
Report on Questionnaire Answers

Questionnaire: TMBC Local Plan - Regulation 18

Question: [Question 4] What are your reasons for selecting this parti...

User Response: Text

Further development would increase opportunities for local area development including accessibility and improved access to resources

Keep as much rural land as possible, but build up Rural service centres so the people do not have to travel into major towns to access services. If the service centres are not developed we will eventually lose what few services we have.

Distributed development does not impact so heavily on already over burdened areas with services as they are in my area at breaking point essential GP practices dentists social care and even the local veterinary practices are over full capacity this focussed over development is unsustainable in the short term and is already at crisis point the roads are chocked and pollution is increasing .

There is too much development around where we live

There is less intrusion into AONB, greenbelt and rural areas and development is confined to existing areas of development.

It's not close to where I live.

Restrict development to urban areas and don't concrete over our countryside and spoil our villages.

Communities in all of the existing settlements are at breaking point with development exceeding the local infrastructure's ability to cope. Kings Hill has benefitted from the dealing of the A228, but has reached its capacity and without significant additional spending on infrastructure, we are full.

A new settlement, planned around significant infrastructure is required. This should be immediately adjacent to the M20 or A21 corridors and also around one of the main train line routes into London. Let's do this right, build something for the future rather than trying to grow villages and settlements designed in medieval times.

Option 1 protects the countryside (green lungs within the borough) and retains the character of individual villages.

I don't want any encroachment into green spaces

How many sites in the Borough have already been given planning permission but have yet to be built on?
It is essential to preserve all green areas in view of Climate Change. As proven in Lockdown the preservation of green areas is also essential for the mental health of the community.

Green belt land should be avoided at all costs

Established transport infrastructure, areas where schools are not oversubscribed, large footprint for different types of dwellings (flats through to 4/5 bed detached houses), outside of greenfield and AONB, near pockets of industrial/commercial use estates potentially offering employment.

AONBs and Green Belt should be protected for our country's sake and sake of well-being of people who live in our county. Residents should be able to get out into the countryside

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Berkeley supports Strategy Option 3 as the most suitable strategy option for TMBC, where development would be focussed on greenfield and previously-developed land within the urban areas and rural service centres, including Borough Green. Option 4 is also supported for the same reason. These options allow for a balance between development in areas with good access to existing services and facilities, as well as meeting the needs of a wider range of communities in accessible locations.

Option 1 is unlikely to be found sound since it would fail to provide an even distribution of housing to meet borough wide needs.

Option 2 is unlikely to have sufficient capacity to meet the borough's housing need and ignores the need for new homes in smaller settlements for existing communities.

Option 3 suffers from the same problem as option 2.

An even distribution of housing proportionate to the needs of each settlement is likely to minimise the burden of housing on each community whilst ensuring the widest range of need can be met.

Option 5 is likely to be highly complex due to the substantial range of required infrastructure. There is no clear choice for a new settlement in the borough and focussing so much need in one new place with lengthy delivery timescales and high infrastructure costs could easily derail the whole plan: See for example the approach in Tandridge District and the South Godstone Garden Village.

Tonbridge is already over-developed. I'm OK with development on brownfield sites in the town.

Option 3 spreads the load more evenly around the existing Urban and Rural Services centres. This seems to me to offer the best combination of utilising existing transport infrastructure and reducing the damaging impact of more housing on any one area. Whilst also protecting the rural communities from having their characters and green space utterly destroyed.

By focussing on these areas, urban sprawl can be avoided and thereby retain the character of the existing small villages.

Limit impact on more rural areas and allow access therefore to existing jobs, schools, transport networks.

Areas of outstanding natural beauty and green belt must be protected to reduce urban sprawl

I live in a new development within Peters Village and I would say there is now enough houses in this area developed/being developed. Any further developments in this area will cause overcrowding, contribute to environmental concerns and there will be an increase in traffic which the local roads will not be able to take and lack of local parking spaces. I would much prefer a strategy option in my selection that 'spreads out' developments to other areas that need development to avoid Urban Sprawl. The green space on our side of the river between Burham and Borstal is the only green area left that isn't protected so ideally housing developments will be preferred elsewhere.

Protection and expansion of, green belt paramount rather than the disjointed free for all that appears currently to be the case

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utilise already good Access to vital services and facilities

We should not build on green field sites, until ALL brown field has been used. Currently builders ride rough shod over everything.

I think development needs to be shared out round the borough as long as it suits the site. Developments in villages and the smaller towns should go hand-in-hand with improved bus services, retention of village schools and encourage medical services even on a part-time basis. To concentrate on already urban areas perpetuates the problems of the lack of services in rural settlements.

I don't agree that kings hill should lose designated green spaces or develop on size further. I believe that new self contained communities can be developed with their own infrastructure.

all seem very focused away from tonbridge

It appears to cause the least damage to the countryside and green spaces near to the urban areas.

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development. Additionally, concentrating development in smaller parts of the borough puts a disproportionate health risk from construction on those areas. Breathing in all the construction dust for many more years to come has got to have a detrimental effect on our lungs. HSE <https://www.hse.gov.uk/pubns/cis36.pdf> .. The opening paragraph on their page relating to dust construction: "Construction dust is not just a nuisance; it can seriously damage your health and some types can eventually even kill. Regularly breathing these dusts over a long time can therefore cause life-changing lung diseases"

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

It protects the greenbelt for future generations and protects the small villages from being more developed and protects their character and to date these have been part of the charm of the county.

I would like to see development spread out between existing areas of housing reducing the need to encroach on the greenbelt. Although I realise some greenbelt may need to be used.

Given the unique characteristics of our boroughs very limited land bank it makes sense to look for a new settlement site. This will avoid the stresses that come from developments that are add on to existing conurbations which will lead to a coalescence/ merging of existing towns villages into unattractive unplanned sprawls of densely populated (under supported in terms of per person infrastructure) black spots.

Preserve what we have while developing a wider range of housing, especially affordable flats

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No encroachment on green belt only brownfield sites should be used.

Not sure I fully understand the options but have chosen this one as it appears to be spreading the impact of more development across more sites with proximity to existing centres but without impacting greenfield sites too heavily. Essentially, however, I believe that Tonbridge and Malling, and the south-east generally has already taken more than its fair share of new development and the council should seek to resist further development on the grounds that government is seeking to redistribute business, jobs and opportunities to other parts of the country. New housing should move correspondingly to serve the shifting population.

1. Does not build on Green Belt

2. maximise use of brownfield - but the plan needs to show that all brownfield has been utilised BEFORE building on greenfield

3. then minimal build on greenfield.

4. building larger urban areas in north east of borough will allow efficiencies of scale - including transport and public services, including maximising use of modern, energy efficient flats and greater social housing

5 preserve character of historical areas

6 prevent towns merging

New developments within repurposed areas. For example i the thousands of empty offices and shops.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion worsening air quality and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

The growth and enhancement of already developed locations should be the priority. This will lessen the need for new transport links and services such as new schools and medical facilities. However, it must be ensured that this supporting infrastructure is improved in already developed locations to cope with whatever additional capacity is required.

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All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

Since being here the area is one conurbation merged into another, no distinct differences anymore. The medical provision is already terrible, too many cars etc. cycling is dangerous. The only housing is "executive" none of it affordable. I am afraid I feel despair about any of the choices.

This way, everyone shares "the pain" and it avoids the horrendity of one huge new township linking Borough Green and Wrotham, i.e. Option 5

This will reduce the impact on existing residents with respect to loss of green spaces on their doorstep, increased traffic congestion and air quality, access to already overstretched medical and dental services. Reduce loss of the uniqueness and heritage of small villages which can become joined up.

Too much countryside is being lost.

Congestion and pollution on Kent roads is not assisted by removing wide open spaces and covering in tarmac and housing.

I repeat no building at all

The green belt should be protected as a priority. Environmental concerns need to take a lead. In addition to this, it is not practical to rely on services in already established areas because many of them are already over subscribed.

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Option 2 provides opportunities to exploit existing infrastructure and local services; at the same time preserving the Green Belt and AONB

The Green Belt must be protected, otherwise urban sprawl will never stop until there is no green space left. Once it's gone, it's gone. There are so many options to develop previously developed land within existing urban areas.

It is recognised that there is a need for further development and a broad area of search for new potential sites, where so much of the land within the Borough could provide viable opportunities, should be adopted.

Greenbelt is extremely important - must retain.

All these development proposals involve focussing on the Medway Gap, where we already have roads that clog

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up completely at peak hours, narrow lanes, a train service that is expected to decline and no buse. Option 4 is therefore the least bad, spreading out the development while option 5 requires abandoning the Green Belt, which is unacceptable and not likely to happen, even under the present government

Berkeley supports Strategy Option 3 as the most suitable strategy option for TMBC, where development would be focused on greenfield and previously-developed land within the urban areas and rural service centres, including West Malling. Option 4 is also supported for the same reason. These options allow for a balance between development in areas with good access to existing services and facilities, as well as meeting the needs of a wider range of communities in accessible locations.

As is noted under paragraph 5.3.24 and shown in figure 9, two principle Housing Market Areas exert an influence across Tonbridge & Malling, these being the Maidstone HMA and the Sevenoaks and Tunbridge Wells HMA. As is highlighted under paragraph 1.22 of the Housing Market Delivery Strategy (July 2022), it has been necessary to apportion a share of TMBC's standard method Housing Need Figure (SM_LHNF) of 839 dpa to each of the HMAs of which the Borough forms a part. Paragraph 1.23 further states 'a reasonable basis on which to split the Borough's overall housing need figure of 839 dpa into the two areas' is 478 for the Maidstone HMA and 361 for the Sevenoaks and Tunbridge Wells HMA.

In order for the Spatial Strategy to align with the evidence produced in the Housing Market Delivery Strategy, Strategy Options 1 and 2 are untenable as these focus too great a quantum of development solely within the Maidstone HMA. Only Strategy Options 3 and 4 allow development to be set in the most sustainable locations within the Borough, whilst meeting the needs of both HMAs and more rural local communities set within the Borough. Regarding Strategy Option 5, the creation of a new settlement that is remote from public transport links and existing services would not be considered sound in relation to the suggested settlement hierarchy. In TMBC we consider that new homes would be most sustainably be provided within or adjacent to existing settlements where they are served by supporting infrastructure such as schools, health care centres, open spaces, and opportunities for active travel such as walking and cycling.

To protect Green Belt and AONB, and avoid swamping small villages with mega-developments like "garden cities".

Green Belt should be retained at all costs.

If new developments are built in existing urban areas then there is no guarantee that the infrastructure to cope with the influx of people will also been provided. This has happened before. Many times.

It seems the required infrastructure (healthcare, amenities etc) are far more likely to be taken properly into consideration within a new settlement than within existing urban areas.

AONBs must be preserved. Options 3, 4 and 5 are just completed disasters and would represent a devastation of the local countryside.

Economies of scale. Provide excellent infrastructure with local services to those currently in the Urban centres. Ensure excellent safe, transport links out to the Rural recreational areas and provide excellent policing of rural areas to avoid litter and anti-social behaviours.

Once bedded in, extend the provision with new builds on the edges of the Urban Centres.

It would be useful to be able to score these in a priority order. In which case I would go for a mix of 3 and 5. My reasoning is to distribute the impacts of development on the environment, facilities and communities evenly. The

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other options will significantly change the character of certain areas.

It would appear to be the lesser of the evils of the plans

Retaining greenbelt land and protecting biodiversity. Preventing over population in areas of already over subscribed amenities and infrastructure.

Protection of Green Belt. Build on brown field sites such as Railway car parks (keep car spaces on ground floor and have development above)

This is a difficult question and I would have preferred to have been putting four of the five options in order of priority. In my case this would have been Option 3, Option 2 Option 5 and Option 4. I don't think Option 1 should be considered as it cannot come close to satisfying the Housing Market Area criteria and therefore it should be totally excluded.

In this order of priority my prime concern has been the ability of the existing settlements to cater for the new development and the ability of the developer or other funding sources to raise the standards of communal and transport infrastructure to properly cater the final settlement as a whole and so ensure it develops into a sound community that people want to live in.

Tonbridge must take it's share of development. The Kings Hill / West Malling area would need very significant improvements in transport, secondary schools, doctor and dental facilities to take even more people

I would prefer to see no developments at all as I believe the government have got their strategy wrong. A consolidation of existing sites (brown fill) and an improved infrastructure, not expansion. However if the council has to expand then do so in areas where the infrastructure already exists.

Development in Tonbridge invariably means 'executive mansions' not affordable houses and takes up greenfield sites for a privileged few.

In-filling, aka ribbon development along rural roads is creating built-up corridors which hide the rural character of the borough.

The Medway Gap area has brownfield sites outside the commuter zone of London and the houses are less likely to be pushed up in price by London commuters.

But the Medway Gap area is at the heart of KCC's biodiversity plan so any building there will need a gold standard biodiversity plan. Nothing conventional will do.

It is essential to protect the areas of Outstanding Natural Beauty for the benefit of people living in urban areas and for Nature.

Option 4 is the least problematic of the proposals, other options involve development in the Medway gap which already suffers from narrow lanes meaning congestions on roads at peak periods and other busy times, there is an absence of buses, medical facilities are oversubscribed whilst option 5 means the greenbelt will need to be

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abandoned which is totally unacceptable.

It builds on the least amount of green belt land which is the most important thing for me it also has minimal impact on outlying villages and concentrates on main areas. I think the choices are poor and more thought should go into already developed areas

The green belt boundary is very important to me

The development area should be expanded to allow for construction of quality homes (homes for life, energy efficient, sustainable etc) rather than a focus on dense low quality housing.

As noted above, I think it is important to concentrate the development heavily on Urban areas and leave the Green belt and other areas untouched as far as possible.

By concentrating development in services centres, new residents can be serviced by sustainable public transport and be less reliant on car transport. This will be beneficial to the mitigation of climate change.

Option 1 clearly isn't viable because it provides little additional housing for people working in the west of the Borough, in Sevenoaks or other similar locations. The Duty to cooperate with Sevenoaks was an issue with the previous draft plan. It is difficult to see how the Council could adopt Option 1 and simultaneously claim to be co-operating with Sevenoaks Council.

Areas like Kings Hill and Snodland are an easy and obvious target for development. They continue to grow but the services available there do not. For example the doctor surgery serving west malling and surrounding areas is swamped. It's impossible to get an appointment. Kings hill in particular continues to grow and will eventually mean the surrounding, historical towns and villages merge into one; they will lose their identity. Kings hill will spread to the A20 at Leybourne, the A26 at Watlingbury and out to East Malling to the east; this will cause enormous traffic problems. It's already gridlock along the A228 whenever there is the slightest problem with traffic flow. The hierarchy is a useful method of identifying the size of areas but perhaps development should be focussed more towards the bottom of the pyramid to grow smaller developments and keep them "alive" whilst improving services for the people who currently live there. Objections to development should not be based on the fact that the place is currently quiet and would not be in character with the existing size of the location because that means there will never be development there which hardly seems fair to those areas inundated with development destroying the surrounding countryside and woodland just to avoid upsetting a few people surrounded by empty unused farmland. I don't agree with destruction of woodland or areas of outstanding natural beauty but if land is unused and ex-farmland there should be no reason to destroy natural habitat.

Options 4 and 5 would effectively urbanise the whole area. Many people living in the current urban areas value their proximity to the countryside and traditional villages and enjoy visiting for recreation. Surrounding the rural

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villages with new development would remove this rural feel from the area.

Development in the rural areas would not be sustainable. It is not safe to cycle or walk on the small lanes for transport to a stop for a (non-existent) bus with the current traffic load and this would become worse. To live in the rural areas and small villages it is necessary to have 2 cars for a family. This also makes such development unaffordable for many people and not desirable going forward. Development in villages and rural areas should only be allowed at very small scale to provide affordable housing for the existing communities.

If we don't protect the green areas now, it won't matter. Any option that allows people to develop more into green areas must not be considered.

I think it's important that the rural settlements in the borough should be protected to prevent urban sprawl of one big entwined urbanisation at the cost of our existing villages. I understand the need for increased housing but it shouldn't be at the cost of local communities losing their identity by joining up the dots on the map through development. I live in Burham and if option 1 or 4 are implemented we will see the beginning of the end of Wouldham, Burham and Eccles as they will all be joined together ruining the essence of village life.

To protect the identified hierarchy of urban development, it is critical that existing brown field sites and the bigger urban areas are used for future building. Encroachment on smaller community areas will ruin them forever, turning smaller villages and rural areas into unattractive locations. People have chosen to live in these areas for the very reason that they are smaller and away from the busier towns and built up areas.

To avoid over-development in the Borough, bearing in mind that most of it is Green Belt with major constraints. And to avoid additional pressure on infrastructure - particularly the increased pressure on roads that are already congested, but also pressure on schools and medical facilities.

Public transport links and not encroaching on existing villages such as Eccles, Burham but also offering better infrastructure

Option 2, or possibly Option 3.

The adoption of the local plan should primarily consider which option does the least harm to the borough as a whole. Developing rural communities involves so much more destruction as roads and transport links require significant improvement.

It is far more logical to extend existing urban settlements, as the facilities and services are already there. Building where there are good public transport links is better for the environment as fewer car journeys are needed, and you therefore address climate change. Children should be able to access schools, colleges and leisure facilities with ease, which is not the case with rural developments.

Building on the edge of towns will allow people to access shops and places of work more easily, which is better for the economy and eases town centre traffic congestion.

In turn, you preserve the rural communities, leave more of the countryside unblemished, and retain the

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character of the borough for future generations.

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- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

I strongly believe focus should be on PDL to limit greenfield impact but spread across the borough - limiting it to one edge of the borough which is already alongside a very developed adjacent borough will create unsustainable impact on local services in those areas.

Close to Motorways and train lines, and builds on the Govt strategy to develop the Medway towns.

The plans for building within and adjacent to urban areas is destroying any green space for current residents. The impact on biodiversity and human wellbeing would be hugely negative. There is no space for parking currently which will just get worse.

Option 2 appears to protect Greenbelt land and AONB, whilst also retaining defined space between developments

These areas already have good transport links and services. Although all the greenbelt should not be taken off the agenda as there may be sites that fit the strict criteria under which the council could propose some housing development.

Looks like consideration has ben given that towns/villages don't merge into one and loose their individual and differing identities.

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OPTION 1, but there is a case for Option 4, in that every rural community needs some housing

This is the only option that protects the integrity of West Malling and provides a stopping point for the river of concrete running from Maidstone to East Malling. The separation of East and West Malling is essential to prevent the blurring and obliteration of the identity of these communities.

To be clear I do not agree with any of the options as they are currently drafted, there should be an Option 6 where new settlement are prioritised over expanding existing urban and rural service centres. The only real option to meet the capacity demand as set out by the government (unless this can be challenged) is to focus on creating new settlements and putting in new infrastructure and services away from existing Urban and Rural Service Centres. The Stage 2 Green Belt Assessment you have commissioned from ARUPS clearly agrees with my view as it states in its conclusion "The evidence currently available indicates tha the borough: - Has limited opportunity to accomodate its needs within existing built-up areas".

Existing Urban and Rural Service Centres are at capacity and the road networks in and around these areas cannot cope. Schools and healthcare facilities are at capacity and cannot be expanded sustainably.

Take the opportunity to build new settlements and create new sustainable communities away from the existing Urban and Rural Service Centres.

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It is entirely illogical to place new homes where there is little if any work opportunities or infrastructure e.g., roads, water, medical facilities.

There should be mixed housing in terms of affordability and style, all should be well designed, and very energy efficient (mandatory for the builder/developer). We feel that a targeted approach should be strongly considered (see response to Question 4.2). A possible site for such a development is adjacent to Kings Hill.

The countryside around us is beautiful and should be preserved for future generations.

There's lots of disused land that is available. Unfortunately, there's a practice where developers purchase land and hoard for long periods of time.

This should be heavily taxed to force their hand to build new residential / commercial properties and free up land for people to do self builds. Self-builds are much more popular in other counties. If we could free up land by discouraging bad practice then this could change.

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It is important that development is focussed on existing urban spaces and does not encroach on AONB or green belt in order to safeguard our environment

It is vital to retain and respect the green belt boundaries to avoid completely ruining the ability to grow our own crops in these difficult times where food production is becoming a very large and important part of our economy and well being.

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deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Much infrastructure will already be in place or be able to be increased sustainably.

Greenbelt is about openness and preventing coalescence of settlements. Will harm views of Area of Outstanding Natural Beauty.

New dwellings will be near to facilities - shops, churches schools, libraries etc, minimising use of cars. But people in each community are still within reach of countryside.

The reasoning is that the drive for increased housing should be met by modest expansion of existing development areas. The opportunity to implant key infrastructure requirement can be more easily met in this way.

If key infrastructure resources are centred in and around areas of greatest population then the requirement to travel is reduced with all the attendant benefits of lower overall impact.

I am keen to preserve the patchwork of villages, countryside and open spaces .

Once these areas are built upon they are lost, for everybody, for ever

I do not feel that by making a beautiful village a built up housing estate is right for the future. This will totally spoil the green belt land for not only those living in the area but also wildlife. It's the most ridiculous idea! Why is it even considered healthy for the environment to increase the housing

Focus please

This option provides a reasonable balance whilst concentrating development in places that easier to service with public transport and other environmentally sustainable resourcing.

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Keep the housing in areas already urban and have the facilities, eg schools, medical, shops, and transport links

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To continue to expand Tonbridge will radically and detrimentally alter its character as a market town as well as adding pressure to services within the town (education, medical, transport) which are unlikely to be met from existing infrastructure. The pressure on infrastructure is already apparent - a broken down vehicle or single temporary traffic light on the A26 creates havoc. Adding several thousand new houses to the area is untenable without dramatic investment in e.g. public transport (and a dramatic reduction in fares to make it an attractive option) - this is unrealistic.

The Green Belt should be considered sacrosanct in the plan - it is a priority for many residents (74% of residents in the South of England are against building on the Green Belt - Ipsos Mori polling 2015: <https://www.ipsos.com/sites/default/files/migrations/en-uk/files/Assets/Docs/Polls/cpre-green-belt-tables-aug-2015.pdf>)

I believe that this approach will help reduce urban sprawl, encourage redevelopment of otherwise undesirable urban land, help keep traffic volumes under control by distributing load, and prevent many historic local towns from merging.

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User Response: Text

TMBC Northeast part of Borough, Medway Gap and Valley including Aylesford Parish will be adversely affected by all of the options, the least bad option being 4 without considering moving green Belt boundaries.

Greenbelt and areas of outstanding natural beauty should not be compromised.

I chose this option 1 largely because it is mostly outside the highest flood risk area, which is Tonbridge. Snodland is also high flood risk, but there was no perfect choice for me, as all options also included Snodland. I just don't think it fair to build homes that have an ever increasing risk of being flooded.

Keep green belt at all costs

Greater spread of new development across the region

Predominantly I think it is essential that we preserve our green spaces, trees and areas of natural beauty. There are plenty of spaces to build that don't require trees to be cut down and wild life habitat to be destroyed

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 MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

- a) to check the unrestricted sprawl of large built up areas
- b) to prevent neighbouring towns merging into one another
- c) to preserve the setting and special character of historic towns
- d) to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by the Tunbridge Wells B.C. in their current local plan.

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.

User Response: Text

Congestion and impact on the rural surroundings is already at its limit in Tonbridge and the surrounding villages. Too many merge in to each other already and traffic is high. Quality of life and access to the rural areas is reduced further with every new development that is approved.

The borough is a mainly rural one with approximately 70% of the area being green belt. Whilst that may present some challenges in terms of planning, it is also the main reason that people choose to live and work here. Once the green belt is lost it will be impossible to regain it. Concreting over large areas and the area becoming congested and polluted will not be sustainable either for existing or future residents.

Any spatial strategy based on expanding the current urban centres can only work if there is significant investment in infrastructure, especially roads and water/drainage systems. The A228 that runs past Kings Hill and down to the A26 is single carriageway and inadequate for the current levels of traffic, and dangerous for cyclists and pedestrians. It is frequently blocked, with long queues during morning and evening rush hours. This results in vehicles crawling along with their engines running, releasing high levels of carbon into the atmosphere and reducing the air quality for those who live nearby. The sewage system is also inadequate, with frequent overflows. Option 4 offers a more distributed strategy that would avoid exacerbating the current problems.

I have selected this option (5) as I do not believe it is possible to achieve the aims as stated via any of the other options and their competing interests.

If the figure of 15,941 is to actually be achieved (It should be resisted), then it will require a new settlement and the release of some greenbelt/rural land.

Option 2 allows development to be focused within the most sustainable locations providing good connections to supporting infrastructure and transport.

Option 1 fails to deliver housing to the southern HMA and should be ruled out for this reason.

Option 3 and 4 spreads development over rural service centres and rural settlements, that are unlikely to provide essential supporting infrastructure and represents the most unsustainable solution to meeting the need.

Option 5 does not provide an indication of the location of a potential new settlement so it is impossible to determine this as being the best option to meet the need. Furthermore, new settlements rely on enabling infrastructure which will likely result in considerable delay and issues of viability which may risk the Local Plan being found sound at examination.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;

User Response: Text

(c) to assist in safeguarding the countryside from encroachment;

(d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

It would have a negative effect on residents' wellbeing if Rural Settlements were developed to the extent of becoming part of the Urban Sprawl. If development starts to join existing settlements together, they will lose their identities & character. It is also of great importance to maintain as much as possible of our own food production, I am not pro the use of agricultural land if possible; we need to feed our residents as well as house them.

Option 1) concentrates the developments mainly in one area only

Option 2) again is restricted in the areas targeted for development

Option 3) provides a better, wider distribution of development targeted at continued development in previously developed areas without damage to the environment of previously undeveloped areas.

Option 4) does provide for a better, wider distribution of development but may have a greater adverse environmental impact.

Option 5) again does provide for a better wider distribution of development but would have the greatest adverse environmental impact especially on AONB.

I expect that none of these options will be chosen as they stand but a mixture of them. My personal choice would be a combination of options 3 & 5 without development into Areas of Outstanding Natural Beauty and Good Arable Agricultural land.

Maintain green belt

Support the key elements I have identified as far as is possible

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

a) to check the unrestricted sprawl of large built up areas

b) to prevent neighbouring towns merging into one another

c) to assist in safeguarding the countryside from encroachment

d) to preserve the setting and special character of historic towns and

User Response: Text

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Continual expansion of Tonbridge beyond existing green belt boundaries will result in extreme congestion and deterioration in the quality of life for the towns inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells BC in their current local plan

The focus should be on existing Towns + Kings Hill with some modest infill development within existing Villages. The need to ensure that Kings Hill cannot be seen from the Medway Valley, is something that I feel strongly about.

it focuses development on current urban areas and maintains the rural nature of the rest of the borough.

It also takes some pressure from the northern end of the borough spreading development more equitably throughout

Maximises use of existing infrastructure and doesn't impinge on Greenbelt or AONB.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns;
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Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. There is an extreme likelihood due to the pending nearby developments (Tudley, Paddock Wood) proposed by Tunbridge Wells B.C in their current local plan.

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- (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by

User Response: Text

encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

It is considered the Local Plan should comprise a hybrid of spatial options 3 - 5. This will ensure that development needs are met across the whole borough area and in both Housing Market Areas. The 2no. HMA's relate to the Tunbridge Wells/Sevenoaks HMA as well as the Maidstone HMA. It will be important housing is met in response to needs across the whole borough (Options 1 and 2 do not achieve this).

The MGB around Tonbridge fulfils all the requirements laid down in the NPFF

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

Continual expansion of Tonbridge beyond existing greenbelt boundaries will result in extreme congestion and deterioration in the quality of life for the towns inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells BC in the current local plan

We should endeavour to prevent development on greenbelt and greenfield as well as on premium agricultural land.

We should endeavour to prevent the merging of villages and towns to protect their identity and in some cases, their historical nature and character

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.

To minimise the pressures on roads and cut through lanes during the busy times of the day and thereby limit the pollution caused by queuing traffic. It would also help to prevent gridlock situations in the towns and built up areas.

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The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Any of these answers is unclear as to what that actually covers in terms of green spaces, I would hope that it's just pure brown land that is built on and trees and green spaces were saved.

the Tonbridge and malling ancient woodland inventory 2010 states that The south east has approx 80% of ancient woodland but is under threat from development pressure. This reason alone should mean this area should be left alone.

These areas are home to protected slowworm plus bats, nightjars, doormouse, grass snakes, owls, woodpeckers and many other species

Road safety and parking would become an even bigger issue to roads

-there are a number of brownfield sites already earmarked for development to satisfy house building 'targets' namely the Broadwater site. Shouldn't this mean that areas that provide a home for the above species and could raise all the issues mentioned be left alone?

Kings hill was built with the intention of providing residents with the type of living That takes advantage Of the gorgeous outside space that surrounds it. Slowly losing that outside space defeats the objective of enjoying the nature That surrounds us.

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

I don't agree with any of these distributions because none of them offer to not over develop Kings Hill. All of these strategies class Kings Hill wrongly as an Urban area (which it is not and neither do residents want it to be) and all strategies involve over developing this village. This is purely money led. Kings Hill is not urban and does

User Response: Text

not have sufficient infrastructure to support new homes. It's already impossible to get GP apts, people are having to travel to other villages to get seen by Drs because our surgery is so over subscribed, all the primary schools are full, there is no secondary school, there are not enough community spaces and your plan is to build over the ones that are there.

It is very important to me that the option taken protects green belt and protected land. Once this land has been built on, it is very difficult to get back.

This option also builds homes close to many existing amenities.

The Green Belt needs to be protected for future generations so developments need to be focused on brownfield sites within Urban Areas.

This means not building on green belt land in and around the villages.

It is important to respect Green Belt and AONB to protect the openness of the countryside and prevent urban sprawl.

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Green belt land and AONBs should be protected while there are sufficient brownfield sites available for significant numbers of affordable housing, with good transport connections and access to schools and healthcare. With buildings such as commercial premises and offices standing empty in many central urban areas, there are opportunities for creating apartments in these areas with access to central transport hubs. Eating into the green belt will mean the loss of valuable farmland, wildlife habitat and natural spaces and amenities for residents.

Prefer option 1 but every community needs some housing so option 4 has some credit.

green belt land is not a reusable commodityif it goes it will never come back.

It is important to retain the metropolitan green belt and areas of AONB in order to preserve the character and attraction of the region.

User Response: Text

Supported by necessary improvements in infrastructure, new waste water treatment, new potable water supply, additional electricity generation and distribution, additional communications and telecom networks, improved gas supplies, as well as local highway improvements, and restructured bus services to provide communication and connectivity between villages and towns.

Green belt should not be included for building as it is the lungs of the community. Crowded housing requires residents to have a place of beauty to recharge their batteries to continue as public citizens, police, medical professionals, teachers, emergency workers all human beings !

Green belt should remain green belt

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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Options 4 and 5 because there simply is the infrastructure in place to the East of the Borough to support Options 1, 2 and 3.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

The option that protects wildlife and doesn't create sprawl. We should not be damaging our environment any further.

User Response: Text

Only build where the housing is needed.

Internal migration should not be encouraged. Why build so that people can move to the area from houses elsewhere.

Greenbelt should be retained as one lost cannot be recovered. Narrow lanes in smaller villages aren't suitable for increased traffic.

Larger developments should be sustainable therefore within easy access walking distance local public transport services. Major infrastructure improvements will be required, therefore developing within some of these rural areas will not be sustainable or viable financially due to the infrastructure requirements.

If such rural communities are selected within the LP. Polices need to protect and improve local bus services and should not be subject to alteration or cancellation after construction has been completed.

Continual expansion of Tonbridge beyond existing green belt boundaries will result in extreme congestion and deterioration in the quality of life for the towns inhabitants

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells BC in their current local plan.

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

To meet the housing needs whilst minimizing the impact on the countryside & green areas, but acknowledging that there will be some required impact on green belt to best utilize existiing infrastructure. Whilst option 1 is appealing to avoid green belt completely, I worry that this option could place too much pressure on schools, health, transport etc in one area - whereas leveraging areas such as Tonbridge should mean less impact and a more scalable approach.

It should be the case that if there is space for development to adjoin or extend from existing, larger settlements, then those should be considered in the first instance. This is due to more developed infrastructure and transport links already being present, and a reduced chance of adverse impact on environmentally and policy constrained land. It would also assist in preserving the openness of the Metropolitan Green Belt.

In addition, there are limited transport links or room for significant expansion of infrastructure to support development in rural areas of the borough, without significant adverse impacts on biodiversity, landscape

User Response: Text

character, air quality, cultural heritage, and openness of the Green Belt – as the sustainability appraisal makes clear.

The sustainability appraisal further supports the economic case for spatial options 2 and 3, and lesser negative impacts on significant areas of environmental concern.

Development should not be permitted in Rural Areas (option 5) – this would cause significant harm to the countryside, and on people’s health and wellbeing who currently reside in these areas, which are widely used for leisure and recreation. In addition, building on grade 1 agricultural land would harm the rural economy.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

I feel that green belt is sacrosanct. It was established for a purpose and should not be adjusted now that it is inconvenient. I appreciate that this presents a challenge whereby new housing has to be concentrated in existing urban areas - but the lack of availability of non- green belt should be part of the reason for challenging the top down allocation of housing by the govt.

Keeping as much green belt land as possible to ensure wildlife

Infrastructure is already in place and can be extended. Rural areas often lack basic infrastructure.

Land in Greenbelt and AONB should be protected and not developed on.

It is more cost effective to build in or close to existing developed areas where infrastructure already exists.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

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Greenbelt land must not be lost. Development must be prioritised on the most urban areas.

By selecting option 1 this keeps developments within areas already built with existing infrastructure.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

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Leave the villages well alone! People choose to live in villages to get away from housing estates. Please continue to develop current housing estates which have the appropriate road networks and infrastructure!

User Response: Text

The Green Belt and the AONB have been designated as such as they have been deemed worthy of protection, and are unique landscapes. Once they have been developed they will be gone with no way of replacing them. They are what makes the Borough the area that it is and must remain protected.

use brown sites first.

I live in the village of Hildenborough and the village cannot sustain any major development that will put a strain on already maxed out infrastructure.

New development needs to be concentrated where there are already good communication and services. Adding significant growth to villages with established heritage buildings and communities would be very difficult without changing their character. A small number of houses that compliment the local environment and meet local needs would be welcomed.

Expansion beyond existing green belts boundaries is going to result in further congestion especially if the developments in Tudeley and Paddock Wood go ahead. You cannot get into Tonbridge in the mornings as it is.

Infrastructure already in place but recognise this would have to be expanded. It would also protect the green belt which is important with an increased population. There would also be less impact on biodiversity and ecological issues

Going further than this would impact on green belt or AONB spaces. We are fortunate to have land that has been protected from major development and it is essential that it is protected. Otherwise the door to even greater encroachment and damage to habitat would be likely to be opened.

OPTION 1, but there is a case for Option 4, in that every rural community needs some housing.

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

To me this strategy option makes the most sense as it focuses development close to where the majority of services and infrastructure are located. Developing areas adjacent to communities lower down the Settlement Hierarchy would require significant investment especially in terms of infrastructure including roads, schools, doctor's surgeries, sewage works etc

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.

User Response: Text

23% is already added to the assessed housing need by the government requirement.

Most importantly though, the Green Belt and Areas of Outstanding Natural Beauty need to be protected more than ever. While I understand the need for housing, there is a climate crisis and our green spaces should be sacrosanct.

Retention of the village identities, green belt and AONB

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF

1 - to check the unrestricted sprawl of large build up areas

2 to prevent neighbouring towns merging into one another

3. to assist in safeguarding the countryside from encroachment

4 to preserve the setting & special character of historic towns

5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, P Wood) proposed by Tunbridge Wells B C in their current local plan.

It is vital to protect the Greenbelt and AONB from development. Protecting areas of outstanding natural beauty is sacrosanct, as once it is gone, it will be lost forever.

Protecting our AONB is covered by Section 85 of the Countryside and Rights of way Act 2000 (the statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty).

There is much more suitable land available outside the AONB in the Borough. No allocations should be made in the AONB or its setting.

Taking Tonbridge by way of example, there would seem to be large areas that could be developed via creation of a couple of multi story car parks / underground parking, with freed up areas being developed.

Green Belt

Building houses alone, should not constitute exceptional circumstances

The government has not set out to redefine the policy considerations in respect of Green Belt so there is a strong case to argue that Green Belt land should not be included in the local plan simply to satisfy government requirement for new homes.

User Response: Text

The policy planning department have confirmed to me that Of the initial 291 sites put forward, 174 are on Green Belt land. That gives 117 sites not on Green Belt land.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
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This Option 1 should help protect the landscape of the greenbelt (one hopes) and also the areas outside of AONB which is to be preserved for future generations.

Need to focus development close to existing main settlements that have infrastructure in place and are sustainable - Tonbridge is ideal for this

The expansion will lead to more traffic, pollution and wildlife will be disturbed

The expansion will lead to more traffic and the wildlife will be disturbed. We have bats and badgers in the vicinity.

I have chosen this strategy because I believe it makes logical sense to build developments where there are good

User Response: Text

existing travel, medical and educational links, not build in villages where transport and road links are inadequate for more developments, and also to keep our open fields and green belt land to ensure we have this land available in years to come for farming for our future generations.

As per comment above - sorry didn't see this field.

Around me - Kings Hill / West Malling there has been a disproportionate amount of development relative to the rest of Kent. Present infrastructure cannot cope with the demand. New developments should be spread across Kent in brownfield / non-green belt land and supported by infrastructure improvements to cope.

To check the unrestricted sprawl of large built up area.

To prevent neighbouring towns merging into one another.

To assist in safeguarding the countryside from encroachment.

To preserve the setting and the special character of historic towns.

To assist in urban regeneration, by the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration of the quality of life for the towns inhabitants.. There are already severe consequences pending from the nearby developments in Tudeley/Capel and Paddock Wood arising from the Tunbridge Wells Local Plan.

Option 1 allows for the extension of existing urban areas where there is already a supporting infrastructure while preserving the Green Belt and areas of Outstanding Natural Beauty.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

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I have selected option 1 with reservations. I feel the starting point should be to protect all the Green Belt, AONB, woodland, SSSIs, RIGS, biodiversity, etc that exist in our borough. However, the pressure to meet housing demand in urban areas may require the development of small pockets of green belt land around selected urban areas, thus incorporating aspects of options 2 & 3.

There is a reason that the Greenbelt was established. It is essential that it is preserved because once it has gone it can never be retrieved. Developments should be concentrated outside of greenbelt and greenfield sites and never on grade 1 agricultural land. Building on it will cause neighbourhoods and villages to merge. Historic towns have special character which is easily destroyed by massive housing projects. Homes should be built in already urban areas that will have the facilities required, for example schools, doctor's surgeries, hospitals, shops and recreation facilities

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Development should be focussed outside of areas marked as Greenbelt and AONB. Once these areas are encroached then it will set a precedent that allows further development in the future and their gradual erosion.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

User Response: Text

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Allowing development of vacant plots along the main access roads to all three settlements - ribbon development - will only hasten the three towns merger into one wide spread development with no clear town centre.

We wish to protect Green Belt and AONB and concur with NPPF (July 2021)

Para 137 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Para 176 Great weight should be given to conserving and enhancing landscape and scenic beauty in AONB which has the highest status of protection in relation to planning issues. *No allocations should be made in AONB*

The following key points are some of the reasons why only Option 1 fulfills the NPPF policies:

In accordance with the NPPF (para 72), local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority's area. These sites should be on land which is not already allocated for housing and should...

be adjacent to existing settlements, **proportionate in size to them, not compromise the protection given to areas or assets of particular importance in this Framework...**

Entry-level exception sites should not be permitted in National Parks (or within the Broads Authority), **Areas of Outstanding Natural Beauty or land designated as Green Belt.)**

NPPF (para 137) The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl...

1. a) to **check the unrestricted sprawl** of large built-up areas;
2. b) to **prevent neighbouring towns merging** into one another;
3. c) to assist in **safeguarding the countryside** from encroachment;

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4. d) to **preserve the setting and special character of historic towns**; and
5. e) to **assist in urban regeneration**, by encouraging the recycling of derelict and other urban land.

