brought forward to ensure that the housing trajectory does not have to be ‘stepped’ but delivers consistently through the plan period.

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We note the options provided are

Option A - Quantum 1 – Meeting Assessed Housing Need

Option B - Quantum 2 – Meeting Assessed Housing Need + up to 10%

5.2 Given the commentary in the Reg 18 Plan at paras 5.3.13 – 5.3.16 about housing affordability, and the current housing land supply situation and past delivery rates, as set out in the Housing Land Supply Position Statement (March 2021), we believe there is a real need for the plan to review the need to deliver the Assessed Housing Need + up to 20% rather than that promoted in question 5. Our rationale for this is set out below

### a) Local Housing Need and the Minimum Housing Requirement

5.3 Whilst the starting point for determining the Local Housing Need (“LHN”) is the Government’s Standard Method, which for TMBC currently equates to 839 dpa [See The Forward to the Draft Plan and Paragraph 5.3.2 on Page 26 of the Draft Plan], PPG is clear that the Standard Method identifies the minimum annual housing need figure [Housing and Economic Needs Assessment chapter of the PPG – Paragraph: 002 Reference ID: 2a-002-20190220 Re-vision date: 20 02 2019]. i.e. it is just the starting point and should not be treated as the housing requirement figure. To this end PPG identifies a number of instances where it might be appropriate to plan for a higher housing need figure than the Standard Method indicates [Housing and Economic Needs Assessment chapter of the PPG Paragraph 010 Reference ID: 2a-010-20201216 Revision date: 16 12 2020]. This the PPG makes clear will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). To this end PPG suggests that circumstances where this may be appropriate include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth;
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a Statement of Common Ground;

5.4 Having regard to the above, matters such as a high affordability ratio that is following a rising trend (see below), along with significant affordable housing need, historic under delivery, and of course the importance of ensuring an adequate buffer to cater for under supply, or instances where the Plan strategy fails to deliver as expected, are all sound reasons for considering an uplift.

5.5 Despite the way in which it is couched, question 5 appears to relate to the issue of housing supply, not the requirement i.e. whether the Draft Plan makes provision for a 10% uplift beyond the LHN in terms of its supply. This is a different issue entirely, to which we will return below, and does not address the importance of planning positively by setting an appropriate Local Plan Housing Requirement. As set out above the PPG is very clear about the obligation to establish the need before looking at it and how it can be met. To this end neither the draft plan nor the evidence base appear to have given any consideration to the issue of the requirement and any potential uplift to address the issues we have outlined in para 5.4 above.

This in our opinion is a serious oversight on the part of the Council and goes to the heart of both the Soundness of the approach taken and Legal Compliance particularly in relation to the DtC, which we will return to below.

### b) Affordability

5.6 Paras 5.3.13 – 5.3.16 of the Draft Plan are clear about the significance of the housing affordability issue across the Borough and how it has worsened over time, whilst para 5.3.18 highlights the fact that the plan should, as a minimum meet the assessed need for housing in full because ‘anything less would have the effect of worsening housing affordability and run the risk of not delivering key national planning policy objectives’. To this end we note, when looking at the ONS House price to workplace-based earnings ratio – March 2021 that the ratio of median house price to median gross annual workplace-based earnings by local authority district, England and Wales [ONS House price to workplace-based earnings ratio – March 2022 – tables 5c & 6c <https://www.ons.gov.uk/peoplepop-ulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>], 1997 to 2021 indicates that the ratio of median house price to median gross annual workplace-based earnings in TMBC has increased significantly over the past 10 years, and

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that TMBC is now the 3rd least affordable Borough in the county after Tunbridge Wells and Sevenoaks, who, together with the western part of Tonbridge and Malling comprise the West Kent HMA.

JAA table 1 – Extracts from ONS median house price to median gross annual workplace-based earnings across Kent - 1997 to 2021

Authority	2009	2012	2015	2018	2020	2021
Medway	5.34	5.73	6.90	8.67	7.69	8.72
Ashford	7.55	7.60	9.02	10.61	10.38	10.45
Canterbury	7.37	7.89	9.49	10.96	11.20	12.86
Dartford	5.76	6.70	8.48	9.67	8.73	8.86
Dover	5.60	6.03	7.29	9.37	7.12	9.25
Gravesham	6.34	6.46	7.44	9.83	8.65	10.90
Maidstone	7.43	8.19	9.05	11.21	10.33	10.85
Sevenoaks	8.98	11.31	13.86	14.81	12.43	14.47
Folkestone	7.57	6.61	7.80	9.24	10.76	11.20
Swale	5.81	6.28	7.11	9.13	9.31	10.10
Thanet	7.46	7.66	8.52	10.49	10.14	10.74
TMBC	7.79	8.21	9.97	11.93	11.93	13.39
TWBC	8.32	8.70	10.98	12.71	13.35	15.43

During this period, the lower quartile house price to income ratio from 8.77 to 13.17

5.7 The rapid increase in the affordability ratio is in our opinion clear evidence of the lack of housing delivery that has taken place over the last 10 year period within the Borough, as demonstrated below. Simply providing for the LHN as calculated through the Standard Method will only slow the rate of decline in affordability no more. For an improvement in the affordability situation to occur positive action is required through the provision of more housing over and above the LHN.

c) Affordable Housing Need

5.8 Linked to the issue of affordability is the significant need for affordable housing identified in the Borough, as acknowledged at para 5.3.16 of the Draft Plan and in the Housing Needs Survey 2022 (HNS) that forms part of the evidence base.

5.9 The HNS 2022 confirms a minimum net annual shortfall for affordable homes of 283 dpa. This has been arrived at by calculating the gross need of 753 dpa and then reducing this to take account of expected annual affordable housing supply from various sources (470 dpa) [See Tables C6 and C7 on Pages 123-124 of HNS 2022]. The figure of 283 dpa must therefore be seen as a minimum because it is dependent on the supply assumptions set out in Appendix C of the HNS 2022.

