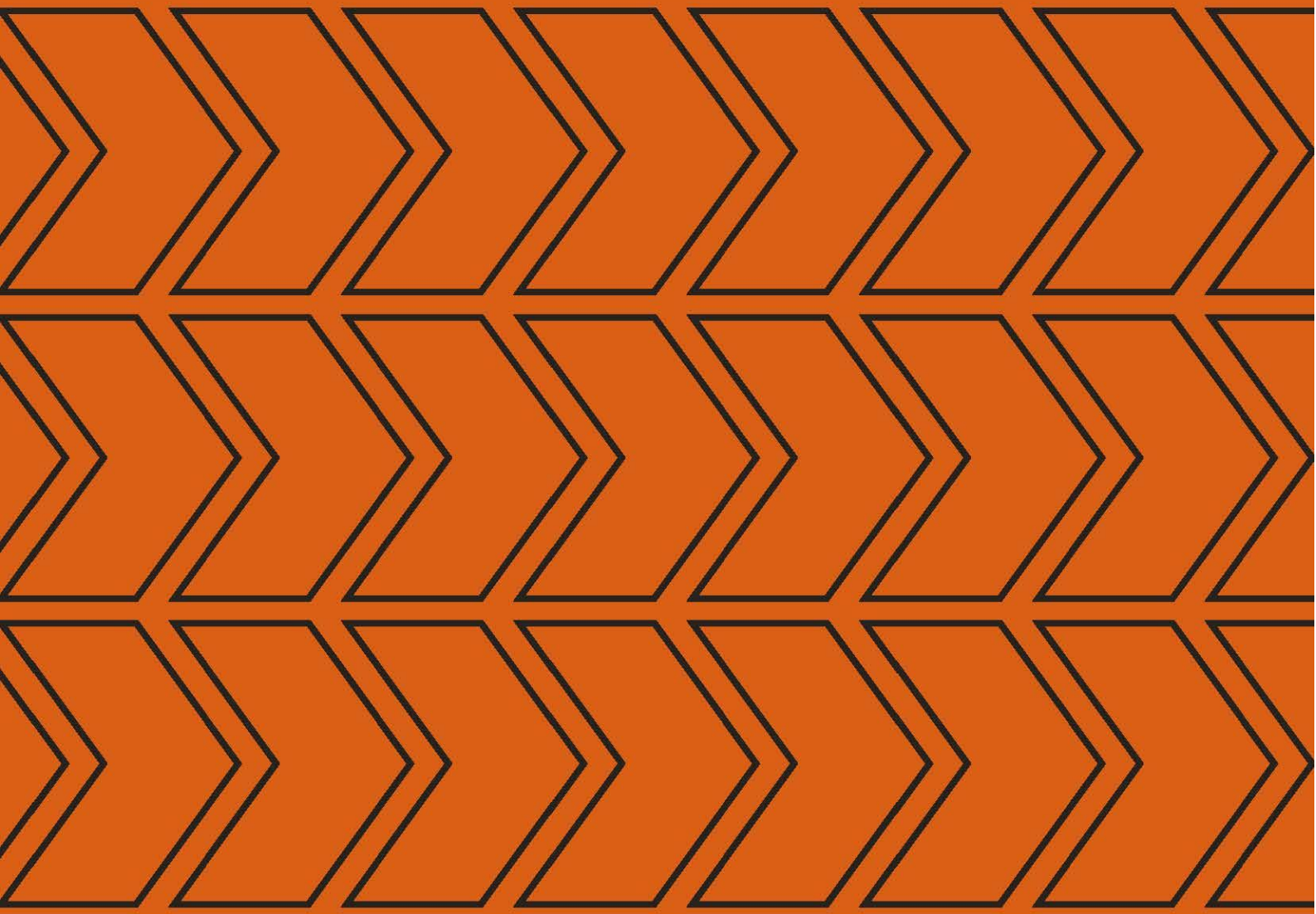
Representations on Tonbridge and Malling Borough Council's Draft Local Plan Regulation 19 Consultation

October 2026



WWA

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On behalf of:

Hildenborough Parish Council

October 2026

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CONTENTS

1 INTRODUCTION 4
2 NATIONAL PLANNING POLICY CONTEXT 7
3 HILDENBOROUGH'S OVERALL DEVELOPMENT DISTRIBUTION 11
4 INFRASTRUCTURE PROVISION AND CUMULATIVE DEFICIENCIES 20
5 GREEN BELT ASSESSMENT AND SETTLEMENT COALESCENCE 28
6 LOCAL GREEN GAP AND LOCAL GREEN SPACE 32
7 LACK OF EFFECTIVE SITE SPECIFIC POLICY FRAMEWORK 36
8 SUPPORTING TECHNICAL MATTERS 40
9 NEIGHBOURHOOD AREA HOUSING REQUIREMENT 57
10 SOUNDNESS CONCLUSIONS 59

Appendix 1: Local Plan Representation to Regulation 18
Appendix 2: 2010 Report to the Planning and Transportation Advisory Board
Appendix 3: 2011 Proposals Map
Appendix 4: TMBC's Site Selection Topic Paper
Appendix 5: Southeastern email to the Parish Council, 4 February 2026 (redacted)
Appendix 6: TMBC Leader's presentation, Hildenborough public meeting, 30 September 2026

1 INTRODUCTION

1.1 West Waddy Archadia has been instructed by its client, Hildenborough Parish Council (herein referred to as 'the Parish Council'), to submit this representation in response to the consultation on the Publication Draft Regulation 19 Tonbridge and Malling Local Plan 2024-2042, prepared by Tonbridge and Malling Council (TMBC).

1.2 Since the Regulation 19 consultation material was prepared, the Plan-making process has also been subject to a Ministerial Direction issued on 4 September 2026. The Direction followed TMBC's decision of 3 September 2026 not to approve the emerging Local Plan for consultation and required TMBC to proceed with the Regulation 19 stage. It is relevant to the examination context because it confirms that the Plan is proceeding notwithstanding the circumstances in which TMBC's decision was taken.

1.3 The emerging draft Local Plan is built on a minimum housing requirement of 20,106 dwellings, an average of 1,117 per year (Policy SP2). This derives from the Government's standard method and represents a 33% increase on the previous figure of 839 per year. Of that total, 13,469 dwellings come from site allocations, with the remainder from completions, extant permissions and a windfall allowance.

1.4 Approximately 71% of the borough is Metropolitan Green Belt. TMBC concludes that needs cannot be met outside the Green Belt and that exceptional circumstances therefore exist to alter Green Belt boundaries. Across the borough, allocations on land to be removed from the Green Belt total 8,034 dwellings.

1.5 The Parish Council begins by recognising where TMBC has responded to its Regulation 18 representations on several points. Emerging Policy NE3 now requires a Landscape and Visual Impact Assessment (LVIA) as requested at paragraph 3.44 of those representations. The Design Review Panel threshold has fallen from 500 dwellings to 100 (Policy D2(3)), and Policy D2(1) now requires a masterplan for all sites of 100 or more dwellings; the Parish Council had asked for 50, so this is partial, but it is movement, and allocations HP1, HP2 and HP3 now qualify. Policy HP1(4) also now prohibits vehicular access from Rings Hill, other than pedestrian, cycle and controlled emergency access.

1.6 The Parish Council objected at Regulation 18 to 1,025 dwellings on four potential allocation

sites in the parish. The Publication Draft now allocates 1,210 dwellings on five allocations in the parish, and 1,254 including Little Trench Farm, an increase of 229 (22%) on the 1,025 objected to at Regulation 18. The Regulation 18 sites and the Regulation 19 allocations do not match one for one: for example, Regulation 18 site HI2 is now HP1 and HP3, the Regulation 18 site TO3 north of Hilden Cottages is now HP4, and Regulation 18 site TO4 is now HP2. None of the land objected to has been removed from the allocations, and HI1, which the Parish Council argued was constrained for a number of reasons, has in fact been increased from 77 to 96 dwellings, and HP4 (Hilden Farm Road), which the Parish Council said at Regulation 18 had capacity only for very small-scale development, has risen from 30 to 66 dwellings on the same 2.81 hectares.

1.7 Where a matter was raised at Regulation 18, this representation identifies the paragraph at which it was raised and how TMBC has responded. The Parish Council's Regulation 18 representations of December 2025 are appended to this representation (Appendix 1) so that the evidence, and the date on which it was provided, are before the Inspector.

1.8 The Parish Council objects to the allocation of HP1, HP2, HP3, HP4 and HI1 and the Little Trench Farm part of TO3 (LAA 59625, 44 dwellings), and considers that the Plan is not sound in allocating them, for the reasons below and because of the disproportionate scale of growth directed to the parish (Section 3). No modification could make these allocations sound.

1.9 HP1, HP2, HP3 and HP4 (1,114 dwellings on contiguous land): the new Green Belt boundaries drawn around them would not endure beyond the plan period (Section 5); the B245, the single road serving Hildenborough and Hilden Park, and the local road network do not have the capacity to serve them, and their cumulative effect has not been modelled (Section 8); none of the junctions on the B245 through Hildenborough, or at the HP1 access points, has been assessed; the Plan relies on Hildenborough Station without evidence that peak rail services, which Southeastern says are at full capacity, can take the additional demand, or that the station improvements the Plan describes as essential are funded (Section 8); and the water supply and sewerage infrastructure needed to serve them is not in place, and the undertakers have not shown that it can be provided within the plan period (Section 8).

1.10 HI1 (96 dwellings): access is from Riding Lane, a narrow semi-rural lane without footways,

street lighting or cycle provision, where earlier proposals for this land were refused on highways and Green Belt grounds; and TMBC's own flood risk evidence found that safe access and egress is not possible (Section 8).