NPPF (para 147) **Inappropriate development is, by definition, harmful to the Green Belt** and should not be approved except in very special circumstances.

When considering any planning application, **local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness**, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

NPPF (para 176) **Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB) which have the highest status of protection in relation to these issues.** The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. 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.

When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

For these key reasons, only Option 1 fulfills the NPPF policies.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns
5. assist in urban regeneration by encouraging the recycling of derelict and other urban land

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality . The Green belt is there to prevent urban sprawl and it should be respected by this Local Plan.

The green belt and areas of outstanding natural beauty should be preserved to protect nature biodiversity help stop pollution , this would keep nature and ourselves happy and healthier.

we need to maintain the greenbelt areas and avoid over development of the existing towns and villages thereby

User Response: Text

avoiding putting a strain on the existing resources.

To avoid making towns into cities then joining them all up into one big sprawling city.

Continued expansion of Tonbridge beyond existing greenbelt boundaries will lead to extreme congestion and deterioration of the quality of life for Tonbridge residents.

Protecting Green Belt

It enables concentration of local services to a critical mass, and should be more economical in ensuring that the infrastructure Investment is effective. The greater dispersal of developments will change the feel of the area to urban rather than rural.

however none of the options are acceptable unless the medical, educational, transport and employment can be met in a timely way. Currently it's difficult to see that happening in the timescale of the plan

I think it is important to spread development out and NOT have it all concentrated in 1 area. (ie No to a Borough green garden city plan). I think it is also important for residents to be able to access work and life using public transport or sustainable transport. These main centres nearly all have access to railway services. School age/ college children and young people should be able to get to schools easily. This is simply not possible in rural communities where roads are unsuitable for walking or cycling.

The same as my previous answer. It shares out the development more evenly, which prevents the rural communities being left behind and the more developed areas becoming too densely populated and busy.

I think avoiding development of green belt land should be key. However, I do think that development within the centre of Tonbridge and other rural areas which are not green belt in addition is sensible.

We need to maintain the greenbelt areas and avoid over development of the existing towns and villages thereby avoiding putting a strain on the existing resources.

This option appears at face value to protect the green belt and rural / semi rural nature of parts of the Borough. Other options appear to advocate simply bulldozing a ring around each existing settlement to create development space, regardless of the impact on communities.

User Response: Text

No option meets the sustainability requirements, as there is no plan to ensure infrastructure, including adequate roads and active transport and health service, is in place PRIOR to building houses.

The continuous development around existing settlements without adequate uplift in infrastructure, such as parking, has meant that additional development would be unsustainable. The concentration, based on avoiding green belt where possible, on the best agricultural area in the borough is inappropriate, and an overall review of approach is critical.

Summary: Infrastructure needs to be in-place before building is started.

Option 1

Much of the most versatile agricultural land in the borough is built over

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option does not address the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The area is in the Maidstone House Market Area, i.e. relies on Maidstone for urban resources. The roads to Maidstone are subject to a number of Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

Kings Hill does not have adequate road transport. Even the main entrance is a private road, closed at the whim of the developer. Many surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill is NOT an urban area so should not be included as a focus for development. See Office for National Statistics: <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about>

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Option 2

Much of the most versatile agricultural land in the borough is built over

The option only partially addresses the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

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Option 3

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Kings Hill does not have adequate road transport. Even the main entrance is a private road, closed at the whim of the developer. Many surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Option 4

Much of the most versatile agricultural land in the borough is potential to be built over

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option only partially addresses the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The continual recent development around village centres has meant that most are already overloaded and struggling and more such development will exacerbate the situation.

Kings Hill does not have adequate road transport. Even the main entrance is a private road, closed at the whim of the developer. Many surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Option 5

A new town would become an urban area and would require pre-implementation of infrastructure. It does not seem that TMBC are willing to put in such investment. In addition, much of the land would be more costly for developers to develop, and would likely only be accepted if there was no alternative. In addition, the road network should be the primary focus for development to ensure that adequate connectivity to service centres was provided. Likewise, new connectivity for water, gas and electricity would need to be implemented. There was brownfield land in green belt that was assigned in the previous (withdrawn) local plan, and that should be re-considered, even given the constraints identified here.

User Response: Text

No option meets the sustainability requirements as there is no plan to ensure infrastructure, including adequate roads and active transport and health service is in place PRIOR to building houses.

Much of the increase relates to high price / earnings ratio which is primarily associated with the Tonbridge region. It does not apply to Kings Hill. Disproportionate amount of new housing has been built in and around Kings Hill and West Malling. The instructions associated with the uplift are that the intention is for brownfield sites in urban areas to be used for the uplift. The plans are not consistent with the government guidelines. Brownfield sites should be a priority such as the sand pits around Borough Green and other areas around Tonbridge.

A substantial amount of development over the last few decades has been around existing towns and villages with limited enhancement of resources placing significant and extensive pressures on these resources.

Kings Hill is not urban and its infrastructure is at breaking point already. **A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green space. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any additional development.** Kings Hill cannot sustain any further development and has already vastly exceeded its original allocation. Further expansion takes it off its existing already over built up brownfield site allocation and intrudes on valuable natural assets, valuable agricultural land and contributes to coalescence of communities.

I repeat previous comments:-

I see nothing here regarding the service levels required to sustain and support new building initiatives. At present there are hardly enough doctors taking on new patients. There are hardly no dentists providing National Health coverage. The roads into and out of Tonbridge are snarled-up during mornings and evenings.

There is poor water pressure. There isn't enough water available in the reservoirs etc. Sewage is already being discharged into the sea and rivers.

This is the situation now. How will adding more houses improve the situation?

Typically locations already subject to significant development already have far better developed infrastructure and amenities and are more able to cope with additional residences. Development in more rural areas has a disproportionate impact on local facilities and services when compared to more urban locations.

Option 1 should help to protect the green belt and also the Areas of Natural beauty.

The strategy's focus should be brownfield sites and urban regeneration outside greenfield/greenbelt areas and most definitely not on Kent's high-grade agricultural land which is critically important for contributing to England's food security post-Brexit. Furthermore, it is vital to safeguard the boundaries and historic character of local towns and villages.

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Given the requirements of the NPPF that green belt land is to be developed only in exceptional circumstances and then only with clear and full justification, Option 1 is the preferred solution for the borough's housing requirements, at least for the short/medium term given the opportunity and preference to focus on regenerating or recycling urban land, particularly PDL. Moreover, the green belt areas around Tonbridge serve to ensure other requirements such as preventing unnecessary 'urban sprawl' and safeguarding the future of the countryside (incl. grade 1/2 agricultural land), ensuring biodiversity and minimising future carbon emissions from avoidable development of previously designated green belt.

Even if there were a strong case for considering such green belt land for development, in areas such as north-east Tonbridge / Higham / Hadlow, such development would put strain on and congest an already busy single main A26 route as well as other services, transport and infrastructure; which itself is already under major threat from the Capel / Tudeley developments that Tunbridge Wells B.C is seeking to progress to the detriment of T&M population.

It would seem there has been significant and positive investment in areas such as the Medway Gap, providing much needed affordable housing, schools, medical etc with major transport links (M20 and mainline rail routes) which offer significant additional capacity for the foreseeable future, to meet a material % of expected housing demand.

The greenfield sites are of fundamental importance to psychological wellbeing and should not be built upon where alternative brownfield sites exist. Also, the agricultural land in my area is of very high quality (grade 1) and should be preserved for food production.

TMBC have a duty of care to existing residents to ensure that AONB, Green Belt areas, and areas of Sites Special Scientific Interest are protected. Once these areas are gone they are gone forever. Everything must be done to secure and preserve environmental biodiversity.

Furthermore TMBC has an equal responsibility to protect the Health and the Mental Health of residents. Loss of views, loss of light, loss of services resulting through new builds and overly large extensions to existing housing stock has a negative effect on a person's sense of well-being.

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- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge and other areas beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

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The countryside should take priority and the character of the area should not be sacrificed

The hierarchy of settlement is too rigid, all communities need to be able to accommodate change and individual merit should apply to applications and selection of sites. The proposed frameworks only hinder this. This mitigates against development rather than seeing development as an opportunity to improve people's lives. Our duty is to improve the lives of those who have less good fortune or are vulnerable as well as preserve the landscape and create a sustainable future. We can accommodate more development without it being detrimental to current communities, in fact development done well is a positive for the community and the landscape. The English landscape has always changed.

The Green Belt must be respected and preserved to maintain the known health benefits, both mental and physical, of exercise in green space.

We also need to retain the ability to provide local food, especially given an increasingly uncertain global supply. In any case, we should be looking to reduce food miles in order to reduce CO2 emissions.

Development in existing urban centres makes sense because of the ready availability of services, such as public transport.

Strategy 2 avoids building on the countryside, which spoils the character of the general environment. There is a need for social housing and that can most easily be satisfied with relatively high-density developments in more-urban areas.

Adding 16,000 homes in a borough that starts with c60,000 is an increase of c30%. Focusing this entirely on a few urban centres will significantly change the nature of those centres. Option 4 provides more opportunity to distribute the increase evenly across the borough.

Focused improvements on infrastructure rather than spreading development and not being able to improve

User Response: Text

infrastructure over wider area. Council has already demonstrated that it can not bring about public transport provision for all areas E.g. bus subsidies cuts to rural services by KCC

I do not prefer any other the spatial strategy options as presented as they all, in some form, call for further development around Kings Hill which is now been classified as a "urban" settlement. Kings Hill was always intended to stay within the bounds of the former West Malling airfield and this principle should be prioritised. Any further development around Kings Hill margins would significantly encroach on East Malling, West Malling and the smaller hamlet settlements situated near by and would destroy valuable farmland and countryside so must be avoided.

Brownfield site development is significantly more preferable to the loss of further soil resources.

Greenbelt should not be used for new housing. Once built on we can never get it back. What's the point of greenbelt land if it is just built over?

Green Belt has been established for a reason. This does not change.

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Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Given current climate issues and the war in Ukraine I do not think it is wise to build on our Green spaces or indeed on good Agricultural Land, I do not want to see villages and towns linked together by new housing and am therefore opted to any development that aims to do this.

None of the above are suitable for Tonbridge area as the existing infrastructure and NHS servies. we already have problems relating to this.

User Response: Text

Would not like any additional house to be built in Kingshill area

Development within the existing restrictions of Green Belt and near to AONB provide an environment for everyone to access and from which benefit is achieved in a rural setting where they have chosen to live.

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Development should be concentrated on brownfield sites and other previously developed areas. The fundamental objectives of the green belt are to "stop urban sprawl" by protecting the countryside from encroachment and maintaining village boundaries. Green belt sites and in particular greenfield green belt sites that have specific qualities, such as good quality agricultural land, are in a setting that assists with preserving the special character of historic towns and villages, and/or are outside of the current development envelope are examples of sites that should not under any circumstances be considered viable for development.

Given the breadth of sites identified, there can be no justification of turning over green belt or other 'protected' land for development- there are no exceptional circumstances. Moreover, focussing the growth towards the north of the borough nearer to the borough's boundary would have the potential of limiting the impact on T&M. Tunbridge Wells BC have already used this strategy in Capel.

Greenbelt land and AONB should be protected and not developed.

Kent is already over populated and the infrastructure for road transport is not meeting current requirements.

Development should only take place where infrastructure already exists. This makes it much more cost effective.

Prevent neighbouring settlements merging into one settlement, encroachment on green spaces between them and destroying historic character

To avoid neighbouring towns merging which would create sprawl and thereby change the special historic character of our towns.

In order to avoid reduction of the Green Belt areas and Areas of Outstanding Natural Beauty and to concentrate

User Response: Text

new development within or adjacent to existing urban areas thus using existing services, transport links and roads.

First and foremost developing on green belt is not desirable as a matter of principle. The creation of green belts are protected by statute for a very good reason - to prevent urban sprawl. However, preferring option 3 to option 1 is on the assumption that modest, proportionate development in rural service centres will bring back lost services. If that is not the case then option 1 is preferred. On the other hand as mentioned above continuing development at Kings Hill as a special case - an ongoing new town - makes option 2 a better preference. I would not favour options 4 or 5 at all, both of which are at odds with preserving the green belt which should be the #1 priority (along of course with the AONB and of scientific interest and the other special areas).

I believe that the Green Belt is absolutely irreplaceable and that it should be respected, maintained and prioritised above all else. Between now and 2040, there will inevitably be incidents of individuals requesting planning permission to develop land that falls within the Green Belt, but on a very small scale, and in ways which add to the total count of new homes being created, whilst having minimal impact on their immediate locality eg. division/extension of one dwelling to create two dwellings, conversion of outbuilding to granny annexe etc. The creation of new dwellings in such a way can be taken into account when attempting to meet government targets for the number of new homes, so I do not consider it necessary to deliberately ear-mark any areas that fall within the Green Belt.

5 There is a greater distribution of housing across the borough which may also allow for different kinds of living. Some areas will be more affordable than high prices centres of previous development like Kings Hill. Some people prefer to live in less developed areas and may offer opportunities for more small communities to arise.

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Protection of green belt areas should be most important as once lost it will never be replaced.

User Response: Text

Risk of over populating already densely populated areas

All options unfairly target Snodland and The Medway Gap for huge increases in houses and not a lot else.

Option 3 is the only option that appears to at least consider a more varied mixture of sites.

The MGB around Tonbridge fulfills all the requirements laid down in the NPPF:

- a) to check the unrestricted sprawl of large built-up areas
- b) to prevent neighbouring towns merging into one another
- c) to assist in safeguarding the countryside from encroachment
- d) to preserve the setting and special character of historic towns
- e) to assist in urban regeneration but encouraging recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing green belt boundaries will result in extreme congestion and deterioration in the quality of life for residents. This is an extreme likelihood due to the pending developments nearby in Tudeley and Paddock Wood proposed by Tunbridge Wells B.C. in their current local plan.

This takes the pressure off the already developed and therefore overstretched areas. Schools, gp and roads are already at capacity.

The existence of an AONB designation should be considered at the very outset in plan preparation and should influence the plan in terms of the spatial strategy for the Borough.

National policy is clear that allocations of land for development should prefer land of lesser environmental value (counting the AONB as high value), that planning policies should contribute to conserving and enhancing the natural environment and that development within AONBs should be limited in scale. It would be inappropriate for the Council's general housing need to be met within the AONB. However, growth of some villages, local centres and rural service centres within the AONB may be appropriate within or adjacent to the AONB, especially where this provides affordable housing, depending on the scale of development proposed and the landscape capacity of specific sites.

AONB setting issues also affect a significant area within the Borough. A large swathe of the Vale of Holmesdale lies within the Borough – this is the valley that lies at the foot of the North Downs and incorporates the A20/M20, M26 and M25 corridors and is an area identified as being where development and changes to the landscape where the setting of the Kent Downs AONB may be more keenly felt. Impacts on the setting of the Kent Downs AONB therefore also needs to be carefully considered and should influence the Spatial Strategy for the Borough.

For potential allocations within the AONB and its setting, we would recommend that the Council considers landscape capacity studies in order to assess the suitability of sites to accommodate development and any mitigation that may be required. Development within the AONB is more likely to be appropriate where it is

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small scale and complementary to local character in form, setting, scale, design, materials and settlement pattern.

Options 5, 4 and to a lesser extent 3 would appear to have most potential to adversely impact on the Kent Downs AONB, therefore Option 1 is the AONB Unit's preferred Spatial Strategy option, followed by Option 2.

The start of this section prejudices what the strategy should be, stating in paragraph 4.2.1 the need to protect natural assets and that all the identified designations, including Areas of Outstanding Natural Beauty should be avoided as far as possible. This is against the background where none of the options put forward for comment by the Council, allow consideration to amending the Green Belt.

All of the Council's options in the Reg 18 draft only involve allowing development within urban areas and adjacent to settlements on greenfield land (with the possible exception of Option 5, where that is also the case, but with the potential addition of a new settlement(s)).

Whilst that is arguably the right approach for housing, the Council's eventual policies in a new Local Plan should not rule out the use of previously developed land for other forms of development.

Therefore, which ever option the Council pursues, it should only apply to new housing development and the policies should be explicit to make that clear.

A distributed approach would result in some development and growth being applied to every settlement across the Borough. This is a fair way of sharing the load and provides the opportunity for each settlement irrespective of size to evolve and grow organically and to sustain the existing community. By utilising the full spectrum of the settlement hierarchy it provides the Council with as much choice as possible as regards location where growth can be accommodated.

Imperative to protect the Greenbelt and AONB

There should not be unrestricted sprawl. The countryside should be protected. Tonbridge has been selected by residents due to its character and size. There should be regeneration not continual expansion into the Green Belt.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Minimise impact on the green belt and exploit the services and resources associated with the urban centres.

User Response: Text

The character of the village should be retained.

Greenbelt and AONB areas should be retained and respected.

This strategy

- Is not harmful to the countryside and our special villages
- Preserves the character of our unique historic towns and villages
- Best preserves against urban sprawl & Prevents Ightham and Borough Green from merging
- Safeguards the countryside, AONB and Green Belt
- Prevents towns and villages encroaching on the countryside
- Provides development which is most appropriate and proportionate to the local area

see comments above

I feel Kent is over-populated already so would oppose most new home building but given we have to build some if you already live in a massively developed area already you probably wouldn't notice some new houses but a village/hamlet would be ruined and gone forever.

It is preferable to focus development in or around existing urban settlements, utilising and enhancing the infrastructure and services within those settlements, preserving the green belt and surrounding countryside

As said previously the joining of two or more large urban areas that should already have reasonable infrastructure will allow the Green Belt/ AONB to be preserved.

Has the least impact on the Greenbelt and AONB's, in line with the vision of valuing the environment.

Preservation of Green Belt land. Development more focused so appropriate infrastructure can be put in place.

It keeps development to those areas where hopefully the infrastructure is there to support it.

Green Belt land should be preserved as far as possible and in accordance with point 4.2.2 of the TMBC vision

User Response: Text

and with the original purpose of the law.

The focus should be on PDL and brownfields with increasing urban or near-urban **vertical** developments (i.e. high-rise flats), just like in continental Europe. This offers advantages in terms of the use of more shared/common infrastructure

Opportunity to enable wider development in the Borough. Developments in locations near to service hubs would potentially utilise and develop existing infrastructure. Other minor developments acceptable such as in Villages with the proviso that the character, amenity, and green space between locations are maintained.

It is important to retain rural areas as 'green' and allow development in urban areas

There are plenty of brownfield sites around the county , use these! The rural character of our villages need to be preserved!! Not just fir residents but for those that use it fir recreation.

Does not infringe green belt

The aim should be to remain the character of the region and not to conjest it.

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To preserve the green belt and the adjoining countryside.

Believe we should not be impacting significantly on Green Belt including agricultural land. It makes sense to

User Response: Text

develop around existing conurbations which already have the requisite infrastructure.

I would prefer to protect the green belt but realise that reduces planning flexibility considerably. The next best approach is therefore to add to existing towns where infrastructure is already in place and accessibility assured. Without infrastructure you will require properties to be fuelled by oil heating, for example.

Developing in areas which already have access to transport/educational and medical services makes more sense. The east bank of the river relies too heavily on services outside of the borough i.e Maidstone and Medway hospitals, secondary schools etc and would require a huge amount of infrastructure improvement to accommodate any more development.

However, I feel Snodland has already been over-developed with little regard to ensuring adequate infrastructure, economic opportunity or quality of life.

The green belt and the Kent downs area of outstanding beauty is extremely important for the environment

For the simple reason that urban areas already have the services required to support developments i.e roads, public services, bus routes etc

Rural areas are losing these facilities and by developing these areas will only stretch further what little public services they have

The Metropolitan Green Belt around Tonbridge fulfils all the requirements laid down in the National Planning Policy Framework: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

I think that AONB and Greenbelt are absolutely central and so very important to preserve - for reasons of biodiversity, preserving a mix of natural environments from farming land to woodlands, diverse environments including the north downs and the greensand hills, all of which support animals, insects and flora and trees; It is paramount that we preserve protected natural spaces like this for these areas are critical in the battle against climate change. Natural species thrive and ensure natural diversity that is critical to the future. Greenbelt additionally serves a lung for London as well as supports mental wellbeing for those travelling from London to be able to enjoy it.

User Response: Text

So concentrating building on urban areas where development would be expected, where relatively comprehensive infrastructure exists would not be unexpected. This differs from option 1 in that it does recognise some building has to happen across the borough. Tonbridge seems to be able to accommodate new building relatively effectively and would balance the borough to some extent so new building is not all up in the north east. We see it as an important thriving town in the SW of the borough.

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are your reasons for selecting this particular spatial strategy option for the
Local Plan (outline briefly (max. 6000 characters))?

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User Response: Text

result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan

The green-belt landscape should be afforded the upmost protection. Such areas of open space are important to both human and wildlife wellbeing. Such areas are required to complement the areas of outstanding natural beauty and support the vital ecosystems and natural habitats for many protected species, they should not to be blighted by having hard boundaries created by development sites.

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

This option preserves the Green Belt, ANOB, conservation areas, rural communities and the beauty of our area. Many of these communities do not have the infra structure to sustain many new houses and the historic identity of our special villages will be lost for ever. Many villages do not have gas and the water supply is struggling. We do not have any shops, the bus service has been dramatically cut, the village school is over subscribed and the country roads are too narrow to contemplate cycling on regularly.

I am concerned that if development is focussed solely on urban areas, these areas will lose all their existing green space. I would also like the impact of homes being used as investments being investigated as this could release housing stock, although this is a national issue particularly in London where a lot of properties are just investments for the super rich.

New housing load spread across the borough.

To much development in the north of the borough, and now needs and new small town built with all new infrastructure, and roads to cope with it all.

The option chosen seemingly is the only one where marginally, the greenbelt, areas of natural of natural beauty and established local communities may be afforded some degree of protection from the onslaught of ever more housing developments.

We are already overcrowded in the South East as it is and are fast encroaching on our green belt land not only upsetting the biodiversity in the area but also fast chipping away at green spaces for the existing local community to enjoy. We don't want to be another satellite area of an ever expanding greater London. I don't want to live in a

User Response: Text

concrete jungle.

We are creating issues in respect of further flooding risks and subsidence in the area as it is, being largely built on clay.

The Borough currently has 130,000+ residents. The plan to add 10,000 plus more homes will greatly increase this number. We have an extensive road network, numerous motorways etc all of which have eaten into our green belt and AoB. Moving forward we should strive to maximise and maintain our greenbelt. Once lost it can never be reclaimed. It's needed for mental health and biodiversity.

Let's develop Brown Field sites and commercial property change of use long before we take the easy route of building on Green Field sites.

Minimise the impact on the green belt and AONB, exploit, enhance and expand the existing services and infrastructure already found in urban settings and minimise the risk of changing and damaging the character of more rural settings.

By pursuing Option1 the Sustainability Appraisal objectives by which sites can best be achieved through access to education and community facilities, proximity to public transport, through support of health and wellbeing and by protecting important health, environment, landscape and natural assets, valuing the district rural character of the area enjoyed by those living in both the Borough's towns and its villages. We should concentrate on development outside of greenfield and greenbelt sites and not on Grade 1 agricultural land.

We should prevent neighbouring towns merging into one another by maintaining village boundaries, assist in safeguarding the countryside from encroachment ,preserve the setting and special character of historic towns and assist in urban regeneration.

The other options[albeit to a lesser extent Option2] would have a major impact on villages and in particular Offham including their rural character and landscape ,the health and wellbeing of local residents.

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User Response: Text

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The Green Belt and Areas of Outstanding Natural Beauty and Conservation areas must be protected., Sites 59779,59825, 59827 should never have been included in the sustainability appraisal

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Green belt and AONB needs to be protected from being built on

Within areas of previous development and adjacent to rail connections

If these central government housing targets (which I do not agree with) have to be met, then I think it is impossible for TMBC to reasonably meet their target and leave the Green Belt untouched (too much density in the north east of the Borough). Given these caveats I reluctantly conclude that some encroachment on the Green

User Response: Text

Belt may be necessary, specifically around Tonbridge and Kings Hill.

The best way to preserve the rural history of the borough for future generations and improve biodiversity within the TMBC borough will be to enable the largest areas of undeveloped land to be link to assist connectivity within the landscape to aid the movement and recovery of habitats and ecosystems.

All areas within the greenbelt around Tonbridge comply with requirements setout in the NPPF:

- Prevent unrestricted sprawl of large built-up areas,
- Prevent neighbouring towns merging,
- Safeguard the countryside from encroachment,
- Preserve the setting and special character of historic towns,
- Assist in urban regeneration, by encouraging the recycling of derelict and other urban land,

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Greenbelt is there to prevent urban sprawl and should be respected by this Local Plan.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF...

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

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. The pending nearby developments (Tudeley, Paddock Wood) proposed by TWBC in their local plan will make this even more likely.

This option supports my feeling about concerning building links between remoter sites and the wider impact on the local communities and extra pressure on road use.

All options where the search for development space is concentrated around existing settlements can only exacerbate the pressure on infrastructure that is already creaking, so it makes sense for settlements to be spread

User Response: Text

around. One thing that should always be taken into account though is the impact on existing residents. Too often it appears that the cost and convenience of using existing residential roads and cul-de-sacs for access to new or larger developments is more important than protecting the environment for existing residents. It sometimes seems a bit like companies offering deals to new customers at the expense of its existing customers.

Expanding Tonbridge beyond the green belt will lead to further congestion on the roads which will lead to the deterioration of the quality of the lives of the people who live here. This is evidenced by the Paddock Wood site which is already under development and Tunbridge Wells BC are proising to include Tudeley in their current local plan

The land around kings hill and the Medway gap have significantly better connectivity in terms of both road and rail links. Those wishing to commute either to London or our county town of Maidstone have multiple options, thus dispersing the commuter traffic. They are areas very close to trunk routes and Motorways. The historical nature of Tonbridge means it cannot cope with the traffic we have, access to the A21 is already congested and there is little that can be done to alleviate this. Around Kings Hill there is a purpose build modern road infrastructure.

This seems the most logical option given the size of the current settlements in this strategy which have good rail/transport links and medical infrastructures in place plus decent road links.

Please see my related comment. Additionally, it has to be sensible to utilise existing infrastructure rather than creat more disruption. Clearly there is a capacity limit to this, so we will ultimately reach saturation point, when we simply have to say to Government, NO. The southeast is already a fairly densely populated area by comparison to other areas, so development should be easier elsewhere. Finally, we should now be clear just how important farm land is, the war in Ukraine has shown we are far to depended on other countries for food that we can and should be producing ourselves, wheat being a good example. So the last thing we should be doing now is building on farm land, we should be helping farmers produce more.

By selecting option 2 we will 'buy time' until the folly of this 'give up new land to concrete' way ahead is recognised as just that---sheer folly.

Concentrate on what is already built on. In particular any vacant and soon to be vacant retail space. Encourage developers to look with more attention at these 'old abandoned shops'.

In addition I see a pattern developing here. The Medway Gap 'falls between' the two HMA's mentioned. (Sevenoaks/Tonbridge/Tunbridge Wells HMA; and the Maidstone HMA). Thus it is getting a disproportionate volume of planning applications approved.

Also there is a real slant/bias in keeping development as far away from Tonbridge as possible.

User Response: Text

The MGB around Tonbridge fulfils all the requirements laid down in the MPPF

1. to check the unrestricted sprawl of large built up areas
- 2.to prevent the neighbouring towns merging into one another
- 3.To assist in safeguarding the countryside against encroachment
4. To preserve the setting and special character of historic towns
5. To assist in urban regeneration, by encouraging the recycling of derelict or other urban land

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The natural beauty and open space of the county's countryside/ANOB/Greenbelt must be protected.

User Response: Text

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2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

Continually building round and round existing settlements destroys the chosen environment for the people who already live there. One new settlement, properly planned with plenty of little terrace houses, like in many of our villages would provide First Homes while only upsetting a very few people. Not all the Greenbelt is beautiful countryside nor high grade agricultural land.

As a Medway Gap resident I am concerned by the gradual erosion of green spaces in this area. I fear that the responses from residents in Areas 1 and 2 will show a NIMBY attitude and seek to have most new development in Area 3. The need to the two HMAs to each shoulder some of the burden will go some way to alleviate this, but I feel that the green belt should not be treated as a sacred cow. It's not all a green and pleasant land that might have been painted by Constable. There are many small villages slowly dying and becoming economically unviable, and unless a reasonable number of working age residents settle there, what services that remain, such as schools, doctors, buses, pubs and shops will disappear. A village with a predominantly elderly population is not somewhere that we want in the Borough, and would become an unpleasant place to live for the residents unable to move out.

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- (b) to prevent neighbouring towns merging into one another;

User Response: Text

(c) to assist in safeguarding the countryside from encroachment;

(d) to preserve the setting and special character of historic towns; and

(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

I am opposed to any development on Green Belt land *adjacent to the town boundaries* because it will ruin the character of the edges of the town, add stress to already over-stressed local services and add to the existing traffic problems and pollution in Tonbridge.

The Council faces a challenge in meeting the objectively assessed needs for housing, which in the case of Tonbridge & Malling amounts to 839 dwellings per annum or 15,941 dwellings across the plan period to 2040.

It is vitally important that the Local Plan identifies a mixed portfolio of sites to provide opportunities for small and medium sized developers. The NPPF is clear that planning authorities should be providing a range of sites and that small and medium sized sites make an important contribution to meeting the housing requirement of an area. Sites should be identified adjacent to towns and villages across the settlement hierarchy. This would assist in supporting and enhancing local services and facilities.

In this context, we do not believe that it is correct to continue to concentrate development just on the settlements beyond the Green Belt at Snodland and The Medway Gap as illustrated in Option 1. These areas have taken a huge amount of recent development and although they probably could accommodate more it would be unreasonable to concentrate all of the new development here.

We do not believe that a new settlement as proposed by option 5 is viable. The lead in times for such projects are enormous and land assembly can be very complex. It is extremely doubtful that it could be achieved within the timeframe of the Local Plan

We consider that Option 4 of distributing development across the borough focusing on greenfield and previously developed land, rural service centres and other rural settlements presents the best overall strategy.

Such an approach would allow for a sensible review of the Green Belt boundary in these areas and allow a limited but controlled expansion of those settlements that could accommodate additional growth, both for housing and employment.

For instance, we believe that the built-up area of Addington should be extended to include the residential areas comprising The Links and Humphries Park Mitsubishi. It should also be extended southwards across the A20 down to the railway to include site 59604/59606.

I think the greenbelt was a carefully designed planning constraint to contain urban sprawl. It is not a constraint which was meant to be breached to support the problem of the moment.

There are so few green areas being preserved nowadays. People who live alongside them have chosen to live there because of the greenery, lower levels of traffic and (personally speaking) uninterrupted dog walking areas of peace and quiet. Why should every village in nice countryside be turned into a housing estate to meet government

User Response: Text

figures?

Nature needs to be thought of as much as people do.

A new town or village would have enough infrastructure (especially doctors, shops and school) not to impact too much on current services. It is already hard enough to get an ambulance, e.g. 4 hours on one occasion. It takes at least 45 minutes to get through to the doctors' surgery on the phone to book an appointment. An X-ray used to take place on the same day as requested and now it takes several weeks. A new population in its own town or village would have its own amenities and services.

Tonbridge is very densely populated already.

Strategy 1 should not exclude brown field sites, but no area should be over developed. Most of the Borough is Green Belt where there are all sorts of restraints.. Then follows agricultural land which is a major part of the calls for sites list. Building on this , wether grades 1,2 or even 3 should be avoided as we start to face national food insecurities and rising food production. NO to development on Green or Agricultural land unless all the options have been considered.

In addition the boroughs infrastructure is creaking, especially in the back lanes so extreme care is needed when considering development in theses areas before infrastructure is totally up graded, (Not just roads but consider pressure on schools & medical facilities etc..)

Once greenbelt is built on it is lost forever so every effort should be made to maintain it.

There is too much suburbanisation of the countryside in the area. Once it is gone you have damaged a beautiful area and it will not return. Every bit of derelict land in towns should be developed before you build even on one piece of countryside. This would reduce commuting also.

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- (b) to prevent neighbouring towns merging into one another;
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- (d) to preserve the setting and special character of historic towns; and
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- a) Green Belt is there to prevent towns and villages linking up to make huge urban areas.
- b) to prevent the countryside being swallowed up.
- c) to help in urban regeneration of derelict sites.
- d) historic towns need to be able to keep their settings

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Green Belts are a long established and widely supported planning device. They have National significance inasmuch as Government policy for them is set out in a specific National Planning Policy Statement (PPS2). The title "Metropolitan Green Belt" further recognises the regional significance in providing accessible open space for London (the metropolis) as well as large settlements bordering the Green Belt (in Kent, these include the Medway Towns, Maidstone and Tunbridge Wells). In effect, they identify an area in which is expected to remain permanently free from built development.

The Council should be fully aware, because of its geographical location, of its own particular role as a guardian of this environmental asset (in all of its facets) on behalf of these large settlements as well as for its own residents. In particular, while the Council is mandated by PPS2 to use the Development Plan process to make min]or adjustments to Green Belt boundaries, this does not (as matters currently stand) extend to unilaterally abandoning Green Belt policy altogether, or promoting its widespread fragmentation. In effect, the Green Belt should be the choice of last resort and should certainly not be seen as a reserve of potential development land, easily raided when selecting sites for building. "Very Special Circumstances" do not apply when alternatives are available.

The simple point is that if maintaining the integrity of the Green Belt is to be maintained (in option 1, but also in the other options) the corollary is that further thrusts must be added:

Firstly, there must be formulation of strategy and policies to promote "intensification" of development *within* the settlements that are not "washed over" by the Green Belt notation, and avoiding "extensification" *beyond* their boundaries. The evidence base for the sustainability of that approach would need to gathered from realistic analysis of rigorous capacity studies of representative parts of the existing settlements concerned. This does not mean searching for sites to maintain traditional suburban development. Rather, it means engaging local

User Response: Text

communities in seeking out opportunities to create modern, attractive and efficient towns and villages of significantly more urban character than now, for reasons of long term sustainability and affordability. Policies might follow for extending existing homes upwards, downwards or sideways, and converting garages to homes. Site specific proposals might also follow for tightening the urban fabric by redevelopment or by assembling garden plots, or creating accessible urban “pocket parks” in place of larger open spaces that may be re-planned and enhanced for mixed uses. Some (in appropriate circumstances) might be relocated to areas within the Green Belt, perhaps in an exchange process.

Secondly, strategy should address the need to make full and efficient use of the Green Belt (which is unlikely to increase in extent) in order to accommodate the increasing demands placed upon it by growing urban populations for open recreation, agriculture and wildlife protection. This is an important environment counterbalance for the emphasis now placed on the scope of wider Housing Market Areas well beyond local administrative boundaries. Tonbridge and Malling (with Sevenoaks BC and others in a similar geographical relationship to the “larger metropolitan population”) should take this opportunity to lead in developing strategic policies akin to the establishment of the Metropolitan Green Belt Regional Park. Safeguarding the environment and its natural resources for future generations in such ways should be a cornerstone of the sustainability appraisal.

Thirdly, the spatial strategy should have a component dealing with enforcement, because all the effort and cost of creating a Development Plan is wasted if breaches of planning control are left unresolved. The Council should include specific commitments in the “implementation” section of the Plan, alongside those which deal with developer contributions or “planning gain”, to itself invest in planning enforcement and (elsewhere) also to lobby Government to do likewise.

Minimises impact on areas within the Green Belt and AONB

Our infrastructure is at breaking point already doctors, schools and more traffic on small local roads.

no response

The Green belt around Tonbridge fulfils requirements laid down in NPPF

- Check unrestricted sprawl of large built up areas
- Prevent neighbouring towns merging
- Safeguard countryside from encroachment
- Preserve setting and special character of historic towns
- assist urban generation by recycling derelict and urban land

Expansion of Tonbridge beyond green belt will increase congestion and add to deterioration of inhabitants quality of life.

To prevent neighbouring towns merging into one another,

User Response: Text

.To assist in safe guarding the countryside from encroachment.

Expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and the quality of life will go down for peopl living here.

There seems to be a strong bias towards focusing on the Medway Gap where there is already heavily congested roads, limited train service within walking distance, many country lanes and virtually no bus service in rural settlements. Option 4 seems to be the least bad.

In order to retain the biodiversity, open spaces for recreation and the attractive character of the communities withingn the Green Belt. Nature has suffered enough to human needs.

do not want to destroy present country appearance and way of life

As a concept 30/40 years ago Kings Hill was a great idea but it has failed. The development evolved from a small sustainable residential + employment development to a complete hash of high density housing with poor infrastructure. It is growing continuously on an ad-hoc basis with no attempt to improve infrastructure and no real plan. TMBC should step back, update their concept of a and consider a second attempt a residential + employment development and get it right this time.

This would seem to give a good balance between urban and rural areas, providing services accessible to all areas. We would prefer, where it is necessary to intrude into the Green Belt we believe this should naturally adjoin an

User Response: Text

already developed area. We do not believe isolated pockets of development in Green Belt areas is acceptable.

Option 2 is closest to my preference as it will retain as much as possible the rural character of the borough and concentrate new development in sustainable locations close to established centres and services. Recognising the pressure to find sites for new housing, I would add to this Borough Green, West Malling Station and Hildenborough Station as locations for more development. I appreciate this increases development in the Green belt, but close proximity to the rail network outweighs this. If we are to get people off the roads then housing needs to be within walking distance of stations and Hildenborough and West Malling Stations are currently isolated, with no surrounding development.

I would not support option 3, which introduces the next tier, Rural Service Centres, as Hadlow and East Peckham are too isolated and distant from train or trunk road connections to be viable or sustainable centres for development. Bus services are insufficient and polluting and do not provide a viable alternative to car use, resulting in congestion at all major road intersections.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Settlements are set up with infrastructure, services and public transport. Much more sense to enlarge and expand these, 'fill in' brown field sites and improve the services to accommodate more residents.

The rural environment and Areas of Outstanding Beauty of our borough are not set up to meet these needs as well as the absolute necessity to preserve these beautiful areas for farming and outdoor recreation e.g. cycling, riding, walking. The lanes are narrow and can not cope with the increased traffic which would arise. They are already used as rat runs. Seven Mile Lane and the A 228 are very busy roads at present and if there is a problem on one of these roads, traffic jams and huge diversions occur. There is already pressure on schools places and local doctor services - very hard to get appointments.

Avoids urban sprawl around Tonbridge which is already heavily developed beyond its infrastructure resources.

Looks like the least amount of widely spread development in this area

My favoured option is **OPTION 1: OUTSIDE** of GREEN BELT and AONB which must be protected at all costs.

User Response: Text

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

To preserve existing areas of outstanding natural beauty and conservation areas within the borough.

TO protect the greenbelt and AONB

I don't agree with any of these distributions because none of them offer to not over develop Kings Hill. All of these strategies class Kings Hill wrongly as an Urban area (which it is not and neither do residents want it to be) and all strategies involve over developing this village. This is purely money led. Kings Hill is not urban and does not have sufficient infrastructure to support new homes. It's already impossible to get GP apts, people are having to travel to other villages to get seen by Drs because our surgery is so over subscribed, all the primary schools are full, there is no secondary school, there are not enough community spaces and your plan is to build over the ones that are there.

The preference to not release green belt land but develop outside the green belt boundary.

The green belt and AONBs must not be built on when other options are available.

Need to protect Greenbelt and ANOB, Need to focus on existing transport infrastructure so new homes can access trains/buses. Need to focus on job employment sites- so homes near jobs to reduce pollution. Need to focus on affordable housing with clean air so plant trees in these areas as well . Could bring Borough Green and Hildenborough into this as both have rail links and a bus service from them. Need to look at industrial land/ towards the motorways. Flood Zone 3 within these areas should not be built on unless stringent measures are used to safeguard properties.

Development should be an expansion of the existing urban environment and not an invasion of important rural space green belt and AONB.

Development should be representative of ability of a town/community to support such expansion

building should focus on developing brown field sites and away from countryside - we should be protecting the natural environment.