5.10 Even assuming the net figure relied upon by the Council is correct this still represents a significant level of need, being 33.7% of the total LHN. Whilst we understand the Council are proposing an affordable housing policy requiring 40% onsite provision, this will only be triggered for those sites that meet the qualifying criteria. It is therefore highly unlikely that the affordable housing need will be met. Given the decreasing trend in terms of affordability set out above, the gross affordable housing need of 753 dpa is highly likely to increase over the plan period, leading to an increase in the net shortfall and in turn a higher number of people in need and on the Council's housing waiting list.

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5.11 In the context of the above we note that according to information produced by KCC [See KCC Strategic Commissioning Statistical Bulletin (September 2022) Affordable Housing in Kent 2020-2021 – web link [https://www.kent.gov.uk/\\_\\_data/assets/pdf\\_file/0003/7356/Affordable-housing-in-Kent.pdf](https://www.kent.gov.uk/__data/assets/pdf_file/0003/7356/Affordable-housing-in-Kent.pdf) and DLUHC table 1011 C <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply> LA Name Tonbridge and Malling (last update June 2022)] TMBC have over the past 10 years, only delivered on average 19.75% affordable housing. Even if one assumes an average of 20%, this suggests that the plan would need to deliver over 1,400dpa to meet the identified affordable housing needs of the Borough [ $100/20 \times 283 = 1415\text{dpa}$ ].

JAA table 2 – record of TMBC affordable housing delivery 2011-2021 as set out in information produced by DLUHC and KCC

	2011 - 12	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	Total
Net additional dwellings	444	390	608	487	912	830	1033	455	447	441	6094
Total affordable dwellings	47	164	249	106	104	55	116	256	75	32	1204
% of total	10.6	42.1	43.8	22.1	11.4	6.6	9.9	60.7	16.78%	7.25%	19.75%

5.12 Whilst we are not advocating this level of growth, the above demonstrates the need for an uplift to the LHN figure to boost the supply of open market and affordable homes and thus help address the affordable housing needs of the Borough.

d) Past Under Delivery

5.12 We note the Councils' Housing Land Supply Position as at 31 March 2021 indicates, based upon the housing need of 839 dpa plus a 20% buffer, and the assumptions made on the supply, that the Council is only able to demonstrate 3.17 years of Housing Land Supply between 1 April 2021 and 31 March 2026. We further note that when one reviews the Oct 2017 AMR (the last AMR produced by TMBC), and update this with information on delivery set out in the HDT and KCC's statistical bulletins, and set this against the Councils position on the housing requirement, it's clear that TMBC have a long history of undersupply.

JAA table 3 – history of housing delivery against requirement 2006 – 2021/22

Year	Requirement*	Delivery (gross)	Shortfall	Cumulative shortfall against SEP, withdrawn LPR and standard method	Cumulative shortfall against withdrawn LPR and standard method only
2006-7	450	850**	+400		
2007-8	450	839	+389	+789	
2008-9	450	798	+348	+1,137	
2009-10	450	372	-78	+1,059	
2010-11	450	351	-99	+960	
2011-12	450	444	-6	+954	-6
2012-13	450	394	-56	+898	-62
2013-14	696	608	-88	+810	-150
2014-15	696	487	-209	+601	-359
2015-16	696	912	+216	+817	-143
2016-17	696	830***	+134	+952	-9
2017-18	696	1166	+470	+1,422	-+461

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2018-19	696	455	-241	+1,182	+219
2019-20	696	477	-291	+891	-72
2020-21	843****	447	-366	+625	-438
2021-22	839*****	?			
Total		9,530  (6,220 since 2011/12)			
Annual average delivery rate		628  (622 between 2011/12 and 2020/21)			

[\*We note table 2.10 of the HNS suggests an LDF requirement of 425dpa from 2011/12 – 2018/19, but would question the legitimacy of this figure given the position adopted by the council in para 2.32 of the 2017 AMR which states: *This AMR deals with the 2016/17 period after the SEP was revoked. The SEP required the provision of 450 units per year on average, which is a total of 6,750 units between 2006 and 2021 (the LDF Plan period). In March 2014 a new Strategic Housing Market Assessment (SHMA) was completed which identified the Objectively Assessed Need (OAN) for the Borough. The SHMA was updated in August 2014 in response to the 2012- based Sub National Population Projections. Following the publication of the Government’s 2012-based Household Projections in February 2015 a further 2 updates of the SHMA was undertaken. The final report emerged in September 2016 that recognised the current Objectively Assessed Need which is 696 units per annum; 13,920 units in total for the period 2011-31. It is on this basis that we have assessed the current housing land supply position, substituting the 450 from 2013/14 onwards because this was the first year after the abolition of the SEP.*]

[\*\* Source – Oct 2017 AMR]

[\*\*\* Source – delivery figures for the period 2016/17 onwards are from the Housing Land Supply Position Statement (March 2021).]

[\*\*\*\* Standard method 2020]

[\*\*\*\*\* Standard method 2021]

5.13 The fact the Council have in 9 out of the past 12 years failed to meet their annual housing requirement, and have accumulated a substantial running deficit would suggest to us that there has been a record of persistent under delivery of housing, and that in order to address this there needs for an uplift to the LHN figure.

5.14 The Council’s history of under delivery is further denoted by the latest HDT results which, as set out below, suggest the Council only delivered 63% of the HDT requirement, which was itself adjusted to take on board the possible effects of Covid on housing delivery, and thus set a lower requirement than that associated with the standard methodology.

JAA table 4 – extract from Jan 2022 HDT results

	Number of	Number of	Number of	Total number	Number of homes	Number of homes	Number of homes	Total number	Housing Delivery	Housing Delivery
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	homes required	homes required	homes required	of homes required	delivered	delivered	delivered	of homes delivered	Test: 2021 measurement	Test: 2021 consequence
Area name	2018/19	19/20	20/21		2018/19	19/20	20/21			
Tonbridge & Malling	854	774	561	2189	457	471	441	1369	63%	Presumption

5.15 Again this supports the needs for an uplift to the LHN figure.

e) Unmet Need

5.16 Nowhere in the Regulation 18 Plan is there any reference to the Duty To Cooperate (DtC) or its potential successor and its implications for the overall housing requirement. This is in our opinion a major omission in the light of the reasons behind the withdrawal of the previous Local Pan Review.