1.11 Little Trench Farm (44 dwellings): agricultural land in Hildenborough parish on the western side of TO3, which TMBC counts separately from the 350 dwellings at Coblands Nursery (Housing Topic Paper, Appendix 3, p.32). TO3's development criteria in Annex 6 require a strong, permanent and defensible landscape boundary and buffer between built form and the open countryside to the west and south. Little Trench Farm should be retained in the Green Belt to provide that buffer, and TO3 reduced to 350 dwellings to match the Coblands Nursery scheme.

1.12 The Parish Council's position is that these allocations should be deleted and the housing directed instead to brownfield land in Tonbridge, which the Plan has not fully used (Section 5; Regulation 18 representations, paragraphs 3.6 and 3.34). The Parish Council's other requests in this representation are made without prejudice to this objection and apply only if the allocations proceed.

1.13 The Parish Council makes no objection to the Coblands Nursery part of TO3, which has a resolution to grant subject to the completion of a legal agreement under section 106 of the Town and Country Planning Act 1990.

1.14 The matters raised in this representation engage the tests of justification, effectiveness and consistency with national policy, and in combination they also affect whether the Plan has been positively prepared. The representation builds on the Parish Council's Regulation 18 representations and identifies the matters which remain unresolved. Each section sets out the test engaged and the modifications sought if the allocations proceed, without prejudice to the Parish Council's objection, are set out at the end of each section. The Parish Council wishes to be heard at the examination hearings in respect of the matters raised.

2 NATIONAL PLANNING POLICY CONTEXT

2.1 The National Planning Policy Framework ("the Framework") sets out the Government's planning policies for England and how these are expected to be applied. Although a new NPPF was published in August 2026, in accordance with Annex A of that document this emerging Plan will be assessed against the NPPF (December 2024) under the transitional arrangements. The Parish Council's comments are therefore based on the NPPF (December 2024).

Presumption in Favour of Sustainable Development

2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision taking (paragraph 11). For plan-making, this means:

> *(a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas); and adapt to its effects;*
>
> *(b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless;*
>
> *i. The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type, or distribution of development in the plan area; or*
>
> *ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework – taken as a whole.*

Plan making

2.3 Paragraph 15 states that the planning system should be genuinely plan-led. Plans should provide a positive vision for the future of each area including addressing housing needs.

2.4 Paragraph 20 requires that strategic policies should set out an overall strategy for the pattern, scale and quality of development, making sufficient provision for housing (including affordable housing).

2.5 Paragraph 36 states that plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

(a) ***Positively prepared*** *– providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.*

(b) ***Justified*** *– an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

(c) ***Effective*** *– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,*

(d) ***Consistent with national policy*** *– enabling the delivery of sustainable development in accordance with policies in this Framework.*

Planning for housing

2.6 Paragraphs 61 to 84 relate specifically to 'delivering a sufficient supply of homes'.

2.7 Paragraph 61 requires Local Planning Authorities 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 and that land with permission is developed without unnecessary delay.

2.8 Paragraph 62 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure,

any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

2.9 Paragraph 72 states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of;

(a) specific, deliverable sites for five years following the intended date of adoption; and
(b) specific, developable sites or broad locations for growth for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

2.10 Paragraph 73 requires local planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown that there are strong reasons why this target cannot be achieved.

2.11 Paragraph 77 states that supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns - provided they are well located and designed and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

(a) Consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
(b) Ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
(c) Set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;
(d) Make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development

corporations)38; and

(e) Consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

2.12 In relation to the preparation of strategic policies, Paragraph 22 elaborates on the justification for these considerations. This states that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

2.13 Paragraph 78 states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites, sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

(a) 5% to ensure choice and competition in the market for land; or

(b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or

(c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework41, and whose annual average housing requirement42 is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.

3 HILDENBOROUGH'S OVERALL DEVELOPMENT DISTRIBUTION

Scale of Development Proposed

3.1 Policy A1 and Annex 3 of the emerging Draft Local Plan allocate five sites which the Plan itself attributes to Hildenborough Parish. Part of a sixth, Allocation TO3, also lies in the parish: TMBC's Site Selection Topic Paper (Appendix 1, attached as Appendix 4) records Little Trench Farm (LAA 59625) in Hildenborough parish, although Policy A1 records the whole of TO3 against Tonbridge.

3.2 All of them are identified in Annex 3 of the draft Local Plan as sites to be removed from the Green Belt.

3.3 The allocations within the Parish are set out in the below table. There is no allocation in the parish on previously developed land within an existing settlement boundary.

Ref	Site	Homes	Green Belt
HP1	Land off Stocks Green Road	602	Release
HP2	Land Northwest of Hilden Park	290	Release
HP3	Land south of Stocks Green Road	156	Release
HP4	Hilden Farm Road, Tonbridge	66	Release
HI1	Land East of Riding Lane, Hildenborough	96	Release
TO3	Little Trench Farm, Trench Road (Coblands Nursery, 350 dwellings, lies in Tonbridge)	44	Release
	Total in Hildenborough Parish	**1,254**	

Figure 1: Table setting out the proposed housing numbers

3.4 Policy A1 and Annex 3 record the whole of TO3 (Coblands Nursery and Little Trench Farm, Trench Road, 394 dwellings) against Tonbridge. TMBC's Site Selection Topic Paper (Appendix 1, attached as Appendix 4) records Little Trench Farm (LAA 59625) in Hildenborough parish and Coblands Nursery (LAA 59746, 350 dwellings) in Tonbridge. TMBC's Housing Topic Paper (2026, page 32) gives Little Trench Farm a yield of 44 dwellings, which is also the difference between TO3's 394 dwellings and the 350 at

Coblands Nursery. The Land Availability Assessment gives 39. This representation uses TMBC's figure of 44 and counts only Little Trench Farm in the parish total of 1,254 dwellings.

3.5 The Plan is also internally inconsistent in regard to Allocation HP1 ‘Land off Stocks Green Road’, applying its allocated housing figures in three different ways.

i. Policy A1 and Annex 3 record HP1's applicable settlement as ‘Tonbridge and Hilden Park’, which would place the proposed 602 dwellings in that settlement. Policy A1 only refers to 96 dwellings being located in Hildenborough settlement.

ii. Figure 5.4 and Annex 1 count the same 602 dwellings within Hildenborough's settlement total of 698. The arithmetic confirms this: the Hildenborough figure of 698 encompasses Allocation HI1 (96) plus Allocation HP1 (602), while the Tonbridge and Hilden Park figure of 3,361 is the nine Tonbridge allocations (2,849) plus HP2, HP3 and HP4 (512).

iii. Figure 5.2 states that Hildenborough will receive around 1,200 homes. That matches the five sites the Plan records in Hildenborough parish (1,210), but it excludes Little Trench Farm (44), because TO3 has been attributed entirely to Tonbridge and Hilden Park. It is a parish figure, whereas the figures of 96 and 698 are settlement figures.

3.6 The Plan therefore uses different bases, settlement figures of 96 and 698 and a parish figure of about 1,200, without saying which it means. A reader is left choosing between them depending on which page they consult, with no textual basis for preferring one over another.

3.7 The problem extends beyond HP1. HP2, HP3 and HP4 (512 dwellings) and Little Trench Farm (44) lie physically within Hildenborough Parish but are counted in the settlement total for Tonbridge and Hilden Park. Annex 1 presents Hildenborough as a village receiving 698 dwellings, when it is in fact a parish receiving 1,254.

3.8 Policy A1 is capable of recording more than one parish against a single site (KH1 is entered as ‘East Malling & Larkfield, Kings Hill’), so where only one parish is given, that is an assertion. Nor is the column applied consistently to sites that straddle a boundary: HA2,

‘Land North of The Paddock and East of Carpenters Lane, Tonbridge and Land South of Common Road, Hadlow’, is recorded against Hadlow alone.

3.9 The Plan uses ‘Tonbridge and Hilden Park’ to describe a single Tier 1 Principal Service Centre but nowhere defines where Hilden Park begins or ends – and the plan’s own allocations confirm that land at Hilden Park lies in Hildenborough. HP2 (Land Northwest of Hilden Park, Tonbridge) and HP4 (Hilden Farm Road, Tonbridge) are both recorded in Hildenborough parish, and paragraph 14.117 describes HP1 as lying west of Hilden Park. The Tier 1 settlement therefore extends across land that is administratively Hildenborough, so that development in this parish is recorded as development in Tonbridge. However, the Policies Map does not clearly reflect or demarcate this.

3.10 The attribution is not a matter of presentation or labelling convenience. It distorts the Plan's reasoning, its evidence base and its delivery.

i. HP1 is defended on the basis that it adjoins Tier 1 Tonbridge and benefits from its services (paragraphs 14.126 to 14.127), yet the dwellings, traffic, pupil requirement and pressure on services all fall within Hildenborough. The site is being justified by reference to a settlement it does not sit in.

ii. Presenting Hildenborough's growth as 698 rather than 1,254 is not a rounding difference – it is the difference between what the Plan can present as a large allocation and what is, in reality, an increase of about two thirds in the parish’s households. No reader of the settlement totals in Annex 1 could grasp the true scale of what is actually proposed for Hildenborough.

iii. Settlement attribution also shapes where CIL and section 106 receipts are directed and which schools and health facilities are assessed as under pressure. On the

Plan's own figures, infrastructure planning for Hildenborough will be based on a population increase little more than half of the true figure.

3.11 The Parish Council requires that the settlement totals in Annex 1 and Figures 5.2 and 5.4 be reconciled with the parish column of Policy A1, that Little Trench Farm be recorded in Hildenborough parish, and that the Plan state the total allocated in Hildenborough parish.

3.12 The Policies Map should also show where the Hilden Park element of the Tier 1 settlement begins and ends, which it does not currently and adds to significant illegibility of the plan.