User Response: Text

All of these options further expand the development of dwellings around West Malling and Kings Hill. North East of the borough has already seen more than its fair share of development over the last 20 years (58% of developments) and the area is becoming completely over-developed, which the infrastructure and services cannot support.

The local plan should be focussed on developing brown-field sites as its number 1 spatial objective and ensure that area of outstanding natural beauty and site of historic and environmental value maintained. It should also focus on reducing climate emissions (so should not support people moving out of London into North Kent to commute back into London for work)

Kings Hill was intended to be a development such that residents could work locally and have recreational facilities and be sustainable. Now, very few residents of Kings Hill work locally (as there are not the businesses to support those who live there) and there are vast numbers of residents who commute into London, Tonbridge, Tunbridge Wells and further afield.

Current built up areas are already over developed

To protect green belt and Aonb

The start

No response

I would like to see preservation of the open spaces as much as possible.

All of the above options have considerable disadvantages in my opinion, and I am therefore reluctant to select any of them. My main objection is the encroachment upon Green Belt land, and in my own particular location the lack of infrastructure to support significant development together with the already overcrowded and increasingly dangerous roads.

Of the options presented we prefer Option 4 whereby some housing - in proportion to the size of the settlement - is allocated to each settlement. There are young people in every settlement that need local housing. This is also more deliverable as often very large allocations prove problematic and prone to delay.

CPRE Kent would like to see sixth option being tested - one that does not meet the full housing requirement to reflect the fact that:

- the standard methodology calculation is flawed – it creates a scenario that addresses housing demand, rather than need

User Response: Text

- there is a question mark over the continued use of the standard method now that the government has stated it wants to move away from the culture of top-down housing targets
- the housing requirement should be reduced – in accordance with paragraph 11(b) of the NPPF – to reflect the fact that the borough has the enhanced status of having land designated as green belt and AONB

It is important to keep green belt land. Use brown fill sites. There are plenty of empty buildings in towns, such as Maidstone that could be turned into affordable housing and for groups, such as the homeless

To allow green fields to be untouched.

I prefer option 1 as it looks to develop existing urban areas further rather than developing rural areas; protecting the Greenbelt and AONB areas. My only amendment to option 1 would be to include development focus in Tonbridge itself so that there is support for the West Kent housing marker area as well as the Maidstone and Medway housing market areas.

To protect the greenbelt and AONB

The local infrastructure is already at breaking point. Our local doctors surgery has 22,000 patients and just 3 full time doctors. Nowhere in the plans listed for near my area is there anything suggesting new doctor surgeries, schools or local infrastructure improvements. To cross into green belt land to add to this already heavy burden is not the answer. Building near current larger urban areas where the buses, trains and jobs are makes more sense than building across wildlife corridors and AONB.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

User Response: Text

I understand the need to develop new houses; I prefer the option of expanding the existing main centres of the population. These are the areas best served by transport infrastructure. I agree with the priority of developing brownfield sites before green belt (or other undeveloped land) where possible, but recognise that these options are limited. That said, I do feel the need to think of how we can redevelop high streets in the main urban and rural service centres as shopping habits change. I would like to see development to include replacing redundant shops with residential premises and community service-orientated businesses such as cafés and local shops similar to Sevenoaks town centre with a good range of independent shops and businesses and redevelopment of the former Tesco store.

Again I question the level of housing

Protects green belt and develops urban areas with better infrastructure.

(a) to check the unrestricted sprawl of large built-up areas.

(b) to prevent neighbouring towns merging into one another.

(c) to assist in safeguarding the countryside from encroachment.

(d) to preserve the setting and special character of historic towns; and

(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Greenbelt is sacrosanct and once lost it is gone forever; it is not a reuseable commodity.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

(a) to check the unrestricted sprawl of large built-up areas;

(b) to prevent neighbouring towns merging into one another;

(c) to assist in safeguarding the countryside from encroachment;

(d) to preserve the setting and special character of historic towns; and

(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

User Response: Text

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

This would do least damage to the environment. People living in Urban areas would have green spaces that they can access .It would protect biodiversity. It would reduce the need to build additional infrastructure.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

- (a) to check the unrestricted sprawl of large built up areas;
- (b) to merging prevent neighbouring towns merging into one another;
- (c) to assist in safe guarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns:
- (e) to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

We need greenbelt land for the sustainability of our environment.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Green spaces and green belt land, rural communities cannot sustain any further over development. There are more than enough brownfield sites to meet TMBC housing allocation but developers would rather develop greenfield land as it's cheaper. This not an acceptable strategy for TMBC to adopt.

Makes use of existing infrastructure in existing significant settlements, without destroying the small villages/ green belt/AONB areas that make this council area so special.

User Response: Text

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

I do not support options 1-4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is a mixture of green belt, useful high grade agricultural land and important woodlands which are essential for carbon capture. Option 4 would be the preferred option as it would spread the development most evenly and is most likely to result in development being focussed on the brownfield sites in the borough. It should also be noted in the last 20 years the area around West Malling including Kings Hill has suffered from a disproportionate quantity of new housing. The report compiled for the Broadwater Action group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden never mind any additional development.

Option 2 impacts a minimal amount of greenbelt land and countryside areas. However, I would raise concerns with the fact that the plan "seeks to locate development in areas with good access to existing services and facilities". Considering many of the existing facilities and services, such as road access, schools and healthcare are already overburdened, I believe that merely adding population to services that are struggling as is, without any plans or provisions for either new services, or expanding the resources of existing healthcare services will result in a significant decline in quality and accessibility of public services to all areas affected. For any plan to be successful, it is imperative that public services in this area must be expanded before any significant development can take place.

need for housing but protect greenfield

- protects greenbelt and areas of beauty
- area in option 1 has solid transport links
- option 1 settlements are emerging communities with scope to develop for future, e.g. newer housing, the blend would be less impactful between new and old

User Response: Text

- protects over development in places such as Tonbridge which has potential to lose its charm and links to immediate countryside and rivers

retain a healthy living environment especially with the move to more working from home. Urban spread will destroy the environment as well as result in overcrowding. This will in turn overstretch the infrastructure and result in physical and mental health crises.

None of these strategies.

Please leave our community alone. More and more cars on the estate roads, more traffic lights and congestion.

More people, not enough Doctors or medical centres. Please do not add to this.

The delivery of the Tudeley and Paddock wood projects will already diminish available green belt and farm land and cause further congestion and strain on services in Tonbridge. Any further loss of Green Belt and farm land is only going to exacerbate this problem.

I do not accept any of these choices. It appears that, by offering a choice of 6 options, the intent is to obtain a conclusion that '*residents of Tonbridge & Malling prefer option X and therefore this option is supported by the residents*' so that development can commence 'with the support of the population'. However, I and most residents would prefer NONE of these options. We **DO NOT** want more housing being built on our beautiful surrounding countryside, destroying habitat, adding pressure on infrastructure, roads, services and worsening the character of the area.

I understand that the central government has imposed targets of increasing the housing on TMBC, and that TMBC is following this directive from government. I wish to register my strong disagreement with the government's requirements to increase housing in this area and urge that the policy should be re-designed. I think government should not see to continually grow the South East at the expense of the Region, but instead invest in the Regions to stop the transmigration of people to the overcrowded South East and to areas such as Tonbridge & Malling.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

User Response: Text

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

It protects greenbelt and ANOB. Tonbridge is already under extreme pressure from development around Paddock Wood, East Peckham and the proposed Tudeley development in the Tunbridge Wells plan.

From what I can decipher from the option maps this I feel spreads the burden of development more fairly across the borough and hopefully will encourage more development on brownfield sites within existing settlements to not only improve the settlements themselves but also ensure better land usage within current settlements, and reduce building on farm land to an absolute minimum. If there is additional need a separate 'new settlement' can be then be considered. This 'demand' needs however to be extensively challenged with the government as the data has changed dramatically in recent years due to Brexit, & Covid amongst other things.

Option 4 distributes development around the borough, placing the least amount of stress on local services. Thinned out development over a wider area can be absorbed more easily.

Due to high demand for local amenities such as doctors, dentists and schools, development should be spread thinly so everyone shares benefits and deficits.

We have found the descriptions and maps difficult to understand but believe Option 1, if we understand correctly, is best as it will protect greenbelt and A.O.N.B areas and local communities from being spoilt.

I feel that further developing previously developed land within urban areas and service centres is most sensible as there will be less need for travelling across the region and the environmental impact on the borough will be less

no comment

Development should also continue previously developed land within urban centres, rural service centres and other rural settlements.

To avoid over-development in the Borough, bearing in mind that most of it is Green Belt with major constraints. And to avoid additional pressure on infrastructure - particularly the increased pressure on roads that are already congested, but also pressure on schools and medical facilities.

The countryside is eroding. It needs to be protected for sustainability and future generations. Also around the

User Response: Text

areas suggested, particularly mereworth, you are purposing works on single tract roads which feed into already congested major roads ie A228(which is already not fit for purpose) and seven mile line. There is not the infrastucture to support building without ruining existing hedgrows and environment. The junction between kent street and A228 has already been responsible for major injuries.

To protect the valuable rural character of Tonbridge & Malling Borough I support Option 1 (focussing development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty) or Option 2 (focussed on greenfield and previously-developed land within the urban areas as well as land adjacent to these settlements). I do not support Option 3 (focussed on greenfield and previously-developed land within the urban areas and rural service centres), Option 4 (focussed on greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements) or Option 5 (focussed on greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements, thereby seeking to maximise the use of previously-developed land in the borough, as well as a new settlement/s remote from existing towns and villages) all of which would have a major impact on Offham including its rural character, and landscape the health and wellbeing of its local residents.

By pursuing Option 1 or Option 2, the Sustainability Appraisal objectives by which sites are assessed can best be achieved through access to education and community facilities, proximity to public transport, through support of health and wellbeing and by protecting important health, environment, landscape and natural assets, valuing the distinct rural character of the area enjoyed by those living in both the Borough's towns and its villages.

In makes sense to expand areas that have already got some level of infrastructure or is currently being developed to expand on this. This would include roads, public transport and services such as shops, GPs etc. Option 1 focuses the development on a small area not using the current infrastructure available further south. Options 3, 4 and 5 focus on areas closer to small villages rather than towns so there would be a need to expand the road system, much of the county already has a well developed road system with motorways and dual carriageways and to build more of these in the country side would have a huge impact on what makes Kent so beautiful. Building more roads and building to house the services the residents would require would unnecessarily impact the environment both during the building process and subsequently by the noise and pollution caused by traffic. Residents in the county should have a choice whether to live in an urban development of rural settlement and this choice would also be removed in villages were expanded. Building on green belt in a choice I wholeheartedly disagree with, our countryside needs to be developed to support nature not removed to build houses.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:-

- 1 prevent the unrestricted sprawl of large built up areas
- 2 prevent neighbouring towns merging
- 3 safeguard the country side from encroachment
- 4 preserve the setting and special character of historic towns
- 5 assist in urban regeneration by encouraging the recycling of derelict and other urban land

User Response: Text

The expansion of Tonbridge beyond existing greenbelt boundaries will result in worsening congestion and air quality. The green belt is there to prevent urban sprawl and it should be respected by this local plan.

This strategy option makes sense to me due to the infrastructure already in place to accommodate increased housing. Suitable roads and rail networks as well as shops, businesses and schools, beyond these areas there is little that would support additional housing with respect to adequate infrastructure which would be required and add to the cost and complexity of additional housing in the borough.

This option focuses on already developed or developing areas with good infrastructure, schools etc.

I am not sure what you mean by settlement confines in option 1 and why these do not appear in option 2? I have selected option one because I would like to see the majority of development in urban areas, maximising use of brown field sites and minimising the use of green belt and areas of outstanding beauty for development. Unhelpfully green belt etc is not shown in option 2 figure 4 so it is hard to judge the degree of use of green belt in this plan. I am particularly against any large housing development in Borough Green and against a Garden City with 3000 housing almost doubling the size of housing in this area. The local infrastructure will not support a large development at Borough Green and having looked at the developers plans for Borough Green felt they gave little regard to green energy saving building . Sevenoaks Plan is not out for consultation yet so it is not possible to see the plans for development on borough boundaries for all neighbouring boroughs. This should be taken into account to look at the impact on areas near borough boundaries. I am against large housing development in rural areas. Any development should be proportional to the size of existing local rural communities.

The use of the term quantum option is jargonistic and not assessable. What do you mean? If you mean by assessed need that the new housing in the plan should be for those in most housing need who cannot afford to buy on the open market then yes and if they will be affordable either to buy or rent then yes.

On the assumption Option 1 is not viable as already over developed, my preference is Option 2 as this will afford new housing in already developed areas and minimise the impact to the unique Kent environment. Any increase in housing under option 2 has to address travel (tonbridge at rush hour has a 20-30 minute queue to get to the train station and as such increasingly polluted) and health services (1 week delay to get access to local GPs).

Any development on Semi rural Option 3 must not be considered as it will forever lose the unique character of Kent: Tonbridge & Malling has many single track roads, ancient woodlands, footpaths and hedgerows ruining what is unique about our county “the garden of England”. Any development under option 3, 4 or 5 must be prevented as it is not sustainable : widening of designated ‘Quiet lanes’, removal of hedgerows, removal of woodland, damaging grade 1 agricultural land losing the beauty of Kent for our future generations. It would also force people to commute by car thus still requiring investment in travel infrastructure for urban areas as per options 1 & 2 anyway.

- With option 1 there is no (and frankly unnecessary) need to build on greenbelt land
- Option 1 has least negative impact on biodiversity of all the options
- Option 1 is least likely to negatively affect the landscape, quality and character of the borough

User Response: Text

- Option 1 would have less negative impact on air quality and emissions than the other options
- Option 1 would likely still provide a good supply of quality housing of varying types/sizes, all without building on greenbelt
- By not developing in the greenbelt outskirts of Tonbridge, there might be less chance of increased traffic at the Waterringbury crossroads caused by people travelling from Tonbridge to Maidstone.

Worst options:

- Option 4 and 5 start to fragment the greenbelt further and risk isolating particular types of animals and reduce wildlife corridors
- Option 4 and 5 have a significant negative impact on air quality and greenhouse gas emissions and therefore climate change
- Option 5 would really carve up the greenbelt with a large area of new settlement

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C.in their current local plan.

We should limit any development on green belt land at all costs. With an environmental crisis the prioritisation of housing development should exhaust brownfield sites and limit development. Also, we should protect our villages and rural service centres which define English culture. People in these areas don't want to live in a town.

A majority of the people who want development in green belt land areas are property development companies and land owners looking to financially benefit, something that local residents are acutely aware of. Council members are only too willing to allow them to build frequently on green belt land already, prioritising their own interests of local residents.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

1 To check the unrestricted sprawl of large built-up areas

2 to prevent neighbouring towns merging into one another

3 to assist in safeguarding the countryside from encroachment

User Response: Text

4 to preserve the setting and special character of historic towns and

5 to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Further expansion of Tonbridge beyond existing green belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's population.

The urban areas are already quite full, it is enough to take a look at Tonbridge high street, the supermarkets are full, the train station, traffic is very dense. There is no room to accommodate development in the urban areas without investment in adapting the infrastructure to accommodate more people. Therefore it is more appropriate to place new dwellings in less densely populated areas of the borough.

To avoid building on greenbelt land wherever possible, and to not add more pressure on infrastructure, which is already overwhelmed.

People chose to live in small rural places precisely because they are small and rural. Expanding those places would directly hurt people who live there. Building within Green Belt must be strictly ruled out.

Rural landscape, e.g. Shipbourne, provides a huge irreplaceable resource for public relaxation, exercise, mental well-being, for borough residents. Shipbourne Common within it's wider landscape of hills, fields and woodlands supports considerable local biodiversity. Significant development (Sites 59825, 59779, 59827) would considerably degrade this amenity; degrade views to/from the Conservation Area, significantly increase daily traffic flows (Safe Lanes initiative); require significant infra-structure investment (in drainage, power) and lead to urbanisation. Greenbelt Study 2016 2:1:2 states high figures of Greenbelt erosion. Para's 2:1:15 to 2:1:17 cite Government support in protecting Greenbelt. Essential services (e.g medical, bus services, transport options) to support housing are located within the Urban sites and offer more economic solutions than rural sites. Developers "large site" housing architecture seldom compliments rural villages and their landscape contrary to proviso in SA6 for these sites.

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This seems to avoid using so much countryside and would mean that everywhere in the area would use the urban parts to their full potential.

User Response: Text

I believe it is important to avoid the spread of existing settlements into adjacent rural areas. If option 1 is unable to provide sufficient development opportunities then Option 5 should be considered.

I have not selected any

It looks to be the least worse option, but is not a favoured option. Why not have development up to the limit which brownfield only sites can take ? You seem to be pandering to the housebuilders. Push back to the Govt who keep blathering on about levelling up.

Option 4 I think that all communities need housing for young families from the locality and see no reason why rural villages should be exempt. There should be a range of housing, including 1 and 2 bed flats and affordable starter homes. Not 5-bed executive housing. The amount of development should be proportionate to the size of the settlement. Option 5 appears to be Borough Green Garden City, which is an option that urbanises the area forming continuous development between Wrotham Heath, Platt, Borough Green and North Ightham.

TMBC is in the South East of England developments around existing urban centres only will only solve the housing shortfalls in the short term.

it is important to maintain the greenbelt and areas of outstanding beauty . Services are available in urban areas that are not in other areas

This option provides links to already existing services, particularly transport links. Concentrating development in fewer sites will enable demand for additional services such as healthcare and educational needs to be included in development plans.

Sites 59808 and 59592 in Hildenborough are in a area of Green Belt and can be only used for development in Exceptional Circumstances. There are no exceptional reasons especially as they are near the huge Fidelity development. As the village is in its settlement boundary this would threaten the boundary and teh anti-coalescence policy. Also Woodfield avenue is a narrow road and unable to cope with the additional traffic.

It was our intention to move from city to rural area. It cost us a lot of money, time and efforts. We chose house near to the Green Belt area to secure the status of the area around.

To protect the greenbelt and AONB

User Response: Text

TO protect the greenbelt and AONB

The original purpose of the Greenbelt is to protect green open space around urban areas and to keep urban sprawl in check. Now it also serves to protect against air pollution, climate change, providing habitats for wildlife, protecting woodland, supporting health and wellbeing. This protection should be just that: 'protection' and should not be so easily passed over.

I do not want to see developments built within the Green Belt boundary or inside the Areas of Outstanding Natural Beauty because I moved to Larkfield to enjoy this beautiful county full of greenfields and I don't want to be confronted with a concrete jungle of houses everywhere I look.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

To protect the environment and preserve the AONBs and Green Belt

With the first 4 options you are simply creating urban sprawl connecting previously unconnected conurbations. There is no definable centre. The Medway Gap is an ugly unplanned development with no centres, simply a main road full of traffic. Extensive new housing needs to have a proper urban plan.

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

Option 5 of an entirely new development in the borough would result in even more destruction of green field

User Response: Text

land, which I would not support.

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The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants.

To Protect the Greenbelt and AONB

For people's mental health, the existing green belt should be preserved as much as possible. This provides ecological and species diversity benefits too.

The original purpose of the Greenbelt is to protect green open space around urban areas and to keep urban sprawl in check. Now it also serves to protect against air pollution, climate change , providing habitats for wildlife, protecting woodland, supporting health and wellbeing. This protection should be just that: 'protection' and should not be so easily passed over.

User Response: Text

Once lost Green Belt and Area Of Natural Beauty cannot be recovered.

The reasons for Green Belt should not be ignored.

In the past decade more and more areas of natural beauty are being eroded and replaced with housing estates. before long there will be a minimal amount of countryside for future generations to enjoy.

Everyone needs to share the pain.

The areas of outstanding natural beauty, green belt and good quality agricultural land must be preserved at all cost.

Access to transport infrastructure, including roads and rail is key. The original Borough Green Garden City scheme was unworkable as it did not commit to creating the transport infrastructure before the new housing.

Community infrastructure such as schools and shops/medical is also critical.

The "other rural settlements" cannot support a weight of new housing without improvement to transport and community infrastructure.

By focussing development on urban and on rural service centres, access to facilities for the dwellings developed will be better, and the sense of identity of the smaller rural communities will be preserved.

The National Planning Policy Framework (NPPF) expects planning policies and decisions to promote an effective use of land in meeting the need for homes, **therefore 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?)

Not in best interest of current ares and support facilities

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;

User Response: Text

(d) to preserve the setting and special character of historic towns; and
(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

The fundamental aim of Green Belt policy is to prevent urban sprawl and is it characterised by openness and permanence.

Areas of Outstanding Natural Beauty are designated for the purpose of conserving and enhancing the natural beauty of the landscape.

To protect the green belt and AONBs

This does not ingress on to greenbelt land. Once lost always gone. We will never be able to reclaim lost green belt.

All areas around Tonbridge within the greenbelt comply with the requirements set out in the NPPF

- To prevent the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns becoming as one.
- To safeguard the countryside from encroachment.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan. Further expansion of Tonbridge beyond existing Green Belt boundaries will result in the already terrible congestion worsening along with a decline in air quality.

T&MBC in the Wateringbury area is very much focussed on the rural roots of the community. There has been much development locally in the Kings Hill area which has changed the dynamic for the residents there but I feel that areas such as Wateringbury have thus far managed to retain their integrity. It is essential that the rural nature of the area is kept especially regarding the community access to the countryside that has become so important particularly following the Covid pandemic. We need to be able to support the existing community giving them access to goods and services and a rural lifestyle that they need. We have precious little Green belt and rural areas left and it is essential to ensure that these are kept for future generations. Once built on, they will be lost forever.

User Response: Text

The character of the area is utterly important. Current plans will make this a town and link the villages making this just another urban sprawl. This is rural kent = orchards UK garden, how can this be seen as a way of protecting or advancing the environment. It cannot and will give an opposite outcome. Yes the Council must address the Govt strategy but at what cost.

To save our borough from more destruction

I would be a fair option for all. We moved to Kings Hill 18 years ago as it was considered to be a village and I would like to keep it that way.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF: 1. prevent the unrestricted sprawl of large built-up areas. 2. prevent neighbouring towns merging. 3. safeguard the countryside from encroachment. 4. preserve the setting and special character of historic towns. 5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF: 1. prevent the unrestricted sprawl of large built-up areas. 2. prevent neighbouring towns merging. 3. safeguard the countryside from encroachment. 4. preserve the setting and special character of historic towns. 5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan. The proposed development sites on the Tonbridge/Hildenborough border on Green Belt land ref 59821,59823 is not infill within the village and will effectively remove any demarcation between the town and the village. Hildenborough will become part of the town forever and will completely lose its identity.

We need to think about encouraging investment in the existing urban areas that are well ready well connected to commuter links. Some of these areas appear to be in decline and it is more likely that affordable more intensive housing (including hi rise) could be accommodated in these spaces allow easy access to the capital, and providing a source of growth for the business centres in and around those areas. Spreading the housing throughout the region would intensify the impact on transport links in what is already highly congested. Our village of Wateringbury crossroads suffers from both high levels of congestion at the crossroads with miles long tailbacks at rush hour and the consequence pollution impact making it the most polluted postcode in the borough. Also preserved will be the character of the countryside allowing for spaces that the urban dwellers can easily access and enjoy nearby. This will also continue to support our agricultural industry, notable with soft fruit.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

User Response: Text

That places like Borough Green with the amount of houses should be moved to an urban area that is able to developed further. This part keeps arguing that it is other rural settlements which should not be the case.

Wrotham could be argued as a Rural service area working alongside Borough Green.

It would not be hard to see areas such as Medway Gap in crouching Eccles and surrounding villages

The creation of a new settlement such as Borough Green Gardens, could deliver new infrastructure to support the new development and address existing issues such as poor air quality. The remaining development would be dispersed over the district therefore the impact on existing areas and green spaces would be less significant. Borough Green is an ideal location for a new garden village, it was included in the withdrawn plan and could deliver a relief road, allowing for the existing A25 through the village centre to be downgraded to improve air quality and accessibility for cyclists and pedestrians.

The creation of anew settlement would deliver a high quantity of the housing need over the plan period and perhaps beyond. This would reduce the need to develop on existing green spaces and therefore preserve air quality, the environment and quality of life on existing residential areas.

More dispersed development over the whole district would mean the density of development in existing areas would be lower and more acceptable. A new settlement away from the already heavily developed areas would alleviate the pressures on these areas, especially where infrastructure, facilities and access is already insufficient in some places.

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- (c) to assist in safeguarding the countryside from encroachment;
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The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

User Response: Text

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Mainly selecting option 3 because the infrastructure is in place or can be easily expanded.

The MGB around Tonbridge fulfills all the requirements laid down in the NPPF

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

Continual expansion of Tonbridge beyond existing green belt Boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley & Paddock Wood) proposed by Tunbridge Wells Borough Council in their current local plan.

Option 1 more closely matches the aspiration to retain the settlement hierarchy which is commensurate with the character of the area placing less of a burden on the development of facilities and infrastructure. Options 3,4 and 5 would have a significant impact upon the roads and other infrastructure with more journeys being made between distributed locations.

Option 2 - preserves existing green corridors which are essential in ensuring the character and spatial qualities of East and West Malling are not lost and existing infrastructure is not swamped by future development (extant permissions have achieved this in the absence of a Local Plan) a new Local Plan - CANNOT - make this situation worse.

The Green Belt and ANOB should be retained.

Development should be applied based upon community needs rather than purely where land is available.

Building should only take place within existing urban areas not on top of greenfield or areas of outstanding beauty/ agricultural land

The use of green belt and AONB sites should only be approved as an absolute last resort if insufficient sites are available through strategies 2-5. These sites should have ruled out via the Sustainability Appraisal (SA)

User Response: Text

assessment of sites.

These areas have existing infrastructure and are outside ANOB and Greenbelt. We need to protect Greenbelt and ANOB areas for our children's future, and to protect nature, reduce climate change and therefore we should not be concreting them over.

The green belt land and AONB/ AONB settings should be protected and building in existing urban developments and on previously developed land seem the obvious answer.

Greenbelt and areas of outstanding natural beauty need to be preserved

Developments should not spread beyond well defined limits to prevent urban sprawl.

Where there is a greater concentration of the population better public transport can be provided and there can be more choice in facilities and activities.

The infrastructure in and around Ightham and Borough Green is already at breaking point with air pollutions at junctions already exceeding limits. This information should already be in your hands -AND CONNOT BE IGNORED. Take into account the coroners report into a childs death from a recent air pollution case

The roads in the area are already over congested and there is no infrastructure to support the amount of proposed housing! It is VITAL that the greenbelt and AONB areas are protected for future generations. Pollution and noise levels are already unacceptably high.

I am very concerned about the erosion of the very nature of the rural service centres if they are included in the scale of development proposed in the latter options. They will cease to be rural service centres over the plan period and will become URBAN thus destroying thier very nature. Far better to continue to grown existing urban areas.

I am also concerned that the transport infrastructure does not exist around these rural centres to handle the inevitable traffic volumes without significant and potentially undeliverable road improvements . This risks turning lasagne parts of TMBC into traffic jams.

I am also concerned about the pull of Sevenoaks for both commuters (although the new route from Maidstone to London Bridge will help if they are frequent enough) and shoppers especially in the west of the region. Traffic flows north /south have capacity on the A21 but not the A227 - east west is poorly served along the A25 west of Borough Green with existing bottle necks at Seal already. The need to work collaboratively with Sevenoaks on the development plans for the west of the borough will be imperative to avoid completely transforming the

User Response: Text

AONB area into a massive car jam!

The landscape of the borough is of beautiful countryside with excellent agricultural land, also woods and AONB. These should be preserved as that is what makes TMBC special. The Plan does not acknowledge that TMBC is easily accessible to London and therefore the Plan should recognise that the capital city will always provide a good proportion of the economic opportunities for residents in TMBC, and this will always influence travel within and from the Borough as well as mean the Borough does not need to be self-sufficient for jobs. Therefore a key part of the Local Plan should be to preserve what makes TMBC special and not a suburb of London and the Green Belt is critical to achieving this.

The best use of non greenbelt land with the least harm to character areas and areas with limited infrastructure. Least risk of creating more flooding problems within the borough. Involves cheaper areas in which to buy and rent and therefore will naturally create more affordable housing elsewhere in the borough. Excellent transport links and roads for much of the areas in options 1 & 2. Thriving towns with great infrastructure nearby,

I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in Particular the proposed development at CAPEL ,on neighbouring areas including East Peckham.

I am also concerned to ensure that relevant Agencies (Environment , Highways, NHS and Utility companies) engage robustly with the Local Planning Consultation process. I am also concerned about Developer engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites

Best use of non green belt land with least harm to character areas and areas with limited infrastructure. Least risk of creating flooding problems within the borough. Involves cheaper areas in which to buy and rent therefore will naturally create more affordable housing than elsewhere in the borough. Excellent transport links and roads for much of the areas in Options 1 and 2. Thriving towns with great infrastructure nearby.

I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

Wider area than option 1 has potential to destroy core character and environment of the area.

There is insufficient infrastructure/amenities for current levels of population and homes, let alone more. Building further from urban areas increases transport use.

User Response: Text

Minimal impact on infrastructure. I object vehemently to developments that create impact on the green belt, and existing open spaces; there is very poor access to medical and dental facilities available to the villages that make up Tonbridge and Malling. Our road system cannot cope now, let alone with the increase in housing envisaged - and what account is taken of the surrounding Boroughs and their plans, which will also impact on the infrastructure that supports us.

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 metro green belt around tonbridge is fulfilling its purpose .

It prevents spread of large built up areas .

Stops neighbouring towns merging and spreading .

Prevents encroachment into the countryside .

preserves historic towns character .

Assists urban regeneration by recycling derelict and urban land .

Further expansion of Tonbridge into the green belt will cause extreme congestion and a loss in the quality of life for its residents , which will be even greater if pending Tunbridge wells council plans in Tudeley and Paddock impact as expected .

Because this option protects greenbelt and the AONBs. These areas are vital assets to Tonbridge and Malling and are the reason that many of us choose to live here. They also serve as green lungs for this over-crowded corner of England. Developments of affordable housing and social housing should be built wherever possible on previously developed or brown field sites in areas with good access to transport links and workplaces. Absolute priority should be given to social and affordable housing.

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2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result

User Response: Text

in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

Protecting the Environmental and Heritage assets of the Borough has the advantage of maintaining and over time enhancing these assets for all those living in the area, either for: visiting, passage through, general wellbeing and pride of place.

Further development of our Urban and Rural Service Areas makes best use of existing infrastructure and allows a more focused improvement schemes to enhance each area to provide more appealing, greener and entertaining centres of attraction. As retailing diminishes and/or changes and as we move towards alfresco cafe dining, town centre craft and work/home lifestyles are urban centres will be transformed.

Safe cycling and walking is more likely to be achieved in existing centres at reasonable costs.

The Green Belt is important to the character of TMBC, there has already been quite a lot of development in Hildenborough, esp the former Fidelity site and new car home which need to be completed and the impact seen both on the environment (impact of flooding), the infrastructure and on life in Hildenborough.

I understand that some development has to happen and that there is a quota to fulfil. I fundamentally disagree with building on green belt! This is an AONB, with 70%+ being greenbelt. I think developments should be focused on areas such as Kings Hill and Snodland which already have new builds and the infrastructure to cope with additional housing. We must preserve, protect and respect our greenbelt. There are plenty of brownfield sites and you should look to these spaces to build on first before destroying our green belt areas. What will we look like in 2040? These are small villages and communities and your other proposals seek to wipe this way of life out.

it is imperative that we save the green belt and AONB's .Once they are gone, they are gone forever.

We must prevent villages which are an essential part of the British landscape from coalescing and becoming large urban areas.

It is vital to maintain our open countryside to the benefit of the flora and fauna and the environment

Option one is preferred. If you build on sites near the edge of AONB then you begin to get a sprawl of housing and increased traffic which due to congested roads in the local area seeks out country lanes for cut throughs/ shortcuts and also results in joyriders (both cars & motorbikes) that don't care about the safety of others. This all inevitably means that what were once idyllic, peaceful rural countryside experiences and beautiful quite lanes for residents to enjoy, instead become what High House Lane, Ashes Lane, Blackman's Lane, Oxenhoath and Roughway Roads have all become in recent years...noisy, dangerous and damaged roads, taking away from the very relaxing and enjoyable experience they are meant to be. Instead further development and expanding sites only result in negatively effecting the health and well being of the local wildlife populations.

User Response: Text

A new settlement is the most likely to minimise erosion of the green belt, disruption to the community and can be planned with the required infrastructure to support the population growth.

I choose this option because there's desire to live in villages across our borough as well as towns. The village shops will benefit from increased custom. There are facilities like schools and doctors which could be enlarged to cope with increased populations. Or in East Peckham a new doctor surgery could be built. It means large new settlements are close to existing roads and new improved cycle paths could be built. Kings Hill could have a new secondary school.

Important to maintain biodiversity and not to encroach on Green Belt and AOONB

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

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2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan. There is no discernible benefit to expanding Tonbridge into Green Belt areas, when there are enough brownfield sites and existing empty units of housing to accommodate our needs.

The areas highlighted in Option 1 are closest to main existing infrastructure services E.g. Motorways, mainline trains, hospitals, schools and larger settlements such as Maidstone & Medway to support employment needs of the residents without impacting the rural nature of the borough.

However, consideration must be given to distance from the amenities upon which we all depend and the narrowness of the roads serving smaller communities, especially with regard to essential services accessing new development. Also the type of development required by that community. Wildlife habitat, water resources and prime agricultural land should always be safeguarded.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and

User Response: Text

(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Best use of non green belt land with least harm to character areas and areas with limited infrastructure. Least risk of creating flooding problems within the borough. Involves cheaper areas in which to buy and rent therefore will naturally create more affordable housing than elsewhere in the borough. Excellent transport links and roads for much of the areas in Options 1 and 2. I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham and Hale Street. Roads are already congested.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

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I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring

User Response: Text

areas including East Peckham.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

Seems the most balanced, holistic view whilst still protecting the countryside.

Seems to be most holistic - still want to protect countryside

It retains the green belt and AONB areas which are highly regarded as places of beauty and relaxation. The other strategies permit increasing levels of invasive development with each step. While it will make adding more houses difficult, it will ensure that land where development is permitted will be used at a higher density, by reducing the amount of land available to developers. However, this does not mean that there should be no new building or infrastructure improvements in the other areas - they need to be made fit for purpose by careful intervention, but without large developments.

This one seems more distributed. I don't want to see development focus one few areas as that would cause traffic problems.

Probably Option 5 however unable to comment fully as need greater understanding on the options, benefits and negatives - would appreciate more information to be able to develop a more informed view - I hope this is an iterative local plan process ie several consultation steps and more opportunity to ask questions.

The urban areas are better suited to envelop developments into their existing infrastructure in a less costly way. The infrastructure in the rural areas is not capable currently to cope with an increase in housing development, and would therefore require much more investment and upgrade in order for the area to be a thriving, safe and enjoyable place to live. The infrastructure in many of the less urban areas are already stretched beyond what is acceptable in my view. Furthermore, it is vitally important to protect the greenbelt land and AONB because it offers enclaves for people and animals to enjoy unspoilt nature and that is positive for both physical and mental health.

Although broadly agreement with option 1 Kings Hill can no be realistically developed further due to the lack of available services and the potential loss of identity of surrounding villages and communities.

User Response: Text

I consider strategy options are misleading and restrictive as it preempts other options see response to Q 2

Our village quality of life has already deteriorated significantly over the last 10-15 years due to extensive house building projects. This increase in population and vehicles overwhelms services, utilities, parking and gridlock traffic at peak times. Further expansion can only be contemplated after major utility and service upgrades. Therefore Greenbelt and AONB land must be protected at all costs, no exceptions.

The maps for options 2 and 3 do not include Eccles and focus on the existing larger urban areas or villages rather than broadly around the borough. Focusing development solely in these locations would mean that smaller sites such as Land east of Bull Lane, Eccles (SA ref 59831) would not be considered for allocation, despite the benefits it could provide to the local community. Chapel Down considers that it is important for housing to be delivered in a variety of locations, including Eccles; where it can truly help to ensure that communities can grow, and that younger generations have the option of living in villages and rural area where they grew up. Option 4 – delivering development across the borough would achieve this as would option 1 which appears to include Eccles – being a settlement outside of the Green Belt. Chapel Down consider that this is the only strategic option that enables the whole borough to grow in a balanced and sustainable way that benefits everyone.

Greenbelt land is sacrosanct! Once it is gone it is gone forever!

Because respecting the green belt and AONB are absolutely key if our community is going to make any meaningful response to climate change

for the amount of housing required making urban areas bigger I disagree with this makes it easier for the planners to say infrasture is there, its not its over capacited. making new sites makes it easier to properly plan and makes schools and healthcare be added for extra capacity

Housing demand is not solely focused on the main urban areas (Tonbridge, Medway Gap, Snodland, Kings Hill and Walderslade), as such, to solely provide new housing within or adjacent to the existing major urban areas would fail to provide for housing needs in the rural areas of the Borough. By providing a range of sites across the urban areas and larger rural service centres housing would remain to be located in the most sustainable locations with good access to shops, services and public transport, whilst balancing the need for housing in the rural communities.

To provide housing in the smaller settlements / other rural settlements where there are limited/no shops, services or public transport would increase reliance on the private car and would therefore undermine the principles of sustainability outlined in the NPPF.

The green belt boundary is set for good reason. Once you start to breach that, it's a one way ticket to urban sprawl and lost character.

User Response: Text

It spreads development around the Borough whilst retaining crucial greenbelt land which should be protected at all costs.

Option 3 presents the best balance of development, taking into account the two housing areas of Maidstone and west Kent. It focuses development on existing urban and large rural communities, whilst minimising development in the green belt and area of outstanding natural beauty. Wherever possible development on new greenfield sites should be limited but it is hard to see such development being avoided entirely.

Greenbelt and AONB areas have been identified for particular purposes and these areas should remain untouched

We should build on existing settlements and their infrastructure. Building over prime green belt land remote from existing settlements would be a serious and irreversible act of destruction. The infrastructure and services in these locations do not exist to support extensive development.

The Green Belt must be protected at all costs.

Being born in East Peckham in 1941 i am of an age when i am saddened to see the amount of countryside being used for other than it has always been there for farming and natural country pursuits that are rapidly disappearing

Villages such as West and East Malling should be kept separate and their boundaries maintained if they are to preserve their unique identities . Many of these sites impact on historical sites with Grade 1 and 2 Listed Buildings. Developing these will ruin the integrity of those areas.

Small 'Country Lanes and 'Quiet Roads' will be jammed with traffic which already uses these roads in an effort to avoid highly congested major roads such as the A20/M20. A very significant amount of traffic has already been generated by the huge and ever increasing level of development at King's Hill and this has spilled out onto surrounding road systems such as Offham Road, Teston Road, West Street and West Malling High Street. This will be exacerbated by developments already proposed or in progress in both West and East Malling, e.g. Broadwater Farm and Forty Acre Field.

Green Belt and Green Field sites should not be considered for development. These areas are prime farming land and a haven for nature. In the UK we already have a depleted diversity of wildlife and destroying these vital habitats and areas for quiet recreation would be an irreversible tragedy. Farming is crucial unless we are to be more reliant than ever on imported food. With the cost of imports rising and as people struggle to feed their families, it is more important than ever that we retain self sufficiency. It makes no sense to concrete over prime agricultural land when there are still many Brown Field Sites available. After a new reservoir was deemed unnecessary in Kent some years ago, water will be another potential problem in the future. The water table will be compromised if large tracts of land are covered in concrete.

User Response: Text

Apart from the highly inadequate highway infrastructure, services in our areas are already stretched to breaking point. The GP to patient ratio in Kent is significantly worse than in other areas of the UK. The promise of a GP surgery at Leybourne Chase has never been honoured and the site has stood empty for many years. It has now been granted a change of use. Schools, bus and train services and hospital facilities are likewise over-subscribed and struggling to cope. The KCC has recently decided to withdraw funding for a number of rural bus services, thereby depriving rural communities of public transport, e.g. in the West Malling area, the No.58, which currently provides a link to Maidstone Hospital. This policy will increase the reliance on private cars/taxis and further increase traffic. It is now unlikely that new development outside of existing settlements would be served by public transport.