5.17 The Reg 18 Plan acknowledges at para 5.3.24 that two HMA's exert an influence on the Borough, the West Kent HMA which encompasses Sevenoaks/Tonbridge/Tunbridge Wells and falls across the north-western, south-western, and south-eastern parts of the Borough; and the Maidstone HMA which falls across the north-eastern and eastern parts of the Borough. In addition para 4.2.15 acknowledges that in determining the quantum options, the Council need to be mindful of the influence of these two HMA's and that neighbouring authorities are facing similar challenges to addressing their assessed needs. It fails however to demonstrate how these issues have been / will be addressed, and where the Council are in their discussions with the affected authorities.

5.18 As set out above the West Kent HMA encompasses the 3 least affordable Boroughs/ Districts in the County, and whilst TWBC are now relatively advanced with their LP Review, with the Inspectors report due imminently, the Inspectors findings on matters such as the housing requirement and the deliverability of the supply have still to be confirmed. At the other end of the spectrum, Sevenoaks have only recently started work on their new Local Pan Review (LPR) following their failed challenge of the Inspectors recommendation that their previous LPR was unsound, in part because of its failure to address the DtC.

5.19 Whilst para 5.3.26 of the Reg 18 Plan acknowledges that: *'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'* the failure of the Reg 18 Plan and its associated evidence base to demonstrate constructive and ongoing engagement with neighbouring authorities from the earliest stages of this Draft Plan, particularly in relation to housing needs for those authorities that share a HMA is a fundamental flaw in the plan. A point exacerbated by the commentary in section 3.4 of the Green Belt Assessment which highlights both the need to liaise with Maidstone, Tunbridge Wells and Sevenoaks to see if they could take some of TMBC's need given the implications delivery has on the GB/AONB; and the fact that *'the requirement to demonstrate that growth cannot be accommodated by neighbouring boroughs has not yet been fully explored and evidenced'*.

5.20 It is in our opinion imperative given the housing needs of the West Kent HMA that the TMBC LPR addresses the issue of the housing needs of the wider HMA, the extent to which any requests to help meet unmet needs has been made and whether TMBC themselves have looked to others to assist them. Only through a rigorous approach to the issue of the DtC will the Council be able to demonstrate that its housing requirement is right and that the spatial strategy is correct in its approach to growth, including the release of GB sites and land within the AONB. To this end the SA should, in order to justify the Councils end approach, test various reasonable alternatives that consider the issue of unmet need and how this could be addressed through the plan. Likewise it's important that the plan encompasses evidence of effective and on-going joint working with neighbouring authorities on the issue of unmet need, both those within the same HMA, and those beyond who may be less effected by issues associated with the removal of land from the Green Belt and major development in the AONB.



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5.21 As things currently stand and cognisant of the situation in Sevenoaks (whose LPR is due to be published this autumn and whose ability to meet its LHN has yet to be clarified), and Maidstone (who are currently at examination, but struggling to meet their current LHN and have as a result a negative position in terms of their 5 year Housing Land Supply position), and Gravesham (who with the exception of Gravesend are wholly within the Metropolitan Green Belt and will not be able to meet their needs wholly within their urban areas); and not forgetting the continued issue of London's unmet need, we believe there is a clear and justifiable reason for the LHN figure to be increased to address the potential unmet needs of adjacent authorities.

f) A Buffer

5.22 As set out above it appears that the Council has tested a scenario within its spatial strategy that provides sufficient housing supply to meet the minimum LHN plus up to 10%. As drafted the Reg 18 plan does not provide any detailed information on the makeup of the supply. Table 2 merely sets out the component parts i.e. extant permissions, windfall allowances and scale of allocations to be made. Whilst we will return to the matter of windfalls below, as far as proposed allocations are concerned we are not able to test their deliverability/ the numbers relied upon in the housing trajectory as they are as yet unknown. We do however note that Para 4.2.15 of the Reg 18 Plan acknowledges that given the time horizon of the plan (to 2040), the Council 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.

5.23 Given the issues of affordability, affordable housing need, past under delivery and the DTC as identified above, all of which have a material impact on LHN, it is considered that at the very least a buffer should be built into the housing requirement for the Plan. Introducing a buffer into the housing requirement would ensure that the Council plans positively for the future in a manner that not only meets the LHN but also provides an uplift to reflect the acute affordability problem and in turn the rising affordable housing need in the Borough.

g) Conclusions on the Housing Requirement

5.24 Whilst recognising that TMBC has worked from the correct starting point, which is the LHN calculated by reference to the Standard Method i.e. 839 dpa, PPG is clear in that the LHN is only the starting point.

5.25 There are a range of factors relevant to the calculation of the housing requirement for the Draft Plan that TMBC needs to consider when arriving at its overall housing requirement. These include

- The severe and worsening affordability issue and the increasingly eye-watering affordability ratios;
- The poor levels of affordable housing delivery, and attendant increasing need for affordable homes; and
- The importance of including a buffer above the LHN to ensure adequate housing delivery particularly given the Council's poor track record of delivery as set out above.

5.26 When these factors are properly scrutinised they demonstrate clear and rational reasons as to why there should be an uplift to the LHN. The 10% suggested in the plan does not go far enough. Having regard to the above Redrow believe that at the very least the plan should provide for the LHN + a 20% buffer to ensure the Plan proceeds on a robust footing. This would lead to an annual housing requirement of 1,007 dpa. Setting the housing requirement at this level would significantly improve the affordability situation within the Borough and would deliver more affordable homes for those members of the community in the most need.

5.27 Unfortunately as TMBC has not tested any scenario above the LHN in terms of requirement, only supply so it is not in a position to determine whether an uplift of 20% could be achieved or not. Equally, if the higher level scenario advocated above cannot be accommodated within the Borough TMBC could then explore through the DtC, or successor alignment policy, whether any of its neighbours could assist, which is of course another important area of work that TMBC has not done.