Disproportionate Distribution

3.13 The scale of change is best expressed in proportion, which the Plan does nowhere. The 2021 Census records 1,908 households in the parish (ONS, Census 2021). Some 1,254 additional dwellings would be an increase of approximately 66% on the parish's 1,908 households. The parish takes 9.3% of all allocations in the borough (1,254 of 13,469) and 15.6% of the borough's entire Green Belt release (1,254 of 8,034). One parish is therefore to carry about a sixth of the Green Belt release across the whole borough.

3.14 The allocation is out of line with the other Tier 3 Primary Villages: Hadlow is allocated 782 dwellings, East Malling and Mill Street 294, and East Peckham and Wateringbury none. The comparison with the Tier 2 Service Centres, which have materially higher levels of service, is more telling still. Borough Green is allocated 2,000 dwellings, Kings Hill 1,638 and Snodland 1,336. At 1,254 dwellings, Hildenborough Parish takes almost as much as Snodland (1,336), a Tier 2 Service Centre, while remaining a Tier 3 village.

3.15 Its Tier 3 score overstates what the village can offer new residents. TMBC's Sustainable Settlement Study (October 2025) awards points where a service is present, regardless of how many there are (paragraph 5.13), and does not consider whether it has capacity; the availability of infrastructure to support growth is left to other evidence (paragraph 1.5). As the Parish Council pointed out at Regulation 18 (paragraphs 3.11 and 3.12), the Study's Appendix A credits Hildenborough with services, including Stocks Green Primary School, Stocks Green Nursery School and the petrol station, that are in Hilden Park, which the Study assesses as part of the Tonbridge Principal Service Centre. Nor does the evidence on capacity support the score. The Study credits Hildenborough Medical Centre, but the NHS Kent and Medway Integrated Care Board's position, as presented by TMBC's Leader, is that existing infrastructure will not have capacity for the planned growth north of Tonbridge and east of Hildenborough and that a new site for primary and community care

will be needed (paragraph 4.10). The expansion of Stocks Green Primary School is unfunded (paragraphs 4.8 and 4.9). Southeastern has advised the Parish Council that the Tonbridge corridor, to which Hildenborough is subject, is at full capacity in the morning peak hour (paragraph 8.7 and Appendix 5). The score itself has fallen from 68 to 61.66 (paragraph 4.3).

3.16 At paragraphs 3.4 to 3.13 of its Regulation 18 representations, the Parish Council objected that the allocations do not follow the settlement hierarchy, that Hilden Park should not be treated as part of the Tonbridge Principal Service Centre, and asked for clear justification of Hildenborough's categorisation having regard to the planned growth (paragraph 3.12). Figures 5.6 and 5.7 are however unchanged in the Publication Draft. The Tier 1 label is the basis on which HP1 is justified as an extension of a Tier 1 settlement (paragraphs 14.126 to 14.127), while the dwellings themselves will lie in a Tier 3 parish. TMBC has given no reasoned response to the physical, administrative, historical and functional case made at paragraph 3.10 of the Regulation 18 representations. Tonbridge is now to have its own parish: the Tonbridge Reorganisation of Community Governance Order 2026, made on 29 May 2026, creates Tonbridge Town Council with effect from 1 April 2027. The new parish adjoins Hildenborough parish and does not include the vast majority of Hilden Park, which remains in Hildenborough.

3.17 TMBC has long counted Hilden Park in two ways. Its report to the Planning and Transportation Advisory Board of 28 July 2010 (Appendix 2) on the Character Area Appraisals placed ‘the Hilden Park part of Hildenborough Parish’ within the Tonbridge volume (paragraph 1.2.1), while describing the Hildenborough appraisal as including ‘both the original village and Hilden Park, which technically lies within the urban confines of Tonbridge’ (paragraph 1.4.1). The 2011 Proposals Map (Appendix 3) shows the boundary of Hilden Park along the rear of the Leigh Road gardens. The Plan continues this dual treatment without defining where Hilden Park begins or ends (3.9, 3.12), and relies on it to justify HP1 as an extension of a Tier 1 settlement while the dwellings lie in a Tier 3 parish.

3.18 The issue is therefore not the quantum of housing in isolation, but whether its distribution is justified against the settlement's role in the hierarchy, the capacity of its infrastructure and the growth directed to higher-order settlements. TMBC has not justified why a Tier 3 Primary Village should take almost as much development as Snodland (1,336), a Tier 2

Service Centre. Nor is it apparent that reasonable alternative distributions were tested to the same level of detail as the preferred and published strategy.

3.19 The Parish Council asks TMBC to reassess the distribution of growth directed to Hildenborough against reasonable alternatives, including the higher-order settlements, and explain why a Tier 3 Primary Village should accommodate almost as much as Snodland (1,336), a Tier 2 Service Centre. The evidence shows that the Plan is contrary to the justified test.

Cumulative Effects

3.20 Allocations HP1, HP2, HP3 and HP4 are contiguous and together comprise 1,114 dwellings, rising to the parish total of 1,254 with HI1 and Little Trench Farm. Their effects on the highway network, schools, healthcare, drainage, community facilities, landscape and settlement identity arise cumulatively, not site by site. Neither the site policies nor the Annex 6 criteria assess them together, and it is not apparent that the Sustainability Appraisal appraised HP1 to HP4 as a single body of development rather than as four separate allocations. Appraising them separately understates the cumulative effect on the surrounding area.

3.21 The cumulative issue also extends beyond the parish boundary. TMBC's evidence identifies growth north and north-west of the Medway crossings that will use the same strategic highway corridors serving Hildenborough and Tonbridge. That traffic is funnelled through the river crossings in Tonbridge town centre, two pairs of bridges on the High Street and on Vale Road, and over the railway bridge at Tonbridge station. On the figures in the TMBC Local Plan Junction Modelling Report 2025, this comprises approximately 3,651 dwellings, including the Hildenborough allocations, the North Tonbridge allocations and other growth in the corridor. The resulting pressure cannot be understood by considering the Hildenborough allocations in isolation, particularly as the B245 and A21 approaches are the principal routes through which this growth will interact, with consequences for highway capacity, public transport, stations and access to services. The same applies to education, healthcare and water resources.

3.22 On the figures in Policy A1, that corridor total of about 3,651 dwellings comprises TO1 (1,500), HP1 to HP4 (1,114), TO3 (394), HI1 (96) and the Tonbridge town centre allocations TO4 to TO9 (547). TMBC's summary of Regulation 18 evidence base responses records that Tonbridge's constrained road network means increased

development, especially to the north, will worsen pressure on the two Medway crossings, and that further detailed modelling is required.

3.23 The picture is complicated further by growth in neighbouring authorities. Hildenborough lies close to the Sevenoaks boundary and within a travel-to-work and travel-to-services area that also includes Tunbridge Wells, so growth planned there will draw on the same corridors, stations, school catchments, healthcare facilities and water infrastructure. The Parish Council therefore considers that the evidence base should show how the cumulative effect of growth across the relevant authorities has been taken into account.

3.24 In particular, TMBC should identify whether the strategic transport evidence incorporates neighbouring growth assumptions and whether the B245/A21 corridor and the stations serving the area have been assessed on a cumulative basis. Similar consideration is required for secondary school capacity and water resources, which are not confined to the boundary of Tonbridge and Malling, and the infrastructure requirements arising from combined growth should be reflected in the Plan's delivery and phasing arrangements. The statutory duty to cooperate ceased on 25 March 2026, as the Plan confirms at paragraph 2.26, but national policy still expects strategic policy-making authorities to collaborate on cross-boundary strategic matters and to prepare and maintain statements of common ground (Framework, paragraphs 24 to 28). The Parish Council also asks that the relevant Statements of Common Ground with neighbouring authorities be made available, and that the Plan show how cross-boundary infrastructure matters have been addressed rather than deferred. The point goes to the effectiveness of the Plan, which depends on the evidence showing that the cumulative infrastructure consequences of growth in the wider area have been properly identified and addressed.

3.25 Sevenoaks District Council has published a Regulation 19 Local Plan providing for 17,460 homes between 2027 and 2042. Hildenborough lies on that district boundary. The Statements of Common Ground with Sevenoaks District Council and Tunbridge Wells Borough Council should address the A21 and B245 corridors, capacity and parking at Hildenborough and Tonbridge stations, secondary school catchments, and water resources in the shared resource zone. The capacity of the railway line, as well as station capacity and parking, should also be addressed, given growth at Tunbridge Wells, Paddock Wood and Sevenoaks on the two-track line south of Orpington. TMBC is required to assess 1,254 dwellings as a single body of development, together with the allocations north and north-west of the Medway crossings and relevant growth in adjoining districts,

and address those cross-boundary matters in the Statements of Common Ground rather than defer them, as the effectiveness test expects. The evidence shows that the Plan is contrary to the justified and effective tests.

3.26 TMBC has not adequately justified concentrating 1,254 dwellings in Hildenborough parish, having regard to its Tier 3 status, its acknowledged reliance on higher-order settlements for wider services, and the absence of proportionate cumulative infrastructure provision. The Plan is neither justified nor effective in this respect.

3.27 The Parish Council therefore asks that the distribution of growth directed to Hildenborough Parish be reassessed against reasonable alternatives, and that the cumulative

infrastructure requirements of the 1,254 dwellings be assessed as a single body of development rather than as separate allocations.