- Focus building on areas with strong infrastructure (train station, bus services, amenities, sports clubs etc.).
- Plenty of brownfield sites in urban areas - once Greenfield is used up, it can never come back. History will not be kind on using Greenfield.
- Least risk of flooding issues.
- I am concerned that the Tunbridge Wells housing strategy is to build on the edge of the TMBC Borough putting pressure on TMBC rural areas enough (Paddock Wood, Capel, Matfield etc.)

I don't want to see green belt land used at all. England's green and pleasant land is at risk of extinction! Though as I have said previously, I think Kings Hill has had too much development. Snodland / Medway/ Walderslade are already uglier areas so should be built on before Kings Hill.

The green belt must be protected to maintain the feel of the borough. Plenty of known brownfield sites exist which should be exhausted before any consideration is given to surrounding greenfield sites (option 2)

In particular options 4 and 5 would be detrimental to the natural environment, biodiversity and the mental well-being of everyone currently living in and enjoying the open spaces in the borough.

I have chosen this option as building within the Green Belt boundary and inside the Areas of Outstanding Natural Beauty would not protect these green spaces. The current growth of housing developments is exponential and if nothing is done to protect these spaces communities surrounding these areas will have no escape from the concrete world we now live in.

Best use of non green belt land with least harm to character areas and areas with limited infrastructure. Least risk of creating flooding problems within the borough. Involves cheaper areas in which to buy and rent therefore will naturally create more affordable housing than elsewhere in the borough. Excellent transport links and roads for

User Response: Text

much of the areas in Options 1 and 2. Thriving towns with great infrastructure nearby. I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham. I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

The area of East Malling north of Kings Hill was in the last local plan (rejected overall but not because of this green belt extension) to be assigned as Green Belt, however now it seems that this area is to be developed completely and become nothing more than an urban outspill. As I understand it the area around East/West Malling, ie Kings Hill and Leybourne Grange has ALREADY absorbed the vast and disproportionate majority of housing increase in the borough. Other areas of the borough need to be used as well to counter the completely lopsided map (your appendix A) which is current and also envisaged to get so much worse by this proposed plan.

The Green Belt around Tonbridge fulfils all the requirements laid down in the NPPF: to check unrestricted sprawl of large built-up areas; to prevent towns merging into one another; to help in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; to help urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt will result in severe congestion and deterioration in the quality of life for the town's inhabitants (particularly in view of developments proposed by Tunbridge Wells Borough Council at Tudely and Paddock Wood).

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

The Green Belt should not be reduced around Kings Hill, East Malling, West Malling and Wateringbury. Each settlement should have its own individual character and important green spaces.

Kings Hill was once brownfield land (an airfield surplus to requirements largely). This brownfield development has now nearly reached capacity.

I feel that preserving the rural nature of the majority of the borough should be the primary consideration. I am against green field and green belt development. I consider there are numerous brownfield land opportunities within existing settlements. These may be more difficult to develop, but are a much more appropriate way to meet housing need. I also consider option 2 sensible.

User Response: Text

As previous comments

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

There is a need for housing in all communities small and large, in particular for young families in their locality. There is a need for starter homes both to rent and to buy. But in all cases, the level of development should be proportional to the size of the community and the services it can provide.

This area is getting too built up without any green areas. Too much traffic overcrowding schools, dentist & doctor's etc.

Its important not to build on greenbelt land, otherwise there would be no local country side left, we chose to live here for this reason

Also need to consider the negative impact upon wildlife, busier roads and more pollution, there is never any new infrastructure with any new building developments

need to avoid developing greenfield sites. Avoid enlarging the urbanisation of the borough - where small communities end up blending into one another

Because it doesn't invade on green space and makes the most of existing developments

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.

User Response: Text

5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

We also support Option 1.

We do not support Option 3 (focussed on greenfield and previously-developed land within the urban areas and rural service centres), Option 4 (focussed on greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements) or Option 5 (focussed on greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements, thereby seeking to maximise the use of previously-developed land in the borough, as well as a new settlement/s remote from existing towns and villages) all of which would have a major impact on Offham including its rural character, and landscape the health and wellbeing of its local residents.

By pursuing Option 1 or Option 2, the Sustainability Appraisal objectives by which sites are assessed can best be achieved through access to education and community facilities, proximity to public transport, through support of health and wellbeing and by protecting important health, environment, landscape and natural assets, valuing the distinct rural character of the area enjoyed by those living in both the Borough's towns and its villages.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Kings Hill, a housing development which started in 1989 and continues to this day, and in the Census of 2011 had 7900 residents (a number which has increased every year since) accounts for close to 10% of TMBC total headcount. West Peckham and Mereworth have already had to cope with the additional traffic from this new town. The lanes around the two villages are incapable of accommodating any more traffic.

There are limited transport links or room for significant expansion of infrastructure to support development in rural areas of the borough, without significant adverse impacts on biodiversity, landscape character, air quality,

User Response: Text

cultural heritage, and openness of the Green Belt – as the sustainability appraisal makes clear.

Development should not be permitted in Rural Areas as this would cause significant harm to the countryside, and on people's health and wellbeing who currently reside in these areas, which are widely used for leisure and recreation. In addition, building on grade 1 agricultural land would harm the rural economy.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in protecting the countryside from encroachment;
- d) to preserve the special character of historic towns; and
- e) to assist in urban regeneration by encouraging the rejuvenation of derelict and other urban land.

Continual expansion of Tonbridge beyond Green Belt boundaries will result in extreme congestion and deterioration in quality of life for the town's inhabitants. This is likely to be even more relevant due to the pending developments in Tudeley and Paddock Wood, proposed by TWBC in their local plan.

The assessed housing need is already accommodating unused planning permissions. Completions have historically all run behind the release of planning permissions, which will only grow and continue due to current economic conditions.

We also have huge scope to grow the developments around Kings Hill and less open spaces than our villages, which are protected by Green Belt and AONB. There are all types of wildlife living in and around our villages - including badgers, foxes, bats, endangered birds etc.

We must preserve the biodiversity of the area. Green spaces really matter to health and well-being.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF

- a) to check the unrestricted sprawl of large built up areas
- b) to prevent neighbouring towns merging into one another
- c) to assist in safeguarding the countryside from encroachment

User Response: Text

d) to preserve the setting and special character of historic towns

e) to assist in urban re generation by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by T Wells BC in their current plan.

New building needs to minimise car use for reasons of global warming, so new homes need to be located near larger population centres with good transport links. The Green Belt was put in place for a good reason, and it should be respected for a whole range of reasons, including respecting the beauty and biodiversity of the countryside. With current global crises, food production should be maximised, and farmland of any sort should not be built on.

Use of non green belt land is best as it causes least harm to character areas and areas with limited infrastructure and presents the least risk of creating or exacerbating flooding problems within the borough.

Using non green belt land involves cheaper areas for land purchasing, helping to create more affordable housing.

Areas within option 1 and 2 have excellent transport links and roads and services.

Because it is essential to protect the Green Belt and AONB. Development within these areas would have a significant adverse effect on the natural beauty and resources within Tonbridge and Malling. It is important to protect, conserve and enhance this for future generations.

The Green Belt and AONB are there for a very good reason. In addition services in the area are focussed in the areas that are available for development. Living in a semi-rural area, the choice is mine to be a little further away from these services as it is not practical to build the infrastructure to service me locally. Options 1 and 2 maintain the character of the area too. The other options look to urbanise what is otherwise a semi-rural area.

This options would strike the right balance between recognising/enhancing exisiting provision and the need to expand provision beyond the current situation

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

Strategy Option 1 - Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty.

Strategy Option 2 - Urban: Development focussed on sites within (green belt as well as previously-development land) as well as adjacent to urban settlements.

User Response: Text

Strategy Option 3 - Urban and Rural Service Centres: Development focussed on sites within (green belt as well as PDL) as well as adjacent to urban areas and rural service centre settlements.

Strategy Option 4 - Distributed: Development focussed on sites within (greenbelt as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities.

Strategy Option 5 - New Settlement: Development focussed on sites within (green belt as well as PDL) urban areas, rural service centres and other rural settlements, as well as a new settlement/s. 1. prevent the unrestricted sprawl of large built-up areas. 2. prevent neighbouring towns merging. 3. safeguard the countryside from encroachment. 4. preserve the setting and special character of historic towns. 5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Development should be focused on urban areas that already have high density housing eg Tonbridge, and the infrastructure already in place to support this (or one that can more easily be enlarged). People who live in this areas have already chosen that kind of area to live in. You should not be forcing an massive housing development onto people who have chosen to live in villages. If they had wanted to live in an large urban area, they would have chosen to live there already.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

User Response: Text

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan. If all proposed development sites (including those classified as "Mixed") go ahead then there will be urban sprawl spreading from east Tonbridge through to Paddock Wood.

protection of green belt

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

As long as this plan means housing will be spread out over the whole borough, I think this is better than just making urban areas even bigger than they are now

Ideally the Greenbelt should be maintained as is. However given the need for housing in the borough, a sensible distribution across the borough would achieve to maintain the local environment better than concentrating development around what is classed as Rural Service centres.

Options 1 and 5 were considered.

Ideally we should be looking to maintain settlement identity, Green belt and green borders (Wedges) around developed areas, to avoid urban sprawl and maintain Anti-coalescence policies.

User Response: Text

This is best managed with brownfield sites, new developments, and limited development on the edges of existing areas.

This should be to limit loss of greenspace (Green belt, farmland, other) and biodiversity, limit increases in pollution and maintain the character of towns and villages. Development for developments sake is a horribly destructive policy.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

I believe Strategy Option 2 is the most palatable of the 5 options. I believe that when selecting a strategy, the Borough needs to be mindful and considerate of existing residents, businesses and other stakeholders, yet it will also be the Borough's duty to find and select suitable land for development, creating a trade-off. The preservation of existing green belt and AONB land should be given a high priority, as biodiversity and environmental sustainability will become ever increasing in value, year on year, as such natural resources become progressively diminished.

Option 1 is the most conservative, and seems to place the full burden of new development on the eastern half of the Borough which does not seem fair or appropriate. In being conservative, I believe there is the highest chance in this not successfully meeting future development needs.

Option 2 appears to be a fairer geographical distribution than Option 1. It has the benefit of preserving the rural nature of the existing rural settlements and limits their exposure to conjoinment with larger urban areas, with the exception of Hildenborough and West Malling. The areas designated for new development are already urban in nature, so less adversely impacted by such new development than a rural settlement / area subjected to rapid expansion. It appears a considerable land area will be potentially made available, making the likelihood of success greater than Option 1 (i.e. by including the perimeter of Tonbridge). Infringement on AONB land is not proposed, and on green belt, the impact is limited. This will need to be carefully managed - e.g. around western

User Response: Text

Snodland, etc.

Option 3 in my view unnecessarily includes the Rural Service Centres as targets for development, adversely changing their character to fully urban, whilst also appearing to unnecessarily infringe upon existing AONB land, which is highly detrimental to sustainability and biodiversity aims of the local plan.

Option 4 is in my view the least favourable strategy as it leads to significant conjoinment of adjacent settlements / areas, which will result in the most damaging changes in the character of the entire Borough, as well as considerable detrimental infringement of development upon AONB land.

Option 5 is the most radical, but has been disregarded in this response, as it is not possible to comment without a better understanding of the siting strategy of the proposed new settlement (other than it has to lie somewhere within the Borough).

the boundaries of the town or tonbridge must not under ANY circumstances be allowed to spread over any green belt land whatsoever. urban land MUST be used

It is imperative that greenbelt and AONB areas are protected from development.

This protects the Green Belt and the AONB and the overall traditional character of the T&M district. Focussing development in the North East of the district provides an opportunity for a major upgrade in housing, infrastructure, etc. in this urban area which is well served with road and rail connections to the rest of the UK and to Europe.

Cannot support any of the Strategy Options but the best of them will be Option 5. Build on OTHER areas.

From all other Questionnaires you are receiving -

Kings Hill is NOT an urban area so should not be included as a focus for development

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Focus development in and adjacent to settlements beyond the outer green belt boundary to protect areas of outstanding natural beauty and rural, nature reserves protecting the quiet area from disruptive, dangerous development.

Keep development out of the Green Belt and AONB. Concentrating development in one area will make it easier and more efficient to improve the infrastructure to cope with new houses.

User Response: Text

Development of Tonbridge beyond green belt will exacerbate our already congested roads and stretched local services,

Focus on the existing most developed areas that sit outside of any green belt or AONB

By focussing development on urban and on rural service centres, access to facilities for the dwellings developed should be and need to be better, and the sense of identity of the smaller rural communities would be preserved. Those communities expected to absorb new development should benefit from improved facilities to cope with the increased numbers.

We do not believe that any of the strategies are necessarily desirable or workable, councillors feeling that this option is the 'least worst' option but accepting that they are broadly the reasonable alternatives from which to develop future and perhaps different preferences. Whatever form of spatial strategy emerges, we support a strong emphasis on separate rural communities.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

I have not explicitly selected any of the above options, as there is a fundamental flaw in the classification of Kings Hill as an urban settlement.

If the above objection is corrected, then Option 2 would be the least worse option; if the above objection is not corrected, then Option 4 might be the least worse option, avoiding any one area being over-developed. But the key to any development is to make sure that is designed carefully, with regard to the character of any existing settlements, while ensuring environmental considerations and the holistic well-being of all inhabitants are taken into account. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, let alone any additional development.

User Response: Text

To avoid over-development in the Hadlow village, which most of it is classified as green belt. Also, the Hadlow village does not have the infrastructure to support the additional housing. The roads are already congested and will only add to the pressure.

To preserve the countryside.

To be able to meet a range of needs in different areas - both rural and urban - as well as make best use of transport infrastructure that already exists and/or can be more easily developed.

To lessen the impact on one particular area?

Focusing on the urban areas will improve the local economy more rapidly than in rural areas; option 1 would be catastrophic for local small villages.

I do not want any changes. I do not want any of the strategies above! I like it as it is. Ightham is a historic village and should remain so. Borough Green does not need development. I moved to Kent because it is the Garden of England.

All communities need a mixed range of housing for old and young families and rural villages should not be exempt from this. There should be a wide range of housing from flats to larger houses to provide a mixed community and avoid the situation in many areas where only the wealthy can afford to live there.
option 5. Looks like a large development that would remove individual village borders and provide an urban style which is inappropriate for a rural community.

These 2 constraints (GB an AONB) should have been applied by the SA assessment of sites. Only if insufficient sites came through should the strategies 2-5 then be offered.

Our preference is for a spatial strategy that protects the GB and the AONB.

The AONB is different to the Green Belt. T&MBC will be unable to demonstrate exceptional circumstances to justify allocation of land in the AONB which is covered by Section 85 of the Countryside and Rights of way Act 2000, i.e. the statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty. There is much more land available outside the AONB in the Borough either in or out of the GB. No allocations should be made in the AONB or its setting.

To minimise encroachment into the Green Belt and avoid even further pressure on local infrastructure such as roads, GP surgeries, schools

User Response: Text

We should maintain as much of the green belt as possible, however there is a clear need to expand urban areas and ensure these are spread around.

I object to any significant development around the Borough Green area as the infrastructure is already at breaking point. The A25 between Wrotham and Sevenoaks is gridlocked in the morning, the doctor's surgery is over capacity (it is extremely difficult to get an appointment) and the local grid is already suffering from power cuts.

It seems to make sense that with the current saturation of the Kings Hill area, that another area of new development should be identified.

Option 1 preserves valuable greenbelt and AONB landscapes while still permitting growth within the established Urban Centres. I might also support Option 2 provided development is prioritised to brown field and windfall development sites without encroachment on green belt

Try asking real questions and use language that everybody can understand

To sustain areas of natural beauty

- With option 1 there is no need to build on greenbelt land
- Option 1 has least negative impact on biodiversity of all the options
- Option 1 is least likely to negatively affect the landscape, quality and character of the borough
- Option 1 would have less negative impact on air quality and emissions than the other options
- Option 1 would likely still provide a good supply of quality housing of varying types/sizes, all without building on greenbelt
- By not developing in the greenbelt outskirts of Tonbridge, there might be less chance of increased traffic at the Wateringbury crossroads caused by people travelling from Tonbridge to Maidstone.

Worst options:

- Option 4 and 5 start to fragment the greenbelt further and risk isolating particular types of animals and reduce wildlife corridors
- Option 4 and 5 have a significant negative impact on air quality and greenhouse gas emissions and therefore climate change
- Option 5 would really carve up the greenbelt with a large area of new settlement

Development should not take place within the greenbelt - the villages in these areas are unique, historic centres without the facilities, infrastructure or capacity to take additional developments. The greenspaces themselves are essential - for biodiversity, for environmental sustainability, to protect the developments we will need from flooding. There should be no reason to damage the green spaces we have when there are clear urban areas that can take additional development without impacting on the spaces we should be protecting.

User Response: Text

A new settlement is the most effective strategy to:

- Minimising the erosion of greenbelt and areas of outstanding beauty. (Utilising brownfield sites and underutilised land should be prioritised and actively encouraged to safeguard greenfield sites and areas of outstanding natural beauty).
- reduce impact on current infrastructure and plan appropriate and adequate infrastructure for new development and population growth.
- minimise impact on biodiversity
 - maintain balance of eco system
 - promote soil formation and protection
 - minimise habitat loss and change
- minimise the disruption to the local communities
- to preserve the setting and special character of existing towns/ villages.
- minimise the likelihood of neighbouring towns/rural service centres merging into one another

This option appears to strike the best realistic balance between protecting designated areas and best use of existing facilities.

It seems unlikely that fragmenting development across a large number of areas would improve the amenities and standard of living for either those in the existing areas or those new as part of the development. Focussing on existing major hubs allows investment and improvement to focus on some key, large scale, areas in the borough - hugely benefitting from the need for fewer separate investments which can therefore be targeted and scaled.

Having, for example 10 smaller development sites across 4 villages is difficult for GP, school and amenity improvements to be made as the financial and practical asks of that are in too many different directions. The most likely outcome is further stretching of already insufficient resources with no benefit. Further buildup of larger scale areas would allow more targeted investment and improvements increasing more likely improving the quality of life for everyone.

In addition to the above, venturing into AONB and significant portions of Green Belt would seem to disregard the very purpose of protecting those areas. If they can be disregarded for the local plan, then it's not clear what their purpose is at all. An extreme example is a site proposal in the call for sites which is for an estate of over 100 homes on a piece of farmland that lies adjacent to the Ightham village sign that says "Welcome to Ightham, Area of Outstanding Natural Beauty". Similarly in Ightham significantly sized proposals (20+ homes) less than 250m from the Grade I listed church.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B

Minimise greenbelt erosion and disruption to the existing rural community.

User Response: Text

If development has to be undertaken, it should be concentrated around urban areas which already have the infrastructure in place to support the additional demand that will be created. The borough's roads already struggle to cope with the volume of traffic, particularly around recently developed sites. We are rapidly losing the Kent countryside that we cherish so much, particularly during and since the pandemic.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. Prevent the unrestricted sprawl of large built-up areas
2. prevent neighbouring towns merging
3. safeguard the countryside from encroachment
4. preserve the setting and special character of historic towns
5. assist in urban regeneration by encouraging the recycling of derelict and other urban land

The expansion of Tonbridge beyond existing greenbelt boundaries will result in worsening congestion and air quality. The greenbelt is there to prevent urban sprawl and it should be respected by this local plan.

We need to ensure that prior to the need to release of any land from the Green Belt as well as agreeing to any development within a protected landscape, that all suitable land has been built on. Once green belt and protected landscapes are used, they are gone for future generations. We have an obligation to use what we have effectively before we start changing agreed and established areas.

A new settlement is the most effective strategy to:

- Minimising the erosion of greenbelt and areas of outstanding beauty. (Utilising brownfield sites and underutilised land should be prioritised and actively encouraged to safeguard greenfield sites and areas of outstanding natural beauty).
- reduce impact on current infrastructure and plan appropriate and adequate infrastructure for new development and population growth.
- minimise impact on biodiversity
- maintain balance of eco system
- promote soil formation and protection
- minimise habitat loss and change
- minimise the disruption to the local communities

- to preserve the setting and special character of existing towns/ villages.
- minimise the likelihood of neighbouring towns/rural service centres merging into one another

A new settlement is the most effective strategy to:

- Minimising the erosion of greenbelt and areas of outstanding beauty. (Utilising brownfield sites and underutilised land should be prioritised and actively encouraged to safeguard greenfield sites and areas of

User Response: Text

outstanding natural beauty).

- reduce impact on current infrastructure and plan appropriate and adequate infrastructure for new development and population growth.
 - minimise impact on biodiversity
 - maintain balance of eco system
 - promote soil formation and protection
 - minimise habitat loss and change
 - minimise the disruption to the local communities
-
- to preserve the setting and special character of existing towns/ villages.
 - minimise the likelihood of neighbouring towns/rural service centres merging into one another.

I believe that development should be focused on areas outside of the green belt and areas of natural beauty, and instead the existing urban areas should be considered for expansion.

Firstly, the roads in a lot of rural areas already struggle to cope with the volume of traffic and I believe it would therefore be simpler and more cost effective to spend money improving the roads around existing urban areas, to ensure they are able to cope with the additional traffic.

From personal experience, I know that traffic around Kings Hill and Watlingbury is dreadful at both morning and evening rush hours, making it very difficult to get out of my road and onto the main road. The building of additional houses will only make the roads more dangerous and could even lead to gridlock on occasions.

Secondly, more needs to be done to protect the countryside that led to Kent being known as the garden of England and avoid it becoming the building site of England.

None of these options.

They will all place considerable strain on an already overcrowded road network and healthcare facility in the area including Eccles, Burham & Wouldham.

The bridge built by Trenport is not going to alleviate the issues that building more houses in this area will cause.

To protect vital green belt land (for environmental reasons, agricultural and therefore economic reasons, and wellbeing/quality of life reasons). Existing urban areas already have existing infrastructure in place and potential capacity to increase this without further damage to greenfield land.

Any expansion beyond existing greenbelt boundaries will increase congestion and air quality. Any developments need to respect the Green Belt.

User Response: Text

Too much development is focused around Kings Hill, Mereworth and West Malling. These settlements are in danger of being combined into one large urban area rather than the unique villages they currently are. For too long this Kings Hill has served the local plan as the development centre. The focus should now move to another area where a similar style of development can be created. Compulsory purchase of land between Shipbourne, Hildenborough and Underriver would make for a much more suitable location with good access to trains and the A21.

Building should be spread out throughout the borough not concentrated in one area. The northern part of TMBC is in danger of becoming one large, merged area rather than the separate villages/towns that they currently are - West Malling, Kings Hill, Mereworth, Wateringbury, Larkfield.

Kings Hill has taken the hit for most of the development in recent years and it's about time other areas are considered for development.

Best use of non green belt land with least hard to character areas and areas with limited infrastructure. Least risk of creating flooding issues within the borough, which is already an issue in some areas. Involves cheaper areas in which to buy and rent, therefore will naturally create more affordable housing in the borough. More transport links and roads for much of the areas in options 1 & 2. There are many towns with great infrastructure near by.

I am extremely concerned and the potential impact of development within Tonbridge Well Borough council, in particular the proposed development at Capel, on the neighbouring areas including East Peckham.

I am concerned that the development will have a strain / impact on the lives of those already living in the area due to the lack of infrastructure already struggling within the community, such as the NHS. The utility companies such as South East Water already can't modernise existing houses due to lack of infrastructure, for example houses on Westwood Road TN12 5DE can't be put on a water meter. Phone coverage is extremely poor in most parts in the village and lack of infrastructure means property's already struggle with broadband speeds and limited providers.

Developing agglomeration further away from London will help with keeping the jobs locally. House development further away from Green Belt supports this idea.

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.

Urban sprawl must be limited, expanding on existing urban areas will result in a deteriorating quality of life for everyone with even more congested roads and strain on essential services.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.

User Response: Text

2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

It would boost the local economy and community in areas that require it but also can handle the increased numbers of residents and the services/ roads etc this requires.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

The greenbelt areas around Tonbridge are there for a reason and comply with the following NPPF requirements

1. to prevent unrestricted sprawl of large built-up areas
2. to prevent neighbouring towns merging
3. to safeguard the countryside from encroachment
4. to preserve the setting and special characteristics of historic towns
5. to assist in urban regeneration by encouraging the recycling of derelict and other urban land

Expanding Tonbridge further, beyond the green belt boundaries will make congestion worse, adversely affect the air quality and lead to urban sprawl.

User Response: Text

The greenbelt should be **respected** by this local plan not ignored

As most of the borough is designated green belt it would make sense to concentrate on existing urban areas

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration,by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

We need to protect Areas of Outstanding Natural Beauty and the Green Belt.

The cultural aspects of TMBC are on the foundation of preservation of the Green Belt and the AONB. Any infringement on these areas can undermine the unique character of the borough

followed by 2. Reduce the need to invest massively in developing the services within the rural community and to protect the countryside I and others have come to love in the local.

Rural service centers such as Borough Green cannot support further development. New settlements (even remote from the village) would add pressure to the limited existing services and facilities and spoil the environment for existing residents.

The green belt must be preserved to stop urban sprawl, avoid over development and maintain a quality of life for residents

Simply to minimise the building over of areas of countryside. From your point of view I imagine this is an eternal dilemma.

User Response: Text

The burden on existing highly populated areas has become too great, and their links to surrounding rural life are being lost. If new homes are indeed needed then a completely new centre for population must be found and sustainably developed.

important to develop areas where housing is needed, but protecting the natural environment when the area is sensitive etc

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF.

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

This is a difficult choice but I believe that that developing the urban development focusing on previously developed land, if controlled well and with a focus on good town centre planning and architectural design, then this could bring many benefits to our existing towns. Tonbridge is a historic town, but has a tired high street especially with the challenges of recent years and additional development will bring money into the area, however high rise development is not favourable as the town has beautiful vistas and this will help to protect the heritage of the town and the castle area. Additionally the existing flood barrier protects the town.

Intensification of development within existing well-served settlements will protect the biodiversity and landscape value of the Borough and reduce the overall carbon footprint of development, as well as preserving agricultural for food security

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.

User Response: Text

5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

Protects green belt land and areas of outstanding natural beauty. These areas have the relevant infrastructure in place to cope with additional housing such as demands on sewage drains, water supplies, transport.

Your Corporate Strategy recognises that the Local Plan can lead on valuing our environment. The Green Belt and AONB are there for a very good reason. Green and Open spaces are essential for people's physical and mental health (thereby saving pressure on the worn-out NHS); Agriculture for feeding our nation on this small island, less imports thereby helping to mitigate against Climate Change; Trees and Hedgerows protecting against flooding which our area is vulnerable too and providing habitats and food for many species.

Options 1 and 2 maintain the character of the area and have existing road networks and services. The other options look to urbanise what is otherwise a semi-rural area.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

To drive sustainability and ensure modal shift away from the private car, it is vital that strategic growth is focused on the most sustainable locations such as Tonbridge with its wide-range of services and facilities, including rail provision.

In terms of the level of detail available at this stage in the Local Plan development, Medway Council does not have a preference for a particular spatial option. We would ask that at the earliest possible point, when further information is available on preferred sites and options - that we are informed at earliest possible point, in order

User Response: Text

for Medway Council to be in the position of testing the likely impacts on Medway of any sites/options being taken forward.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF: 1. prevent the unrestricted sprawl of large built-up areas. 2. prevent neighbouring towns merging. 3. safeguard the countryside from encroachment. 4. preserve the setting and special character of historic towns. 5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

- Existing utility and transport infrastructure in place
- Educational access
- Potential to offer a wider mix of housing or making as greater contribution towards local housing needs
- Fewer heritage sites impacted potentially
- Higher potential for economic benefit

To keep the Green belt intact and ANOB areas,- good for biodiversity and human health and wellbeing.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending

User Response: Text

nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their local current plan.

To protect the environment and develop a plan that recognises the proven detrimental effects of climate change and unrelenting building development. Increasingly scarce resources, an unknown future for food supply, energy, and water utilities. The current year (2022) has again given proof of what we are facing, viz: record temperatures, water shortages, uncertain weather patterns (high winds and heavy rain/flooding), threatened electricity supply cuts, current affordable food shortages and a UK economy clearly facing serious difficulties. The Plan needs to recognise these issues which will exist into the future rather than relying on increased building/hypothetical commercial benefits as a panacea. I am also very concerned about the concept of mineral extraction before some of the proposed developments (should they ever take place). Flooding is a serious issue for all that live in the Tonbridge and Hildenborough areas and natural drainage should not be compromised.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

Developments need to consider the available infrastructure.

Schools, shops, surgeries, leisure centres, transport need to be available and close for every day living.

Pollution is an increasing problem to our health and well being.

Communities thrive when people are happy. Housing needs to be affordable, within a good infrastructure where people can work.

Preservation of the Green Belt is essential as is preservation of land for agricultural purposes. Both should be a legacy for future generations. Once lost they would never be recoverable, so housing needs must be met elsewhere.

The retention of the green belt is important to reduce the spread of build up urban areas, stopping neighbouring towns from encroaching on each other and the surrounding countryside.

User Response: Text

Retaining the character of historical towns is also important otherwise they just get lost in the over development.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

I appreciate that some new housing needs to be built in Tonbridge and Malling, but I strongly disagree with building on green belt land. Local Brown field sites should be the first place to look to when looking for new housing sites.

Don't wish to see the Green Belt compromised in any way.

The area is already built on with necessary schools, medical facilities, shops and other infrastructure.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan. The expansion of settlements within the existing Green Belt boundaries would result in worsening congestion and air quality, not to mention increasing demand on water sources in the already drought-stricken SE.

In a wider context the housing target set within this local plan contributes to the overdevelopment in the South East. Given the government's levelling up agenda, should some of the housing targets not be shifted to other parts of the country (instead of other parts of the borough or West Kent), alongside with economic stimulus and employment opportunities?

User Response: Text

Option 4 maximises the use of previously-developed land in the borough and supports a wide range of communities. Significant building in any one area, with no development in other areas, threatens the communities (including as a result of coalescence). It is inequitable for build to be focussed on one area and should be shared proportionate to, say, existing populations.

Development should be across the borough and be dispersed according to the size of communities and proportionate to the size of the communities.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Villages like Mereworth should remain a village and not be consumed by housing which would join it to larger settlements like Kings Hill.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. preventtheunrestrictedsprawloflargebuilt-upareas.
2. preventneighbouringtownsmerging.
3. safeguardthecountrysidefromencroachment.
4. preservethesettingandspecialcharacterofhistorictowns.
5. assistinurbanregeneration,byencouragingtherecyclingofderelictand other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

On an assessed need basis.... This seems like the least likely way to create conurbations which would destroy village and hamlet communities. It's not ideal and I would encourage TMBC to continue to lobby HM Government for a reduction in allocation. I believe Kings Hill and West Malling have absorbed a significantly disproportionate volume of new homes in recent decades and a balance needs to be set by enlarging the number of commutable homes within the town of Tonbridge itself (without growing the boundaries of *all* towns in the borough (the alternative provisions all have this as the only way i.e. you can't enlarge Tonbridge without enlarging every other main town)).

User Response: Text

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

New settlements can be created with all the facilities needed in one place for ease of access and to create a balanced village atmosphere. We need to ensure that we are using what we have effectively before we start changing agreed boundaries. We understand that 117 sites submitted in the call for sites are not on Green belt and these should be considered first.

Preservation of the Green Belt is essential as is preservation of land for agricultural purposes. Both should be a legacy for future generations. Once lost they would never be recoverable, so housing needs must be met elsewhere.

Option 4 allows for development to be spread more or less evenly across the borough across the borough as a whole.

The other options are too focused on developing existing urban sites where the infrastructure is inadequate. There needs to be a more balanced distribution of housing throughout the borough not huge swathes of new housing in 3 or 4 sites.

Leave the MGB and AONB alone

Green belt and agricultural land should be avoided, to preserve the countryside, the character of the village and prevent merging with neighbouring villages

There are already too many new homes in this area and the infrastructure cannot support what we have let alone more. We also need to keep our green belt and areas of outstanding beauty, it is so important to the community

I do not agree with any of the options but have selected this option as other options involve development in smaller rural settlements such as East Malling. East Malling Village is sandwiched between Kings Hill and the Medway gap developments and will suffer as a consequence. I do not consider Kings Hill as a typical urban area as this is a fairly new development in the middle of the countryside. Most developments seem to focus on the north east of the borough with very little in the south and west other than Tonbridge

User Response: Text

I'd like to protect the green belt

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

The MGB around Tonbridge fulfills all the requirements laid down in the NPPF which are:

[a] to check the unrestricted sprawl of large built-up areas

(b) to prevent neighbouring towns merging into one another

(c) to assist in safeguarding the countryside from encroachment

(d) to preserve the setting and special character of historic towns

(e) to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration of the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments [Tudeley and Paddock Wood] proposed by TWBC in their current Local Plan.

I believe that green belt and areas of outstanding natural beauty should be protected at all costs as these are the lungs of the borough and hold the majority of the biodiversity for plants, fungi, birds and animals.

I selected the options which has the minimal effects on greenfield spaces, as well as helping to retain the character of the rural villages.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air

User Response: Text

quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

OPTION 1, but there is a case for Option 4, in that every rural community needs some housing.

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

All areas within the green belt around Tonbridge comply with requirements set out in NPPF.

Prevent the unrestricted sprawl of large built up areas.

Prevent neighbouring towns merging

Preserve the setting and special character of historic towns.

More housing development of housing in RSC without provision of extra services, transport and traffic control is not desirable.

As the plan states this is a 'diverse and characterful place' and any development should seek to preserve this. Some of the proposed sites run very much counter to this by joining up what are currently distinct village settlements. Doesn't the assessed need already include a 23% addition?

Development should be focussed in areas already settled that lie beyond AONB and Greenbelt with the appropriate infrastructure.

It would protect the countryside and wildlife.

Shipbourne is a conservation area of natural beauty and should remain this way. It is a small village and the introduction of further housing to this extent is preposterous. The lanes are narrow and could not cope with more traffic.

Possibly 1. I do not believe we should be building on green belt or any AONOB and that actually we should be extending and protecting more of the areas in the borough.

However, I also think we need to protect the gaps between our urban and rural villages. We currently have an urban sprawl which is seeing this disappear at an increasingly speedy rate.

I do not think the current house building target is sustainable.

User Response: Text

Green belt is supposed to be protected. It is the reason we have paid such high prices for our houses because they are near precious land for leisure, countryside enjoyment, views, fresh air and to enjoy the innate character of our country's landscape. This has become even more important to our mental health and wellbeing since Covid. Crowded, traffic-filled roads and lack of basic services for the existing town/village populations require easing, not making worse. Therefore, new settlements away from green belt land should be planned, not squeezing more housing into existing towns.

Protection of the green belt and rural areas.

Option 3 would spread development across different parts of the borough, rather than concentrating it in just one or two corners. It also seems to be the most sustainable option because it would focus new development in accessible locations near to existing service hubs and would provide the greatest opportunities for contributions from more than one development to combine towards investment in new infrastructure. However, we also consider that there should be leeway for some minor or modest development in smaller settlements so long as this respects the character of the village, does not harm the community and amenity, and maintains green space around and between different villages.

It balances the development across different areas rather than all in one area.

It seems to involve the least green field sites.

Uses the existing infrastructure

Green belt should be protected

If you start building on the green belt/ AONB, where does it stop? Eventually everything will merge into one big sprawling mass. We need to protect the green belt and ANOB and the biodiversity they support.

Even though I live in Tonbridge and this would mean losing maybe areas that would affect where I live, I feel it is the lesser of the 5 evils spreading the burden as far as possible without intruding totally on the small villages where once they are encroached upon it will never stop and we will lose all of our beautiful green spaces. I don't agree with any of the options really but if we have to choose then a sacrifice has to be made somewhere. I do feel the number of houses we are being forced to build is far too many but we all need to be able to still appreciate the beautiful countryside around us. The infra structure is already in place, bursting at the seams but it is there, it can be added to and therefore would possibly be the cheapest and easiest option to expand.

User Response: Text

Avoidance of village boundaries merging. Maintenance of existing & historic village characteristics. Damage to and reduction of high grade agricultural & green belt land. Reduces over-development which is already impacting the village of West Malling and surrounding areas

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF: -

- a) prevent the unrestricted sprawl of large built-up areas
- b) prevent neighbouring town merging
- c) safeguard the countryside from encroachment
- d) preserve the setting and special character of historic towns
- e) assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

Green Belt is there for a reason and that reason hasn't changed.

I do not want any of the Green Belt to be taken away for the development of houses, businesses or public amenities., nor any of the Areas of Outstanding Natural Beauty (AONB) to be encroached on.

I do not want any farming land to be used for housing because we will need to grow more of our own produce in the coming years, and these farm lands often abut the Green Belt and AONB.

Having chosen to live in a rural village setting, the building of inappropriate housing that does not fit into the character of the area is to destroy the very nature of our Kent villages which reflect the need of quiet , the need of fresh air, the need of exercise, the sight of the night sky and of bats , and the sound of owls calling. Extra lighting from more houses in Ightham and Ivy Hatch All these things define the word 'rural'

User Response: Text

I have explained my reasoning in the comments box

It is imperative that we protect the Green Belt and the character of the towns and villages within it that gives the borough its unique and appealing character. Focussing development on areas like the Medway Gap and Kings Hill will allow investment in those areas of Transport, Schools and infrastructure that will be of benefit to current and future residents, thus maximising the investment and benefits

Many people like to live in urban environments which are set up for supporting a higher density and level of population. Increasing these settlements will be less intrusive and more practical than completely changing the nature and character of rural environments that has residents who have significantly chosen to live in those kind of environments.

The NO2 levels in Watringbury are the highest in the Borough. They far exceed the legal limits and yet the consultation allows the prospect of tripling the homes in the area.

The infrastructure and services already provided in urban areas, rural service centres (and other rural settlements, if any) is already over-stretched. Attempts to expand capacity to cover the greater needs as a result of development would be disruptive and expensive. Better to plan from scratch in the areas outside the GB and ANOB. This approach would also provide a major opportunity to design developments in such a way as to meet as many Sustainability Appraisal Objectives as possible. These would include specific over-arching issues that must be addressed before any house construction is considered in detail. For example Road Capacity, Public Transport, Air Quality, Supporting and Social Infrastructure (see above).

Urban areas have existing infrastructure already developed or relatively easily extended to benefit a large number of people. Road and rail links in Tonbridge, Snodland and the Medway Gap have in several instances already been much improved. Extending development into rural service centres and / or other rural settlements will mean that the cost of improving all aspects of infrastructure (roads, buses, rail, schools, surgeries, retail, entertainment etc) will be prohibitive, or not cost effective and thus won't be done.

The new lower Thames crossing is planning on using road links onto the A227, which is already over congested, has multiple speeding restrictions and no possibility of improvement - in particular consider the A227 from Meopham to Wrotham, through Brough Green to Ightham, Shipbourne and Tonbridge.

Where we live in Mereworth, we're shocked to see the proposals to build on the fields that surround our house. We moved to the village to live in the countryside for our wellbeing, not to be surrounded by houses. The roads in Mereworth are congested enough as it is and we as well as many of our neighbours feel they could not cope with any more burden. My own car as well as my next door neighbours have both been damaged by other drivers due to the congestion that builds up in the village. It's already at breaking point at peak times and this isn't helped by the village being used as a rat run by residents in surrounding villages and Kings Hill. More housing in our local area as well as the Watringbury sites will only make this situation even worse.

We have a community to protect in our small village and do not want hundreds of houses to be built around us.

User Response: Text

We also worry about the impact this would have on the value of our home, both in respect of our property being appealing to those wanting to live in the countryside surrounded by fields and also if the congestion on the roads worsened, the village would become unattractive to live in. By building on the land surrounding our village, you'll be removing the open space that we treasure and reduce our quality of life.