Due to the capped nature of the housing need, to provide a buffer to ensure delivery of need, due to the acute affordability and affordable housing needs in the borough, and to potentially assist with meeting wider housing needs under the DtC.

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The requirement of delivering 839 dpa should be clearly recognised as a minimum requirement as set out at paragraph 11b of the NPPF which states, “strategic policies should, as a minimum, provide for objectively assessed needs for housing”. Thus, in ensuring the 839 dpa or indeed 923 dpa is a minimum (+10%), this will provide the basis to allow affordability to improve across the Borough which currently sits at 13.39 (property price to earnings ratio). The Council therefore needs to do everything it can to ensure the target used is the minimum and that there is “a sufficient supply and mix of sites” (NPPF, paragraph 68) allocated which are deliverable across the Plan period to improve affordability. This is vital.

Paragraph 11a) of the Framework requires all plans to promote a sustainable pattern of development that seeks to meet the identified needs of the area; whilst 11b) confirms that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other needs, as well as any needs that cannot be met within neighbouring areas. Furthermore, the Government has an objective of significantly boosting the supply of homes, as set out in paragraph 60 of the Framework, and therefore sufficient amounts and variety of land must be available to meet specific needs.

Tonbridge and Malling has a need of 839 dwellings per annum across the plan period up to 2040. In order to be found a sound plan, it must be positively prepared and provide a strategy which seeks to meet the area’s assessed needs, as a minimum (paragraph 35a)) of the Framework. Tonbridge and Malling, at March 2020, could demonstrate a housing land supply of just 2.93 years, which is chronically low against the 5-year requirement.

Section 33A of the Planning and Compulsory Purchase Act and paragraph 24 of the Framework has a requirement for local planning authorities to maintain effective cooperation, the therefore Council has to demonstrate a Duty to Cooperate with neighbouring authorities of strategic matters to maximise the effectiveness of the activity of plan preparation and this includes ensuring unmet need in the neighbouring housing market areas / authorities is positively planned for.

The Council have previously withdrawn a failed Local Plan (July 2021) due to the failure of legal compliance to meet the Duty to Cooperate. As confirmed in paragraph 12 of the Inspectors’ Report (June 2021 – ED83) in respect of the failed Tonbridge and Malling Borough Council Local Plan, Sevenoaks District Council has an unmet housing need. Sevenoaks is a neighbouring local authority, falling within the West Kent Housing Market Area, alongside a large proportion of Tonbridge and Malling Borough.

There is a risk that some allocated sites are not deliverable within the plan period and / or the quantum of development is overestimated. As such, and in order to ensure the need is met in full, the additional 10% could address those sites that are not developed.

Question 5 invites views on whether the Local Plan should “as a minimum provide for objectively assessed needs for housing and other uses, including retail, leisure, office and other main town centre uses”, consistent with NPPF paragraph 11(b), or whether the Plan should propose a 10% increase above the minimum level.

Vistry maintain that there is a clear case for exceeding the minimum Standard Method-derived housing figure, as set out in ‘Option B’. Indeed, the supply of new homes in the Borough has historically been constrained by the prevalence of the Green Belt, and other designations. This has led to recognised impacts, such as suppressed household formation and worsening levels of housing affordability, with associated socio-economic consequences.

The latest Office for National Statistics (ONS) dataset indicates that the median house price affordability ratio for the Borough was 13.39 in 2021. By comparison, the 2021 affordability ratio for England and Wales was 8.93. A similar pattern is reflected in lower quartile affordability ratios, with the 2021 figure for Tonbridge and Malling being 13.17, compared to 7.85 across England and Wales as a whole.

Relative levels of housing affordability are further considered in the Housing Needs Survey (2022) which forms part of the evidence base for the consultation. At Table 3.7, this document confirms that housing within Tonbridge and Malling is amongst the least affordable in Kent, with median (workplace-based) affordability ratios only being higher in neighbouring Sevenoaks and Tunbridge Wells.

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At paragraphs 5.3 of the Housing Needs Survey, it is confirmed that gross affordable needs equate to 753 dwellings per annum (dpa), with a net shortfall of 283 dpa being identified, when taking account of the projected supply of affordable rental accommodation and new-build commitments. Notwithstanding the absence of a Viability Assessment at this stage, it is nonetheless unlikely that simply increasing the percentage of affordable housing required from each major development is likely to address this shortfall.

Therefore, it is essential that the Plan increases the supply of housing overall (to levels well above the Standard Method minimum figure) to facilitate additional affordable provision and to achieve meaningful progress towards redressing the general affordability issues facing the Borough.

Such over-provision is also vital to provide flexibility and choice in the supply of new homes. Indeed, as the Consultation Document sets out (at paragraph 4.2.15), the two distinct HMAs exert an influence across the Borough. Likewise, neighbouring authorities are facing similar challenges in seeking to address their objectively assessed needs. The Plan therefore must make provision for significant levels of new supply within both HMAs, in order to address 'real-world' market dynamics. This is likely to justify a higher growth approach, essentially increasing the housing requirement to levels over and above the minimum Standard Method figure.

Furthermore, it must be noted that the dated nature of the current Core Strategy (adopted 2007) and the Development Land Allocations DPD (adopted 2008), together with the failure of the previously submitted Local Plan at Examination, has prevented the Plan-led release of Green Belt land. This means that the supply of new homes has not increased as it otherwise would have. Constraints to housing supply are borne out in comparatively low average rates of housing delivery over the preceding five years (591 dpa).

Indeed, the latest Housing Delivery Test (HDT) score for Tonbridge and Malling (published January 2022) was just 63%. For comparison, and as noted in a report to the Planning and Transportation Advisory Board (meeting 01 March 2022), only 8% of LPAs nationwide achieved a HDT measurement lower than that in Tonbridge and Malling. Consequently, for the purposes of calculating five-year housing land supply (5YHLS), a 20% buffer is currently applied to the requirement.