4 INFRASTRUCTURE PROVISION AND CUMULATIVE DEFICIENCIES

Failure to Match Housing Growth with Infrastructure

4.1 Given the discrepancies and internal inconsistencies in the Plan's presentation of Hildenborough's housing figures identified above, the Parish Council considers that the correct position is that 1,254 dwellings are allocated within Hildenborough Parish. This represents a substantial scale of additional development for the Parish, for which the Plan has not demonstrated that the necessary infrastructure and community facilities are available, planned or capable of being delivered alongside the proposed growth. On the face of the parish allocations, there is no new school proposed, no healthcare or general practice provision, no community hub or community building, no indoor sports provision, no clear mechanism for securing the necessary infrastructure, and no appropriate infrastructure triggers linked to occupation or phasing. In these circumstances, the Parish Council considers that the Plan has failed to demonstrate that the proposed scale of housing growth is sustainable or that the infrastructure necessary to support it can be delivered. This is a further reason why the allocations should not proceed and without prejudice to that objection, they should not do so unless and until the Plan provides a clear and credible strategy for addressing the infrastructure deficit arising from the proposed level of growth.

The Settlement Hierarchy Evidence

4.2 TMBC's own evidence shows why the above omissions matter. Hildenborough is a Tier 3 Primary Village (Figure 5.6), a category which the Sustainable Settlement Study places in a scoring range of 48 to 68 and describes as having a good range of services, but with residents needing to travel to larger centres for wider shopping, leisure, employment and health needs. Of Hildenborough specifically, the Study says it is included in the category because it depends on other settlements, including Tonbridge and Hilden Park, rather than having a range of services in its own right, and that it therefore does not meet the definition of a service centre.

4.3 Its classification is unchanged in the updated 2026 evidence, but its score has fallen from 68 in the October 2025 Study to 61.66. TMBC's evidence now records the settlement as less well served than previously assessed at the same time as the Plan directs 1,254 dwellings to it, while Tonbridge and Hilden Park continue to be assessed collectively as a

Principal Service Centre. The updated evidence changes the score but neither explains nor results in any change to the distribution of growth.

4.4 The Plan directs growth on the scale of a Tier 2 Service Centre to a settlement its own evidence treats as dependent on others, without securing the services that would reduce that dependence. That is not a justified strategy.

4.5 Education provision illustrates the problem. Allocation HP1 does not require a school, a healthcare facility or a community building. The Plan's treatment of allocations elsewhere reveals a clear pattern: every allocation of 1,300 dwellings or more secures a school, and no allocation below that figure does, including AY1 at 938 dwellings, HP1 at 602 and HA1 at 422. The effect is that the largest single allocations attract a school while smaller ones do not, regardless of what they add up to. The Hildenborough allocations are each below 1,300, so do not individually trigger the threshold to secure a school, yet together they amount to 1,254 dwellings, about 50 short of the 1,300 at which the Plan elsewhere secures a school. Because the allocations are assessed one by one and not as a single body of development, that cumulative demand is never met.

4.6 Kent County Council's Commissioning Plan for Education Provision in Kent 2026 - 2030 (paragraph 6.2) states that its forecasts do not incorporate demand from housing which does not yet have planning permission and does not form part of an adopted Local Plan. Those forecasts would not, on that basis, include the allocations in this Plan. Secondary provision is planned across a travel-to-school area covering Tonbridge and Malling, Maidstone, Tunbridge Wells and Sevenoaks, and three of those areas are bringing forward substantial growth in the same period. TMBC's evidence base summary also records that the County Council assessed the Plan on a maximum pupil yield, treating all units as houses, and that feasibility studies were still required to confirm the mitigation in the Infrastructure Delivery Plan.

4.7 The Parish Council therefore asks that the evidence base sets out the housing growth assumptions used in the education forecasts, including neighbouring growth, and

demonstrate that the resulting primary and secondary requirements can be met through identified schools, capacity, contributions and delivery mechanisms.

Ref	Homes	Settlement	On site requirements
BG1	2,000	Borough Green	3FE primary school, healthcare facility, community hall and indoor sport, convenience retail
TO1	1,500	Tonbridge	2FE primary school, healthcare facility, community hall and indoor sport, convenience retail
SN1	1,300	Snodland	2FE primary school, community hall and indoor sport, convenience retail
KH1	1,300	Kings Hill	8FE Secondary school, playing pitches available for community use
MG1	1,300	Medway Gap	2FE Primary school, community hall and indoor sport; convenience retail
-	1,254	Hildenborough Parish (5 allocations and Little Trench Farm combined)	Convenience retail, outdoor sport and play
AY1	938	Aylesford/Eccles	Convenience retail forming a local centre; no school
HP1	602	Hildenborough	Convenience retail, outdoor sport and play only
HA1	422	Hadlow	No school
TO2	408	Tonbridge	None in the policy, supporting text at 14.73 refers to education

Figure 2: Table setting out the allocation requirements

4.8 The objection is not that HP1 should have a school because other allocations do, but that 1,254 dwellings generate a quantified education need which the Plan does not address on any site or by any mechanism. At Regulation 18 (paragraphs 3.59 to 3.65 and 3.103 to 3.105) the Parish Council showed, from TMBC's Interim Infrastructure Delivery Plan, a primary need of 5.8 forms of entry arising from development in the wider area, not the parish alone. TMBC should state the need arising from the parish allocations, using Kent County Council's pupil product rates. It also showed that Stocks Green Primary School can be expanded whereas Hildenborough Church of England Primary School cannot, and that the proposed Grange Farm school is intended to serve North Tonbridge. The Infrastructure Delivery Plan lists the expansion of Stocks Green Primary School by one form of entry, which in capacity is equivalent to a new one-form-entry school. It is unfunded and is not secured by any allocation. On Kent County Council's pupil yield for houses (0.28 primary pupils per dwelling), 1,254 dwellings would generate about 350 primary pupils, about 1.7 forms of entry, so the expansion would meet only part of the need. Elsewhere the Plan secures a new two-form-entry school on allocations of 1,300 dwellings or more.

4.9 The Infrastructure Delivery Plan (Annex 1, August 2026, p.13) lists the expansion of Stocks Green Primary School by one form of entry, the locally supported option of expanding it from 1 Form Entry (1FE) to 2 Form Entry (2FE), as a 'Critical' project costing about £4.3 million, but the project is unfunded. Stocks Green Primary School occupies a single-storey building dating from 1969. The Infrastructure Delivery Plan does not show whether a second form of entry can be added to the existing building or whether part or all of it would need to be rebuilt, which would affect both the cost and the timing. TMBC has therefore identified the project but has neither funded nor secured it. Given that primary-aged children require schools within a reasonable walking and cycling catchment, the priority should be to fund and secure the expansion of Stocks Green Primary School to meet growth generated by Hildenborough and Hilden Park. The Regulation 19 evidence therefore remains incomplete.

4.10 The same applies to healthcare. No facility is secured on any allocation in the parish, and the cumulative effect of 1,254 dwellings on general practice capacity is not addressed anywhere in the Plan. The NHS Kent and Medway Integrated Care Board's position, as presented by TMBC's Leader at a public presentation in Hildenborough on 30 September 2026 (Appendix 6), is that for about 3,000 dwellings north of Tonbridge and east of

Hildenborough ‘existing infrastructure will not have capacity to meet the additional demand and a new site for a facility for primary and community care will need to be identified’. The Plan identifies no such site in the parish, and Policy HP1 secures no healthcare provision. Nor is there evidence of list sizes or current capacity at the practices serving the parish, or of the additional demand the allocations will generate. The Plan's reference to healthcare in Tonbridge also needs clarification. The adopted Tonbridge Town Centre Masterplan Framework and Delivery Strategy provides for a modern GP practice alongside the replacement leisure centre, but the Plan does not say whether this is additional capacity for growth arising from the Hildenborough allocations or principally a replacement or relocation of existing provision. If it is additional, the Infrastructure Delivery Plan should identify the capacity, the population it is intended to serve, how contributions from the Hildenborough allocations will be secured and when it will be delivered relative to occupation. If it is replacement, it cannot reasonably be relied on as mitigation for the demand generated by 1,254 dwellings.

4.11 The Integrated Care Board also expects developer contributions towards expanding capacity in the acute hospitals. The Viability Assessment allows a single generic sum of £11,000 per dwelling for all section 106 contributions (paragraph 4.30). The Plan does not show that contributions to primary care and the acute hospitals can be met from it alongside education, highways, community facilities and 50% affordable housing. Without that, there is no assurance the healthcare capacity the ICB says is needed will be funded.

4.12 The ICB's response to outline application 26/00230/OA in Hildenborough (letter of 9 April 2026) sought a contribution towards primary care capacity at Hildenborough Medical Group and Warders Medical Centre, but stated that ‘it is not possible at this time to set out a specific premises project for this contribution’. The ICB could not say which premises project the contribution would fund.

4.13 Policy HP1(1) requires convenience retail towards the Tonbridge Road frontage, outdoor sport and play space, but no indoor community or sports building. The Infrastructure Delivery Plan lists provision for indoor sport and community use in connection with the allocation (Annex 1, page 49, £300,000), but Policy HP1 does not require it, so it is not secured. If HP1 proceeds, the policy should require a community hub and indoor sports facility on site, or at another suitable site in the village, secured by planning obligation.

4.14 If the allocations proceed, and without prejudice to the Parish Council's objection, the question is whether they can be delivered properly, which goes to the effective test. The

Plan is weak on when infrastructure will arrive. Policy HP1(8) and (9) tie the timing of the new road between Tonbridge Road and Stocks Green Road, and of the pedestrian and cycle links to Hildenborough Station, to a "Vision and Validate / Monitor and Manage" framework informed by engagement with Kent County Council and Network Rail. There are no fixed occupancy triggers on the face of the policy. That is a monitor-and-react approach to infrastructure on which residents will rely from first occupation, and it does not give the certainty the effectiveness test requires. The Plan shows it can do better: Policy AY1 requires phasing so that infrastructure, services and community facilities are provided in step with occupation, and no reason is given for a weaker approach at HP1, where the highway and station connections are fundamental to the sustainability case.