Because it is essential to protect the Green Belt and AONB. Development within these areas would have a significant adverse effect on the natural beauty and resources within Tonbridge and Malling. It is important to protect, conserve and enhance this for future generations.

green belt and areas of outstanding Natural Beauty must be protected at all cost.

minimise construction in green belt/area of outstanding natural beauty

infrastructure upgrade costs in green belt areas and rural areas will be significant which will have a detrimental impact on the affordability of housing

- 1) I think it is important to protect green belt land as an important amenity for the population of the area
- 2) Farm land should be protected as the current cost of living crisis shows the importance that this country grows as much of its own food as possible. Also to reduce the global warming effect of 'food miles' we should be growing as much as possible locally.
- 3) By concentrating development, where possible, within existing urban areas people will be living closer to the amenities that they use with a reduced need for car use and the possibility that public transport can be improved.
- 4) As somebody who lives in a property in Brookmead Hildenborough which has suffered from flash flooding 4 times since 2009 there is a need not to put additional strain on the drainage infrastructure in areas where it is struggling to cope with the increasing number of extreme weather events as a result of global warming.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air

User Response: Text

quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

Option 4 will allow the distribution of housing growth across the Borough that will also disperse the effects of development, rather than focus this predominantly on a single area – which could ultimately lead to negative impacts such as traffic congestion, noise and air pollution and stretched community resources/infrastructure – for example.

Such an approach will also ensure the spatial strategy accords with paragraph 68 of the NPPF in allocating “*a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*”. Subsequently, this will provide the basis for the Council to deliver a robust 5YHLS by allocating specific and deliverable sites.

N/a

I am concerned with the growth of large urban areas, and the currently poor infrastructure (doctors, schools, public transport etc) - in addition to the impact that the lack of green areas has on our communities and mental health.

All areas within the greenbelt around Tonbridge meet the requirements set out in the NPPF 13 regarding protecting green belt land

Green Belt and AONB sites should never be authorised unless all other avenues have been exhausted.

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2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

You should not build on greenbelt land.

User Response: Text

Minimise future damage to greenbelt areas and disruption to the existing rural community.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

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We believe that Option 4 allows for a better balance of development across the borough and gives people more options as to where to live. It would also allow for the provision of better services (facilities, houses and jobs) to the smaller villages and communities and would probably lower the amount of travel required within the borough.

TMBC is a unique and beautiful, yet well-functioning and supportive, area of the country with a great balance of towns, villages and countryside. The Options presented boil down to: maintaining and enhancing this (Option 1) seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape; destroying this beauty slowly (Options 2 and 3) by expanding the urban areas significantly; or destroying this beauty quickly (Option 4 and 5) by urbanising any area that looks vaguely viable. Option1 is therefore the only one that seeks to maintain the integrity of this unique and beautiful area of the country.

The people of this borough by and large live here because we choose to do so. A significant part of why we choose to live here is its essentially rural character, in particular as a result of the green belt. If we wanted to live in a city we could move a few miles into London, one of the greatest and most exciting conurbations in the history of humanity. The fact that we do not move (and indeed why many of us have moved from London to here) shows how much we value this borough as it is, with its green belt intact.

User Response: Text

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would allow for further development to be spread most evenly across the entire borough and is most likely to result in development being focused on the brownfield sites. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport links, local road networks and essential services in Kings Hill and Malling are not currently able to cope, nevermind any addition development.

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan settlements.

Strategy Option 3 - Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements.

Strategy Option 4 - Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities.

Strategy Option 5 - New Settlement: Development focussed on sites within (greenfield as well as PDL) urban areas, rural service centres and other rural settlements, as well as a new settlement/s

Reduce impact on infrastructure and erosion of green belt.

I think that all communities need housing for young families from the locality and see no reason why rural villages should be exempt. There should be a range of housing, including 1 and 2 bed flats and affordable starter homes. Not 5-bed executive housing. The amount of development should be proportionate to the size of the settlement. Option 5 appears to be Borough Green Garden City, which is an option that urbanises the area forming continuous development between Wrotham Heath, Platt, Borough Green and North Ightham

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

User Response: Text

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. preventtheunrestrictedsprawloflargebuilt-upareas.
2. preventneighbouringtownsmerging.
3. safeguardthecountrysidefromencroachment.
4. preservethesettingandspecialcharacterofhistorictowns.
5. assistinurbanregeneration,byencouragingtherecyclingofderelictand other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

Seems to have a clear focus, without impacting greenbelt land, and near existing major roads/motorways. Consideration should be given to creating link to High Speed Rail which runs north of borough as this would provide major benefits to existing and new developments in this part of borough.

Protection of the Metropolitan Green Belt and avoiding development in AONB

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3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

OPTION 1, but there is a case for Option 4, in that every rural community needs some housing

User Response: Text

Preserves greenbelt and prevents encroachment of urban areas into the countryside

Use existing brownfield / other urban land for development

Concern that further development around Tonbridge will put pressure on out of town roads and infrastructure

It focuses development in areas that would not be spoiled by extended development.

It avoids a strategy of trying to identify many small development sites that would maximise local anger for minimal gain in housing numbers.

it also allows the planners to require developers to include certain amenities, if the site numbers are larger (economies of scale and all that)

The green belt and areas of natural beauty are precious and should be treated as sacrosanct when considering large scale development. Option four is second for me, affordable housing is clearly needed in all rural areas (evenly key).

The development needs should be spread across our community.

If I've read it correctly - because I don't agree with building on any greenbelt land.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

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(a) to check the unrestricted sprawl of large built-up areas;

(b) to prevent neighbouring towns merging into one another;

(c) to assist in safeguarding the countryside from encroachment;

(d) to preserve the setting and special character of historic towns; and

(e) to assist in urban regeneration, by encouraging the recycling of derelict and

User Response: Text

other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

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5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

Make use of existing developed areas, infrastructure and roads and don't eat into new countryside

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

It would appear from what I've read and can deduce from the diagram that this option restricts development to existing urban areas where there is a more robust existing infrastructure, road network, public transport,

User Response: Text

opportunities for local employment and the least impact on arable land and countryside within the borough.

Preserve the character and livelihoods of villages where infrastructure is not and never could be fit for development. Preserve agricultural land and resource. Developing already developed 'urban' environments will require less upgrade of services, roads and other infrastructure. Protect AONB and outdoor spaces which is ever proving to improve the livelihoods of physical and mental health.

This option seems to balance distributing development widely across the borough with the limitations of transport infrastructure in the more rural areas. Development around small settlements which have limited services and small roadways doesn't make sense.

Strategy Option 2 takes advantage of the services already provided by urban areas: schools, healthcare, shops, decent public transport links etc that would be needed by a development of this scale. It provides a sustainable development opportunity whilst ensuring the least negative impact on the environment.

AONBs and Green Belt must be protected.

Focus should be on existing urban sites with services, to minimise need for car journeys and to protect countryside.

Do not support development around "rural service centres" without a significant improvement in public transport, which this Local Plan definitely is not offering.

West Malling is an area of outstanding beauty and there are other options for development which do not involve building on greenfield and greenbelt sites. We should be seeking to concentrate development outside of greenfield and greenbelt sites and not on grade 1 agricultural land.

West Malling is in danger of merging into Kings Hill and losing its historical character. It is important to maintain village boundaries, in particular the boundary between Kings Hill and West Malling as they have such different characters.

We need to safeguard the countryside, which proved to be so important for people's mental and physical health during Covid and continues to be.

We need to preserve the setting and special character of our historic village of West Malling.

Developing in areas which already have access to transport/education and medical services makes more sense. The east bank of the river relies too heavily on services outside the borough i.e. Maidstone and Medway hospitals, secondary schools etc and would require a huge amount of infrastructure improvement to accommodate any more development.

User Response: Text

However, we feel that the Snodland area has already been over-developed with little regard to ensuring adequate infrastructure, economic opportunity or quality of life.

FECL Preferred Option:

It is considered that there will be no single spatial option that should be pursued. The intensification/densification option must be considered to accord with national guidance (on the reuse of previously developed land and before land is released from the Green Belt) but it will not deliver sufficient quantities of land to meet the required development needs.

The intensification option is also likely to be limited in historic city and town centres where historic assets will need to be protected. It is also likely that there will be infrastructure capacity issues associated with significant levels of new development within existing settlements e.g. schools and health services already at capacity with limited scope to expand. The likely yield from this land source must be rigorously tested to make sure it is reliable for development and not over-stated.

A mixed spatial option is likely to be the most sustainable and deliverable option. FECL consider that should first establish the capacity of the main towns to accommodate further expansion and focus on extending existing urban areas in locations where new communities can enhance and improve infrastructure provision and create sustainable communities (i.e. Option 2). This should also prioritise the best-connected places to maximise and improve the existing infrastructure where available. This must include a focus on Tonbridge as a priority to reflect its role as the largest settlement and its location in the southern HMA.

Beyond this, and depending on the scale of growth to be accommodated, FECL support some limited dispersed growth across smaller settlements before new standalone settlements are considered.

We set out our comments on each option under a separate comment due to word restrictions.

Adding housing to Option 1 is will retain the greenbelt and AOB. Facilities e.g schooling, healthcare doctors is already over stretched in the rural areas and roads . traffic will not cope.

See response to Q2

We shouldn't be building on our green spaces, they will never get replaced. The developers will cut down 100s of trees that are hundreds of years old and only plant a handful more.

Option 1 seems to copy TWBC's approach of dumping all the housing on the edge of the boundary, which is inequitable and will put huge strain on that settlement.

User Response: Text

Option 5 seems to be a free for all.

Option 3 seems the best compromise, but care needs to be taken to maintain the areas characteristics. For example, this looks to further increase the creep of Tonbridge into Hildenborough. Space needs to be maintained and quality of housing and infrastructure needs to be considered beyond just numbers.

Any building development that does not use green belt or AONB is essential. this would protect these areas for future generations

The Green Belt and areas of outstanding natural beauty (AONBs) are part of the cultural heritage of Kent. The landscape is part of the county's identity and its' connection to the land.

By conserving the Green Belt and AONBs, biodiversity is maintained and restored, climate change mitigated, and physical and mental health supported.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

1. Option 3 is favoured as it seeks to deliver development within the most sustainable locations i.e. the two upper tiers of the Settlement Hierarchy and also recognises that new development outside of these existing settlements, adjoining and so well related to the existing built edges will be required in order to meet the Boroughs housing requirements.
1. This option best reflects the findings of the Housing Market Delivery Study (GL Hearn July 2022). In this regard, as the Council is aware this concludes that whilst the overall annual housing requirement is 839 dwellings per annum (dpa), some 478 of this need is generated within the Maidstone Housing Market Area (HMA) and 361 within the Sevenoaks and Tunbridge Wells HMA. Option 3 proposes to focus development around three of the upper tier settlements in the Sevenoaks and Tunbridge Wells HMA, (Tonbridge, Hildenborough and Hadlow) and then around seven settlements / areas in the Maidstone HMA (Borough Green, Snodland, Medway Gap, Kings Hill, Walderslade, East Peckham and West Malling) reflecting the greater need in the Maidstone HMA.
1. Option 3 performs well, and potentially is the most sustainable option (alongside option 2) as assessed within the Interim Sustainability Report (LUC, August 2022). It scores particularly well in terms of key Objective 4 '*To encourage sustainable economic growth, business development, and economic inclusion across the borough*' and 14 '*To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures*'.
1. Option 1 in is not favoured as this disregards issues of locational sustainability and housing need and simply proposes that development is located in areas not currently designated as Green Belt or AONB. As the draft plan notes (Table 1) 70% of the Borough is designated as Green Belt and 26.84% AONB (with some crossover), which means that if this option were to be followed this would leave only very limited locations for growth, unrelated to existing infrastructure, facilities and principles of good planning and sustainability.

User Response: Text

1. Option 2 whilst performing well (similar to Option 3) in the Sustainability Appraisal is not supported as it would result in too narrow a focus on tier one settlements only and would as a result mean that large areas of the borough including very sustainable settlements (Rural Service Centres) do not benefit from any growth at all.
1. To ignore the Rural Service Centres would be contrary to paragraph 79 of the NPPF which advises that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The NPPF notes that opportunities for growth should be supported where this will support local services.
1. Option 2 would similarly run contrary to the advice at paragraphs 62 and 63 of the NPPF which make clear that affordable housing needs should be met in the areas that they occur. Clearly delivery of new homes in only a very small number of locations would not address the wider affordable housing needs of the borough. For example a need for affordable homes in Borough Green could not be satisfactorily addressed in Tonbridge or The Medway Gap.
1. Option 4 is considered the second most appropriate strategy after Option 3. This is on the basis that it includes a number of the benefits that are delivered by Option 3. However we hold concerns that this option raises the potential for some quite dispersed development within smaller settlements with limited public transport opportunities and so the need to travel further using less sustainable modes. These concerns are highlighted within the Sustainability Appraisal where the option scores poorly in terms of access to facilities (SA 2) and reducing greenhouse gases (SA 10).
1. Option 5 relies upon urban sites within existing settlements and also the delivery of at least one new settlement away from existing centres.
1. Many of the urban sites are noted within the Urban Capacity Study (Urban Intelligence - July 2022), as being in existing use as either car parks or amenity land.
1. Given the sites have existing uses and some were previously identified in the last local plan but have failed to come forward it is considered that there would be significant risk in relying on a substantial portion of development from these sites.
1. That aside, even if all 75 sites were to come forward as set out in the Urban Capacity Study this would deliver just under 2,000 new homes.
1. This would in turn leave approximately 7,245 (Table 2 of the local plan) as still being required to be allocated in the period to 2040. This is a substantial number to achieve from one or even two new settlements in the time available.
1. Whilst new settlements can assist in delivering sustainable new development alongside new infrastructure this option would leave the plan heavily reliant upon them and very likely to fail if, as is often the case, they deliver at significantly slower rates than hoped / predicted. This option would not in our view include sufficient flexibility and contingency as the basis for a sound plan.
15. The option also performs relatively poorly against the others in terms of the Sustainability Appraisal Objectives.

User Response: Text

Development option 1 is for areas that are not in the green belt or AONB. In addition this area falls outside areas likely to be flooded more frequently due to intensification of precipitation.

Building on the green belt increases the risk of flooding as by building on fields which currently absorb water therefore help with water management.

Existing wildlife habitats would be destroyed.

Rural businesses are affected - farms and animal business have many business servicing them such as feed merchants, vets, farriers.

Positive well-being - by building onto existing developments the infrastructure for travel, shops, social are available without car use.

We need to look after our countryside and respect what we have.

Fits local needs best and avoids further sprawl

I am aware that we need to protect the greenfield sites before they are lost. To enable enjoyment of the outside space and environment. providing walking/cycling routes for families with older and younger generations. But also needs to be able to provide things like schools, healthcare facilities so the current ones aren't overstretched. But also need to provide infrastructure for more schools, for the children living in the "new" houses.

ALL farmland and Greenbelt land MUST be saved from development to ensure a future for our children!

we need to produce much more of our own food and rewild our green spaces therefore massive housing schemes are completely wrong for our future survival

Green jobs should be created

The respondent strongly supports the principle of densification and feel that it should play a leading role in the meeting the Housing Needs of Tonbridge & Malling's residents. Substantial weight is attributed to the use of brownfield land within settlements in Paragraph 118 of the NPPF.

Sheltered Housing and Extra Care are characterised as being high density, efficient developments located within existing communities in sustainable locations within walking distance of shops and services and are typically windfall sites on previously developed land.

Policies that encourage the delivery of specialist older persons' accommodation will facilitate building at higher densities in sustainable locations accordingly.

User Response: Text

Expanding Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green belt is there for a reason- to stop urban sprawl and the Local Plan should honour this.

We should comply with the NPPF:

Prevent urban sprawl

Prevent neighbouring towns merging

Safeguard the countryside

Preserve the history and character of historic towns

Assist in urban generation by recycling existing derelict land and buildings

- To protect the valuable rural character of Tonbridge & Malling Borough we support Option 1 or Option 2.
- We do not support Option 3 (focus on greenfield and previously-developed land within the urban areas and rural service centres), Option 4 (focus on greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements) or Option 5 (focus on greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements, thereby seeking to maximise the use of previously-developed land in the borough, as well as a new settlement/s remote from existing towns and villages) all of which would have a major impact on Offham including its rural character, and landscape the health and wellbeing of its local residents.
- By pursuing Option 1 or Option 2, the Sustainability Appraisal objectives by which sites are assessed can best be achieved through access to education and community facilities, proximity to public transport, through support of health and wellbeing and by protecting important health, environment, landscape and natural assets, valuing the distinct rural character of the area enjoyed by those living in both the Borough's towns and its villages.
- Offham has one bus a day - the school bus to Wrotham is about to be stopped and the one public bus may also cease soon so the council is considering taking away our current very very limited public transport.
- There is now no GP service in West Malling, so for local residents of Offham, West Malling, the nearest GP is in Kings Hill or Leybourne where one needs to drive.

The infrastructure can all be created in once place with minimal disruption to already contentious community facilities and infrastructure that is in desperate need of improvements.

To maintain vibrant mixed communities and support localised services and businesses.

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original

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brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development. Additionally, concentrating development in smaller parts of the borough puts a disproportionate health risk from construction on those areas. Breathing in all the construction dust for many more years to come has got to have a detrimental effect on our lungs. HSE <https://www.hse.gov.uk/pubns/cis36.pdf> . The opening paragraph on their page relating to dust construction: "Construction dust is not just a nuisance; it can seriously damage your health and some types can eventually even kill. Regularly breathing these dusts over a long time can therefore cause life-changing lung diseases"

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

This option protects the current green belt and areas of outstanding natural beauty, and should minimise the impact on current traffic hotspots, the development being close to new road infrastructure, the M2, M26 and M20 motorways, and having access to multiple train stations.

Comments like "This seeks to locate development in areas with good access to existing services and facilities" show a lack of understanding of the existing areas that the other options look to increase the size of. Services and existing infrastructure is already strained, especially in the "Urban" areas placed in the hierarchy, the better option would be to start from scratch in other, preferably brownfield, areas. Allowing the larger conurbations to expand and merge with one-another will only exacerbate social problems within these areas. Keeping development areas small with green areas between and distributing traffic/people is far preferable to putting all eggs in one basket and hoping the ones at the bottom don't break.

Strategy Option 3 provides the most sustainable strategy for development by focusing development in areas with good access to existing services and facilities, as well as meeting the needs of a wider range of communities in accessible locations. The other strategies would either overly concentrate development solely in Urban Areas, or create a new settlement remote from public transport links and existing services.

Strategy Options 1 and 2 would also focus too great a quantum of development solely within the Maidstone HMA to the extent that it would not align with the evidence produced in the Housing Market Delivery Strategy (July 2022) and distribution of development within the Maidstone Housing Market Area (HMA) and the Sevenoaks and Tunbridge Wells HMA.

Only Strategy Options 3 and 4 would meet the needs of both HMAs and provides homes in a range settlements within the Borough. With Option 3 focusing development in the most sustainable locations within the Borough, where they are better served by supporting infrastructure.

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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 risk to public safety with access in narrow country lanes .

Disturbing greenbelt land.

The overcrowding of a small village with very limited resources, including one very small school.

The infrastructure in small villages like Hildenborough does not allow for any more housing.

We need to see new Urban settlements to follow the success of Kings Hill which provides several thousand houses, with a wide range of accommodation and affordability.

A new settlement space should include shops, surgeries, primary and senior schools, commercial space so there is opportunity for some residents to work within the settlement, cycle lanes, EV charging points, parks, sports facilities etc.

This is hugely preferable to continuing to allow small developers to infill village areas where there is no provision for any of the above, along with the critical need for drainage, mains water, gas, solar, and parking and new roads.

Purpose made new settlements as St Peter's can be created with all the facilities needed to form a balanced village atmosphere. Issues such as access, cycle lanes and parking can be designed into the layout.

Reference is made to 117 sites submitted in the Call for Sites these not being on Green Belt land and should be considered first.

Option 4 We think that all communities need housing for young families from the locality and see no reason why rural villages should be exempt. There should be a range of housing, including 1 and 2 bed flats and affordable starter homes. Not just 5-bed executive housing. The amount of development should be proportionate to the size of the settlement.

Following on from my comments to 2 above, as it is important to concentrate development in nucleated settlements so as to avoid suburbanisation of the countryside. However, there should be caveats. All development should be at a much higher level of density with restrictions on, for example, the availability of private parking (a maximum of two cars per house?). Use of terrace and semi-detached housing with a much more urban feel would allow more new houses per area of land, and their provision at a lower price. There should also not be any erosion of existing amenity land and intensifying development should not be at the expense of existing buildings of historic interest, scheduled ancient monuments or ancient woodland, protection of which should be improved. Policies put in place by the Labour Government but repealed by the Coalition after 2010 might act as a good

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guide.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF: 1. prevent the unrestricted sprawl of large built-up areas. 2. prevent neighbouring towns merging. 3. safeguard the countryside from encroachment. 4. preserve the setting and special character of historic towns. 5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

The proposed development sites on the Tonbridge/Hildenborough border on Green Belt are not infill within the village and will effectively remove any demarcation between the town and the village. Hildenborough will become part of the town forever and will completely lose its 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 Brexit and Covid. This addition will lead to more stress on already overstretched local services

All areas within the Green Belt around Tonbridge comply with requirements set out in the NPPF.

1. Prevent the unrestricted sprawl of large build up areas.
2. Prevent neighbouring towns merging so they retain their identities.
3. Safeguard the countryside from encroachment. Once built on, the land has gone forever.
4. Preserve the setting and special character of historic towns.
5. Assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality, with resulting damage to health. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

The Greenbelt must be protected to prevent urban sprawl. Once it has gone we won't get it back.

It is important that the plan complies with the NPPF. I don't want to see all the little villages around Tonbridge merge into one sprawling settlement, nor do I want Kings Hill to merge into the Aylesford/Ditton area. I want development around existing facilities made best use of, this may mean redeveloping existing single storey sites such as Tonbridge Sainsbury/Angel centre into 2 or 3 storey mixed use developments. It may mean building around Hildenborough train station and going into some green belt

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All areas within been belt around Tonbridge comply with requirements set out in NPFF. We would like to especially highlight

1. Prevent unrestricted sprawl of large built up areas
2. Safeguard countryside from encroachment

If Tonbridge is expanded beyond Green belt boundaries, it will only result in worsening air pollution and congestion and extreme pressure on infrastructure. The purpose of Green Belt is to prevent urban sprawl and it has to be upheld and respected by this local plan.

Any new developments must not destroy the natural environment that we are lucky enough to still enjoy in parts of the Borough.

FECL Preferred Option:

It is considered that there will be a hybrid spatial option that should be pursued. An urban focussed strategy (i.e. Option 2) should be prioritised to accommodate the bulk of the growth requirements. The intensification/densification option must be considered to accord with national guidance (on the reuse of previously developed land and before land is released from the Green Belt) but it will not deliver sufficient quantities of land to meet the required development needs.

The intensification option is also likely to be limited in historic city and town centres where historic assets will need to be protected. It is also likely that there will be infrastructure capacity issues associated with significant levels of new development within existing settlements e.g. schools and health services already at capacity with limited scope to expand. The likely yield from this land source must be rigorously tested to make sure it is reliable for development and not over-stated.

A mixed spatial option is likely to be the most sustainable and deliverable option. FECL consider that should first establish the capacity of the main towns to accommodate further expansion and focus on extending existing urban areas in locations where new communities can enhance and improve infrastructure provision and create sustainable communities. This should also prioritise the best-connected places to maximise and improve the existing infrastructure where available. This must include a focus on Tonbridge as a priority to reflect its role as the largest settlement and its location in the southern HMA.

Beyond this, FECL support some limited dispersed growth in villages where there is identified needs before new standalone settlements are considered. These should be non-strategic, small sites.

We recommend Option 3 is the preferred option for the new Local Plan.

1) Option 3 promotes sustainable development in the Borough

Option 3 directs development towards Urban Areas and Rural Service Centres which have the best range of key services and facilities, and levels of accessibility, therefore promoting sustainable patterns of development.

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2) Option 3 ensures a dispersed pattern of growth

Option 3 is a dispersed approach to distributing development and ensures a balanced distribution of growth. It is more likely to lead to the achievement of meeting a wider range of housing (and other development needs) in full, because development is focused in the most sustainable and established locations. This approach contributes towards achieving sustainable patterns of development.

3) Option 3 ensures a balanced distribution of development across 2 HMA's

Option 3 ensures a balanced level of development is distributed between the two Housing Market Areas ('HMA's'). It identifies settlements across both West Kent and Maidstone HMA's ensuring that development can be delivered where it is needed the most. This balance is also essential given the Council's Housing Market Delivery Study states that the Maidstone HMA will not be able to absorb future housing supply in full independently.

4) Limited opportunity to develop within existing settlement confines

Urban Capacity Study, states only 75 sites in the Borough have been identified as having potential for redevelopment within urban areas and Rural Service Centres, with an overall capacity of 1,946 dwellings. This is c.2 years of the draft housing requirement (based on 839 dwellings per annum (dpa) and is not sufficient to meet the Council's housing and employment needs in the Borough.

The SA also acknowledges the limited opportunity to develop in urban areas and the need to consider greenfield development. Para. 4.19 of the SA states that "*the Council believes that it will need to consider the use of greenfield sites, within and beyond existing built-up areas to meet its objectively assessed need*". We agree with this view and expect the new Local Plan to bring forward greenfield / Green Belt sites to help meet local development needs.

5) Option 3 would require minor alterations to the Green Belt only and EC's exist to do so

Option 3 involves focusing development at land adjoining existing urban areas and rural service centres. Given the Green Belt boundaries are tightly drawn around these settlements, Option 3 would require minor alterations to the Green Belt to fulfil this spatial strategy option. Exceptional Circumstances ('EC's') exist at a strategic level to alter Green Belt boundaries to help meet this assessed development needs. This is also supported by the Council's evidence base, notably the EC's Topic Paper (July 2022) which concludes that EC's exist to amend the Green Belt boundaries.

We also consider that these alterations to the Green Belt to fulfil Option 3 could only be minor and be tightly drawn around small extensions to the settlement, rather than releasing large swathes of the Green Belt in unsustainable locations.

We recommend that a review of the Green Belt boundaries is undertaken, and Court Lane Nurseries is released from the Green Belt to meet development needs.

6) Option 3 would ensure a wide range of sites

Option 3 would ensure a wide range of sites are allocated, for example brownfield, greenfield and previously developed land, which can also be delivered across different timescales (for example smaller sites in the short term / first 5 years).

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Through allocating a wide range of sites, this will ensure the Council can avoid using a stepped trajectory and ensure delivery is consistent throughout the Plan Period. This will also ensure a wide range of housing types for example houses, flats, self-build, specialist etc.

Option 3 also supports the Council's Housing Market Delivery Study which identifies that the Borough needs more small - medium sized sites as it encourages a more dispersed strategy.

7) Less or no-reliance on strategic sites to achieve development needs

Option 3 would ensure a range and mix of sites are provided, and does not rely on larger strategic sites, including a new settlement to be delivered. We support this approach given the build out rates of new settlements.

New settlements can be more challenging to bring forward and can take time to deliver. It can take between 5 and 8 years for large sites to come forward (Lichfields Start to Finish Report) and delivery rates of sites between 1,500 and 1,999 new homes are between 50 – 200 dpa. It is more reliable to allocate sites that contribute to the housing target consistently throughout the Plan period.

8) Windfall approach to development covers all settlements

The proposed approach to small and large windfall sites allows for development to take place at all settlements, including lower tier locations. This helps ensure that new development can come forward across the Borough that is commensurate with the size of each settlement and that site allocations are not necessarily required in all settlements.

No response

Minimal effect on Green Belt and AONB.

There will always be a need for development no matter what for as long as people have children and people move to the UK seeking better opportunities. Only allowing development in non-designated areas will put too much pressure, both literally and policy wise, to develop those areas beyond what is appropriate.

Green Belt was designed to stop London sprawling as development at the time was centered around low density, car dependent settlements. However this has resulted in hugely inflated property prices from capped supply whilst overloading areas which are not Green Belt like Maidstone.

Allowing 'some' development across all settlements around the borough, especially those which are accessible like Tonbridge or Borough Green, will distribute the need more evenly. I did not pick option 5 though as that would seem to lead to large developments in the middle of nowhere with no facilities.

Spatial Option 2 represents the most appropriate option and is justified by the Council's evidence and by other considerations.

Our response to Q2 supports the use of the existing settlement hierarchy as a basis for the Plan's growth strategy.

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Option 2 is a best-fit for that hierarchy and should therefore form the basis of the Council's approach to accommodating growth.

Option 2 recognises that existing urban areas, particularly those at the higher tiers of the settlement hierarchy, offer the best prospects for delivering sustainable growth. New development should be well-related to existing communities, strengthening and supporting existing social structures. New development can support existing facilities, and can fund or deliver expansion or additional facilities to the benefit of new as well as existing residents, including offering support for marginal services. In addition, development focussed around existing urban areas – where sustainable transport options are most widely available – ensures the greatest prospects for sustainable travel choices being available to residents early.

Our response to Q.2 set out why the urban areas – particularly Snodland – in the north east of the Borough are best suited to meeting housing need. The comparative analysis undertaken by the interim Sustainability Appraisal Report ('the iSA') supports that view, demonstrating that Option 2 performs better than other alternatives (including Option 3, which performs similarly on all but Objective 9, for which Option 2 scores better).

Other factors support Option 2 being the preferred spatial strategy option, including settlement-specific factors which will inform the detailed distribution of development to existing urban areas.

The Housing Needs Study 2022 ('HNS') demonstrates that there are specific needs to be addressed by the Plan, including particularly the need to ensure that new dwelling stock is provided in a mix of sizes and tenures to address existing deficiencies, and that affordability represents a significant barrier to home ownership and private rental opportunities, including acutely in Snodland. The need to respond to the separate HMAs also supports Option 2, given that a focus on urban areas offers the best prospect of addressing those needs.

The Housing Market Delivery Study ('HMDS') demonstrates that larger sites are able to deliver quicker than smaller sites. Unconstrained sites offer the prospects of the quickest delivery rates. The availability of suitable deliverable sites is therefore also a factor in determining which growth option is best suited to meeting the demonstrable needs of the Borough. Our responses to other elements of the Plan (notably question 8) demonstrate that we consider that the site of the Medway Cement Works is able to underpin the delivery of strategic growth at Snodland, supporting Spatial Strategy Option 2.

Other options fail to offer the benefits that Option 2 provides.

Option 1 is inconsistent with the Council's evidence that Green Belt releases are justified to meet housing need (notably the conclusions at section 4 of the Stage 2 Green Belt Assessment, July 2022). Given that significant parts of the Borough are subject to Green Belt designation, a blanket policy restriction risks ruling out potential development sites which offer advantages and which perform comparatively better against wider social, economic and environmental objectives and which, other than being within the green belt, offer the best prospects for securing the Plan's overall objectives.

Option 3, although it performs comparatively to Option 2 in the iSA, has the potential to perform less well against SA objective 9. In our view, Option 3 risks diluting the advantages which would be secured under Option 2 by means of reducing the potential for larger strategic sites to deliver quickly, and relying on smaller settlements whose facilities are not as well geared to new development or where there is insufficient capacity to accept growth.

Options 4 and 5 perform poorly in the iSA, particularly against objectives which relate to social, housing and

User Response: Text

economic factors. As development is distributed to smaller settlements – contrary to the advantages of upholding the existing settlement hierarchy – it becomes increasingly likely that growth will rely on smaller piecemeal development opportunities which result in slower and less sustainable growth.

In our view, Spatial Option 2 provides the best means of securing the Plan’s overall objectives in a way which offers the best prospects for sustainable growth, as evidenced by the iSA.

To meet local housing and employment needs across the borough.

This is an area of outstanding natural beauty and very concerned that insensitive development of rural areas will cause that to be lost. The road infrastructure around the area I live in in West Peckham and Mereworth is not sufficient to enable the expansion of housing proposed in these areas, which traffic circulation is already under extreme stress. There is also inadequate schooling and services to sustain the sort of increase in housing proposed in these rural areas. The expansion beyond green belt areas will lead to the loss of agriculture in the area as farms will be tempted to sell off for residential development at a time of increased need for agriculture. All in all any development should be limited to the more suitable urban areas where infrastructure in place is better able to cater the onslaught on services of increased housing.

Extending existing urban settlements makes sense as more housing is always expected. Urban areas have the appropriate infrastructure in place which can much more easily be extended if needs be. Same with transport links.

Rural spaces should be left as rural spaces - they are precious and a vital part of a balanced environment. Most rural spaces do not have the infrastructure to support a new community.

Extending urban areas would have less overall impact on the character of the borough and the environment and would cost significantly less.

All other options involve to some degree the effective merger of current distinct villages into larger villages or urban areas. In addition, one reason the Kent Downs are an AONB involve the views from, as well as those of, the AONB of the surrounding area. Major development of this area would have a doubly deleterious effect - notwithstanding the breaching of the Green Belt.

No Response

I think that the green belt and areas of natural beauty are there to be enjoyed by all. People living in Urban areas want to be able to enjoy unspoilt, open, green countryside and not leave one urban area for another. I have lived in other countries and the UK green belt and designated AONB is an uplifting treasure not found anywhere else in the world.

User Response: Text

I feel that any developments should only be made where there is sufficient infrastructure to satisfy the needs of the added population.

No option addresses climate change; the presumption that Borough Green is an RSC is erroneous; Option 1 is the least worst. The report at 5.3.33 suggests that it has already been concluded that Option 4 is the way forward (assuming assessed needs are to be met), on which basis the answers to this question are irrelevant.

I strongly disagree with developing on green field areas around larger towns eg To bridge Hildenborough /
i support smart use of Brownsite redevelopment in such towns or eg remodelling office buildings To apartment living for entry buyers

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

Urban needs should be met so far as possible from development of brownfield sites. Developers no doubt prefer greenfield and PLD sites for reasons of cost and convenience but they tend to impose higher infrastructural costs.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

User Response: Text

Climate and energy are pressing needs. Densifying existing urban settlement is generally seen by most commentators as the most resource efficient solution. The spectrum of land that runs from the green belt through to AONB is also a precious resource, esp for those in dense urban areas for reasons of well being and mental health. Such land should be protected and not degraded

The areas which already have a large scale of development also have the infrastructure to support it. If you develop the more rural areas, they will need the infrastructure to be carefully planned, and implemented and this will cost a lot more than using the existing ones, especially if you are looking at areas that are prone to flooding.

In addition it has been often proven that the developers say they will provide all the requirements such as improved drainage but end up only focusing on what makes them money, the residential side of things. Its all well and good to drain the buildings you have created well but then adding them into an already stretched system which floods cannot work.

How can rural areas that have not got a doctors, dentist, or decent transport connections (for non drivers) be a justified development area? In addition schools would need to increase capacity, many rural village schools have nowhere to expand to, or sufficient funding, they would need to expand at the same time as any development. Not just schools but medical facilities are already overstretched at local health centres and hospitals. We have lost our local police station in Paddock Wood and now rely on Tonbridge, any "non urgent" reports made to 101 can take weeks to be dealt with as they are focussed on the emergencies, more people living in the outlying areas would need support.

The foul drainage systems are old and unable to cope in the existing residential areas in rural parts. In the more rural areas many places that have been identified as development areas are on what is currently arable land, much of this is sited higher than the roads that cut through it and as a result the run off during heavy rainfall leads to widespread flash flooding which would be ascerbated if these areas were built on as concrete and tarmac has even less chance of absorbing water.

I would want all agencies to be consulted and heard, GP's, NHS (Pembury Hospital) Highways Agency, Police, fire, water & drainage suppliers, and the environment agency all need to have their say.

Does not destroy the Green Belt and keeps our local community together.

Greenbelt spaces are not set up for increases in traffic or water use and supplies.

Wateringbury as a conservation area applies planning restrictions which affect current residents and should not be overridden just because local land owners want to make money by building there. Other places are more appropriate choices where infrastructure already exists

Protection of green belt land is paramount, not limited to the benefits of maintaining current agricultural levels to ensure food security in a post Brexit UK, ensuring biodiversity is at least maintained, and general protection of green spaces for people to enjoy recreationally. Sites outside of greenbelt and AONB, i.e. existing urban areas and brownfield site should be expanded upon first.

User Response: Text

Option 1 is the best of a bad lot. Ideally any further housing development, if needed, should be strictly confined to existing urban areas - if necessary by redevelopment of currently wasted land and reallocation of shops and offices. Urban sprawl outside of the current confines of these areas should be prevented.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. prevent the unrestricted sprawl of large built-up areas.
2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality; it is there to prevent urban sprawl and should be respected by this Local Plan.

Development should be focused around the most sustainable settlements: i.e. 'Urban Areas' as defined in the Settlement Hierarchy (Figure 2), such as Kings Hill. Therefore, Option 2 should be the primary spatial strategy adopted; especially so given it scores highly in the 'Interim Sustainability Appraisal Report' (Aug 2022).

Focusing delivery in and around 'Urban Areas' would promote the most sustainable patterns of development when considering existing community infrastructure (especially where there is the potential to enhance provision), transport connections, and centres of employment. The identified 'Urban Areas' are also well distributed when considering the two 'housing market areas' which split the Borough east and west (as identified in the 'Housing Market Delivery Study' (2022)).

Notwithstanding, Option 3 and to a lesser degree Option 4 would also promote sustainable patterns of development and could support the delivery of homes (both market and affordable) in more rural communities across the Borough. Albeit there would still need to be a focus on delivering in and around the defined 'Urban Areas' in both scenarios to meet housing needs sustainably.

Option 5 could also be a good potential spatial strategy if there are realistic options for a new settlement(s). However, new settlements – which can be successful in delivering new infrastructure – are associated with long lead in times. Any gap between the plan being adopted and a new settlement delivering homes would need to be met by deliverable and developable sites elsewhere in Borough before said new settlements came on stream. These sites should primarily be sourced around existing Urban Areas to deliver the most sustainable patterns of development in the meantime.

Option 1 would result in imbalanced delivery across the Borough. It would not provide any housing for the Sevenoaks 'Housing Market Area' to the west of the Borough (where there is severe housing pressure) and limits the sustainable development options around key Urban Areas such as Tonbridge and Kings Hill. There is also

User Response: Text

unlikely to be sufficient deliverable and developable land to meet the areas defined housing needs in such a focused area within this plan-period.

We must protect Greenfield and Areas of natural beauty to preserve what little is left of the countryside, wildlife and country heritage

Greenbelt and rural settlements/areas were defined as such to protect the English countryside from over development, to protect nature, the environment and retain the character of the rural areas we have left. These areas are important for both people, agriculture and wildlife and it is wrong to redefine them as building plots to meet government targets which seem to be excessive in the county of Kent as a whole. Once you start selecting these areas for building, whether its for housing or commercial, there will be no stopping it and we will lose the beautiful areas which makes TMBC area a green and pleasant place to live. We also do not have the infrastructure, be it roads that can cope with an increase in traffic, doctors, schools etc to cope with the number of units TMBC is being asked to build. Neighbouring borough councils have built many large developments right alongside our own, with their traffic movements for school and work crossing over our borough's roads and it cannot cope. Commuting is taking longer year after year for what is relatively minor journeys. Adding to this flow of traffic, in areas where roads cannot be improved due to the rural and village nature of much of the borough will only make it worse. I cannot see how adding houses in these Greenbelt/Rural areas which cannot cope with any increase will give any kind of improvement to the area.

The amount of houses required will put enormous pressure on the the transport network - especially roads. By developing close to the urban areas, there is already networks in place and infrastructure will be more easy to upgrade (schools etc).

The A227 is a particular concern due to the second Thames crossing already identifying this as a problem.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

transport and other infrastructure already overloaded in most areas so do not agree with widespread development which will basically spread the misery of overdevelopment, destroy green belt and the essential character of the area

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in

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safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

Stansted Parish Council favour Spatial Strategy Option 2

The areas identified already have good infrastructure that can be further developed and improved. Snodland, Walderslade and the Medway Gap are already well served by the A228 and M2, and by High Speed Rail. Tonbridge is well served by the recently improved A21 and already has excellent rail connections. The existing schools, medical facilities, shops and employment opportunities could be expanded and developed to meet future requirements.

The A20 and A227 are already significantly burdened by heavy traffic and it is important to protect them and the areas they serve from further congestion and over-use with resulting pollution. The A227 is already threatened by potential heavy traffic from the proposed new Lower Thames Crossing.