It is important then that the new Local Plan addresses the historic and ongoing shortfall in housing provision within the Borough, and takes steps to markedly improve the supply of new market and affordable homes. Vistry considers that Option B is clearly preferable to Option A. However, in view of the concerns raised, it is concerning that higher uplifts (i.e., exceeding 10%) were not considered within the consultation document, the Interim SA, or the wider evidence base.

Furthermore, it is evident that a quantum of unmet housing need is again at risk of arising within the Sevenoaks and Tunbridge Wells (West Kent) HMA. As noted, Sevenoaks District Council is about to consult on a Regulation 18 'Issues and Options' Local Plan, that does not firmly commit to meeting objectively assessed needs in full. Likewise, the Submission Version Tunbridge Wells Local Plan (which is currently at Examination) does not propose to accommodate any unmet need.

The current TMBC Consultation Document is silent on the question of unmet need within the Sevenoaks and Tunbridge Wells (West Kent) HMA, and nor does the evidence base provide substantive comment. This is most concerning, given the comments of the Inspectors examining the previously submitted TMBC Local Plan, who stated at paragraph 33 of their report that;

"The identified need for housing exists now, and the likely existence of unmet need has been known about for some time and is therefore a strategic matter that should have been considered through the DtC in the current round of local plans, not delayed to some future date. Deferring the issue to subsequent plans does not amount to constructive, active engagement, especially when the plan making processes were, in reality, closely aligned."

Consequently, it is crucial that the Local Plan and SA test options that would result in the Plan fully meeting the need for both market and affordable homes, in addition to potentially accommodating unmet needs arising within the wider Sevenoaks and Tunbridge Wells HMA. This is essential, both as a matter of sound planning and to address the Duty-to-Cooperate.

Again, Vistry make these points in the context of previously stated concerns regarding the limited scope of future Local

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Plan consultations. Progressing from this high-level 'Issues and Options' style of consultation directly to the Regulation 19 Stage, effectively curtails the transparent consideration of options beyond those currently presented.

Reluctantly accepting Option 1, I believe that the assessed need is already too high – it is based on out-of-date pre 2014 population figures and makes no allowance for changes brought about by Covid and Brexit. The Borough is already overcrowded. This addition will lead to more stress on already overstretched local services such as healthcare and education, and more congestion on the roads into and around Tonbridge.

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My preferred quantum option is **OPTION 3**

There is no sense in wasting land building houses to attract people who already have houses elsewhere.

We should be building **only** for international migration, for affordable housing, for a sustainable amount of growth and/or replacing poor, existing housing.

QUANTUM 3 - Housing need MINUS 50%, no allowance for "Internal Migration"

There is no sense in wasting land building houses to attract people who already have houses elsewhere

Just meet local housing need, not 50% for market housing and developer profit.

No more encroachment of the Green Belt and Areas of Outstanding Natural Beauty.

Regulation 18 Local Plan consultation outlines two options for housing growth based on the target set out in

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the draft plan of delivering 15,941 dwellings by meeting the Assess Housing Need (Option A), or meeting the Assess Housing Need plus up to a 10% buffer (Option B) which would assist in meeting housing short fall.

Housing delivery is a national issue and TMBC has an important role to play in facilitating the delivery of new homes balanced with economic growth to supply housing land and job creation that meets the needs of the local community.

The previous TMBC Local Plan (Regulation 22 Submission dated January 2019) was submitted under the 'transitional period' lasting for six months after the publication of the July 2018 NPPF within which any draft Local Plan submitted to the Secretary of State was able to proceed using the locally derived housing need figures, which outlined a lower overall housing requirement for TMBC.

This had resulted in TMBC accelerating its Local Plan preparation period. One of the tests of soundness considered at examination stage is whether the plan is "positively prepared". This means that a Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. During the course of the examination process of the previous draft Local Plan, the Inspectors were minded that the Plan failed to meet the tests of soundness on the basis that the Local Plan failed to adequately assess the housing need for the borough alongside a failure to engage with neighbouring authorities to address the shortfall in housing provision under the duty to cooperate. The Inspectors were the view that the housing targets outlined in the previous draft Local Plan achieved a shortfall in provision of c. 21% against the objectively assessed need (OAN).

The Regulation 18 Local Plan consultation makes reference that the objectively assessed need for housing for the borough across the plan period is 15,941 dwellings, which equate to 839 dwellings per annum. It is unclear whether the targets outlined in the Regulation 18 Local Plan consultation are reflective of current shortfall in delivery. At present, the TMBC Housing Delivery Test results for 2021 indicate that Tonbridge and Malling Borough Council was able to deliver only 63% of the housing required between the period from 2019-2021, which follows a shortfall in provision in the preceding periods. Therefore, it is considered and requested that the housing targets contained in the new Local Plan should meeting the Assess Housing Need plus a 10% buffer to ensure that delivery in the borough adequately addresses the housing need of the borough. This would also ensure that the Local Plan would be prepared robustly to meet the test of soundness.

Quantum option 3 - Housing need MINUS 50%, no allowance for "Internal Migration"

What are your reasons for selecting this particular quantum option ?

There is no sense in wasting land building houses to attract people who already have houses elsewhere

*- Housing need MINUS 50%, no allowance for "Internal Migration"*

**There is no sense in wasting land building houses to attract people who already have houses elsewhere**

I selected Quantum 1 as I see no reason to exceed the onerous housing targets set by the current government in the South East

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Concentration must be focused on assessed needs. Otherwise further traffic congestion would here have an overall negative impact on climate change. It would also create a higher land take for green field sites.

No more housing than necessary

- None of the options are supported as each assumes expansion of Kings Hill
- Kings Hill should remain within the confines of its airbase brownfield site as per previous plans.
- Any further expansion would intrude upon valuable natural assets and contribute to the coalescence of communities.
- No building on valuable green spaces within existing areas should be considered as they are too valuable to the local population. NPPF Green Space Policy ref 99 states that “Existing open space, sports and recreational buildings should not be built on.”
- We believe the development of brownfield is preferable to destroying open countryside, valuable farmland and green spaces.