4.15 The Parish Council also understands that Kent County Council does not generally rely on section 106 contributions for highway works appropriately secured through section 278 agreements. The Plan should therefore identify the works required, the delivery mechanism and the point at which each must be secured relative to occupation, applying measurable triggers consistently to HP1 and the other Hildenborough allocations while leaving the detailed form of highway works to section 278. A general commitment to monitor and manage the network is no substitute for an enforceable delivery mechanism.

4.16 If the allocations proceed, and without prejudice to its objection, the Parish Council therefore seeks the following:

- Require contributions from each allocation towards expanding Stocks Green Primary School from one to two forms of entry, provided Kent County Council confirms the expansion can be achieved; failing that, safeguard land for, and require, a new two-form entry primary school within HP1 or elsewhere in Hildenborough Parish.
- Require on-site healthcare provision within Policy HP1, or a secured contribution to expanded general practice capacity identified in the Infrastructure Delivery Plan, supported by NHS Kent and Medway Integrated Care Board evidence on list sizes, capacity and additional demand.
- Require in Policy HP1(1) a community hub and indoor sports facility on site, or at another suitable site in the village, secured by planning obligation. The contribution

identified in the Infrastructure Delivery Plan (about £300,000, Annex 1, page 49) would not on its own provide such a facility.

- Insert numeric occupancy triggers into Policy HP1 for the station links and each item of social infrastructure, and import the phasing wording of policy AY1 into Policy HP1 and Annex 6 criteria. If the new road is retained despite the Parish Council's objection, require it to be completed before construction of HP1 or HP3 begins, so that it can carry construction traffic.

4.17 The Plan is therefore not effective in respect of infrastructure in Hildenborough parish. It secures none of the social infrastructure it provides elsewhere at a comparable scale, and it defers what it does require to an unfixed monitoring framework. Nor is it justified, because

a quantified education need identified in TMBC's own evidence is neither carried forward into the Plan nor met by any mechanism within it.

5 GREEN BELT ASSESSMENT AND SETTLEMENT COALESCENCE

Conflict with TMBC's Own Green Belt Assessment

5.1 The matter was raised at paragraphs 3.19 to 3.27, 3.67 to 3.70 (HI1) and 3.88 to 3.90 (HI2, now HP1 and HP3) of the Parish Council's Regulation 18 representations and remains unanswered. The Plan relies on the Stage 2 Green Belt Assessment (Arup, July 2026) and the Green Belt Exceptional Circumstances Topic Paper (August 2026) (Plan paragraphs 5.88 and 5.91). Every assessed sub-area of HP1 (HI-02, HI-03 and HI-07 to HI-11) is 'not recommended' in the Stage 2 Assessment (Table 9), and the Topic Paper accepts this. The earlier 2025 Assessment had also warned that releasing HI-02 alone would nearly merge Tonbridge with Hildenborough, and that releasing HI-02 and HI-03 together would lead directly to their physical merging, creating an irregular and indefensible boundary. It reached a similar conclusion on sub-parcel TO-07 (Regulation 18 paragraphs 3.123 to 3.124), which contained the Regulation 18 site TO3 north of Hilden Cottages. The Topic Paper (p.35) confirms that TO-07 is HP4.

5.2 The emerging Local Plan does not answer the Assessment but endorses the outcome it warned against in progressing Allocation HP1. Paragraph 14.119 describes ongoing development as '*strengthening the physical relationship between Hildenborough and Tonbridge'*, and paragraph 14.123 describes the site as '*part of the transition between the built-up areas and the countryside'*. The Plan thus describes the gap it proposes to build in and treats closing it as a positive.

5.3 TMBC is asked to identify where, in the Green Belt Exceptional Circumstances Topic Paper (August 2026) or the Exceptional Circumstances Strategic Note (2026), the reasoned justification for departing from the Stage 2 Assessment's conclusions on HI-02, HI-03, HI-07 to HI-11 and TO-07 is set out. If there is none, the allocation of HP1 is not justified on TMBC's own evidence. The Parish Council does not accept that exceptional circumstances have been shown. TMBC's case rests on housing need that, on its own evidence, cannot at present be supplied with water (Section 8), and on the conclusion that all other reasonable options have been examined (Plan paragraph 5.86), when brownfield land in Tonbridge has not been fully used. In any event, the test is site-specific. A general case does not justify releasing a parcel that TMBC's own assessment did not recommend for release. On this land, the evidence points the other way. The Plan says that it released brownfield land first, then grey belt, then other Green Belt (paragraph 5.87), and that a

small number of allocations are ordinary Green Belt (paragraph 5.89). TMBC is asked to state into which of these categories each of HP1, HP2, HP3, HP4 and HI1 falls.

5.4 Nor does the Plan answer the landscape evidence. Views from River Hill in the National Landscape look over this land. TMBC's Landscape and Visual Appraisal finds 'limited or no potential for development' on HP1 parcels 59653, 59679 and 68459 (Part 2, pp.305 to 337), which Plan paragraph 14.135 summarises as 'potential for development when considered comprehensively'.

5.5 Policy SP7(3) and national policy require new Green Belt boundaries to follow physical features that are readily recognisable and likely to be permanent, so that they endure beyond the plan period. The boundaries drawn around HP1 to HP4 and HI1 would not. At HP4, the eastern and south-eastern boundary is a stock fence with scattered trees, with no permanent physical feature. The HP4 criteria in Annex 6 require a 'strong, permanent and defensible landscape boundary' to be created, which confirms that none exists. Once the land is removed from the Green Belt, the land beyond them would adjoin the built-up area. TMBC's Land Availability Assessment records further land in Hildenborough parish already promoted for development, including Land West of Tonbridge (LAA 59804, 101.73 ha), Land east of Coldharbour Lane (68446, 48.49 ha) and Land at High Barn (68441, 7.61 ha). Parish Councillors report, from local knowledge, that HP2 and HP4 would provide three access routes from the B245 to the land east of Coldharbour Lane: via Woodfield Avenue, a new road beside 100 Tonbridge Road, and Hilden Avenue. The new boundaries would therefore face pressure for further release within the plan period, particularly north of the B245, at Rings Hill, at the Ancient Woodland edges and along the western parcel of HP1.

5.6 The Parish Council therefore seeks the following:

i. Provide a reasoned, site-by-site justification for departing from the Stage 2 Green Belt Assessment's 'not recommended' findings, stating the category of each of Allocations HP1, HP2, HP3, HP4 and HI1 (previously developed land, grey belt or other Green Belt), having regard to the physical and visual separation between Tonbridge, Hilden Park and Hildenborough, the extent and openness of the intervening gap, and the cumulative effect of releasing adjoining parcels.

ii. Delete or reduce those allocations where they conflict with the conclusions of TMBC's own Green Belt Assessment, or alternatively publish a clear, evidence-

based justification explaining why TMBC has departed from the Stage 2 Assessment's recommendations for HI-02, HI-03, HI-07 to HI-11 and TO-07.

iii. Amend the Policies Map to ensure that any revised Green Belt boundaries comply with Policy SP7(3) and the NPPF by following readily recognisable and permanent physical features, particularly to the north of the B245, at Rings Hill, the Ancient Woodland edges and the western boundary of HP1.

iv. If the allocations proceed, designate a Local Green Gap over the remaining land between Hildenborough, Hilden Park and Tonbridge, as set out in Section 6, in

order to maintain settlement separation and prevent coalescence where Green Belt land is proposed to be released.

6 LOCAL GREEN GAP AND LOCAL GREEN SPACE

6.1 The emerging Local Plan recognises the important role that Local Green Gap designations play in preventing the coalescence of settlements where development pressure is greatest. Paragraph 5.109 explains that the designation is intended for land between settlements that are in close proximity, lie outside other strategic protective designations, and are experiencing significant pressure for development. Those circumstances now arise between Hildenborough, Hilden Park and Tonbridge following the proposed release of 1,254 dwellings from the Green Belt within Hildenborough Parish.

6.2 The Parish Council asked for a Local Green Gap at Regulation 18 (paragraphs 3.29 to 3.31 of its representations). TMBC's Green Gap Study (Enplan, October 2025, paragraph 1.6) scoped out settlements in the Green Belt because they were ‘essentially protected from coalescence’. The gap between Hildenborough, Hilden Park and Tonbridge was therefore never assessed, and the Plan now removes the protection on which that decision rested. The Regulation 19 Plan proposes to remove the Green Belt designation from substantial areas of the land separating these settlements, leaving the intervening land without either Green Belt or Local Green Gap protection.

6.3 The Plan therefore creates the very circumstances in which Policy SP9 is intended to operate. Its supporting text at paragraph 14.119 acknowledges that continuing development is strengthening the physical relationship between Hildenborough and Tonbridge, yet the Policies Map provides no equivalent gap designation to maintain their separate identity.

6.4 Policy SP9 already demonstrates TMBC’s acceptance that green gaps require bespoke protection where Green Belt alone is insufficient. The issue is not whether the principle of Local Green Gaps is justified, but why the strategic gap request between Hildenborough,

Hilden Park and Tonbridge has been ignored despite TMBC's own evidence identifying increasing settlement pressure and the removal of Green Belt protection.

6.5 The Local Green Gap designation is sought in order to:

i. prevent the coalescence of Hildenborough, Hilden Park and Tonbridge;

ii. maintain separate identity, character and setting;

iii. protect the open character of the intervening land following Green Belt release; and

iv. provide a clear, long-term planning framework for land that would otherwise lose its strategic role in maintaining settlement separation.

6.6 If the allocations proceed, and without prejudice to its objection, the Parish Council asks TMBC to amend Policy SP9 and the Policies Map to designate a Local Green Gap encompassing the land between Hildenborough, Hilden Park and Tonbridge, including the land proposed to be released from the Green Belt.