Without looking at each of the 5 spatial options in very fine detail, which is not presented within the Draft Plan, it is not possible to establish which of the proposed settlements will directly or indirectly impacts on statutory and non-statutory designated wildlife sites and protected and priority habitats. It is recommended that the Option Maps are overlaid with environmental designations/constraints, also accounting for the existing Biodiversity Opportunity Areas – which are likely to form a fundamental part of the emerging Local Nature Recovery Strategy – to establish which options represent the best outcomes for biodiversity and the climate.

Brownfield sites are typically preferable for development as where these comprise significant areas of hard standing on existing infrastructure it is expected that their biodiversity value is lower than a green field site. The distinction between these brownfield sites, and wildlife rich brownfield sites which support areas of 'Open Mosaic Habitat on Previously Development Land (OMHPDL)' priority habitat should be clearly set out within the plan.

Outside of Green Belt and AONB which must be protected at all costs.

Greenbelt is what it says it is and, unless there are no other options then it should stay that way. Why would you build in an AONB if there are options not to?.

All others allow the encroachment on to green belt.

Less Green Belt encroachment & Borough Green would be swamped. Also no infrastructure to support a huge development

User Response: Text

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

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2. prevent neighbouring towns merging.
3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historical towns.
5. assist urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

See previous comments.

Next preference would be 1.

In any event if any further development is to take place in Tonbridge, a solution in some form of north and eastern side ring road needs to be found or the entire town will gridlock.

I am in favour of Option 5 as:

- Kings Hill does not have the infrastructure to support current existing level of development, never mind as a node for further development - this includes doctor surgery capacity, road infrastructure, rail links, street parking etc
- There was brownfield land in the green belt that was assigned for development in the previous (withdrawn) local plan, and that must be reconsidered in order to have an equitable development distribution rather than proposing 6000 new dwellings for Kings Hill!

There should be a focus on redeveloping brownfield sites and reviewing the currently unoccupied dwellings rather the more development. According to government statistics birth rates are dropping and the percentage of housing being built is more than required.

That places like Borough Green with the amount of houses should be moved to an urban area that is able to developed further. This part keeps arguing that it is other rural settlements which should not be the case.

Wrotham could be argued as a Rural service area working alongside Borough Green.

It would not be hard to see areas such as Medway Gap in crouching Eccles and surrounding villages

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The MGB around Tonbridge fulfils all the requirements laid down in the NPPF: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

We support Option 3 because it allows for growth to be dispersed to the most sustainable (Tier 1 and Tier 2) settlements and allows for development in Hadlow, one of the four largest settlements outside of the urban area.

Hadlow, despite its existing status as a rural service centre, has seen limited growth through the last plan period and neither options 1 nor 2 would allow for further growth in this location. Options 1 and 2 are therefore not supported as without growth in Hadlow, the community would decline with young people unable to buy a home due to the lack of affordable housing, and a lack of development would also lead to a lack of investment and spending within the centre. Options 1 and 2 do not accord with the objective of Paragraph 79 of the Framework.

Option 3 allows for growth both in the urban area and in rural service settlements such as Hadlow and is considered to be consistent with the Framework. We therefore support Option 3.

Whilst Option 3 would necessitate the release of land within the Green Belt, the Stage 2 Green Belt Assessment Exceptional Circumstances (Strategic) Note (July 2022) recognises that House prices in the Borough make it difficult for residents to purchase property at Table 3.2. This, TMBC's own commissioned data, indicates that, in TMBC, the median property in 2021 (£375,500) costs 13.4 times the median income (£28,050). This affordability ratio is worse than that for Kent^[1], the entirety of SE England^[2], and England as a whole^[3]. This means there is a high barrier of entry for first time buyers hoping to get on the property ladder compared to other authorities. The Borough has a high and worsening housing affordability ratio and so year on year the Borough has exceeded both national and regional house price averages, demonstrating that the Borough is less affordable than England and Southeast England.

The Borough is a desirable place to live with a strong housing market that is overheated according to the HMDS – this means that demand outstrips supply. Hadlow is no exception to this where demand often exceeds supply and there is a lack of affordable family housing on the market. The demand for housing is high and growing in Hadlow and the wider Borough. The undersupply of housing appears to be worsening. The Council should therefore be looking to significantly boost supply through Local Plan 2040.

We note that Table 2 of the HMDS estimates the split of housing need between the Maidstone HMA (Housing Market Area) and the Sevenoaks / Tonbridge / Tunbridge Wells (S/T/TW) HMA. Hadlow falls within the S/T/TW HMA and the estimated need in this area is 361dpa (43% of the overall minimum need of 839dpa). The principle of this does not seem to be covered by any Reg 18 question however we note that the preamble to Q4 on page 22 of the Reg 18 document does refer to the housing market area. Without a clear indication of the preferred strategy, and the preferred approach to allocations, it is difficult at this state to make any meaningful comment as to whether this split is suitable to deliver sustainable balanced communities and meet the plan objectives.

We do also note that the HMDS recognises at Para 5.43 that the 5 year HLS and completed sites compound annual growth rate for the S/T/TW HMA is 0.71% and 0.66% respectively. This indicates that, over this period, the 5YHLS trajectory is unlikely to be achievable. Further site allocations are therefore needed to significantly

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boost the supply of new homes in line with the Framework.

We agree with the Green Belt Assessment Exceptional Circumstances (Strategic) Note that the tightly drawn Green Belt boundaries minimise the potential for settlements such as Hadlow, to accommodate growth without alterations to the existing Green Belt boundaries. We agree this is an important factor in the exceptional circumstances case. We also agree that the constrained nature of the land and the high housing need supports the case that exceptional circumstances exist to justify Green Belt boundary alterations.

We agree therefore that Local Plan 2040 has a good strategic exceptional circumstances case for altering the Green Belt boundaries to help meet the assessed development needs.

The evidence base made available as part of this Regulation 18 consultation therefore clearly supports Option 3 as the way forward. Development in Hadlow should therefore be supported through allocations and release of land from the Green Belt within Hadlow including the land at Maidstone Road (Site ref 59842) which is ideally situated to meet the objectives of the plan.

[1] Where the median property is 11.16 times the median salary

[2] Where the median property is 11.12 times the median salary

[3] Where the median property is 9.05 times the median salary

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

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3. safeguard the countryside from encroachment.
4. preserve the setting and special character of historic towns.
5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality.

Additional development in areas already prone to flooding (mainly from surface water due to inadequate and poorly maintained drains) will only increase the flood risk - both to existing and new developments.

The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

It is an environmental crime to build in areas of beautiful countryside. You will be destroying diversity in nature and homes for thousands of animals and birds. We have in the field behind us bats, owls, rabbits, birds of prey, and many other important species. There are also crops. What will be left to eat if all we have is houses.

User Response: Text

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- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

We welcome the objective to encourage the re-use and redevelopment of previously-developed land. Such redevelopment should seek to preserve existing mature trees and protect existing habitats on biodiverse brownfield sites. High density housing should seek to accommodate trees along boundaries, paths and in areas of public space.

I moved from London to the beautiful Kent countryside to enjoy the space and greenbelt for wonderful walks and to be able to breathe fresh air. I accept there needs to be development but there is enough space around the current towns such as Tonbridge, Malling and Kings Hill without needing to build on any of the greenbelt land. I also hope the numbers are very much reduced as this is rather a large number of properties required in such a small area of Kent and the UK.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

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Development with Option 2 :

1. Allows expansion for additional housing but utilises the existing services and infrastructure in all forms . If the expansion of housing requirements exceeds these , it is still more economic to expand the existing than create new. Any new facilities that are created will provide maximum advantage and utilisation for the community within , therefore allowing the Borough to make higher levels of investments in better facilities. .

2. It reduces travel as the infrastructure is accessible locally and therefore reduces the environmental footprint. Pollution is limited.

3. It is more cost effective in the development and future management for the Borough and its residents

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4. It avoids or limits impact on the continual pressure to erode the green belt

5. The Green Belt and the rural landscape is a valuable asset of the people that needs to be respected as it cannot be regenerated for future generations once lost . The current generation are custodians .

6. New Development in completely rural or extensively rural outlying areas, such as proposed in options 4 and 5 cannot avoid major destruction of Heritage , Ecology of local habits and the existing biodiversity . The wildlife , Flora and Fauna and their ecosystems centered in such areas are already pressurised by many global influences therefore must be protected and nurtured at a more local level.

7. The communities within the area are still able to enjoy the existence of local rural areas that have been retained and nurtured to be available for their enjoyment through networks of footpaths enabling them to experience the physical and mental health benefits .

Option 4 will allow the distribution of housing growth across the Borough that will also disperse the effects of development, rather than focus this predominantly on a single area – which could ultimately lead to negative impacts such as traffic congestion, noise and air pollution and stretched community resources/infrastructure – for example.

Such an approach will also ensure the spatial strategy accords with paragraph 68 of the NPPF in allocating “a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”. Subsequently, this will provide the basis for the Council to deliver a robust 5YHLS by allocating specific and deliverable sites and in respect of the release of the Site from the Green Belt, will accord with the NPPF at paragraph 79, in that, it will provide “opportunities for villages to grow and thrive, especially where this will support local services.”

It should be the case that if there is space for development to adjoin or extend from existing, larger settlements, then those should be considered in the first instance. This is due to more developed infrastructure and transport links already being present, and a reduced chance of adverse impact on environmentally and policy constrained land. It would also assist in preserving the openness of the Metropolitan Green Belt.

In addition, there are limited transport links or room for significant expansion of infrastructure to support development in rural areas of the borough, without significant adverse impacts on biodiversity, landscape character, air quality, cultural heritage, and openness of the Green Belt – as the sustainability appraisal makes clear.

The sustainability appraisal further supports the economic case for spatial options 2 and 3, and lesser negative impacts on significant areas of environmental concern.

In West Peckham, which has been used as a main location for 'The Larkins' on ITV for the last two summers, as well as in surrounding villages - the nature of the area is an important draw for visitors, benefiting rural businesses offering boutique accommodation or retreats in the countryside close to London, or even just for day trippers visiting local pubs or even vineyards. The tourism economy (and its potential for growth in future) is reliant on the special nature of the area to attract people to visit.

Development should not be permitted in Rural Areas (option 5) – this would cause significant harm to the countryside, and on people’s health and wellbeing who currently reside in these areas, which are widely used for

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leisure and recreation. In addition, building on grade 1 agricultural land would harm the rural economy.

I have not chosen a particular strategy option for the following reasons:

1. I have been unwell and have not had sufficient time to properly review the Options that you outline.
2. I do not believe that the Council is looking deeply and radically enough at the opportunities within Tonbridge Town Centre and particularly redeveloping existing commercial buildings and making the most of the abundance of airspace that is ready and waiting to be utilised. In my view that should be properly tested first because it is fully in accordance with NPPF policies, can be set within a vision that looks at least 30 years ahead and is a potential game changer on many fronts including making effective use of land, achieving appropriate densities, rejuvenating the town centre, adopting modern working practices, promoting sustainable transport, minimising reliance on the motor car and protecting the maximum amount of Green Belt Land.
3. I know from experience that there are likely to be strong elements that could be adopted from all 5 options and so the best way forward could well be a permutation that you haven't even considered yet.

Green belt land must be preserved especially if it is valuable agricultural land

there is land available within the Borough which sits outside the Greenbelt and AONB which can meet the needs of the request for building developments. Furthermore this land is closeby local amenities and schools

The road infrastructure the main issue with over developing current sites. We are decades away from living without vehicles and by over developing current sites we damage the environment and feel of current living.

We are blessed today with green belt, AONB, SSSI etc. We need to protect these special designations for future generations. A high proportion of the Borough is greenbelt and I believe Option 1 helps to preserve the biodiversity and green spaces so valued by many residents - humans, animals and plants alike! We need to be guardians of the countryside - now more than ever with mounting concerns about climate change and sustainability. In addition, nature and open spaces are so important for the wellbeing and mental health of human beings. If we can preserve what we have, people living in more densely populated areas of the borough (and outside the borough) can come and enjoy the greenbelt. It doesn't just benefit the people living immediately within green belt/AONB. Preserving the countryside benefits visitors too.

We need to develop areas that have the infrastructure already in place. Many rural areas have not. The East bank of the river has to rely on services out of our area, & it is at breaking point. Lives are being affected.

To be clear I do not agree there should be any building in Tonbridge and Malling. However, if there is to be any then it should be concentrated around urban areas, with the exception of Kings Hill which is a housing development in a rural area. Under no circumstances should green belt land be used. With both a climate and food

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crisis looming, land should be preserved, re-wilded or used to grow food.

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years.

A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

Additionally, concentrating development in smaller parts of the borough puts a disproportionate health risk from construction on those areas. Breathing in all the construction dust for many more years to come has got to have a detrimental effect on our lungs. HSE <https://www.hse.gov.uk/pubns/cis36.pdf> .. The opening paragraph on their page relating to dust construction: "Construction dust is not just a nuisance; it can seriously damage your health and some types can eventually even kill. Regularly breathing these dusts over a long time can therefore cause life-changing lung diseases"

Option 5 of an entirely new development in the borough would result in even more destruction of green field areas which I do not support.

The most sustainable locations for growth are those that have good access to services and facilities. A mix within the strategy will ensure a wide range of sites, both in terms of size and location, delivered to support a vibrant and diverse housing market. There are substantial advantages in identifying strategic development opportunities, especially those (like Broadwater Farm **site ID: 59740**) that can make an early contribution to housing land supply (in a location where growth is needed). Pragmatically, this location can accommodate growth, and development on the fringes of Kings Hill would be consistent with the successful spatial policy approach previously established. There is no need for emerging strategic options to ‘reinvent the wheel’ – in fact, to do so, would seriously delay and complicate the delivery of housing, employment, and infrastructure. This last point militates against option 5.

Hereunder, each option is considered in some more detail.

Strategy Option 1: Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty

This option follows the provisions of the Framework at chapters 13 and 15, whereby in the first instance development should be focused away from the Green Belt and nationally important areas like AONB. This approach would see greater levels of development being focussed in locations like Broadwater Farm (**site ID: 59740**) but it would be somewhat imbalanced in terms of distribution of growth across the wider Borough including in relation to Housing Market Areas. It would not facilitate development in some sustainable locations such as the Rural Service Centres and its very limited approach would mean the Borough’s housing needs are less likely to be met.

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Strategy Option 2 - Urban: Development focussed on sites within (greenfield as well as previously-development land) as well as adjacent to urban settlements

This option provides for a strong opportunity to deliver significant development at sustainable locations like Broadwater Farm (**site ID: 59740**). Urban extensions are a well-recognised way of delivering development at scale that is close to existing services and facilities, but which can also provide additional facilities and infrastructure to compliment what is available in urban areas (as is referenced in the Framework at paragraph 73). It would however limit development in some sustainable locations such as the Rural Service Centres.

Strategy Option 3 - Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements.

It is likely that this option strikes a better balance between supporting the urban, and rural, communities of the Borough as well as across the two Housing Market Areas. There remains a significant opportunity in this option to deliver development at locations like Broadwater Farm (**site ID: 59740**).

Supporting some development at settlements further down the settlement hierarchy allows for a balanced housing distribution and for development to aid in sustaining rural services and facilities. Therefore Option 3 is Berkeley's preferred option.

Strategy Option 4 - Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities.

Option 4 includes more potential locations for development in rural areas and at smaller settlements. However, the ethos of supporting communities - both rural and urban - across the Borough is similar to option 3. Again, there remains a significant opportunity in this option to deliver development at locations like Broadwater Farm (**site ID: 59740**) and at Rural Service Centres. Therefore, Berkeley also supports Option 4.

The most important factor which will dictate whether this option is pursued is likely to be the overall scale of need for development, and adjustments to the ultimate development requirements, which are considered later in these representations.

Strategy Option 5 - New Settlement: Development focussed on sites within (greenfield as well as PDL) urban areas, rural service centres and other rural settlements, as well as a new settlement/s.

Berkeley does not support this option, which would bring with it significant hurdles in terms of delivery and the provision in a timely manner of the necessary built and social infrastructure. It appears there is no obvious location for a new settlement that would be well served by public transport and as such the approach is likely to be less sustainable than the other options, particularly Option 3.

Don't waste the nature

don't ruin the forest or cut trees down

My preferred options would be Strategy Option 1 or Strategy Option 5. Option 1 as we need to protect the green environment and it is the one option that seems to have this focus. The reason for mentioning Option 5 is that I

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think there should be development allowed on a proportionate scale in the existing settlements and, if possible, a new development such as that at Kings Hill.

I believe that there should be a distribution of additional housing through the whole borough

Green belt needs to be extended in East Malling as per original proposal

In terms of local plots the proposed plots 59752, 59802, 59797, 59800 would all destroy areas of outstanding natural beauty, ancient woodland and their local natural habitat.

They will also absorb Wateringbury, as an other rural settlement into Kings Hill, an urban area, disrupting the settlement hierarchy principle.

Wateringbury, and in particular Canon Lane, will be hugely impacted by this in terms of traffic/water table issues where we saw a water drought this Summer without this major impact, so in effect this is a anti climate change measure which at first sight is not sustainable. In addition the lane is in effect single track.

Note in particular site 59802 comprises well managed vineyards and, until recently, productive agricultural fields which have been set aside for reasons which are unclear.

Protecting the green belt should be the highest priority for this and future generations.

Protecting green belt and Areas of Outstanding Natural Beauty are paramount.

To protect the greenbelt and AONB

Wish to retain green belt and protect ANOB

This is the only Option that maintains Green Belt and AONB.

In the other options you are increasing development in areas that are already very built up and are already lacking in green spaces.

Making existing settlements larger is the lazy option. It strains resources, devalues existing property and dilutes what attracted existing residents to those areas in the first place. If this is supposed to be a 'vision' for 2040, then think bigger than creating new build estates on the edge of existing settlements.

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To avoid over-development in the Borough, bearing in mind that most of it is Green Belt with major constraints. And to avoid additional pressure on infrastructure - particularly the increased pressure on roads that are already congested, but also pressure on schools and medical facilities

1. Continual expansion of Tonbridge beyond Green Belt boundaries will add to the congestion and deterioration of quality of life for residents.

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

i agree with TMBC that the figures for population increase and housing targets are too high, and it seems unlikely that the existing infrastructure (roads, schools, GP surgery in Hildenborough) will be able to expand to meet demand within the planning timeframe. Open spaces are enjoyed by local people for walking and exercise and this has noticeably increased following the COVID epidemic. Fields in the Green Belt are home to a variety of birds and animals, such as deer, barn owls, buzzards and other birds of prey. Greenfields also slow up the flow of surface water and reduce the risk of flooding

In selecting option 5 this is only on the basis that say one specific new concentrated settlement is built as a garden village with new facilities and infrastructure rather than sprawling adhoc development across the green belt. This is in addition to development focused on existing settlements. In all cases a holistic view for new transport (road, rail, bus, cycling and walking), education (pre-school, primary and secondary), medical (GPs, dentists, and hospital), infrastructure (waste, water, digital) etc facilities for a new concentrated area or expansion of existing areas must always be considered.

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- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

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Protect the AONB and focus development in areas where the infrastructure exists or can most effectively be upgraded.

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

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Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

We should be seeking to concentrate development outside of the greenfield and greenbelt sites.

Preventing neighbouring towns merging into one another by maintaining village boundaries, assist in safeguarding the countryside from encroachment, preserve the setting and special characteristics of historic villages (Mereworth was in the Doomsday book), assist in urban regeneration

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF: Strategy Option 1 - Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty. Strategy Option 2 - Urban: Development focussed on sites within (greenSeld as well as previously-development land) as well as adjacent to urban settlements. Strategy Option 3 - Urban and Rural Service Centres: Development focussed on sites within (greenSeld as well as PDL) as well as adjacent to urban areas and rural service centre settlements. Strategy Option 4 - Distributed: Development focussed on sites within (greenSeld as well as PDL) as well as adjacent to urban areas, rural service centres and

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other rural settlements to support a range of communities. Strategy Option 5 - New Settlement: Development focussed on sites within (greenSeld as well as PDL) urban areas, rural service centres and other rural settlements, as well as a new settlement/s. 1. prevent the unrestricted sprawl of large built-up areas. 2. prevent neighbouring towns merging. 3. safeguard the countryside from encroachment. 4. preserve the setting and special character of historic towns. 5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

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The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

Assessed housing need is already met by unused planning permissions.

All areas within the greenbelt around Tonbridge comply with the requirements set out in the NPPF:

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2. Prevent neighbouring towns merging.
3. Safeguard the countryside from encroachment.
4. Preserve the setting and special character of historic towns.
5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

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Development should not be confined to the existing urban areas as outlined in Options 1 and 2 because it will place far too much of a burden on already overcrowded roads, essential services such as GP and dentistry facilities and on remaining green open spaces in these already overdeveloped areas. While Option 3 is slightly more acceptable it is only Option 4 which facilitates the moderate and overdue growth of settlements in all parts of the Borough alongside some further but less intensive development in the established urban areas. As development will be spread more evenly across the Borough some pressure will be taken off those areas of the Borough especially in the Medway Gap that are currently overstretched. As for the smaller settlements themselves it may allow some affordable or social housing to be constructed in parts of the Borough where there is a dire shortfall of this type of housing. This in turn may encourage younger people and people with more diverse employment skills to these areas. This might also have a beneficial impact on rural schools which can suffer a shortfall of pupils compare to their urban counterparts. Green Belt should be respected but not treated as sacrosanct especially in areas of poor land quality, former brown field sites and settlement edges.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by the local plan.

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(d) to preserve the setting and special character of historic towns; and

(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF: Strategy Option 1 - Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty. Strategy Option 2 - Urban: Development focussed on sites within (greenfield as well as previously-development land) as well as adjacent to urban settlements. Strategy Option 3 - Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements. Strategy Option 4 - Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities. Strategy Option 5 - New Settlement: Development focussed on sites within (greenfield as well as PDL) urban areas, rural service centres and other rural settlements, as well as a new settlement/s. on sites within (greenfield as well as previously-development land) as well as adjacent to urban settlements. Strategy Option 3 - Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements. Strategy Option 4 - Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities. Strategy Option 5 - New Settlement: Development focussed on sites within (greenfield as well as PDL) urban areas, rural service centres and other rural settlements, as well as a new settlement/s. 1. prevent the unrestricted sprawl of large built-up areas. 2. prevent neighbouring towns merging. 3. safeguard the countryside from encroachment. 4. preserve the setting and special character of historic towns. 5. assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

This area is better suited for development

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

(a) to check the unrestricted sprawl of large built-up areas;

(b) to prevent neighbouring towns merging into one another;

(c) to assist in safeguarding the countryside from encroachment;

(d) to preserve the setting and special character of historic towns; and

(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and

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deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

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- To safeguard the countryside from encroachment.
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in more congestion of roads and services to the detriment of current residents.

A new settlement would hopefully minimise the erosion of the greenbelt areas of outstanding beauty that we all rely on for both human and animal wellbeing (especially since COVID and its impact on mental health as well as physical health).

We should be utilising brownfield sites as a priority.

A new settlement would reduce the impact on the existing infrastructure that is already failing in many many areas for residents of Hildenborough. A new settlement would need adequate infrastructure planned into the development.

The greenbelt land should be protected to prevent the urban sprawl of built up areas and prevent villages and towns merging.

User Response: Text

Tonbridge and Malling Borough is split into two Housing Market Areas (HMAs). A housing market area as defined in the NPPG is the geographical area defined by household demand and preferences for types of housing, reflecting the key functional linkages between places where people live and work.

HMAs are not limited by Borough boundaries but rather by the area in which people want to live and work. In Tonbridge and Malling's case, as an example those residents living in Tonbridge would not be likely to contribute to demand for housing close to the Borough boundary with Maidstone. It is therefore necessary to split housing allocations between the two HMAs to meet housing need requirements (therefore ruling out Option 1).

Housing demand is not solely focused on the urban areas, as such, to solely provide new housing within or adjacent to the existing major urban areas would fail to provide for housing needs in the rural areas of the Borough. By providing a range of sites across the urban areas and larger rural service centres, housing would remain located in the most sustainable locations with good access to shops, services and public transport, whilst balancing the need for housing in the rural communities.

To provide housing in the smaller settlements / other rural settlements where there are limited/no shops, services or public transport would increase reliance on the private car and would therefore undermine the principles of sustainability outlined in the NPPF.

OPTION 1, but there is a case for Option 4, in that every rural community needs some housing. Greenbelt is sacrosanct, it is not a re-useable commodity - once it has gone, that is forever.

Having regard to the identified development needs of the area, the constraints in the borough and the two HMAs, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below.

Option 1

1.2.11 Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape.

1.2.12 For the reasons outlined above we fundamentally object to the notion that Green Belt should not be released. If one looks at the settlement hierarchy, Tonbridge, Kings Hill, Snodland, Borough Green, East Peckham, Hadlow, Hildenborough and West Malling are all tier 1 and 2 settlements that fall within the Green Belt and would see development restricted by the option 1 approach. Similarly, Wateringbury also offers a good quality offer of services and facilities that can be enhanced further with growth.

1.2.13 In respect of national policy, paragraph 140 of the NPPF states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

1.2.14 We acknowledge that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined all other reasonable options making as much use as possible of

User Response: Text

suitable brownfield sites and underutilised land; optimising the density of development and informed by discussions with neighbouring authorities.

However, these exercises were carried out in detail as part of the previous Local Plan work and evidence established that Green Belt release is needed.

1.2.15 Notwithstanding the earlier decisions and evidence, housing or employments need can be an exceptional circumstance to justify a review of your Green Belt boundary. This principle was set out within the Hunston High Court judgment in St Albans.

1.2.16 Case law, (*Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council* [2015] EWHC 1078 (Admin)) also provide guidelines for determining whether exceptional circumstances exist. The above judgement states:

‘planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive
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obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:

- (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important);
- (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development;
- (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
- (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent’.

Option 1 spatial diagram

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1.2.17 Considering these parameters in turn, the acuteness of the local and economic housing need is clear in the need to deliver 15,941 new homes and 296,260 sq.m (69.8ha) of employment provision in the plan period. Furthermore, the Council’s Green Belt Assessment prepared by Arup also confirms that TMBC does have a good strategic exceptional circumstances case for altering the Green Belt boundaries to help meet the assessed development needs.

1.2.18 Suitable Green Belt sites must not be ruled out based on a blanket strategy.

Option 2

1.2.19 Option 2 has an urban focus on greenfield and previously-developed land within the urban areas and land adjacent to these settlements. This seeks to locate development in areas with good access to existing services and facilities.

Option 2 spatial diagram

1.2.20 For reasons outlined above, we support the principle of some growth in these locations and they should be the priority for the greatest level of growth.

However, restrict development to within and adjacent to these settlements and not affording any growth to lower tier villages, such as Watlingbury, to evolve, to improve their own sustainability credentials and to benefit from new

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infrastructure that only development can deliver would be contrary to good

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planning principles.

1.2.21 It is also important to stress that many of the major settlements are constrained by designations such as flood risk, Green Belt, AONB and highway constraints.

Whilst these are not absolute, there is also a duty to consider what growth can be accommodated without encroachment on these areas.

Options 3 and 4

1.2.22 Option 3 is focussed on settlements near the top of the settlement hierarchy with development focussed on greenfield and previously-developed land within and adjacent to the urban areas and rural service centres.

1.2.23 Option 4 follows a similar principle but also allows for some growth other rural settlements.

Option 3 spatial diagram

1.2.24 Effectively options 3 and 4 follow dispersed growth strategies and allow for most settlements to benefit from some level of growth. In our opinion option 4 provides the greatest scope to deliver the right homes in the right location and to ensure that site selection consider all available opportunities on their own merits. We

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consider it would be wrong not to allow some proportionate growth for a settlement of Wateringbury's current status and offer.

Option 4 spatial diagram

Option 5

1.2.25 Option considers the potential for a new settlement/s in the borough with residual development focussed on greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements.

1.2.26 Option 5 would result in significant concerns. New settlements by the nature are rarely deliverable in an emerging plan period owing to the extensive work required in respect of the physical planning, obtaining of consents and the delivery of essential infrastructure that needs to be front loaded at the outset. Indeed, a strategy dominated by strategic sites will compromise short to medium-term housing needs of the borough as by their nature they will not deliver at the consistent rate required to sustain a five-year supply nor meet the associated HDT.

1.2.27 It is also important to stress that within the south east many Local Plans have failed or encountered significant difficulties owing to overly ambitious plans for

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new settlements . Indeed, the proposed delivery of strategic level (i.e. >1000 unit) schemes in Kent have consistently failed due to a lack of understanding of delivery constraints and cross boundary planning (see examples in Ashford, Canterbury and Dover).

1.2.28 We believe it would be unsound to move towards a new settlement strategy until opportunities around existing settlements have been fully explored and exhausted.

Option 5 spatial diagram

1.2.29 Having regard to the options presented, the greatest benefits are associated to options 2 to 4 and the disbursed growth models, accepting that there are exceptional circumstances to justify the release of some Green Belt and AONB sites.

Whilst we support this option in principle, as opposed to a much wider distribution under Option 3, we do feel

User Response: Text

there are merits of a hybrid option between these, one that recognises the proximity and contribution Hildenborough plays to Tonbridge. Many of the other rural service centres are more remote, and hence more reliant on longer travel journeys for employment and other services and facilities. Hildenborough practically abuts the boroughs Principal Town, which we suggest ought to be factored into settlement hierarchy assessments, as part of a slightly amended Option 2, and as a means to attain a more sustainable distribution of growth.

Rydon prefers a combination of Options 3 and 4

Spatial Strategy Option 3- Urban and Rural Service Centres: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas and rural service centre settlements.

Answer: Berkeley supports Strategy Option 3 as the most suitable strategy option for TMBC, where development would be focused on greenfield and previously-developed land within the urban areas and rural service centres, including West Malling. Option 4 is also supported for the same reason. These options allow for a balance between development in areas with good access to existing services and facilities, as well as meeting the needs of a wider range of communities in accessible locations.

Selected Option 1 (as above) and Option 2.

Best use of non greenbelt land with least harm to character areas and areas with limited infrastructure. Least risk of furthering flooding problems. Naturally create more affordable housing in cheaper areas. Towns have better infrastructure with good transport & road links, also better medical facilities and bigger schools.

We are very concerned about the potential impact of the proposed development of Capel by Tunbridge Wells Borough Council. This development would impact on East Peckham and surrounding areas. The roads would not be able to cope with this huge proposed development. Our already at breaking point NHS would not be able to handle another 16,000 families.

Please ensure that all relevant agencies are consulted.

This is not really a spatial option without a proper understanding of the availability and deliverability of sites outside the GB and the AONB. These 2 constraints (GB and AONB) should have been applied by the SA assessment of sites. Only if insufficient sites came through should the strategies 2-5 then be offered. Currently the SA of the 5 options indicates that OPTION 1 scores best overall for a balanced spatial strategy. Our preference is for a spatial strategy that protects the GB and the AONB.

User Response: Text

The GB study on exceptional circumstances concludes that exceptional circumstances could be applied in T&M. However this means nothing in terms of where the allocations should go without a comprehensive Green Belt study across all the LPAs in the Housing Market Areas (HMA) affecting T&M which identifies areas where GB functions are most and least important. Development of the options and then choice of an option is premature in advance of this study. Please refer to our responses under Q40 and 41.

The AONB is different to the Green Belt. More land in the Borough is outside the AONB than outside the Green Belt. T&MBC will be unable to demonstrate exceptional circumstances to justify release of land in the AONB which is covered by Section 85 of the Countryside and Rights of way Act 2000, i.e. the statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty. No allocations should be made in the AONBs

I prefer Option 1, followed by Option 2 for the following reasons :

- Best use of non green belt land with least harm to character areas and areas with limited
- Least risk of creating flooding problems within the borough.
- Involves cheaper areas in which to buy and rent, and therefore will naturally create more affordable housing than elsewhere in the borough.
- There are existing excellent transport links and roads for much of the areas in Options 1 and 2, which have thriving towns with great infrastructure nearby.

I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

[Option 1 or 2 selected]

Best use of non green belt land with least harm to character areas and areas with limited infrastructure. Least risk of creating flooding problems within the borough. Involves cheaper areas in which to buy and rent therefore will naturally create more affordable housing than elsewhere in the borough. Excellent transport links and roads for much of the areas in Options 1 and 2. Thriving towns with great infrastructure nearby.

I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

User Response: Text

Q4 Reasons:

These 2 constraints (GB an AONB) should have been applied by the SA assessment of sites. Only if insufficient sites came through should the strategies 2-5 then be offered.

Our preference is for a spatial strategy that protects the GB and the AONB.

The AONB is different to the Green Belt. T&MBC will be unable to demonstrate exceptional circumstances to justify allocation of land in the AONB which is covered by Section 85 of the Countryside and Rights of way Act 2000, i.e. the statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty. There is much more land available outside the AONB in the Borough either in or out of the GB. No allocations should be made in the AONB or its setting.

Gladman would prefer Option 4, whereby the growth is spatially distributed across the borough.

Gladman consider that a balanced approach to spatial distribution is preferred, therefore Option 4 is preferred. Areas such as East Malling Village are capable of accommodating growth without requiring the need for Green Belt release and should do so to ensure continued vitality and viability.

Option 1 is unlikely to be able to provide land to meet the housing requirement in full due to the Borough's quantum of Green Belt land and the AONB. Equally, Option 2 provides limited scope for growth by limiting growth to urban settlements.

Options 3 and 4 present balanced approaches and recognise the ability of Rural Service Centres and Other Rural Settlements to offer the opportunity to deliver future residential developments in sustainable locations in close proximity to services, facilities, and public transport connections.

Option 4 presents the most balanced approach and recognises the contributions rural settlements can make to the provision of housing. This approach ensures housing can be delivered where it is needed whilst maintaining the vitality and viability of rural settlements.

Gladman support the balance of greenfield land and previously developed land across all options. This recognises that brownfield land is not suitable to be the sole solution to addressing local housing needs and could potentially present viability issues due to the potential for high costs associated with the redevelopment of brownfield land.

- None of the suggested options reflect the needs of current built communities of the North-East area of the borough
- all options seem to continue with the over expansion of builds within existing built areas – this is not deemed acceptable
- **TMBC encouraged to continue to lobby Government for reduction in allocation**
- **Disproportionate amount of TMBC's new housing has been built in and around West Malling in the last 20 years.**

User Response: Text

- 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 homes**

[Selected options 1 and 2]

Best use of non green belt land will with least harm to character areas and areas with limited infrastructure. Least risk of creating flooding problems within the borough. Involves cheaper areas in which to buy an rent and therefore will naturally create more affordable housing than elsewhere in the borough. Excellent transport links and rise for much of the areas in options one and two. Thriving towns with great infrastructure nearby. The parish council is concerned about the potential impact of development within Tunbridge Wells borough council in particular the proposed development of Capel on neighbouring areas including E Peckham. The parish council is concerned to ensure that the relevant agencies (Environment Agency Highways Agency and HS utility companies) engage robustly with the local planning consultation process we are also concerned about developers engaging with those agencies meaningfully to ensure timely and robust consultations in relation to specific sites.

None of these strategies appears to meet West Malling’s needs.

Spatial Strategy 5 comes closest, but since the boundaries are indicative, it is difficult to say.

WMPC places great importance in the need for protection of our town’s historic importance, and its rural setting. We therefore favour a spatial strategy which ensures separation of WM from Kings Hill, East Malling, Larkfield and Leybourne, and a separation of these villages from one another.

We believe our neighbouring Parish Councils also support this emphasis on separate, rural communities.

Given the need to meet Government Housing targets, we recognise the difficulty in a Borough where so much land lies within areas of special protection. However, we do not wish to see further merging of Maidstone and Malling which would result from the options concentrating development in the north-east of the Borough. Though the concept of a garden community is an attractive one, we have difficulty with supporting it without a chosen location.

The preferred spatial strategy option is: Option 4 Distributed: Development focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities.

It is important that services within existing settlements can continue to be supported. This can be underpinned with the provision of additional housing that is delivered in a site specific and locally sensitive manner.

User Response: Text

The National Planning Policy Framework (NPPF) seeks to ensure that “a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed...” (Paragraph 60). With this as the backdrop for the aim of delivering a sufficient supply of homes, it is imperative that all demographics of people are catered for. Development cannot be restricted to just areas outside of the Green Belt, or Areas of Outstanding Natural Beauty (AONB), as this will not necessarily provide land or a mix of housing that is considered suitable or needed and for all communities.

Paragraph 79 of the NPPF sets out that “housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” The spatial strategies which seek to avoid development in the rural areas, will not provide a contribution to their vitality or ensure their growth and support. Option 4, which promotes a distributed development approach, will ensure that rural areas are allowed and encouraged to grow and not stagnate.

The land adjacent to Kemsing Road and Borough Green Road, Wrotham (site 59707) is situated in a sustainable location with no physical constraints, is available for development and a residential development at such a location will support and benefit from the services provide from neighbour Borough Green. It is considered that the inclusion of site 59707 as a housing allocation would duly support spatial strategy option 4.

Spatial strategy Option 3 focuses on growth in and adjacent to the settlements near the top of the settlement hierarchy, including Tonbridge. As para 4.2.9 of the R18 Plan states, these are settlements with good access to existing services and facilities that can accommodate further growth in a sustainable way. Option 3 is likely to deliver the highest overall growth at the greatest number, variety, and distribution of sustainable sites. Option 3 attained the most positive scores in the SA which would appear to support our proposition that Option 3 is the most sustainable of the options put forward; the Local Plan should follow the findings of the SA and the evidence base.

Option 1 in focusing development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty effectively directs all growth to the north eastern part of the Borough. It is questionable whether this area could fully meet the Borough’s housing needs as well as how this strategy would address the housing needs of West Kent HMA, which is concentrated around the south western part of the Borough. The SA of the previous Local Plan indicated that this approach would lead to an unsustainable approach to growth. This option is in our unsustainable and should not be supported on any level.

Whilst we strongly support development within the top tier of the settlement hierarchy, such as Tonbridge, the option to only develop in this tier could impact the delivery of homes across the Borough in accordance with the housing needs set out in the HMA. A similar option was tested during the last Local Plan Examination and the SA highlighted that it did not perform best in respect of any of the then SA objectives, and was the only option to register a significant negative effect in relation to three of the then SA objectives, including housing delivery and economic growth.

3

Option 4 involves distributing development across the Borough which would lead to unsustainable growth as not all development would be located within areas with good access to existing services and facilities. As such this approach would lead to increased reliance on the car.

With no potential ‘new settlement’ identified areas of search set out in the R18 Plan, it is not possible to comment on Option 5, other than to highlight the fact that this is an inherently high risk option which as authorities such as Tandridge and Waverly can allude to, is not necessarily the panacea it may appear. TMBC has a history of under delivery and a 5 Year Housing Land Supply (5YHLS) deficit and need to adopt a housing strategy that delivers a variety of sites in different locations and sizes that will generate

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a rolling 5YHLS. A new settlement will not do this. Not only will it not provide for early delivery, but it could also actively prejudice the overall 5YHLS if delivery slips below that originally envisaged. We note that spatial Option 5 scored the lowest overall in all bar 1 option.

Much of the increase is due to the high price/earnings ratio, which is primarily associated with the Tonbridge region. The instructions associated with the uplift are that the intention is for brownfield sites in urban areas to be used for the uplift. Thus, the plans are not consistent with the government guidelines. Brownfield sites must be used where available, even if they are in green belt, such as the sand pits around Borough Green, and other areas around Tonbridge. Much has been made of the success in the prevention of the development of brownfield sites in Tonbridge, which is contrary to Government guidelines.

Much of the development over the last few decades has been oriented around extensions to existing towns and villages with limited enhancement of resources within those location. This has resulted in significant pressure on the majority of resources in those towns and villages. This includes primary healthcare, parking, roads (especially rural roads that are include those assigned as quiet lanes There are brownfield sites in green belt areas which should be considered as a priority for such development, in the same way as development of Bluewater shopping centre and the neighbouring housing developments.