We strongly support the Council’s position at paragraph 5.3.18 of the Regulation 18 Local Plan Consultation Document that the “only reasonable approach” would be to meet the assessed need for housing in full, and that this would be the “minimum position”.

While we would support Option B Quantum 2 over Option A Quantum 1, on the basis that it would allow for greater flexibility and resilience in meeting housing needs across the Plan period. We are concerned that Option B would still be insufficient.

Concerns remain because the assessed housing need is the minimum number of homes that the council should be seeking to deliver, and we note that the ‘uncapped’ Standard Method figure includes a 59% uplift, reflecting significant affordability issues across the Borough. An uplift greater than 10% of assessed housing need would therefore likely be required to address affordability issues. In addition, we would be concerned that a 10% uplift would not be sufficient to address any unmet need arising from London or neighbouring authorities.

We therefore suggest that meeting assessed housing need plus a figure than 10% plus should be considered by the Council.

BAG cannot justify supporting any of the options offered on the basis that in each there is an assumption of expanding, in particular, Kings Hill which was always intended to be a development which remained within the confines of its airbase brownfield site. Any further expansion would intrude upon valuable natural assets and contribute to the inevitable coalescence of communities.

As a principal however, BAG believes the development of brownfield as preferable to destroying open countryside and valuable farmland.

The south east economy is already at breaking point, TMBC also have a large area of Green Belt so restricts the land availability.

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The target area already includes +10% so why do we need more? Why is there not an option to reject government figures and look elsewhere as part of the levelling up strategy.

Kings Hill is already over developed and considerably more than the original plans. The original plan to have 40% given to green space has been disregarded and ignored.

Focus development in and adjacent to settlements beyond outer greenbelt boundary and outside of the AONBs.

Infrastructure is already over-crowded/struggling. The recent proposal from KC to reduce bus services are unhelpful.

The number of houses required should be challenged first before including additional numbers.

If done properly. If your housing need assessment is based upon modelling then this needs to be regarded with scepticism. What error margins have been incorporated? What type of Monte Carlo analysis has been used?

QUANTUM 3 - Housing need MINUS 50%, no allowance for "Internal Migration".

There is no sense in wasting land building houses to attract people who already have houses elsewhere.

Quantum 3 - Housing need MINUS 50%, no allowance for "Internal Migration".

There is no sense in wasting land building houses to attract people who already have houses elsewhere.

The local plan is already based on a very large increase in dwellings

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- Kings Hill should remain within the confines of its airbase brownfield site as per previous plans.
- Any further expansion would intrude upon valuable natural assets and contribute to the coalescence of communities.
- No building on valuable green spaces within existing areas should be considered as they are too valuable to the local population. NPPF Green Space Policy ref 99 states that "Existing open space, sports and recreational buildings should not be built on."
- We believe the development of brownfield is preferable to destroying open countryside, valuable farmland and green spaces.

**QUANTUM 3 [Housing need MINUS 50%, no allowance for "Internal Migration"]**

There is no sense in wasting land, building houses to attract people who already have houses elsewhere and encouraging commuters to the area.

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We commend the Council in considering a higher level of housing over the plan period – there are a number of sound planning reasons why this is appropriate, whereas the alternative of constraining the amount of new housing will exacerbate the acute affordability issues that are prevalent in the Borough.

To check the unrestricted sprawl of large built up areas to prevent neighbouring towns / villages merging into one another to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

- None of the options are supported as each assumes expansion of Kings Hill
- Kings Hill should remain within the confines of its airbase brownfield site as per previous plans.
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- No building on valuable green spaces within existing areas should be considered as they are too valuable to the local population. NPPF Green Space Policy ref 99 states that “Existing open space, sports and recreational buildings should not be built on.”
- We believe the development of brownfield is preferable to destroying open countryside, valuable farmland and green spaces.

My preferred quantum option is **OPTION 3**.

There is no sense in wasting land building houses to attract people who already have houses elsewhere.

We should be building **only** for international migration, for affordable housing, for a sustainable amount of growth and/or replacing poor, existing housing.

Any development must be based on reasonable assumptions; many previous norms are no longer valid post pandemic, for example that of the primacy of London dictating working and travelling habits.

Given the quantity of houses built in this part of Kent over the past 15-20 years and the resultant demonstration of inadequate infrastructure, particularly roads, there can be no reasonable argument to plan for more than the minimum that would satisfy Government edict.

Firstly, with reference to the Interim Sustainability Appraisal, Option A [=Quantum 1] generally has more ‘significant’ (higher) positive and less harmful negative scores, than Option B [=Quantum 2]. Therefore, based on this high-level sustainability scoring, Option A should be taken forward. Secondly, in consideration of the existing Green Belt constraints, with over 70% of the Borough comprising land having a protected Green Belt designation, this should support the adoption of Option A (Quantum 1); as housing need alone is unlikely to outweigh the harm (as noted above in Q4). Furthermore, this fact could help justify the adoption of a lower housing target, which would more likely achieve sustainable development, given the local circumstances, and cause less harm. Lastly, it is widely acknowledged that the ‘standard method’ overestimates housing need, based on the out-dated 2014 Office for National Statistics (ONS) projected growth. Thus, the case should be made for adopting a housing need based on the more realistic and up-dated figures (e.g. 2018). The difference between the 2014 and 2018 figures, at a national level, equates to about a 50% reduction in the actual housing need (i.e. from 300,000/year, for 2014, to only “164,000”/year2). Therefore, it might be reasonable to assume that a similar (50%) reduction could realistically be



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applied in our Borough, significantly reducing the need to develop any green field sites.