6.7 The evidence shows that the Plan is contrary to the justified and effective tests. Omitting the gap is not an appropriate strategy on TMBC's own evidence, and it leaves settlement separation unsecured once the Green Belt is removed.

Local Green Space

6.8 The Parish Council supports the proposed Local Green Space designations within Hildenborough, including Hildenborough Village Green (LGS43), Hildenborough Recreation Ground (LGS70) and Westwood, London Road (LGS106). These designations appropriately recognise land that is demonstrably special to the local community.

6.9 LGS70, Hildenborough Recreation Ground, is the only facility in the parish for formal sport, with tennis courts, a multi-use games area and a cricket club, together with a play space and extensive open areas.

6.10 The Local Plan should also provide a positive policy framework for the future designation of Local Green Spaces through neighbourhood planning. While Policy NE8 identifies allocated Local Green Spaces, it does not expressly recognise the ability of neighbourhood

plans to designate additional qualifying sites, despite national policy expressly providing for this mechanism.

Conclusion

6.11 If the allocations proceed, the Parish Council asks TMBC to designate a Local Green Gap between Hildenborough, Hilden Park and Tonbridge through Policy SP9 and the Policies Map.

6.12 The remaining gap is also smaller than the Policies Map suggests. The Map shows the Oakhill development, north of Tonbridge Road, as open land, but it has been built and should be shown as built development. North of Tonbridge Road, the only open land that now separates Hildenborough from Hilden Park is the land allocated as HP2.

6.13 Should TMBC or the Inspector conclude that a Local Green Gap is not justified, the Plan should instead designate qualifying land as Local Green Space, which may include parts of HP1 and HP2, and amend the HP1 and HP2 boundaries and yields accordingly. This would ensure that TMBC's evidence on settlement separation and its own conclusions on

heritage harm in the Heritage Impact Assessment (p 70 to 72) is reflected in an effective and enduring policy framework following the proposed Green Belt release.

7 LACK OF EFFECTIVE SITE-SPECIFIC POLICY FRAMEWORK

7.1 The Plan allocates 1,254 dwellings within Hildenborough Parish. Of these, HP2 (290 dwellings), HP3 (156), HP4 (66), HI1 (96) and Little Trench Farm (44) account for 652 dwellings (52%), yet none are supported by an individual site allocation policy. Instead, they rely solely on the brief development criteria contained within Annex 6.

7.2 By contrast, the Local Plan applies dedicated policies to strategic allocations elsewhere, with comprehensive requirements relating to placemaking, infrastructure, access, delivery and masterplanning. The Hildenborough allocations contain no equivalent policy framework despite representing one of the largest concentrations of growth within the borough.

7.3 Policy A2 does apply to these sites, and covers transport, affordable housing, landscape and infrastructure, but only in general terms. It is too general to secure what allocations of this scale require, and it does nothing to co-ordinate the delivery of HP1 to HP4.

Annex 6 criteria are inadequate for allocations of this scale

7.4 The Annex 6 criteria are limited to a small number of environmental constraints and omit many of the fundamental matters necessary to ensure comprehensive and coordinated development.

7.5 There is no requirement for a comprehensive access strategy; highway mitigation and sustainable transport connections; education or healthcare infrastructure; affordable housing provision; green infrastructure; drainage phasing; design principles; or delivery arrangements.

7.6 This deficiency applies across HP2, HP3, HP4 and HI1, where the criteria are confined largely to landscape, trees, groundwater and flood risk, leaving the principal planning issues to be resolved at application stage rather than through the development plan.

The allocations function as a single strategic urban extension

7.7 This omission is particularly significant because HP1–HP4 are contiguous and collectively deliver 1,114 dwellings. They do not operate as independent sites but form one continuous

area of expansion extending between Hilden Park, Stocks Green Road and Hilden Farm Road.

7.8 Treating these as separate allocations prevents the Local Plan from addressing:

- the cumulative highway, transport and access strategy;
- coordinated green infrastructure;
- integrated surface water and drainage infrastructure;
- education and healthcare provision;
- water supply;
- protected species;
- phasing and infrastructure delivery; and
- the relationship between landscape buffers and settlement separation.

7.9 Without a unified policy, each allocation can be advanced independently on the assumption that wider infrastructure will be delivered elsewhere, creating uncertainty over responsibility and timing.

Conflict with the Plan's own strategic approach

7.10 Paragraphs 1.15–1.17 of Annex 6 explain that sites under 400 dwellings rely on site criteria, while larger allocations receive bespoke policies. This arbitrary threshold results in HP2 (290 dwellings) being treated in the same way as HP4 (66 dwellings), although together with HP1 and HP3 they form a single contiguous extension of 1,114 dwellings.

7.11 Similarly, Policy D2(1) requires masterplans for developments of 100 dwellings or more, meaning HP2 and HP3 will both require masterplanning. However, a masterplan is only effective where it is tested against clear policy objectives. The generic masterplan requirement cannot substitute for a site-specific policy setting out the infrastructure, access, design and delivery outcomes it must achieve.

7.12 The Plan is therefore not effective because the Hildenborough allocations lack sufficiently detailed policy requirements to secure coordinated delivery of over 1,000 dwellings.

Fundamental matters have been deferred to the development management process rather than being established through the Local Plan.

7.13 If the allocations proceed, and without prejudice to its objection, the Parish Council requests that full site allocation policies be prepared for HP2, HP3, HP4 and HI1; or preferably, a single comprehensive policy be introduced for HP1–HP4, supported by one

masterplan, one infrastructure delivery schedule and one phasing programme to ensure coordinated delivery of the Hilden Park urban extension.

7.14 The evidence shows that the Plan is contrary to the effective test.

8 SUPPORTING TECHNICAL MATTERS

8.1 The supporting technical evidence has evolved since the Regulation 18 consultation, including updated transport, infrastructure, Green Belt and environmental evidence. The Parish Council welcomes this additional work; however, significant gaps remain between the evidence base and the policy framework contained within the Publication Draft.

8.2 In a number of instances, the technical documents identify important constraints—such as flood risk, education capacity, water infrastructure, protected habitats and cumulative transport impacts—but the corresponding site allocation policies either omit those issues entirely or defer them to future planning applications. The role of the Local Plan is to establish the strategic framework within which development will come forward, and matters that are fundamental to the deliverability of the allocations should therefore be addressed through policy rather than left to subsequent development management.

8.3 The following sections identify the principal technical deficiencies and the main reasons for why a re-assessment of the plan is required in order to ensure that the Plan is justified, effective and consistent with national policy. The requests below for changes to the site policies are made if the allocations proceed, and without prejudice to the Parish Council's objection to them. The Parish Council welcomes the requirement for a minimum of 50% affordable housing on land released from the Green Belt (Policies SP8(4) and H2(3)), with a tenure mix of approximately 80% social rent and 20% intermediate (Policy H2(4)) and affordability in perpetuity (Policy H2(5)).

Ancient Woodland, the Station Link and Rail Capacity

8.4 Paragraph 14.130 accepts that the pedestrian and cycle route to Hildenborough Station required by Policy HP1 must pass through the Ancient Woodland in the south-western part of the site and suggests boardwalk or no-dig construction. Ancient woodland is an irreplaceable habitat attracting the highest level of protection in national policy. A policy which requires a connection that may not be deliverable without harm to an irreplaceable habitat is not an effective policy, and the sustainability credentials of the allocation depend in significant part upon that connection.

8.5 The Parish Council seeks an amendment to Allocation HP1 to require that the pedestrian and cycle connection to Hildenborough Station follows a deliverable alignment which

avoids Ancient Woodland, ancient woodland buffers and root protection areas. Where this cannot be demonstrated, the policy should identify an alternative route.

8.6 The Plan relies on Hildenborough Station to support Policy HP1, describing it as providing 'regular rail services to London' (paragraph 14.129), and leaves station infrastructure to future consultation with Network Rail (Policy HP1(9)). It provides no evidence that peak rail services can take the additional demand from 1,254 dwellings in the parish and from planned growth elsewhere on the same line (paragraph 3.25).

8.7 The evidence that exists points the other way. Southeastern advised the Parish Council on 4 February 2026 (Appendix 5) that the Tonbridge corridor is at full capacity during the high peak hour (London arrivals between 08:00 and 09:00), 'with every train path utilised and maximum train formations (train lengths) in service', and that it is 'constrained at the current time by the availability of our rolling stock'. On Tuesdays to Thursdays, half the trains departing Tonbridge at the busiest time are loading above seating capacity. Hildenborough, with four trains an hour in that period, 'is subject to the same constraints'. This matches Parish Councillors' own experience that peak trains from Hildenborough are already crowded, with standing room only. TMBC's Interim Infrastructure Delivery Plan (2025, p.8) states that 'overcrowding is rare on lines serving Tonbridge and Malling'.

8.8 Nor are the station works the Plan depends on funded. The Infrastructure Delivery Plan lists 'Essential' improvements at Hildenborough Station, including step-free platform access and additional decked car parking 'potentially using adjacent land to current car park', with delivery 'subject to availability of funding' from section 106 contributions and the Department for Transport's Access for All programme. In January 2026 the Government reset Access for All: of 50 stations at feasibility stage, 8 were taken forward to delivery, 23 to detailed design and 19 were paused, with priority given to busy stations and schemes with third-party funding (Rail Technology Magazine, 19 January 2026). The forecourt, cycle hub and bus stand works listed alongside these items were completed in March 2025,

funded by the section 106 contribution of £82,388 from the Oakhill development, so that contribution is no longer available.

8.9 Without evidence that peak rail capacity, and the station improvements the Plan itself describes as essential, can be funded and provided, the Plan's reliance on Hildenborough Station is not justified or effective (see also paragraphs 3.25 and 8.26).