The number of required dwellings is more than the resources required to be available in the various habitation centres, and as such, a new habitation centre should be considered.

The continuous development around existing settlements without adequate uplift in infrastructure, such as parking, has meant that additional development would be unsustainable. The concentration, based on avoiding green belt where possible, on the best agricultural area in the borough is inappropriate, and an overall review of approach is critical.

Our interpretation of the TMBC Housing Market Delivery Study is that TMBC has had a higher level of CAGR (Compound Annual Growth Rate) for new builds than most of Kent (approximately 50% higher than the average for the South East). Much of the increase in demand for housing is coming from people moving out of London. The primary purpose of the green belt is to avoid the London sprawl destroying the surrounding countryside, and I consider that this aim is important to maintain.

However, the result, where locations closer to London are being built on because of the shape of the green belt, means that the result is in contradiction to the aims of the Green Belt. Based on the TMBC report, we consider that the high rate of new builds in the borough is encouraging the moves from London to the borough, and this is exacerbating the issue, and neighbouring boroughs should be approached to see whether some of the TMBC housing obligations can be satisfied by them, under the duty to co-operate. Alternatively, use of urban and brown field sites is likely to be less attractive to people moving from London and make such developments more available to the local population, which may go some way to alleviating the high house price / earnings ratio that is meaning that government targets for the borough are much higher than the ONS estimate for increases in housing need.

Spatial Strategy: Option 1

Much of the most versatile agricultural land in the borough is built over. There is now pressure on the remaining agricultural land

Much of the proposed area is in flood plain.

The option does not address the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The area is in the Maidstone House Market Area, i.e., relies on Maidstone for urban resources. The

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roads to Maidstone are subject to several Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

Kings Hill does not have adequate road transport. Kings Hill has one main entrance on Tower View which is private and closes once a year for 24 hours on Christmas Day. Several surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill is NOT an urban area and must not be included as a focus for development. See Office for National Statistics: <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about>

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Spatial Strategy: Option 2

Much of the most versatile agricultural land in the borough is built over.

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option only partially addresses the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The area is in the Maidstone House Market Area, i.e., relies on Maidstone for urban resources. The roads to Maidstone are subject to several Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

Kings Hill does not have adequate road transport. Kings Hill has one main entrance on Tower View which is private and closes once a year for 24 hours on Christmas Day. Several surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill is NOT an urban area and must not be included as a focus for development. See Office for National Statistics: <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about>

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Spatial Strategy: Option 3

Much of the most versatile agricultural land in the borough is potential to be built over

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option only partially addresses the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The area is in the Maidstone House Market Area, i.e., relies on Maidstone for urban resources. The roads to Maidstone are subject to several Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

Kings Hill does not have adequate road transport. Even the main entrance is a private road, closed at the whim of one of the parties developing the site. Many surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill is NOT an urban area and must not be included as a focus for development. See Office for National Statistics: <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about>

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Spatial Strategy: Option 4

Much of the most versatile agricultural land in the borough is potential to be built over.

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

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The option only partially addresses the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The area is in the Maidstone House Market Area, i.e., relies on Maidstone for urban resources. The roads to Maidstone are subject to several Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

The continual recent development around village centres has meant that most are already overloaded and struggling and more such development will exacerbate the situation.

Kings Hill does not have adequate road transport. Even the main entrance is a private road, closed at the whim of one of the parties developing the site. Many surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill is NOT an urban area and must not be included as a focus for development. See Office for National Statistics: <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about>

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Spatial Strategy: Option 5

A new town would become an urban area and would require pre-implementation of infrastructure. It does not seem that TMBC are willing to put in such investment. In addition, much of the land would be more costly for developers to develop and would likely only be accepted if there was no alternative. In addition, the road network should be the primary focus for development to ensure that adequate connectivity to service centres was provided. Likewise, new connectivity for water, gas and electricity would need to be implemented. There was brownfield land in green belt that was assigned in the previous (withdrawn) local plan, and that should be re-considered, even given the constraints identified here.

Much of the increase is due to the high price/earnings ratio, which is primarily associated with the Tonbridge region. The instructions associated with the uplift are that the intention is for brownfield sites in urban areas to be used for the uplift. Thus, the plans are not consistent with the government guidelines. Brownfield sites must be used where available, even if they are in green belt, such as the sand pits around Borough Green, and other areas around Tonbridge. Much has been made of the success in the prevention of the development of brownfield sites in Tonbridge, which is contrary to Government guidelines.

Much of the development over the last few decades has been oriented around extensions to existing towns and villages with limited enhancement of resources within those location. This has resulted in significant pressure on the majority of resources in those towns and villages. This includes primary healthcare, parking, roads (especially rural roads that are include those assigned as quiet lanes

There are brownfield sites in green belt areas which should be considered as a priority for such development, in the same way as development of Bluewater shopping centre and the neighbouring housing developments.

The number of required dwellings is in excess of the resources required to be available in the various habitation centres, and as such, a new habitation centre should be considered.

The continuous development around existing settlements without adequate uplift in infrastructure, such as parking, has meant that additional development would be unsustainable. The concentration, based on avoiding green belt where possible, on the best agricultural area in the borough is inappropriate, and an overall review of

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approach is critical.

Our interpretation of the TMBC Housing Market Delivery Study is that TMBC has had a higher level of CAGR (Compound Annual Growth Rate) for new builds than most of Kent (approximately 50% higher than the average for the South East). Much of the increase in demand for housing is coming from people moving out of London. The primary purpose of the green belt is to avoid the London sprawl destroying the surrounding countryside, and I consider that this aim is important to maintain. However, the result, where locations closer to London are being built on because of the shape of the green belt, means that the result is actually in contradiction to the aims of the Green Belt. Based on the TMBC report, we consider that the high rate of new builds in the borough is actually encouraging the moves from London to the borough, and this is exacerbating the issue, and neighbouring boroughs should be approached to see whether some of the TMBC housing obligations can be satisfied by them, under the duty to co-operate. Alternatively, use of urban and brown field sites is likely to be less attractive to people moving from London and make such developments more available to the local population, which may go some way to alleviating the high house price / earnings ratio that is meaning that government targets for the borough are much higher than the ONS estimate for increases in housing need.

Spatial Strategy: Option 1

Much of the most versatile agricultural land in the borough is built over. There is now pressure on the remaining agricultural land

Much of the proposed area is in flood plain.

The option does not address the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The area is in the Maidstone House Market Area, i.e. relies on Maidstone for urban resources. The roads to Maidstone are subject to a number of Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

Kings Hill does not have adequate road transport. Kings Hill has one main entrance on Tower View which is private and closes once a year for 24 hours on Christmas Day. A number of surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill is NOT an urban area **and must not be** included as a focus for development. See Office for National Statistics: <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about>

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Spatial Strategy: Option 2

Much of the most versatile agricultural land in the borough is built over.

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option only partially addresses the high house price / earnings ratio for the borough which is skewed because

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of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The area is in the Maidstone House Market Area, i.e. relies on Maidstone for urban resources. The roads to Maidstone are subject to a number of Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

Kings Hill does not have adequate road transport. Kings Hill has one main entrance on Tower View which is private and closes once a year for 24 hours on Christmas Day. A number of surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

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Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Spatial Strategy: Option 3

Much of the most versatile agricultural land in the borough is potential to be built over

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option only partially addresses the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The area is in the Maidstone House Market Area, i.e. relies on Maidstone for urban resources. The roads to Maidstone are subject to a number of Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

Kings Hill does not have adequate road transport. Even the main entrance is a private road, closed at the whim of one of the parties developing the site. Many surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill is NOT an urban area and must not be included as a focus for development. See Office for National Statistics: <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about>

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

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Spatial Strategy: Option 4

Much of the most versatile agricultural land in the borough is potential to be built over.

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option only partially addresses the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The area is in the Maidstone House Market Area, i.e. relies on Maidstone for urban resources. The roads to Maidstone are subject to a number of Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

The continual recent development around village centres has meant that most are already overloaded and struggling and more such development will exacerbate the situation.

Kings Hill does not have adequate road transport. Even the main entrance is a private road, closed at the whim of one of the parties developing the site. Many surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill is NOT an urban area and must not be included as a focus for development. See Office for National Statistics: <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about>

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Spatial Strategy: Option 5

A new town would become an urban area and would require pre-implementation of infrastructure. It does not seem that TMBC are willing to put in such investment. In addition, much of the land would be more costly for developers to develop, and would likely only be accepted if there was no alternative. In addition, the road network should be the primary focus for development to ensure that adequate connectivity to service centres was provided. Likewise, new connectivity for water, gas and electricity would need to be implemented. There was brownfield land in green belt that was assigned in the previous (withdrawn) local plan, and that should be re-considered, even given the constraints identified here.

We consider that Option 3 is the most preferable spatial option which focuses on greenfield and previously developed land within the urban areas and Rural Service Centres, as well as land adjacent to these settlements.
3.21 We recommend Option 3 is pursued as the spatial strategy option in the new Local Plan.

We consider that Option 3 which focuses on greenfield and previously developed land within urban areas and Rural Service Centres as well as adjacent to settlements, will ensure housing and employment needs can be met in full (in accordance with Para. 61 of the NPPF) and will promote sustainable patterns of growth (in accordance with Para. 11a of the NPPF) within the new Local Plan.

3.23 The Interim Sustainability Appraisal ('SA') also supports this statement, given Option 3 scored as one of the most

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favourable strategy options against the SA criteria.

3.24 We recommend that Option 3 is pursued as the spatial strategy option as part of the new Local Plan for the reasons we set out below.

3.25 Our comments on each option are also set out below.

Preferred Spatial Option - Option 3 – Urban and rural service centre focus on greenfield as well as PDL within and adjacent to settlements

3.26 We recommend Option 3 is the preferred option for the new Local Plan. It is the most sustainable spatial strategy

option and we recommend the new Local Plan focuses new development in and around urban areas and Rural Service Centres. As part of this strategy, new development should be allocated at Hadlow.

3.27 We consider Option 3 should be pursued as the preferred spatial strategy option for the following reasons:

1) Option 3 promotes sustainable development in the Borough

3.28 Option 3 directs development towards Tier 1 (Urban Areas) and Tier 2 (Rural Service Centres) settlements which

have the best range of key services and facilities, and levels of accessibility, therefore promoting sustainable patterns of development.

In accordance with Para.8 of the NPPF, Option 3 would achieve sustainable development against all three objectives (economic, social and environmental objectives).

- Economic Objective - Option 3 would ensure sufficient land of the right types is provided in the right places (i.e. the most sustainable settlements) in order to support growth, innovation and improve productivity.

- Social Objective – Option 3 would support and promote existing strong and vibrant settlements in the Borough. It would enhance already accessible settlements and their services and facilities, and encourage walking and cycling creating sustainable and healthy communities.

- Environmental Objective – Option 3 would protect and enhance the natural, built and historic environment through locating development in areas that are least constrained and the most sustainable. The accessibility of services and facilities encouraged through Option 3 would also reduce the reliance on private car journeys, promoting sustainable modes of transport in and around the Borough. This would also help in reducing carbon emissions and mitigating climate change.

3.30 We recommend that Hadlow is one of the most sustainable settlements in the Borough, and the site at Court Lane

Nurseries, Hadlow is the most sustainable site.

2) Option 3 ensures a dispersed pattern of growth

3.31 Option 3 spreads development across 10 settlements (both Urban Areas and Rural Service Centres) in the Borough. This is a dispersed approach to distributing development and therefore ensures a balanced distribution of growth.

3.32 This dispersed and balanced approach is more likely to lead to the achievement of meeting a wider range of housing (and other development needs) in full, because development is focused in the most sustainable and established locations.

3.33 It also means a wider range of types of sites and development proposals will come forward. This will help achieve

local development targets.

3.34 This dispersed and balanced approach therefore contributes towards achieving sustainable patterns of development in accordance with Para.11 of the NPPF.

3) Option 3 ensures a balanced distribution of development across two Housing Market Areas

3.35 Option 3 ensures a balanced level of development is distributed between the two Housing Market Areas ('HMA's').

It identifies settlements across both West Kent and Maidstone HMA's ensuring that development can be delivered

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where it is needed the most.

3.36 This balance is also essential given the Council's Housing Market Delivery Study (2022) states that the Maidstone

HMA will not be able to absorb future housing supply in full independently.

4) Limited opportunity to develop within existing settlement confines

3.37 As outlined in the Urban Capacity Study, only 75 sites in the Borough have been identified as having potential for

redevelopment within existing urban areas and Rural Service Centres, with an overall capacity of 1,946 dwellings.

This is c.2 years of the draft housing requirement (based on 839 dwellings per annum (dpa)) and is not sufficient to

meet the Council's housing and employment needs in the Borough over the Plan period.

3.38 This means that Option 3 should be the Council's preferred option given the lack of available sites for redevelopment within settlement confines alone, sites beyond the settlement boundaries are required to meet identified growth.

3.39 The SA also acknowledges the limited opportunity to develop in urban areas and the need to consider greenfield

development. Para. 4.19 of the SA states that "the Council endeavoured to make best use of previously-developed land in built up areas such as Tonbridge for many years. However, and as a consequence, these types of sites are becoming less common. Therefore, the Council believes that it will need to consider the use of greenfield sites, within and beyond existing built-up areas to meet its objectively assessed need".

3.40 We agree with this view and support Option 3 and expect the new Local Plan to bring forward greenfield / Green

Belt sites to help meet local development needs.

5) Option 3 would require minor alterations to the Green Belt only and EC's exist to do so

3.41 As set out in the new Local Plan, Option 3 involves focusing development at land adjoining existing urban areas

and rural service centres.

Given the Green Belt boundaries are tightly drawn around these settlements, Option 3 would require minor alterations to the Green Belt to fulfil this spatial strategy option.

3.43 We consider Exceptional Circumstances ('EC's') exist at a strategic level to alter Green Belt boundaries to help

meet this assessed development needs. This is also supported by the Council's evidence base, notably the EC's Topic Paper (July 2022) which concludes that EC's exist to amend the Green Belt boundaries.

3.44 We also consider that these alterations to the Green Belt to fulfil Option 3 could only be minor and be tightly drawn

around small extensions to the settlement, rather than releasing large swathes of the Green Belt in unsustainable locations.

3.45 We recommend that a review of the Green Belt boundaries is undertaken, and Court Lane Nurseries is released

from the Green Belt to meet development needs.

6) Option 3 would ensure a wide range of sites

3.46 Option 3 would ensure a wide range of sites are allocated, for example brownfield, greenfield and previously developed land, which can also be delivered across different timescales (for example smaller sites in the short term / first 5 years).

3.47 Through allocating a wide range of sites, this will ensure the Council can avoid using a stepped trajectory and

ensure delivery is consistent throughout the Plan Period. A wide range of sites will also ensure a wide range of

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housing types for example houses, flats, self-build, specialist etc.

3.48 Option 3 through providing a range of sites, also supports the Council's Housing Market Delivery Study (2022)

which identifies that the Borough needs more small to medium sized sites as it encourages a more dispersed strategy.

7) Less or no-reliance on strategic sites to achieve development needs

3.49 Option 3 would ensure a range and mix of sites are provided, and does not rely on larger strategic sites, including

a new settlement to be delivered. We support this approach and consider this is positive given the build out rates of new settlements.

3.50 New settlements can be more challenging to bring forward and can take time to deliver, as demonstrated by other

new settlements across the country and referenced within the Lichfield's Start to Finish Report. This sets out that it

can take between 5 and 8 years for large sites to come forward and delivery rates of sites between 1,500 and 1,999 new homes are between 50 – 200 dpa.

3.51 Whilst we recognise that some of the risks associated with the delivery rates can be addressed through housing

trajectories and placing a higher delivery at the end of the Plan period, we consider this remains high risk, and we suggest it is more reliable to allocate sites that can contribute to the housing target consistently throughout the Plan period.

8) Windfall approach to development covers all settlements

3.52 The proposed approach to small and large windfall sites set out in the new Local Plan allows for development to

take place at all settlements, including lower tier locations. This helps to ensure that new development can come forward across the Borough that is commensurate with the size of each settlement. It also means that site allocations are not necessarily required in all settlements.

Possible Option - Option 4 – Distributed pattern of development across the Borough on both greenfield and previously developed land at all tiers of settlement

3.53 Option 4 proposes to distribute development across the Borough at all settlements within the settlement hierarchy,

on both previously developed land and greenfield.

3.54 Whilst we do not dismiss Option 4 as a spatial strategy option, we still consider Option 3 is the most sustainable

for the reasons we set out above.

3.55 Option 4 and its level of dispersal across the Borough is not required, given the windfall approach within the Council's new Local Plan allows for windfall sites to come forward.

3.56 Option 4 would also lead to excessive Green Belt release and would not have regard to the permanence of Green

Belt alterations in the long term, as it would likely be sporadic and in isolated locations. It would also be more challenging to justify Green Belt release in less sustainable locations, unless significant infrastructure is brought forward alongside this growth.

3.57 We therefore do not consider Option 4 should be pursued as the spatial strategy option for the new Local Plan.

Dismissed Option - Option 1 – Focus in and adjacent to settlements / avoiding Green Belt release

3.58 Option 1 proposes to focus development in and adjacent to settlements beyond the outer Green Belt boundary

and outside of the Areas of Outstanding Natural Beauty.

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3.59 We do not support Option 1 and it should not be pursued as the spatial strategy for the new Local Plan for the following reasons:

- Option 1 does not promote sustainable patterns of development (in accordance with Para. 11 of the NPPF). Option 1 restricts potential locations for growth to a limited number of settlements only, namely to the northeastern part of the Borough, and it does not consider the Borough as a whole. This is not a sensible or realistic approach to define where growth should be located as all existing settlements will have their own needs.

- Option 1 does not represent a balanced approach towards distribution of development as the settlements identified as the focus of development are mostly located in the north-eastern part of the Borough, which has already seen a significant level of development as part of the existing Core Strategy.

- Option 1 could lead to the coalescence of the settlements in the north-east of the Borough, notably Snodland, The Medway Gap and Kings Hill, if development was to come forward outside of these settlement confines.

- Option 1 reduces the range of sites and type of housing (by limiting options for locations for growth).

- Option 1 does not provide a balanced approach across the two Housing Market Areas ('HMA's'). It would direct development largely within the Maidstone HMA, with little development identified in the West Kent HMA.

This would create an unbalanced and unsustainable distribution of development across the HMA's.

Dismissed Option - Option 2 – Urban area focus at greenfield and previously developed land within urban areas.

3.60 Option 2 proposes to focus development on sites within greenfield as well as previously developed land, as well as

adjacent to the main urban areas of Tonbridge, Kings Hill, Snodland, Medway Gap and Walderslade.

3.61 We do not support Option 2 and it should not be pursued as the spatial strategy for the new Local Plan for the following reasons:

- Option 2 does not promote sustainable patterns of development (in accordance with Para. 11 of the NPPF). Option 2 restricts potential locations for growth to a limited number of settlements only, namely to the northeastern

part of the Borough and it does not consider the Borough as a whole. This is not a sensible or realistic approach to define where growth should be located as all existing settlements will have their own needs.

- Option 2 does not represent a balanced approach towards distribution of development as the settlements identified as the focus of development are mostly located in the north-eastern part of the Borough, which has already seen a significant level of development as part of the existing Core Strategy.

- Option 2 could lead to the coalescence of the settlements in the north-east of the Borough, notably Snodland, The Medway Gap and Kings Hill, if development was to come forward outside of these settlement confines.

- Option 2 reduces the range of sites and type of housing (by limiting options for locations for growth).

- Option 2 does not provide a balanced approach across the two Housing Market Areas ('HMA's'). It would direct development largely within the Maidstone HMA, with little development identified in the West Kent HMA.

This creates an unbalanced and unsustainable distribution of development across both HMA's.

Dismissed Option 5 – Development on sites at urban areas, rural service centres and other rural settlements, as well as a new settlement

3.62 Option 5 proposes a new settlement in addition to development at urban areas, rural service centres and other rural settlements.

3.63 We do not support Option 5 and it should not be pursued as the spatial strategy for the new Local Plan for the following reasons:

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- Option 5 includes a new settlement (although the Council have not specified where this new settlement could be). Large sites such as new settlements require significant infrastructure improvements to be implemented prior to the commencement of any works. This can cause significant delays to delivery.

Build out rates for new settlements are often slow and can take between 5 and 8 years to come forward.

- The Housing Market Delivery Study (2022) Table 1 states that annual completion rates are 94 dpa to 107 dpa on large / strategic sites in the Borough / local area. This figure is very low compared to the national average of between 50 dpa and 200 dpa (Lichfield's Start to Finish Report). Such large strategic sites are also more challenging to bring forward, mainly as a result of significant pre-commencement works e.g. infrastructure improvements.

- Reliance on large strategic sites would likely require a stepped housing trajectory. This should be avoided as it can cause delay to housing land supply in the short term.

- Option 5 would likely require large amounts of Green Belt release, including Green Belt release for a new settlement given the area outside the Green Belt (to the north-east of the Borough) has already previously been the focus for new growth as part of the adopted Core Strategy.

- Larger sites may be more impactful to landscape, heritage, highways and drainage, than smaller alterations to the Green Belt, that would likely be required for some of the other spatial strategy options, namely Option 3.

Summary

3.64 Overall, we recommend that Option 3 is pursued as the spatial strategy for the new Local Plan, with Option 4 as

the second favourable option.

3.65 Options 1, 2 and 5 should not be pursued further as part of the new Local Plan for the reasons we set out above.

3.66 This is also supported by the conclusions of the Council's SA process, as we discussed further in Questions 7 and 8.

Having regard to the identified development needs of the area, the constraints in the borough and the two HMAs, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below.

Option 1

Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape.

For the reasons outlined above we fundamentally object to the notion that Green Belt should not be released. If one looks at the settlement hierarchy, Tonbridge, Kings Hill, Snodland, Borough Green, East Peckham, Hadlow, Hildenborough and West Malling are all tier 1 and 2 settlements that fall within the Green Belt and would see development restricted by the option 1 approach. Similarly, the edge of Borough Green also offers a good quality offer of services and facilities that can be enhanced further with growth.

In respect of national policy, paragraph 140 of the NPPF states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

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We acknowledge that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined all other reasonable options making as much use as possible of suitable brownfield sites and underutilised land; optimising the density of development and informed by discussions with neighbouring authorities. However, these exercises were carried out in detail as part of the previous Local Plan work and evidence established that Green Belt release is needed.

Notwithstanding the earlier decisions and evidence, housing or employments need can be an exceptional circumstance to justify a review of your Green Belt boundary. This principle was established in the judgement of *St Albans District Council v Hunston Properties Limited* [2013] EWCA 1161.

Further case law, (*Calverton Parish Council v Nottingham City Council*, *Broxtowe Borough Council and Gedling Borough Council* [2015] EWHC 1078 (Admin)) also provide guidelines for determining whether exceptional circumstances exist. The above judgement states:

‘Planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:

- i. the acuteness/intensity of the objectively assessed need (matters of degree may be important)
- ii. the inherent constraints on supply/availability of land prima facie suitable for sustainable development
- iii. (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt
- iv. (the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
- v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent’.

Considering these parameters in turn, the acuteness of the local and economic housing need is clear in the need to deliver 15,941 new homes and 296,260 sq.m. (69.8ha) of employment provision in the plan period. Furthermore, the Council’s Green Belt Assessment prepared by Arup also confirms that TMBC does have a good strategic exceptional circumstances case for altering the Green Belt boundaries to help meet the assessed development needs.

In respect of the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced, this is to be judged on a site-by-site basis. However, we consider the public benefits of our client’s land would include potential for improving public access to the countryside, better footpath links, and would deliver substantial opportunity for biodiversity net gain via woodland management and enhancement. Furthermore, these benefits will occur on a site accepted as suitable for development by the Borough council on a number of previous occasions.

Given this context, suitable Green Belt sites must not be ruled out based on a blanket strategy.

Option 2

Option 2 has an urban focus on greenfield and previously developed land within the urban areas and land adjacent to the tier 1 settlements. This strategy seeks to locate development in areas with good access to existing services and facilities.

For reasons outlined above, we support the priority of some growth in these locations. However, restricting development to within and adjacent to these settlements and not affording any growth to lower tier villages to evolve, to improve their own sustainability credentials and to benefit from new infrastructure that only

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development can deliver would be contrary to good planning principles.

It is also important to stress that many of the major settlements are also constrained by designations such as flood risk, Green Belt, AONB and highway constraints and they cannot absorb full development needs in their entirety.

Options 3 and 4

Option 3 is focussed on settlements near the top of the settlement hierarchy with development focussed on greenfield and previously developed land within and adjacent to the urban areas and rural service centres.

Option 4 follows a similar principle but also allows for some growth other rural settlements.

Effectively options 3 and 4 follow dispersed growth strategies and allow for most settlements to benefit from some level of growth. In our opinion option 4 provides the greatest scope to deliver the right homes in the right location and to ensure that site selection consider all available opportunities on their own merits. We consider it would be wrong not to allow some proportionate growth for a settlement of Ightham's status and offer, particularly given its proximity and relationship with Borough Green.

Option 5

Option 5 considers the potential for a new settlement/s in the borough with residual development focussed on greenfield and previously developed land within the urban areas, rural service centres and other rural settlements.

Option 5 causes significant concern. New settlements by the nature are rarely deliverable in an emerging plan period owing to the extensive work required in respect of the physical planning, obtaining of consents and the delivery of essential infrastructure that needs to be front loaded at the outset. Indeed, a strategy dominated by strategic sites will compromise short to medium-term housing needs of the borough as by their nature they will not deliver at the consistent rate required to sustain a five-year supply nor meet the associated HDT.

It is also important to stress that within the southeast many Local Plans have failed or encountered significant difficulties owing to overly ambitious plans for new settlements. Indeed, the proposed delivery of strategic level (i.e. >1000 unit) schemes in Kent have consistently failed due to a lack of understanding of delivery constraints and cross boundary planning (see examples in Ashford, Canterbury and Dover).

We believe it would be unsound to move towards a new settlement strategy until opportunities around existing settlements have been fully explored and exhausted.

Having regard to the options presented, the greatest benefits are associated to options 2 to 4 and the disbursed growth models, accepting that there are exceptional circumstances to justify the release of some Green Belt and AONB sites.

To retain as far as possible the existing rural character of the areas outside the urban settlements and their immediate environs.

21. Option 1 : Trenport supports Option 1, being consistent with national policy and partly taking forward the strategy already enshrined in the existing Development Plan. It will support the continued development of the East Bank Strategy explained above. It will minimise the loss of Green Belt. This is key to a sound local plan as unless the Council can demonstrate through its site allocation process that non-Green Belt alternatives have been

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maximised, there will be no exceptional circumstances case to allow for the release of land from the Green Belt. For the reasons set out above, although this option would lead to development at lower order settlements, if infrastructure is properly planned, a sustainable strategy can be brought forward.

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22. Option 2 : Trenport does not support Option 2 as it would result in significant and unjustified erosion of the Green Belt, particularly at Tonbridge. In our submission, Option 2 would be no more sustainable than Option 1 as large scale urban extensions would be required that would require their own social infrastructure to be sustainable. There is no reason why such extensions could not be sustainably accommodated outside of the Green Belt as in Option 1.

23. Option 3 : whilst this option suggests a slightly more dispersed pattern of development it would still result in significant conflicts with Green Belt policy and (in the case of expansion at Borough Green) AONB designations but in a wider range of locations compared to Option 2.

24. Option 4 : suggests a dispersed pattern of development. This would still allow for the continuation of the East Bank Strategy and could allow for a more refined selection of changes to the Green Belt boundary where this is needed. However, it would still result in significant erosion of the Green Belt and potential conflict with AONB designations.

25. Option 5 : Trenport do not consider that a completely new self-contained settlement in an undefined location will be a sound strategy. Deliverability will be a key stumbling block, as will be the cost and intensity of new road, rail and social infrastructure. Moreover, even if a site could be identified that was considered sound, it would not deliver new homes for many years and would only contribute to housing trajectory much later in the Plan period. The Borough needs new homes to be supplied to meet needs throughout the Plan period. It is highlighted that a number of Local Plans that have relied on new settlements, often branded “Garden Communities” have been found unsound on the basis of doubts as to viability, infrastructure and timing of delivery.²

26. Overall, Trenport prefers Option 1 albeit some development at other locations at Tonbridge and other settlements in the Green Belt may still be required to meet the overall housing requirement. This would suggest a hybrid of Option 1 and Option 4 may be the most appropriate.

Having regard to the identified development needs of the area, the constraints in the borough and the two HMAs, we note that five potential spatial strategy options have been identified. We respond on the merits of each of these below.

Option 1

Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape.

[Option 1 spatial diagram]

For the reasons outlined above we fundamentally object to the notion that Green Belt should not be released. If one looks at the settlement hierarchy, Tonbridge, Kings Hill, Snodland, Borough Green, East Peckham, Hadlow, Hildenborough and West Malling are all tier 1 and 2 settlements that fall within the Green Belt and would see development restricted by the option 1 approach. In the case of Kings Hill, development would be artificially restricted to the north side, precluding any consideration of sustainable development opportunities to the south of Kings Hill.

User Response: Text

In respect of national policy, paragraph 140 of the NPPF states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

We acknowledge that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined all other reasonable options making as much use as possible of suitable brownfield sites and underutilised land; optimising the density of development and informed by discussions with neighbouring authorities.

However, these exercises were carried out in detail as part of the previous Local Plan work and evidence established that Green Belt release is needed.

Notwithstanding the earlier decisions and evidence, housing or employment need can be an exceptional circumstance to justify a review of the Green Belt boundary. This principle was set out within the Hunston High Court judgment in St Albans where judge stated:

‘Having identified the full objectively assessed needs figure the decision maker must then consider the impact of the other policies set out in the NPPF. The Green Belt policy is not an outright prohibition on development in the Green Belt. Rather it is a prohibition on inappropriate development in the absence of very special circumstances. It is entirely circular to argue that there are no very special circumstances based on objectively assessed but unfulfilled need that can justify development in the Green Belt by reference to a figure that has been arrived at under a revoked policy which was arrived at taking account of the need to avoid development in the Green Belt.’

Case law, (Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin)) also provide guidelines for determining whether exceptional circumstances exist. The above judgment states:

‘planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:

- (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important);
- (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development;
- (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;
- (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
- (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent’.

Considering these parameters in turn, the acuteness of the local and economic housing need is clear in the need to deliver 15,941 new homes and 296,260 sq.m (69.8ha) of employment provision in the plan period. Furthermore, the Council’s Green Belt Assessment prepared by Arup also confirms that TMBC does have a good strategic exceptional circumstances case for altering the Green Belt boundaries to help meet the assessed development needs.

Suitable Green Belt sites must not be ruled out based on a blanket strategy which would be entirely contradictory to the evidence based on a sound planning strategy.

User Response: Text

Option 2

Option 2 has an urban focus on greenfield and previously-developed land within the urban areas and land adjacent to these settlements. This seeks to locate development in areas with good access to existing services and facilities.

[Option 2 spatial diagram]

For reasons outlined above, we support the principle of growth in these locations and they should be the priority for the greatest level of growth. It is important to stress that many of the major settlements are constrained by designations such as flood risk, Green Belt, AONB and highway constraints. Whilst these are not absolute, there is also a duty to consider what growth can be accommodated without unacceptable encroachment on these areas.

Option 3

Option 3 is focussed on settlements near the top of the settlement hierarchy with development focussed on greenfield and previously-developed land within and adjacent to the urban areas and rural service centres.

[Option 3 spatial diagram]

Option 3 is a more positive strategy to that of options 1 and 2, in that the Rural Service Centres are quite rightly allocated a proportion of growth.

Option 4

Option 4 follows a similar principle to option 3 but also allows for some growth in other rural settlements. Effectively options 3 and 4 follow dispersed growth strategies and allow for most settlements to benefit from some level of growth.

[Option 4 spatial diagram]

Option 5

Option considers the potential for a new settlement/s in the borough with residual development focussed on greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements.

Option 5 would result in significant concerns, not least given that there is clear conflict with the NPPF's requirement (para 22) for strategies which include new settlements to be set within a vision that looks at least 30 years ahead, to take into account the likely timescale for delivery. This is not the case with this emerging plan which proposes a plan period of just 15 years from intended adoption (2025 to 2040).

New settlements by their nature are rarely deliverable in an emerging plan period owing to the extensive work required in respect of the physical planning, obtaining of consents and the delivery of essential infrastructure that needs to be front loaded at the outset. Indeed, a strategy dominated by strategic sites will compromise short to medium-term housing needs of the borough as by their nature they will not deliver at the consistent rate required to sustain a five-year supply nor meet the associated HDT.

It is also important to stress that within the south east many Local Plans have failed or encountered significant difficulties owing to overly ambitious plans for new settlements. Indeed, the proposed delivery of strategic level

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(i.e. >1000 unit) schemes in Kent have consistently failed due to a lack of understanding of delivery constraints and cross boundary planning (see examples in Ashford, Canterbury and Dover).

We believe it would be unsound to move towards a new settlement strategy until opportunities around existing settlements have been fully explored and exhausted.

[Option 5 spatial diagram]

Having regard to the options presented, the greatest benefits are associated to options 2 to 4 and the disbursed growth models, accepting that there are exceptional circumstances to justify the release of some Green Belt sites.

Having regard to the identified development needs of the area, the constraints in the Borough and the two HMAs, five potential spatial strategy options are identified. We respond on the merits of each of these below.

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Option 1 seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the AONB, thereby seeking to avoid the need to release of any land from the Green Belt as well as avoiding development within a protected landscape.

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We acknowledge that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined all other reasonable options making as much use as possible of suitable brownfield sites and underutilised land; optimising the density of development and informed by discussions with neighbouring authorities. However, these exercises were carried out in detail as part of the previous Local Plan work and evidence established that Green Belt release is essential.

Notwithstanding the earlier decisions and evidence, housing or employment need can be an exceptional circumstance to justify a review of the Green Belt boundary. This principle was set out within the Hunston High Court judgment in St Albans where judge stated:

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[Option 2 spatial diagram]

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[Option 3 spatial diagram]

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Option 4

User Response: Text

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[Option 4 spatial diagram]

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It is also important to stress that within the south east many Local Plans have failed or encountered significant difficulties owing to overly ambitious plans for new settlements. Indeed, the proposed delivery of strategic level (i.e. >1000 unit) schemes in Kent have consistently failed due to a lack of understanding of delivery constraints and cross boundary planning (see examples in Ashford, Canterbury and Dover).

We believe it would be unsound to move towards a new settlement strategy until opportunities around existing settlements have been fully explored and exhausted.

[Option 5 spatial diagram]

Having regard to the options presented, the greatest benefits are associated to Options 2 to 4 and the disbursed growth models.

We believe **spatial strategy options 3** (focussed on settlements near the top of the settlement hierarchy) is the most appropriate and sustainable spatial strategy. We appreciate that TMBC needs to consult on a range of options, it is not clear of the basis of option 5 (new settlement) without knowledge of what is being promoted. TMBC needs to be mindful that a basket of sites, of varied scales, notably those controlled by housebuilders, should provide the most achievable/ deliverable sites, to maintain a rolling five year housing land supply. New settlements, or major strategic sites do have significant lead in times for delivery.

Spatial strategy options 3 focuses growth in and adjacent to the settlements near the top of the settlement hierarchy, including Tonbridge and Hadlow. As para 4.2.9 of the Reg 18 Plan states these are settlements with good access to existing services and facilities that can accommodate further growth in a sustainable way. In addition options 3 is likely to be able to deliver the highest overall growth at the greatest number, variety, and distribution of sustainable sites.

User Response: Text

Option 1 in focusing development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty effectively directs all growth to the north eastern part of the Borough. Not only is it questionable as to whether this area alone could meet the totality of the Boroughs housing needs, but it has to be questioned how this strategy would address the housing needs of West Kent HMA which is concentrated around the south western part of the Borough. Given our involvement in the previous Local Plan Examination we are aware of the fact that the SA of the previous Local Plan indicated that this approach would lead to an unsustainable approach to growth. This option is in our opinion totally unsustainable and cannot/ should not be supported on any level.

Option 2 in concentrating development just within the top tier of the settlement hierarchy potentially prejudices the smaller sustainable settlements, such as Hadlow, and is less well related to the needs of the principle HMA's that fall within the Borough. Again we note that a similar option was tested during the last Local Plan Examination and the SA highlighted the fact that it notably did not perform best in respect of any of the then SA objectives, and was the only option to register a significant negative effect in relation to three of the then SA objectives, including housing delivery and economic growth. Whilst this did not automatically mean that option performed poorly overall (as options were not assigned any weighting), the SA acknowledged that it was a strong indicator.

Option 4 in distributing development across the Borough would we feel lead to an unsustainable approach to growth as not all development would be located within areas with good access to existing services and facilities. As such this approach would lead to increased reliance on the car.

And with no potential 'new settlement' identified / areas of search set out in the Reg 18 Plan, it is not possible to comment on Option 5, other than to highlight the fact that this is an inherently high risk option, which as authorities such as Tandridge and Waverly can allude to, is not necessarily the panacea it may appear. Where, in authorities such as Tonbridge and Malling you have a history of under delivery and a 5 year Housing Land Supply deficit you need to adopt a housing strategy that looks to deliver a variety of different sites in different locations and of different sizes that will generate a rolling 5 year Housing 0 see themselves in a planning by appeal situation which would be to no one's advantage - least of all local residents and service providers.

Whilst we comment further on the Assessment of the Spatial Options in the SA in our response to question 7, we note that spatial option 5 scored the lowest overall in all bar 1 option, and that conversely option 3 attained the most positive scores which would appear to support our proposition that option 3 is the most sustainable of the options put forward.

New housing should be located outside the greenfield and greenbelt sites and not on grade 1 agricultural land. It would also avoid building within a protected landscape.

In our opinion option 4 provides the greatest scope to deliver the right homes in the right location and to ensure that site selection consider all available opportunities on their own merits. We consider it would be wrong not to allow some proportionate growth for a settlement of East Peckham's status and offer, particularly given its relatively strong provision of existing day-to-day services and facilities and its proximity and relationship with Paddock Wood.

Having regard to the options presented, the greatest benefits are associated to options 2 to 4 and the disbursed growth models, accepting that there are exceptional circumstances to justify the release of some Green Belt and

User Response: Text

AONB sites.

We consider that all options set out above are a suitable way forward in defining the spatial strategy with a focus on a combination of Options 4 and 5.

TMBC faces challenges in order to accommodate housing and economic needs over the Plan period, particularly given that the Borough is presently 71% Green Belt. To deliver the level of growth required, it is considered that development should be distributed across the Borough (Option 4) and new settlement option (option 5) should be proposed.

The ability to meet need in both HMAs is key to the Local Plan being found sound. Focus should be on, and adjacent to, the urban areas first. Recognising that there is limited scope for expansion of Tonbridge in the West Kent HMA, opportunities for allocations adjacent at Tonbridge should be taken ((such as the allocation of Goldings Yard, Stocks Green Road)) together with allocations at the next most sustainable settlements: the RSCs. Land at Maidstone Road, Hadlow, represents such a suitable site. Option 4 is the next most preferable. Option 1 is unsound, and Option 5 has significant risks in terms of soundness.

Option 4 will allow the distribution of housing growth across the Borough that will also disperse the effects of development, rather than focus this predominantly on a single area – which could ultimately lead to negative impacts such as traffic congestion, noise and air pollution and stretched community resources/infrastructure – for example.

Such an approach will also ensure the spatial strategy accords with paragraph 68 of the NPPF in allocating “a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”. Subsequently, this will provide the basis for the Council to deliver a robust 5YHLS by allocating specific and deliverable sites and in respect of the release of the Site from the Green Belt, will accord with the NPPF at paragraph 79, in that, it will provide “opportunities for villages to grow and thrive, especially where this will support local services.”

This option (Option 4) would distribute development across the Borough, providing development at the most sustainable settlements (using PDL and sustainably located greenfield sites as appropriate) whilst also, importantly, having regard to the provision of housing, on PDL and sustainably located greenfield sites, in and adjacent to the Borough’s rural service centres and other rural settlements, thereby providing for local housing needs and supporting local level service provision.