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and high- quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge’s geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

**Which spatial strategy option do you prefer? OPTION 1, but there is a case for Option 4, in that every rural community needs some housing**

**What are your reasons for selecting this spatial strategy option? Greenbelt is and AONB are protected areas for a reason it is not a reusable commodity – there are biodiversity unique environments of nature. At a time where climate change is at the forefront for most countries, UK are getting rid of vast areas of trees and natural habitat to make way for more houses. Green areas are not only good from an ecological viewpoint but also from a mental health viewpoint.**

**Once Greenbelt is gone, it is gone forever, and Greenbelt's main use is openness and to prevent "Coalescence of Settlements" we don't want villages to sprawl into each other, we want them to remain separate and unique villages. If you build on greenbelt, planting shrubs and trees will not replace the biodiverse environment that bugs, insects, animals, reptiles, birds have taken 100s of years to create.**

This is a forced choice because the plan is using out-of-date (pre 2014) population figures. It does not consider changes resulting from Brexit and Covid since then. Without accurate data, there will be unnecessary development into areas of essential wetlands and greenbelt that absorbs CO2, provides wildlife habits and prevent the town from flooding. Skilful and high- quality development and refurbishment of existing buildings and brownfield areas could provide additional housing while preserving greenbelt and wetlands.

Additionally, due to Tonbridge’s geography it is not possible to build additional road infrastructure to reduce traffic, which is already congested.

- None of the options are supported as each assumes expansion of Kings Hill
- Kings Hill should remain within the confines of its airbase brownfield site as per previous plans.
- Any further expansion would intrude upon valuable natural assets and contribute to the coalescence of communities.
- No building on valuable green spaces within existing areas should be considered as they are too valuable to the local population. NPPF Green Space Policy ref 99 states that “Existing open space, sports and recreational buildings should not be built on.”
- We believe the development of brownfield is preferable to destroying open countryside, valuable farmland and green spaces.

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Kings Hill has already provided enough dwellings over last 20 years to meet Government targets.

It protects our cherished Green Belt, and AONB, Tonbridge area is saturated with cars/peoples/schools - build on brown belt areas near transport links.

Any development must be based on reasonable assumptions; many previous norms are no longer valid post pandemic, for example that of the primacy of London dictating working and travelling habits

T&M Council has not fully met housing need for at least 30 years plus. To attempt to meet it in full by 2040 would be a nightmare scenario

I understand that the target already includes +/-10% so no further increase is necessary. Also, apparently there was a penalty 20% uplift following the previous plan's withdrawal.  
Kings Hill has already been developed beyond original expectations, especially regarding the approval of the amount of green space area that should remain within the airfield.

Quantum 3 - Housing need MINUS 50%, no allowance for "Internal Migration".

You are talking about destroying greenbelt land to build houses for people who already have houses!

TMBC have to include in the Plan for growth until 2040. With the growing population, in terms of numbers of people, exacerbated by the ageing population, the 10% (as you have only put forward two options) is a value TMBC feel is appropriate, hence my response, but if the scientific data shows +7%, or +17%, whatever, that surely is the figure that should be used.

Question 5 invites views on whether the Local Plan should '...as a minimum provide for objectively assessed needs for housing and other uses, including retail, leisure, office and other main town centre uses...', consistent with NPPF paragraph 11(b), or whether the Plan should propose a 10% increase above the minimum level.

We would firmly argue that there is in fact a clear basis upon which the Council should be seeking to exceed the minimum Standard Method-derived housing figure, as set out in 'Option B'. Indeed, the supply of new homes in the Borough has historically been constrained by the prevalence of the Green Belt, and other designations. This has led to recognised impacts, including suppressed household formation, worsening levels of housing affordability, etc., with associated socio-economic consequences.

The latest Office for National Statistics (ONS) dataset indicates that the median house price affordability ratio for the Borough was 13.39 in 2021. By comparison, the 2021 affordability ratio for England and Wales stands at 9.1. A similar pattern is reflected in lower quartile affordability ratios, with the 2021 figure for Tonbridge and Malling Borough being 13.17, compared to 7.85 across England and Wales as a whole.

Relative levels of housing affordability are further considered in the Housing Needs Survey (2022) which forms part of the evidence base for the Consultation Document. At Table 3.7, this document confirms that housing within the Borough is

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amongst the least affordable in Kent, with median (workplace-based) affordability ratios only being higher in neighbouring Sevenoaks and Tunbridge Wells.

At paragraphs 5.3 of the Housing Needs Survey, it is confirmed that gross affordable needs equate to 753 dwellings per annum (dpa), with a net shortfall of 283 dpa being identified, when taking account of the projected supply of affordable rental accommodation and new-build commitments. Notwithstanding the absence of a Viability Assessment at this stage, it is nonetheless unlikely that simply increasing the percentage of affordable housing required from each major development is likely to address this shortfall.

It is essential therefore that the Plan increases the supply of housing overall (to levels well above the Standard Method minimum figure) to facilitate both additional affordable provision and to make a meaningful inroad to redressing the general affordability issues facing the Borough's communities.

Such over-provision is also vital to provide flexibility and choice in the supply of new homes. Indeed, as the Consultation Document sets out (at paragraph 4.2.15), the two distinct HMAs exert an influence across the Borough. Likewise, neighbouring authorities are facing similar challenges in seeking to addressing their objectively assessed needs. The Plan must therefor make provision for significant levels of new supply within both HMAs, to address the 'real-world' market dynamics. This is likely to justify a higher growth approach essentially increasing the housing requirement to levels over and above the minimum standard method figure.

Furthermore, it needs to be noted that the Borough's latest Housing Delivery Test (HDT) score (published January 2022) was just 63%. For comparison, and as noted in a report to the Planning and Transportation Advisory Board (meeting 1st March 2022), only 8% of LPAs nationwide achieved a HDT measurement lower than that in Tonbridge and Malling Borough. Consequently, for the purposes of calculating five-year housing land supply (5YHLS), a 20% buffer is currently applied to the requirement.

It is important then that the new Local Plan addresses the historic and ongoing shortfall in housing provision within the Borough and takes steps to markedly improve the supply of new market and affordable homes. And delivery of this be focussed in the early part of the plan period. Taking all this into consideration, BDW considers that Option B is clearly preferable to Option A. However, in view of the above concerns, it is concerning that higher uplifts (i.e., exceeding 10%) have not been considered within the consultation document, the Interim SA, or the wider evidence base.