8.10 The evidence shows that the Plan is contrary to the justified and effective tests and to consistency with national policy on irreplaceable habitat.

Ecology

8.11 Neither Policy HP1 nor the Annex 6 criteria for HP2, HP3, HP4 and HI1 contain a protected species requirement.

8.12 That is so notwithstanding the evidence submitted by the Parish Council at Regulation 18: that HI1 straddles four of Natural England's Core Strategic Opportunity Areas for great crested newts and is surrounded by others; that a 200 square metre pond was approved and constructed immediately north of HI1 under application TM/23/01695/FL, with ponds 25 metres and 50 metres from the site boundary; the Regulation 18 TO3 and TO4 sites (now HP4 and HP2) were wholly covered by those areas; and that presence was confirmed at West Wood Pond in summer 2025 by the Medway Valley Countryside Partnership on behalf of Natural England.

8.13 The great crested newt is a European Protected Species. All the parish allocations lie within Natural England's amber risk zone for great crested newts. GCN were also found to be present in two ponds in the retained gardens at Oakhill, close to the allocations, where the planning permission required protection measures. The presence of such is a material consideration bearing directly on the developable area and the deliverability of the allocations, and it is a matter for the plan-making stage and not only for the determination of applications. Its complete absence from the Plan is a straightforward evidence gap.

8.14 The Parish Council requires the insertion of a new ecological criterion within Allocation HP1 and the Annex 6 criteria for every other allocation in the parish, requiring protected species surveys, avoidance, mitigation and (where appropriate) district level licensing for

great crested newts, together with confirmation that the developable area and dwelling yield have been assessed having regard to these constraints.

8.15 The evidence shows that the Plan is contrary to the justified test and to consistency with national policy on protected species.

Heritage (Foxbush and Mountains)

8.16 If HP1 proceeds, Policy HP1(10) should require the retention of the Foxbush and Mountains historic park and garden (locally listed in Annex 4 of the Plan as Foxbush) and the open land south of Tonbridge Road, with the yield reduced accordingly. TMBC's Heritage Impact Assessment finds a high risk to this land and recommends retaining parts of the park (pp.70 to 72). The Parish Council also asks that the Hildenborough Conservation Area be extended to include the listed buildings north of HP1 and the Foxbush and Mountains historic Park and Garden.

Flood Risk and the Level 2 Strategic Flood Risk Assessment

8.17 TMBC's Level 1 Strategic Flood Risk Assessment (SFRA) categorised HI1, and the eastern portion of the land now allocated as HP1, as 'Least Preferable', and concluded that safe access and egress is not possible. The response in the Publication Draft, in the Annex 6 criteria for HI1, is to require at application stage, a Flood Risk Assessment demonstrating that safe access and escape can be delivered. That inverts the burden: a finding that safe access is not possible has been converted into a requirement to prove that it is. The finding has been deferred rather than answered. The executive summary of the Level 2 Strategic Flood Risk Assessment also names HI1 (LAA 59896) among three sites with extensive surface water flood risk and access and escape issues. This is the flood risk ground for the Parish Council's objection to HI1. These findings were set out at paragraphs 3.72 to 3.73 and 3.116 of the Regulation 18 representations.

8.18 TMBC's Level 2 Strategic Flood Risk Assessment (SFRA) (JBA, report ref. SNN-JBA-XX-XX-RP-HM-0013-A1-C01. August 2026) began with 1,019 sites from the initial site screening. TMBC filtered these to 84 sites on the basis of size and other constraints, and

then carried out a Red-Amber-Green (RAG) assessment of those 84 sites against fluvial and surface water flood risk.

8.19 The assessment classified sites as follows:

- **Red:** more than 20% of the site lies within Environment Agency Flood Zones 2 and 3, or within an area at 0.1% AEP (1 in 1,000 year) surface water flood risk. The assessment describes these as having significant obstacles or challenges to development that would need consideration if taken forward.
- **Amber:** greater than 0% and less than 20% of the site lies within those areas. These sites are flagged for further consideration by planners and developers, but the assessment considers that flood risk constraints can likely be addressed at planning application stage.
- **Green:** by implication, sites not affected by either constraint or where flood risk is unlikely to have an impact on future development.

8.20 The Level 2 Strategic Flood Risk Assessment identifies HP1 as a Red site. The remaining Hildenborough allocations were identified as Amber.

8.21 TMBC's own screening therefore places HP1, the largest allocation in the parish at 602 dwellings, in the highest-risk category, with the Exception Test potentially engaged. The Plan nonetheless allocates HP1. Policy HP1(15) requires only a flood risk assessment and the avoidance of built form in the areas most at risk; it does not require safe access and escape to be demonstrated. Where a site has been classed Red, the sequential and, if

needed, Exception Tests should be applied and satisfied at plan-making stage, not left to applications.

Safe access and escape at HP1

8.22 The Level 2 Strategic Flood Risk Assessment records extensive flooding in the southern area of HP1, the part classed Red, which will impede safe access and escape within the site. This means:

- A safe road is of limited value unless the whole route, from each dwelling to land outside the flood zone, is safe.
- The Plan does not show how 602 dwellings, the internal road layout and the station link can be arranged around the southern flooding, so the developable area and yield are untested.
- The Level 1 Assessment found safe access and egress not possible for the eastern part of HP1. The Level 2 Strategic Flood Risk Assessment (SFRA) confirms the same.
- The parish allocations drain towards the same catchment upstream of Tonbridge. No assessment of their combined surface water effect has been identified. TMBC's summary of Regulation 18 responses recorded the concern that the Strategic Flood Risk Assessment was not complete, and the surface water implications for Tonbridge of the proposed growth.
- At present the sites hold back heavy rain and release it slowly into the Hawden Stream over several days, which reduces flooding downstream. Building on them would remove that effect, and the Plan does not address it. The Plan is not effective in this respect.

8.23 The Parish Council requires TMBC to apply the sequential test and, where necessary, the Exception Test to HP1 at plan-making stage; demonstrate a safe route from each dwelling to land outside the flood zone; confirm the developable area and yield; and undertake a cumulative surface water assessment of the parish allocations. Until this has been done, the evidence shows that the Plan is contrary to the effective test and to consistency with national policy.

Highways and Transport

8.24 Policy HP1(3) requires vehicular access via Tonbridge Road, Stocks Green Road and Noble Tree Road. The evidence before TMBC indicates that access from Tonbridge Road

has not been shown to be achievable, and that the network serving the adjoining land at Stocks Green Road has limited capacity:

- Appeal decision APP/H2265/A/04/1170042 found that an adequate visibility splay could not be achieved north-westwards from the existing Chequers Farm access on Tonbridge Road.
- The Les Henry Associates Highways Technical Appraisal (October 2018) concluded that 109 dwellings on Railway Field (LAA 59692, now part of HP3 and served from Stocks Green Road) would generate around 800 vehicle trips each weekday and could not be adequately served by the highway network.

8.25 Both were before TMBC at Regulation 18. The Plan does not explain how either finding has been overcome. A policy requirement that has not been shown to be deliverable is not effective.

8.26 TMBC does not expect most of HP1 to come forward until the end of the plan period. Its indicative phasing places 390 of HP1's 602 dwellings (65%), on LAA sites 59653, 59679 and 68459, in 2037/38 to 2040/41 (Housing Topic Paper, 2026, Appendix 3, pp.28 to 29). Site 68459, next to Hildenborough Station, does not appear to have formed part of the land considered at Regulation 18, and the case for the allocation rests in large part on its access to the station. Yet that parcel is among the last to come forward, and the pedestrian and cycle link to the station must cross Ancient Woodland (paragraph 14.130). The Viability Assessment applies a generic section 106 allowance of £11,000 per dwelling (paragraph 4.30, p.26). Policy HP1 has not been shown to be effective.

8.27 The Parish Council objects to the new road required by Policy HP1(5) between Tonbridge Road and Stocks Green Road. It would draw additional traffic onto the B245, the single

road serving Hildenborough and Hilden Park, including through the Hildenborough Conservation Area, and it would cross or adjoin Ancient Woodland.

Network capacity and modelling

8.28 Hildenborough and Hilden Park are in substance served by a single road, the B245. Traffic from TO3 and the North Tonbridge allocations will use the same corridor, so the effects reach the village wherever site accesses are formed.

8.29 The transport evidence does not match that reality:

- TMBC Cabinet resolved in October 2025 to obtain robust transport evidence, yet the March 2026 committee report recorded that only 27 junctions had been modelled at Regulation 18 and that costings for the Regulation 19 transport work had not been received.
- TMBC's transport evidence identifies the B245 Tonbridge Road as a 'hot spot', a link above 85% of capacity, in both the AM and PM peaks of the Local Plan scenario, and the B245 arm of Morley's Roundabout as a hot spot in the AM peak (Local Plan Tests Report, October 2025, section 4.3.2, pp.51 to 52). It reports that journey times on the B245 increase by 13% eastbound 'due to delays and queues along B245 near Leigh Road' (section 4.3.3, p.57). Yet TMBC has not assessed the junctions on the B245 through Hildenborough. Its Junction Modelling Report (October 2025, section 1.1) models no junction on the B245 between Morley's Roundabout and Vauxhall Roundabout, none of the access points that Policy HP1(3) requires on Tonbridge Road, Stocks Green Road and Noble Tree Road, and not the A227 Shipbourne Road/B245 London Road junction at Bordyke. TMBC's Leader stated at a public presentation in Hildenborough on 30 September 2026 (Appendix 6, slides 14 and 15) that key junctions were missing from those analysed in detail, that this work remains ongoing, and that concerns about the highways evidence were one of the reasons the Council decided on 3 September 2026 not to proceed with the Plan.
- The wider growth corridor north and north-west of the Medway crossings includes approximately 3,651 dwellings on the TMBC Local Plan Junction Modelling Report evidence. These allocations use the same network and cannot reasonably be assessed independently.