Furthermore, the ‘distributed’ option would ensure that the Local Plan strategy is not overly reliant on large developments that often have delivery limitations and, therefore, ensures a more deliverable strategy overall. Such an approach would also be in accordance with paragraph 69 of the National Planning Policy Framework (“the Framework”), which states that: “small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”.

User Response: Text

Credibility of Options / Reasonable Alternatives

Vistry are concerned that the options presented at Q.3 and its associated text, do not appear to have a strong relationship with the supporting evidence base. Therefore, it is not clear that these options can be comprehensively tested and compared. Our underlying concern is that TMBC intends to progress from this high-level 'Issues and Options' style of consultation, directly to a Regulation 19 'Draft Local Plan', followed by submission for Examination. This approach is likely to preclude proper consideration and testing of the spatial options (and alternatives) that the Plan could pursue.

It is acknowledged that the Interim SA (2022) provides an analysis of the options presented in the Consultation Document. However, the robustness of this assessment is reduced because the options considered are highly conceptual and do not appear sufficiently embedded within supporting evidence. Therefore, in the absence of an intervening consultation (such as a consultation on a 'Preferred Options' document or Regulation 18 'Draft Local Plan'), there will be limited scope to test or refine the options in a manner which is transparent and credible.

For example, the Consultation Document indicates that an option for a new settlement(s) is being considered and explored as a reasonable alternative. Yet, neither the document nor the evidence base identifies the potential areas of search for a new settlement(s). Despite this, we are effectively asked to accept that potential locations for a new settlement(s) could be fully explored, with a final selection subsequently being 'presented' in a Regulation 19 Local Plan without the need for any further testing or consultation prior to submission.

Moreover, this 'hurried' approach may also mean that locations for potential new settlements / urban extensions, are not successfully identified and evaluated. This includes, for example, strategic growth that might be provided in the vicinity of Hildenborough Railway Station, as part of a transport-centric urban expansion / Garden Village (as noted below). Having a full understanding of the opportunities available will be vital in demonstrating that the Plan's policies are fully justified (as a test of soundness).

It is challenging then to accept that all options and reasonable alternatives will be fully and transparently considered. This increases the risk that, during the Examination, the Plan will be found not to comply with the 'Environmental Assessment of Plans and Programmes Regulations 2004', and other relevant legislation. Should a material lack of compliance be demonstrated, then it is possible that the Plan would fail on a matter of legal compliance.

Similarly, if spatial options are considered in a 'cursory' way, it will be more challenging to demonstrate that the Plan contributes to the achievement of sustainable development, by promoting sustainable patterns of development. This is a fundamental requirement of Plan-making, as set out at Section 39 of the 'Planning and Compulsory Purchase Act 2004', and as further articulated through the NPPF. The Plan could therefore fail the tests of soundness. This is to say nothing of the political challenges that may arise if the consultation process is felt to be deficient.

Notwithstanding our concerns regarding the depth of the evidence base and the apparent intention to 'rush' to a Regulation 19 consultation, Vistry believes that Option 3 is the most suitable option, with Option 5 also meriting consideration. The reasoning behind this is set out in our response to Question 4 below.

Q.4 Reasons for Selecting this Spatial Strategy Option.

As indicated Vistry consider that Option 3 followed by Option 5, should be preferred. Vistry provides commentary below on each of the spatial strategy options identified in the Consultation Document, as well as the two alternative options identified in the SA at pages 94 to 100.

Option 1

User Response: Text

This option seeks to “Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty”.

Vistry recognises that Option 1 would not require the release of Green Belt land. However, the ‘Stage 2 Green Belt Assessment Exceptional Circumstances (Strategic) Note’ (July 2022), which forms part of the evidence base, effectively confirms that a spatial strategy prepared in accordance with this option would result in housing needs failing to be met in full.

On page 12 of the Exceptional Circumstances (Strategic) Note, it is indicated that some 77% of the Borough is constrained by either Green Belt, Areas of Outstanding Natural Beauty (AONBs) or national / internationally significant environmental constraints (such as SSSI). Much of the Borough is also constrained by other constraints, such as flood risk.

Moreover, were Option 1 to be progressed, the vast majority of new development would be concentrated in and around a small number of settlements in the east of the Borough. Such a focus would invariably place significant pressure on existing infrastructure. This may increase the complexity of delivering of homes, as new pre-requisite strategic infrastructure has to come forward to mitigate and/or alleviate potential impacts. In turn, this creates a risk to the timely delivery of new homes, potentially rendering the Plan less effective at sustaining the required five-year housing land supply (5YHLS).

The concentration of growth in the east of the Borough would also be inconsistent with the two Housing Market Areas (HMAs) identified in the Housing Market Delivery Study (July 2022). This report confirms that the west of the Borough falls within a ‘Sevenoaks and Tunbridge Wells HMA’, that experiences distinct patterns of supply and demand when compared to the ‘Maidstone HMA’.

As the Sevenoaks and Tunbridge Wells HMA falls almost entirely within the Green Belt and/or AONBs, there is no option but to meet housing needs within areas of constraint. Indeed, land beyond the Green Belt / AONB (within Tonbridge and Malling Borough) falls within the separate Maidstone HMA. Consequently, new housing has to be directed to west / south-west of the Plan-area, in order to ensure that housing is provided where there is a clear market impetus for delivery and demonstrable need.

Moreover, it is notable that the Sevenoaks and Tunbridge Wells HMA, extends across administrative boundaries to include the towns of Sevenoaks, Tonbridge, Tunbridge Wells and Crowborough. There is then a clear rationale for delivering new homes within this HMA, despite the aforementioned constraints. Indeed, Vistry regard this as essential, noting that the absence of an effective plan for achieving coordinated growth (within this cross-boundary HMA) was the underlying cause of the previously submitted Plan’s failure to address the Duty-to-Cooperate.

A spatial strategy that seeks to wholly avoid areas of constraint (including the Green Belt) would therefore not be effective, justified, nor consistent with national planning policies. Put simply, if the Plan is progressed based on Option 1, it is likely to be judged unsound when subject to Examination.

Option 2

Option 2 ‘Urban’ would see “Development focussed on sites within (greenfield as well as previously-developed land) as well as adjacent to urban settlements.”

Whilst such an approach would be more justified than Option 1, in that growth would occur in both HMAs identified in the evidence base, Option 2 would nonetheless result in an overconcentration of development at top-tier settlements.

User Response: Text

For the Plan to prove effective at both addressing housing needs in full and maintaining a rolling 5YHLS, it is essential that housing growth is distributed more broadly than envisaged in Option 2, in accordance with the identified settlement hierarchy.

A particular concern is that a singular focus on top-tier settlements is likely to result in excessively concentrated growth. Vistry consider that this approach risks reducing rates of housing delivery, as localised markets are unable to absorb very high levels of supply, within limited geographies.

Likewise, apportioning future growth exclusively to top-tier settlements would fail to spread the benefits of development (such as new affordable housing and community infrastructure) in an equitable way. An over-concentration is also likely to increase the magnitude of required strategic infrastructure and transport-related improvements. This may impact implementation and delay the delivery of new homes, services, and employment.

As such, a strategy focused solely on achieving growth at Urban Areas is unlikely to be effective at meeting housing needs and would therefore be unjustified and inconsistent with national planning policies, which represent fundamental tests of soundness.

Option 3

This option ('Urban and Rural Service Centres'), suggests that Development will be "focussed on sites within (greenfield as well as PDL), as well as adjacent to, urban areas and rural service centre settlements".

In creating a larger pool of different sized sites, this approach will facilitate the supply of housing and spread the benefits of growth to a wider range of communities, including Hildenborough.

However, it is important that sites which do not directly adjoin existing settlement boundaries are not simply excluded from the detailed site selection process. This is particularly the case where a site is well-related to the services at the settlement and presents other sustainability benefits.

For example, in the case of Hildenborough, Land South of Noble Tree Road lies outside of the settlement boundary. However, it adjoins Hildenborough Railway Station, such that new housing at the site would facilitate low-carbon transport modes. Likewise, the site is connected to the settlement via a pedestrian walkway and is approximately 10 minutes' walk from the main cluster of local services in the village.

Overall, and subject to the proviso specified above, Vistry considers that Option 3 could represent a justified and effective spatial strategy, particularly if the detailed site selection process favours those sites where development has the potential to maximise travel by non-car modes.

Option 4

Option 4 ('Distributed'), would see development "focussed on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and other rural settlements to support a range of communities".

This option would result in a very broad distribution of growth to settlements across the Plan-area. Whilst this approach has the advantage of spreading the benefits of development to a wide range of communities, it may result in growth at locations which are not accessible, lack services and which have small existing populations.

Should this option be taken forward, most of the future housing growth would still need to be directed to the urban areas and rural service centres. The scale of distribution to villages within the 'other rural settlements' category would need to be comparatively limited overall, with the scale of specific allocations being informed by the circumstances of each settlement.

User Response: Text

Option 5

This option 'new settlement', considers the potential for a new settlement(s) to be brought forward within the Plan-area "in-principle". Vistry are concerned that the 'broad areas of search' associated with this option (as set out at Figure 7 of the consultation document), appear to deliberately exclude land adjoining or near existing settlements.

The exclusion of areas around existing settlements is not appropriate, as 'new settlements' are rarely brought forward in areas that are entirely free of existing development. Indeed, new settlements are typically proposed at key transport nodes (notably train stations) and/or function as 'urban extensions' to existing towns, even if they are physically separated by design.

For example, many 'garden villages' are described as new settlements, in so far as they promote a degree of self-containment and are master-planned to avoid physical coalescence (through the distribution of open space and green infrastructure). However, such new settlements are often located within close proximity to an established town or village, and exhibit strong functional relationships (through work and travel patterns) with it.

Vistry consider that such a 'garden village' could be provided to the west / south west of Hildenborough, within the area that lies to the north of the railway line and south of Noble Tree Road / Tonbridge Road. This would facilitate connectivity between Hildenborough and Hilden Park, and Hildenborough Railway Station, and would deliver new homes near an important public transport node. This would clearly bring significant sustainability benefits, not least through the facilitation of travel by non-car modes.

Taking this into account, Vistry maintains that the area of search should be both broadened such that land next to existing settlements is not excluded on an arbitrary basis. This will allow for a fuller exploration of how best to promote sustainable patterns of development across the Plan-area. The broad area/location(s) should also be more refined prior to Regulation 19 Stage, noting Vistry's previously cited concerns regarding the limited scope of future Local Plan consultations as proposed.

Strategy Option 1_ Should be adopted as this prohibits the loss of the Green Belt and harmful development in an Area of Outstanding Natural Beauty.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

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- to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

The MGB around Tonbridge fulfils all the requirements laid down in the NPPF:

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

Continual expansion of Tonbridge beyond existing Green Belt boundaries will result in extreme congestion and deterioration in the quality of life for the town's inhabitants. This is an extreme likelihood due to the pending nearby developments (Tudeley, Paddock Wood) proposed by Tunbridge Wells B.C. in their current local plan.

My favoured option is **OPTION 1: OUTSIDE** of GREEN BELT and AONB which must be protected at all costs.

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

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

User Response: Text

The overall plan should be seeking to protect areas of high quality green belt (such as open green fields, previously undeveloped greenbelt). There should also be efforts to protect high quality agricultural land in the plan, whether it is in greenbelt or not. Although Option 1 focuses on areas outside the greenbelt, those would be my top 3 priorities:

1. Protect green belt
2. Protect high quality agricultural land
3. Protect previously undeveloped greenfield green belt land

In addition i would like to see an overall strategy that avoids settlements merging and avoiding development outside of the established boundaries of settlements

Greenbelt is vitally important for openness. It doesn't have to be pretty, just open and to prevent urban sprawl.

I prefer Option 1, followed by Option 2 for the following reasons :

- **Best use of non green belt land with least harm to character areas and areas with limited**
- **Least risk of creating flooding problems within the borough.**
- **Involves cheaper areas in which to buy and rent, and therefore will naturally create more affordable housing than elsewhere in the borough.**
- **There are existing excellent transport links and roads for much of the areas in Options 1 and 2, which have thriving towns with great infrastructure nearby.**

I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including Hadlow.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

The proposed land in Hildenborough is over developed, and services stretch to capacity i.e. sewers, landscape drainage, schools, doctors surgeries over subscribed.

Question.5

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

Question.6.

What are your reasons for selecting this spatial strategy option? Greenbelt is sacrosanct, it is not a re-useable commodity - once it has gone, that is forever

User Response: Text

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

Option 4 I think that all communities need housing for young families from the locality and see no reason why rural villages should be exempt. There should be a range of housing, including 1 and 2 bed flats and affordable starter homes. Not 5-bed executive housing. The amount of development should be proportionate to the size of the settlement. Option 5 appears to be Borough Green Garden City, which is an option that urbanises the area forming continuous development between Wrotham Heath, Platt, Borough Green and North Ightham.

Option 1- Focus development in and adjacent to settlements beyond the outer green belt boundary and o/s area of outstanding natural beauty

A check unrestricted sprawl

B prevent neighbourhood neighbouring area towns merging

C safeguard countryside from encroachment

D preserved setting and character of the town

E assist urban regeneration.

Continual expansion of Tonbridge beyond existing green belt will cause congestion and that aeration of the town.

Q3 /Q4 : I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

User Response: Text

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I am very concerned about the potential impact of the local development within the Tunbridge Wells borough council, in particular the proposed development in Capel, on the neighboring areas including East Peckham.

I am concerned to ensure that relevant agencies i.e. environment agency, highway agency, NHS and utility companies, engage robustly with local planning consultation process. I am also concerned about developers engaging with those agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

- 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.
- As a principal however, I agree that the development of brownfield is preferable to destroying open countryside and valuable farmland.

Best use of brown belt sites. Medway mainly industrial

Green Belt land should be protected to avoid urban sprawl. It is mostly good agricultural land much needed for future food production.

- Green Belt and Areas of Outstanding Natural Beauty are sacrosanct. The purpose of Green Belt is to protect the countryside and prevent urban sprawl. AONBs should not be subjected to harmful development.

User Response: Text

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

- None of the suggested options reflect the needs of current built communities of the North-East area of the borough
- all options seem to continue with the over expansion of builds within existing built areas – this is not deemed acceptable
- **TMBC encouraged to continue to lobby Government for reduction in allocation**
- **Disproportionate amount of TMBC's new housing has been built in and around West Malling in the last 20 years.**
- 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 homes**

Outside of Green Belt and AONB which must be protected at all costs. Whilst all areas need some development, Green Belt was initially set up to legally protect these areas. It is sacrosanct.

It is noted that an Urban Capacity Study (July 2022) has been undertaken to identify sites within existing urban areas and Rural Service Centres that could be utilised for housing needs. The study identifies a range of potential development sites with a theoretical capacity of circa. 2,000 homes which are to be investigated further as part of the Plan-making process. However, we consider that as part of this process it will be essential to robustly establish if these sites are realistically suitable, deliverable and available, particularly as the majority of sites appear to comprise valuable public amenity land or previously developed sites comprise car parks, which from the aerial imagery provided at Appendix E of the Study appear to be well used.

The Study therefore indicates limited opportunities exist within the urban areas and RSCs, much less than the theoretical capacity identified, and we therefore have significant reservations that reservations that Options 1, 2

User Response: Text

and 3 alone would deliver sufficient land to accommodate the Council's housing needs.

It is therefore considered that a balanced and blended approach to Options 4 and 5 will likely be required to meet the housing needs of the Borough. These Options will best ensure that a wide range of sites, including smaller and larger plots, development adjacent settlements, on green field and on brownfield are delivered, which will assist in providing for a consistent supply of homes across the Plan period.

We note that the Housing Market Delivery Study identifies East Peckham to be located within the Maidstone HMA, albeit limited evidence is provided to establish why this is now within the Maidstone HMA and not the Sevenoaks and Tunbridge Wells HMA. It is unclear whether the emerging Local Plan will seek to provide a distinct housing requirement for each HMA, if this is pursued additional evidence and a robust justification will be needed to demonstrate the suitable locational boundaries between the HMAs in the Borough.

Where there is overlap between the HMAs, which is likely to be the case for East Peckham, these areas should be acknowledged as appropriate locations for housing delivery to serve both HMAs.

Matters relating to HMAs are a cross boundary strategic issue. Changes to HMA boundaries should be discussed and agreed with relevant neighbouring authorities within the same HMA areas (i.e. Maidstone and Sevenoaks).

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'.

Option 5 is the best opportunity to match infrastructure & facilities to the development needs.

User Response: Text

Option 1 and Option 5.

West Malling and Kings Hill currently delivers almost 60% of development in the last 20 years yet accounts for only 1% of the area of TMBC. Other areas should be considered for development.

Assess housing need 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.

Existing settlements should retain their identity and not turn in to a continuous urban sprawl. The Metropolitan Green Belt need to extend to the West Malling by-pass

Is the houses are genuinely required this would spread the impact in already crowded areas. Also, experience shows improving and updating facilities doesn't happen as population increases.

The heritage character of the countryside must be preserved. This is what makes Kent special. You risk destroying that important landscape feature.

Best use of non green belt land with least harm to character areas and areas with limited infrastructure. Least risk of creating flooding problems within the borough. Involves cheaper areas in which to buy and rent therefore will naturally create more affordable housing than elsewhere in the borough. Excellent transport links and roads for much of the areas in Options 1 and 2. Thriving towns with great infrastructure nearby.

I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

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OPTION 1, but there is a case for Option 4, in that every rural community needs some housing.

Greenbelt is sacrosanct, it is not a reuseable commodity - once it has gone, that is forever.

None – we should be seeking to concentrate development outside of greenfield and greenbelt sites and NOT on grade 1 agricultural land.

We should be safeguarding our agricultural land not concreting over it. Out countryside is disappearing at an alarming rate of knots.

OPTION 1, but there is a case for Option 4, in that every rural community needs some housing.

Greenbelt is sacrosanct, it is not a reuseable commodity - once it has gone, that is forever.

I choose Option 1, all development should take place outside Greenbelt and AONB.

It's best to focus development in our towns rather than letting them sprawl. Our towns provide the basis for economic development and it is important that Tonbridge retains its setting and special character.

I choose Option 1, all development should take place outside Greenbelt and AONB.

- None of the suggested options reflect the needs of current built communities of the North-East area of the borough
- all options seem to continue with the over expansion of builds within existing built areas – this is not deemed acceptable
- **TMBC encouraged to continue to lobby Government for reduction in allocation**
- **Disproportionate amount of TMBC's new housing has been built in and around West Malling in the last 20 years.**
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User Response: Text

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This area is greenbelt / greenfield and grade 1 agricultural land. There are plenty of available sites that aren't that could be used instead. These sites have been put forward before. I think it's important that villages have boundaries and this would encroach on this.

OPTION 1. But every rural community would benefit from some housing.

Greenbelt land must be protected to prevent urbanisation

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.

We support Option 3 on the basis that it provides a balanced approach to meeting needs across the Borough. In our view, East Peckham is a wholly appropriate location for new housing.

I choose Option 1, all development should take place outside Greenbelt and AONB.

I choose Option 1, all development should take place outside Greenbelt and AONB.

Over building in the area with over stretch services, drainage and water run off.

Option 1 is the least worst option.

We should be seeking to concentrate development outside greenfield and greenbelt sites and not on grade 1 agricultural land. Villages should retain their geographical entity and not be allowed to spread into neighboring settlements.

From the meeting held on Tuesday 1st Nov at Trottiscliffe, I understand there to be 5 Options open to the Council

User Response: Text

to fulfil it's statutory duty to build new homes in Tonbridge and Malling.

As was stated, none of the options are attractive, in that the new housing will put even more pressure on roads transport, school, doctors etc. It would appear therefor to be a case of choosing the least worst.

This would appear to be option 3 with option 2 a second to that

My reasoning for this is that all the sites would be in areas where there are already some facilities and it would be a case of improving these rather than starting from scratch.

Smaller villages such as Trottiscliffe have narrow single track roads, poor transport links and no shops as well as being in an area of outstanding natural beauty.

- None of the suggested options reflect the needs of current built communities of the North-East area of the borough
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- **TMBC encouraged to continue to lobby Government for reduction in allocation**
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My favoured option is **OPTION 1: OUTSIDE** of Green Belt and Areas of National Beauty, which must be protected at all costs.

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

Selected 1 Option and Option 2

What are your reasons for selecting this particular spatial strategy option for the Local Plan?

Best use of non green belt land with least harm to character areas and areas with limited infrastructure. Least risk of creating flooding problems within the borough. Involves cheaper areas in which to buy and rent therefore will naturally create more affordable housing than elsewhere in the borough. Excellent transport links and roads for much of the areas in Options 1 and 2. Thriving towns with great infrastructure nearby.

User Response: Text

I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

Focusing development in existing urban areas makes use of existing infrastructure and avoids the untidy sprawl of disconnected developments where inadequate or no infrastructure exists nor is unlikely to be provided in sufficient quantity.

We should be seeking to concentrate development outside of greenfield and greenbelt sites and not on grade 1 agricultural land.

We should also be preventing neighboring towns from merging into one another by maintaining village boundaries, assisting in safeguarding the countryside from encroachment, and preserving the setting and special character of historic towns

As we are not part of T&M, we hesitate to offer a view. However, the emphasis on The Medway Gap, Snodland and, particularly, Kings Hill in Options 1-4, inclusive, generates considerable concern that traffic volumes passing through our village will increase substantially.

Option 5 would appear to reduce that threat, but, clearly, those T&M residents living close to any new settlement would understandably be very concerned, especially if such new settlement(s) are poorly planned and consulted upon.

We have not selected an option, but have offered comments based on likely impact on traffic generation in already problematic local road infrastructure.

When the previous Local Plan was submitted for examination, the Planning Inspectors raised some significant initial concerns about the evidence base relating to the Green Belt changes. In view of this, we have concerns about how the legal tests (e.g. exceptional circumstances) could now be justified when there are plenty of other sites put forward outside these protected areas. Furthermore, proposals for a substantial Green Belt land release (in view of the alternative sites) would both be contrary to the National Planning Framework (NPPF, 2021, e.g. Para. 140-141) and likely be unjustified (i.e. unsound), given that housing need alone is unlikely to outweigh the harm. In the Interim Sustainability Appraisal Report, this option generally appears to have been scored just as positively as Options 2 & 3, and has more positive scorings, than the other options. Notwithstanding these observations, about the Option scoring, we are concerned that there is no specific Objective to take account of infrastructure constraints (inc. highways capacity), which is an important consideration when trying to assess the most sustainable spatial strategy (see Q.8 & 11). With reference to Para. 5.5.22 (Reg. 18 L.P.) and TMBC's previous comments (on TWBC Reg. 18

User Response: Text

Consultation), it is acknowledged that there are existing “infrastructure challenges in Tonbridge”. As such, there is limited scope for more development in and around Tonbridge, requiring significant areas of Green Belt, which cannot represent sustainable development without suitable brownfield sites/road capacity. Further east, there is less protected land and bigger strategic roads (e.g. M20) with more capacity, than our roads, so development would have less negative impacts. We support maximising the “use of previously-developing land”, as stated in Option 5. It is also important to prevent the coalescence of surrounding settlements and urban extensions within the countryside buffers of rural settlements, to preserve their rural character and separate identity. Please refer our comments in Question 2, which highlights proposals contrary to these principles.

Option 1 and 2 selected

Best use of non green belt land with least harm to character areas and areas with limited infrastructure. Least risk of creating flooding problems within the borough. Involves cheaper areas in which to buy and rent therefore will naturally create more affordable housing than elsewhere in the borough. Excellent transport links and roads for much of the areas in Options 1 and 2. Thriving towns with great infrastructure nearby.

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I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

User Response: Text

All areas within the greenbelt around Tonbridge comply with requirements set out in the NPPF:

1. Prevent the unrestricted sprawl of large built-up areas.
2. Prevent neighbouring towns merging.
3. Safeguard the countryside from encroachment.
4. Preserve the setting and special character of historic towns.
5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

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.

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

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3. Safeguard the countryside from encroachment.
4. Preserve the setting and special character of historic towns.
5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The expansion of Tonbridge beyond existing Green Belt boundaries will result in worsening congestion and air quality. The Green Belt is there to prevent urban sprawl and it should be respected by this Local Plan.

None of the suggested options reflect the needs of current built communities of the North-East area of the borough

- all options seem to continue with the over expansion of builds within existing built areas – this is not deemed acceptable
- **TMBC encouraged to continue to lobby Government for reduction in allocation**
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User Response: Text

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Least impact on Green Belt and environment.

Building the minimum of houses possible.

Focusing development in existing urban areas makes use of existing infrastructure and avoids the untidy sprawl of disconnected developments where inadequate or no infrastructure exists nor is unlikely to be provided in sufficient quantity.

Small rural settlements are in danger of stagnating with declining service provision. New Housing growth in all of them would provide a welcome stimulus.

I understand that West Malling and Kings Hill only account for 1% of area of TMBC, but has provided 58% of development in last 20 years. Other than Option 1, the remaining options include intrusion into the Green Belt and other countryside areas which is undesirable. Are there any other strategies for locating sites which would minimize the loss of the countryside, whilst still meeting the housing need?

There is absolutely no reason to destroy green belt land in this area. At a time of climate emergency you are looking to rid the area of much needed countryside.

Frankly I'm disgusted it's even on the table for you.

It is the best use of non green belt land with the least harm to character areas and areas with limited infrastructure. There is least risk of creating flooding problems within the borough. It Involves cheaper areas in which to buy and rent therefore will naturally create more affordable housing than elsewhere in the borough. There are excellent transport links and roads for much of the areas in Options 1 and 2. There are thriving towns with great infrastructure nearby.

I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham and Hale Street.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers

User Response: Text

engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

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Nationally we have a housing crisis with approx. 1.5 million homes needed. To answer this the Borough should look at the mechanism to spread the growth to all sustainable locations to both spread the burden and offer choice in size, style and value.

Based on the very high-level scale maps and commentary presented within the Consultation Document and the Interim Sustainability Appraisal (ISA), BDW consider that either Option 3 or Option 4 should be preferred. BDW also generally support Option 2 albeit this option is comparatively less preferable due to the likelihood such a strategy would less effectively spread the benefits of developments across the Borough given its concentration on the top-tier settlements.

Options 3 and Option 4

Option 3 and Option 4 provide more opportunities to deliver balanced growth across the Borough.

Option 3 focusses development upon on sites within (greenfield as well as PDL), as well as adjacent to, urban areas and rural service centre settlements. This option is more likely to enable the Council to diversify the nature and scale of sites allocated for development. This in turn facilitating the supply of housing and spreading the benefits of growth to a wider range of communities.

Option 4 focusses development on sites within (greenfield as well as PDL) as well as adjacent to urban areas, rural service centres and the other rural settlements to support a range of communities. This option would also likely result in a very broad distribution of growth; however, it will also likely result in growth at locations which are not as accessible, lack services and increase reliance upon travel by private motor vehicles to facilitate for day-to-day needs to access services and facilities. As such, Option 4 is less likely to contribute to sustainable patterns of development than Option 3 contrary to national planning policy objectives.

Alternative Options

In addition to the options presented in Question 3 of the Consultation Document, BDW would take this opportunity to also raise a broader concern. That none of the identified options or alternative options, explore a strategy for meeting needs through a coordinated cross-boundary strategy. Whilst progressing such a strategy

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evidently presents political challenges, it is precisely the absence of such a strategy which resulted in the withdrawal of previously submitted Plans in both Tonbridge and Malling Borough, and in Sevenoaks District. This issue is also one of the key risks facing the submitted Tunbridge Wells Local Plan, which is currently at Examination.

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, never mind any addition development.

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

WE SUPPORT Spatial Strategy Option 2 for the borough which has an urban focus as per the indicative map illustrating this option as set out in Figure 4. In this instance development would be focussed on greenfield and previously developed land within the urban areas as well as land adjacent to these settlements. Thus, locating development in areas with good access to existing services and facilities. Also, option 2 will significantly and positively impact on encouraging sustainable economic growth, business development, and economic inclusion across the borough, and have less of a negative impact on the Mereworth sites listed above [see comments under Downs and Mereworth].

It should be the case that if there is space for development to adjoin or extend from existing, larger settlements, then those should be considered in the first instance. This is due to more developed infrastructure and transport links already being present, and a reduced chance of adverse impact on environmentally and policy constrained land. It would also assist in preserving the openness of the Metropolitan Green Belt. In addition, there are limited transport links or room for significant expansion of infrastructure to support development in rural areas of the borough, without significant adverse impacts on biodiversity, landscape character, air quality, cultural heritage, and openness of the Green Belt – as the sustainability appraisal makes clear. The sustainability appraisal further supports the economic case for spatial options 2 and 3, and lesser negative impacts on significant areas of environmental concern. Development should not be permitted in Rural Areas (option 5) – this would cause significant harm to the countryside, and on people’s health and wellbeing who currently reside in these areas, which are widely used for leisure and recreation. In addition, building on grade 1 agricultural land would harm the rural economy.

OPTION 1, but there is a case for Option 4, in that every rural community needs some housing

User Response: Text**Option 1:**

Much of the most versatile agricultural land in the borough is built over

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option does not address the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The area is in the Maidstone House Market Area, i.e. relies on Maidstone for urban resources. The roads to Maidstone are subject to a number of Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

Kings Hill does not have adequate road transport. Even the main entrance is a private road, closed at the whim of the developer. Many surrounding roads are quiet lanes which would have their character and use for recreation destroyed by such over development.

Kings Hill is NOT an urban area so should not be included as a focus for development. See Office for National Statistics: <https://geoportal.statistics.gov.uk/datasets/national-statistics-postcode-lookup-2021-census-august-2022/about>

Kings Hill does not have the resources of an urban area, such as police station, fire station, ambulance station, library, post office, hotel etc.

Option 2:

Much of the most versatile agricultural land in the borough is built over

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option only partially addresses the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

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User Response: Text**Option 3:**

Much of the most versatile agricultural land in the borough is potential to be built over

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Option 4:

Much of the most versatile agricultural land in the borough is potential to be built over

Much of the proposed area is in flood plain: More pressure on the most versatile agricultural land

The option only partially addresses the high house price / earnings ratio for the borough which is skewed because of the lack of available homes in the South and East of the borough. Does not follow government guidelines with respect to uplift due to high house price / earnings ratio.

The area is in the Maidstone House Market Area, i.e. relies on Maidstone for urban resources. The roads to Maidstone are subject to a number of Air Quality Monitoring Areas (AQMA) and additional traffic will exacerbate the pollution for residents.

The continual recent development around village centres has meant that most are already overloaded and struggling and more such development will exacerbate the situation.

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Option 5:

A new town would become an urban area and would require pre-implementation of infrastructure. It does not seem that TMBC are willing to put in such investment. In addition, much of the land would be more costly for developers to develop, and would likely only be accepted if there was no alternative. In addition, the road network should be the primary focus for development to ensure that adequate connectivity to service centres was provided. Likewise, new connectivity for water, gas and electricity would need to be implemented. There was brownfield land in green belt that was assigned in the previous (withdrawn) local plan, and that should be re-considered, even given the constraints identified here.

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture.

Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, never mind any addition development.

Traffic and Parking is already an issue due to builder/planners not reserving enough parking for each house based on the number of bedrooms, growing families and making garages too small to get out of a family car even if they could get the car in the garage. When there is a problem on the A228 Kings Hill becomes gridlocked as it did last week when the roads of Kings Hill flooded and a broken down car on the A228. The A228 goes into a single road to Mereworth and cannot take the traffic now especially if there is a problem on Seven Mile Lane which is also a single road not built for the purpose of carrying the volumes of traffic and size of lorries on the road these days not meant for villages

GP – the local surgery cannot cope at the moment and many people have to use private medical services because they cannot get an appointment. The queues before 8 in the morning outside the GP is ridiculous. Additional houses will add to this problem and may even add to fatalities because of lack of GP's and building another surgery will not solve the problem if Gp's do not want to work in Kings Hill.

Schools – Local schools are full and no Secondary school on Kings Hill pupils are forced to use Public transport (which looks like being culled in February) meaning more cars trying to leave Kings Hill by the only exits onto A228

Stores/Shops- The existing stores are at capacity with the current population (ne Aldi may relieve some of this) amenities at present are insufficient for the current population

Public Transport – Poor , expensive and non-existent on Sunday. To be culled in February with no bus to the station and others being cut.

User Response: Text

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Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

OPTION 1, but there is a case for Option 4, in that every rural community needs some housing
Greenbelt is sacrosanct, it is not a reuseable commodity - once it has gone, that is forever

To expand beyond will cause extreme congestion. Other nearby developments are under way - making almost gridlock in peak times. General decline of a rural area.

[Options 1 and 2]

Best use of non green belt land with least harm to character areas and areas with limited infrastructure. Least risk of creating flooding problems within the borough. Involves cheaper areas in which to buy and rent therefore will naturally create more affordable housing than elsewhere in the borough. Excellent transport links and roads for much of the areas in Options 1 and 2. Thriving towns with great infrastructure nearby.

I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

User Response: Text

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

I choose Option 1, all development should take place outside Greenbelt and AONB.

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

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This area is greenbelt / greenfield and grade 1 agricultural land. There are plenty of available sites that aren't that could be used instead. These sites have been put forward before. I think it's important that villages have boundaries and this would encroach on this.

We should be seeking to concentrate development outside of greenfield and greenbelt sites and not on grade 1

User Response: Text

agriculture land.

We should also be preventing neighboring towns from merging into one another by maintaining village boundaries, assisting in safeguarding the countryside from encroachment, and preserving the setting and special character of historic towns

Option 1, but there is a case for small scale development for local community housing needs in rural areas.

Greenbelt must be protected, it is a precious environment and once it has gone, there is no going back, it is lost forever.

- Green Belt and Areas of Outstanding Natural Beauty are sacrosanct. The purpose of Green Belt is to protect the countryside and prevent urban sprawl. AONBs should not be subjected to harmful development.

Option 1 , but there is a case for Option 4, in that every rural community needs some housing

Greenbelt is sacrosanct, it is not a reuseable commodity - once it is gone, that is forever

Greenbelt is too precious, it cannot be replaced. Losing hedges and other greenbelt areas will affect wildlife and biodiversity negatively. The impact could create flood risks where there is lack of soil drainage.

Option2 with some option 4

Option2 :Urban areas have the infrastructure to cope with new development,

Option4 Some small development in all locations to cover natural local growth.

OPTION 1, but there is a case for Option 4, in that every rural community needs some housing

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

My favoured option is **OPTION 1: OUTSIDE** of GREEN BELT and AONB which must be protected at all costs.

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

INFRASTRUCTURE - is already crumbling - it must be upgraded before a single brick is laid

User Response: Text

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

I believe it is important to concentrate development outside of greenfield and greenbelt sites and not on grade 1 agricultural land.

It is also important to prevent the neighbouring towns merging into one another by maintaining village boundaries, We should assist in safeguarding the countryside from encroachment, preserve the setting and special character of historic towns, assist in urban regeneration

Options 1 and 2

Best use of non green belt land with least harm to character areas and areas with limited infrastructure. Least risk of creating flooding problems within the borough. Involves cheaper areas in which to buy and rent therefore will naturally create more affordable housing than elsewhere in the borough. Excellent transport links and roads for much of the areas in Options 1 and 2. Thriving towns with great infrastructure nearby.

I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

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I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

I choose Option 1, all development should take place outside Greenbelt and AONB.

I choose Option 1, any development if really needed should take place outside Greenbelt and AONB.

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I choose Option 1, all development should take place outside Greenbelt and AONB.

Greenbelt and AONB should be respected and brownfield sites prioritized. There are significant brownfield sites in the Borough and Borough Green in particular.

OPTION 1, but there is a case for Option 4, in that every rural community needs some housing.

Greenbelt is sacrosanct, it is not a reuseable commodity - once it has gone, that is forever.

OPTION 1, but there is a case for Option 4, in that every rural community needs some housing

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We should be seeking to concentrate development outside of greenfield and greenbelt sites and not on grade 1 agricultural land. Also preventing neighbouring towns merging onto one another by maintaining village boundaries, assist in safeguarding the countryside from encroachment, preserve the setting and special character of historic towns, assist in urban regeneration.

Because we should avoid developing other centres where this would lead to the joining of settlements.

I do not support spatial options 1-4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural

User Response: Text

land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has place on local services and green spaces. The transport link and essential services (in particular doctors and dentists are not able to cope with the current burden, nevermind any addition development. Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

- 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.
- As a principal however, I agree that the development of brownfield is preferable to destroying open countryside and valuable farmland.

I understand that West Malling and Kings Hill only account for 1% of area of TMBC, but has provided 58% of development in last 20 years. Other than Option 1, the remaining options include intrusion into the Green Belt and other countryside areas which is undesirable. Are there any other strategies for locating sites which would minimize the loss of the countryside, whilst still meeting the housing need?

I choose Option 1, all development should take place outside Greenbelt and AONB.

Greenbelt is not reusable. Once it is gone it cannot be replaced.

Focusing development in existing urban areas makes use of existing infrastructure and avoids the untidy sprawl of disconnected developments where inadequate or no infrastructure exists nor is unlikely to be provided in sufficient quantity.

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough.

It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater

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Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

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.

[Options 1 and 2]

Best use of non green belt land with least harm to character areas and areas with limited infrastructure. Least risk of creating flooding problems within the borough. Involves cheaper areas in which to buy and rent therefore will naturally create more affordable housing than elsewhere in the borough. Excellent transport links and roads for much of the areas in Options 1 and 2. Thriving towns with great infrastructure nearby.

I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites. The appropriate infrastructure needs to be in place before any approval is made to ensure minimal impact to existing residents

Reluctantly accepting option 1.

I think that the assessed need is too high.

Keep Green Belt safe and Areas of Outstanding Natural Beauty.

User Response: Text

Q3 /Q4 : I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

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Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

Answer: Option 4 I think that all communities need housing for young families from the locality and see no reason why rural villages should be exempt. There should be a range of housing, including 1 and 2 bed flats and affordable starter homes. Not 5-bed executive housing. The amount of development should be proportionate to the size of the settlement. Option 5 appears to be Borough Green Garden City, which is an option that urbanises the area forming continuous development between Wrotham Heath, Platt, Borough Green and North Ightham.

[Options 1 & 2 selected]

Best use of non green belt land with least harm to character areas and areas with limited infrastructure. Least risk of creating flooding problems within the borough. Involves cheaper areas in which to buy and rent therefore will naturally create more affordable housing than elsewhere in the borough. Excellent transport links and roads for much of the areas in Options 1 and 2. Thriving towns with great infrastructure nearby.

I am concerned about the potential impact of development within Tunbridge Wells Borough Council, in particular the proposed development at Capel, on neighbouring areas including East Peckham.

I am concerned to ensure that relevant Agencies (Environment Agency, Highways Agency, NHS, Utility companies) engage robustly with the Local Planning consultation process. I am also concerned about Developers engaging with those Agencies meaningfully, to ensure timely and robust consultations in relation to specific sites.

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

I do not support spatial options 1 – 4 as they will all result in an expansion of Kings Hill beyond the original brownfield footprint. The area surrounding Kings Hill is mixture of Green Belt, useful high grade agricultural land, and important woodlands which are essential for carbon capture. Of the options 1-4, option 4 would be the preferred option as this would spread the development most evenly across the borough and is most likely to result in development being focused on the brownfield sites in the borough. It should also be noted that in the last 20 years, the area around West Malling (including Kings Hill) has suffered from a disproportionate quantity of new housing in the last 20 years. A report compiled for the Broadwater Action Group found that despite accounting for 1% of the geographical space of the borough, the West Malling area has absorbed roughly 58% of the number of new dwellings with the associated demand this has placed on local services and green spaces. The transport link and essential services (in particular doctors and dentists) are not able to cope with the current burden, nevermind any addition development.

User Response: Text

Option 5 of an entirely new development in the borough would result in even more destruction of green field land, which I would not support.

- Green Belt and Areas of Outstanding Natural Beauty must not be violated.
 - The purpose of Green Belt is to protect the countryside, prevent urban sprawl and prevent the merging of neighbouring towns into one another. They provide a mechanism for defining limits to development.
 - AONBs should not be subjected to harmful development.

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