Furthermore, it is evident that a quantum of unmet housing need is again at risk of arising within the Sevenoaks and Tunbridge Wells (West Kent) HMA. As noted, Sevenoaks District Council is about to consult on a Regulation 18 Issues and Options Local Plan, which does not firmly commit to meeting objectively assessed needs in full. Likewise, the Submission Version Tunbridge Wells Local Plan does not propose to accommodate any unmet need.

The current TMBC Consultation Document is silent on the question of unmet need within the Sevenoaks and Tunbridge Wells (West Kent) HMA, and nor does the evidence base provide substantive comment. This is most concerning, given the comments of the Inspectors examining the previously submitted TMBC Local Plan, who stated at paragraph 33 of their report that:

*'The identified need for housing exists now, and the likely existence of unmet need has been known about for some time and is therefore a strategic matter that should have been considered through the DtC in the current round of local plans, not delayed to some future date. Deferring the issue to subsequent plans does not amount to constructive, active engagement, especially when the plan making processes were, in reality, closely aligned.'*

Consequently, it is crucial the Local Plan and SA test options that would result in the Plan fully meeting the need for both

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**User Response: Text**

market and affordable homes, in addition to potentially accommodating unmet needs arising within the wider Sevenoaks and Tunbridge Wells HMA.

This is essential, both as a matter of sound planning and to address the Duty-to-Cooperate.

Again, we make these points in the context of previously stated concerns regarding the limited scope of future Local Plan consultations. Progressing from this high-level Issues and Options style of consultation directly to the Regulation 19 Stage, effectively curtails the transparent consideration of options beyond those currently presented.

Greenbelt is sacrosanct, it is not a reuseable commodity - once it has gone, that is forever

Quantum 3 Housing need MINUS 50%, no allowance for "Internal Migration"

There is no sense in wasting land building houses to attract people who already have houses elsewhere

With the choice that I have I have to go with Option A which I believe is based on out of date population figures anyway. There is definitely insufficient infrastructure to support this. We are already overstretched and overcrowded.

**QUANTUM 3 - Housing need MINUS 50%, no allowance for "Internal Migration"**

**There is no sense in wasting land building houses to attract people who already have houses elsewhere**

**QUANTUM 3 - Housing need MINUS 50%, no allowance for "Internal Migration"**

*There is no sense in wasting land building houses to attract people who already have houses elsewhere*

Quantum 3 - Housing need MINUS 50%, no allowance for "Internal Migration".

We do not need to waste more precious building land one homes for people who already have one.

Quantum 3 - Housing needs MINUS 50% no allowances for "Internal Migration"

There is no sense in wasting land building houses to attract people who already have houses elsewhere

QUANTUM 3 - Housing need MINUS 50%, no allowance for "Internal Migration"

There is no sense in wasting land building houses to attract people who already have houses elsewhere.

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Quantum 3 - *Housing need MINUS 50%, no allowance for "Internal Migration"*

Quantum 3

**Why do we need extra 50% for internal migration?**

Quantum 3 -- *Housing need MINUS 50%, no allowance for "Internal Migration"*

***There is no sense in wasting land building houses to attract people who already have houses elsewhere***

My preferred quantum option is **OPTION 3 - *Housing need MINUS 50%, no allowance for "Internal Migration"***

There is no sense in wasting land building houses to attract people who already have houses elsewhere.

We should be building **only** for international migration, for affordable housing, for a sustainable amount of growth and/or replacing poor, existing housing.

Should be based on actual local need rather than government-imposed target

Quantum 3 - housing needs MINUS 50%, no allowance for "Internal Migration"

There is no sense in wasting land building houses to attract people who already have houses elsewhere

QUANTUM 3 - housing need MINUS 50%, no allowance for "Internal Migration"

There is no sense in wasting land building houses to attract people who already have houses elsewhere

Because option A already imposes more construction activity than would be desirable during the period.

I understand that the target already includes +/-10% so no further increase is necessary. Also, apparently there was a penalty 20% uplift following the previous plan's withdrawal. Kings Hill has already been developed beyond original expectations, especially regarding the approval of the amount of green space area that should remain within the airfield.

Do not need to build housing for those who already have a house.

Option A - meeting assessed housing need on the understanding that the housing stock created is local people to own or rent not for speculators.

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**User Response: Text**

Any development must be based on reasonable assumptions; many previous norms are no longer valid post pandemic, for example that of the primacy of London dictating working and travelling habits.

If only two options then we must go with 'only meeting assessed housing need' - i.e. Option 1. It is evident that, even if not included in the new Local Plan, then extra development will take place as it always does with reference to special circumstances of some kind. Additionally, we draw attention to our comments associated with Q 11, below.

Having stated the above, we are disappointed that there was not an Option 3 for the Local Plan to return to the assessed quantum need prior to the penalty 20% uplift following the previous plan's withdrawal, or even an Option 4 to reject the Government figures entirely.

BAG strongly urges TMBC to continue challenging the Government's assessment of housing needs as mentioned in Matt Boughton's Foreword to the new plan.

BAG also highlights the fact that the West Malling area has already borne a disproportionate amount of new housing in the last 20 years. Here follows an extract of a 2022 report compiled for BAG regarding local housing developments:

'... the increase in housing in the immediate vicinity of West Malling; that is within a 1 mile radius, the number of dwellings has increased by 3695. Tonbridge and Malling Borough Council covers a 93 square mile area, of which the area surrounding West Malling (including Kings Hill and Leybourne Grange) accounts for 1% of the geographical space of the borough. However, this very small area has absorbed roughly 58% of the number of new dwellings and the associated increase in demand on local services; destruction of natural habitat and green spaces that this entails'.

The MGB round Tonbridge meets all the requirements specified in the NPPF i.e. To safeguard the countryside from encroachment.

Meet needs in certain areas according to infrastructure

Answer: I selected Quantum 1 as I see no reason to exceed the onerous housing targets set by the current government in the South East

Report run at 15 Jun 2023 15:10:51. Total records: 794