8.30 TMBC's Infrastructure Delivery Plan, Annex 1 (August 2026, page 7), lists 'B245 London Road (Dry Hill Road East) to High Street/Bordyke junction' as an Essential bus scheme, with no funding secured. The possible measures it describes are Old London Road as a southbound bus-only link, the widening of Shipbourne Road to create a bus lane and bus gate, and a southbound bus lane on the High Street. Parish Councillors report that the High Street loading bays are set into the widened pavements, so a bus lane would remove them and return deliveries to the traffic lane. The scheme is unfunded and has not yet been designed, so the Plan cannot rely on it.

8.31 Parish Councillors report the following local observations. The cumulative modelling should include these routes and the diversion scenario:

- southbound traffic queues back from the roundabout at the southern end of the High Street over the railway bridge;
- congestion on the B245 and the High Street diverts traffic onto Yardley Park Road, The Ridgeway and Dry Hill Park Road; and
- the B245 carries A21 traffic when the A21 between Sevenoaks and Tonbridge is closed.

8.32 During the week commencing 12 October 2026, within the consultation period, Parish Councillors have observed traffic count cables, and in places cameras, at or near the junctions of Stacey Road, Oast Lane, Farm Lane and Hilden Avenue with the B245, and in Tonbridge on the High Street, on the railway bridge south of the Vale Road roundabout and on Quarry Hill Road. In mid-September they also observed cables on the B245 either side of LAA site 58710. A Kent County Councillor has confirmed that the surveys were not commissioned by Kent County Council, and the Parish Council understands that they were not commissioned by TMBC. They therefore appear to have been commissioned by a third party. TMBC is asked to confirm whether they form part of its transport evidence and, if not, to seek the data and make it available to the examination.

8.33 The evidence should show that the modelling includes HP1 to HP4, HI1, TO3, the North Tonbridge allocations and other committed or planned growth in the corridor, including the vehicular routes from these sites to and from the B245 and Tonbridge town centre, where they meet traffic from planned growth to the south and south-east of Tonbridge, and that all material junctions have been tested. Where a junction or corridor is at or near capacity,

it should identify the mitigation, its deliverability, its funding mechanism and the trigger for its implementation.

8.34 The Parish Council seeks an amendment to Policy HP1 and the supporting evidence to require cumulative modelling of the Hildenborough allocations and the North Tonbridge allocations, covering the B245 corridor (including its junctions with Leigh Road and Watts Cross Road), Stocks Green Road, Noble Tree Road, Rings Hill and the relevant A21 junctions together with Tonbridge High Street, Yardley Park Road, The Ridgeway (including its junctions with Shipbourne Road and Hadlow Road) and Dry Hill Park Road, and a scenario in which the A21 between Sevenoaks and Tonbridge is closed. The policy should set out the mitigation, funding mechanism and occupation triggers for each strategic transport intervention. TMBC should also either demonstrate a deliverable vehicular access from Tonbridge Road or delete that requirement from Policy HP1(3).

8.35 The evidence shows that the Plan is contrary to the justified and effective tests.

Water supply

8.36 Water supply capacity is a fundamental infrastructure constraint that the Plan does not address. South East Water's response of 17 December 2025 identifies a lack of available headroom in the relevant area. It states that growth beyond the assumptions in its Water Resources Management Plan cannot be accommodated during the plan period without additional measures.

8.37 Hildenborough lies in WRZ1 (Tunbridge Wells), which South East Water identifies as under significant supply stress (South East Water response of 17 December 2025). The company expects a new baseline demand forecast only by spring 2027, and proposed interventions by spring 2028, with the draft Water Resources Management Plan 2029 scheduled for March 2028. The Plan would therefore be examined before the interventions needed to serve its growth have been identified. Policy HP1 contains no water supply clause, although its supporting text records sensitive groundwater conditions. The masterplan for HP1 should address groundwater source protection zones.

8.38 TMBC has itself recognised the seriousness of this constraint. On 3 September 2026 it resolved to pause preparation of the Regulation 19 Plan because of concerns about whether sufficient water supply would be available to support the growth required. The Plan was published on 11 September 2026 following a ministerial direction. South East Water’s own figures show the gap. Its Water Resources Management Plan 2024 assumed

‘over 6,300 properties’ in the borough to 2042, against the Plan’s requirement of 20,106 dwellings (paragraph 8.39). In a letter of 3 February 2026 to TMBC’s Cabinet Member for Infrastructure, it said it ‘would be unable to accommodate any growth exceeding the highest growth pathway of our WRMP24 forecast assumptions’. TMBC’s Leader stated at a public presentation in Hildenborough on 30 September 2026 (Appendix 6, slides 22 and 23) that ‘South East Water say they can supply an additional 317 homes a year. The housing target is 1,117 homes a year’, and that ‘The Council will be arguing the Plan isn’t sound because of water supply’.

8.39 South East Water's Planning Position and Options Statement (August 2026) records that its Water Resources Management Plan 2024 assumed ‘over 6,300 properties’ in the borough for 2025 to 2042 (page 2). The Plan requires 20,106 dwellings. The undertaker has therefore planned for about a third of the homes the Plan requires. The Statement records that this leaves a supply-demand deficit of ‘up to 5.3Ml/d during peak summer demand conditions’, which ‘equates to 15% of the overall demand’ in the borough (page 2). This is the pathway on which TMBC can be expected to rely, but the schemes South East Water proposes to meet that deficit still depend on additional funding, for which it has made only a provisional submission to Ofwat, and on regulatory approval through the Water Resources Management Plan change process (pages 1 and 5). Water supply is, in the Parish Council's view, the clearest reason why the Plan is unsound.

8.40 The Regulation 19 Plan nonetheless directs 1,254 dwellings to Hildenborough Parish, alongside growth elsewhere in the borough and in neighbouring authorities. The Parish Council does not seek to prevent the borough from meeting its housing need. However, where TMBC’s stated position is that the majority of the Plan's housing cannot currently be supplied with water, the Plan is not effective, because the delivery of the allocations is uncertain. It is not justified, because the spatial strategy and the phasing of Hildenborough's allocations are not shown to reflect what can actually be delivered. And the case for Green Belt release, which rests on meeting housing need, is weakened where that need cannot be met within the plan period.

8.41 The same constraint has halted plan-making elsewhere in South East Water's area. Basingstoke and Deane Borough Council's Cabinet agreed on 8 September 2026 to abandon its draft Local Plan and restart under the new plan-making system, moving adoption from 2027 to September 2029. The Cabinet report, *Local Plan: Next Steps*, records South East Water's position that the growth required to 2042 cannot currently be

accommodated within available and environmentally sustainable water resources. The Government's own correspondence on Basingstoke acknowledges concerns about South East Water's performance and the challenge this presents to housing delivery there.

8.42 The comparison shows that the same undertaker's evidence has been treated as a plan-making constraint in another authority in South East Water's supply area, and that this is a question of substantive evidence for examination, not a precautionary concern. The Plan should be tested against that evidence. The Parish Council invites the Inspector to examine the water evidence in full, and, if TMBC cannot demonstrate that the constraint can be overcome within the plan period, to find the Plan unsound.

8.43 The issue cannot be left to developers consulting the undertaker at application stage. Where the undertaker has identified capacity constraints at plan-making stage, the Plan must demonstrate that they can be overcome within the plan period and that occupation will be phased so that it does not outpace water infrastructure.

8.44 The Parish Council therefore asks TMBC to:

- publish the Interim Position Statement on which its figure of 317 homes a year relies, and a statement of common ground with South East Water;
- show how the Plan's housing trajectory, including the phasing of the six Hildenborough allocations, reconciles with that capacity;
- explain how the Plan's requirement of 20,106 dwellings can be met when South East Water's 2024 Water Resources Management Plan assumed over 6,300 properties in the borough (paragraph 8.39); and
- identify the infrastructure, investment, funding and delivery measures needed to create additional capacity, and when they will be delivered. South East Water does not expect to identify these measures until its draft Water Resources Management Plan in March 2028 (paragraph 8.37). Until they are identified, the Plan cannot show that its housing can be supplied with water, and it is not effective.

8.45 The Parish Council requests the insertion of a water supply criterion into Policy HP1 and the Annex 6 criteria for HP2, HP3, HP4 and HI1 requiring confirmation from the statutory undertaker that sufficient capacity exists, or that identified upgrades will be delivered before

occupation, with development phased accordingly. Amend the housing trajectory to reflect confirmed water capacity.

8.46 The evidence shows that the Plan is contrary to the justified and effective tests.

Wastewater and Foul Drainage

8.47 The Infrastructure Delivery Plan, Annex 1 (August 2026), records that sub-parcels within the land now allocated as HP1 are subject to limited network capacity requiring off-site upgrades tied to the water company's investment cycles. This was raised at Regulation 18 (paragraphs 3.106 to 3.108). Policy HP1 contains no foul drainage or wastewater clause at all: clauses 13 to 15 deal only with surface water, groundwater and flood risk.

8.48 All foul water from HP1 to HP4 would drain to Hawden pumping station, which is nearing capacity. Southern Water, the sewerage undertaker, also records storm overflows at Coldharbour Lane, Hilden Park and Riding Lane. TMBC has not shown that sewer capacity exists, or can be provided, for the allocations, and it should be shown before the land is allocated. The Plan is not sound in this respect, because it is not effective.

8.49 The Parish Council seeks the insertion of a foul drainage policy requirement into Policy HP1 and Annex 6 requiring a wastewater strategy agreed with Southern Water as the sewerage undertaker, including occupation triggers linked to off-site sewer network upgrades where necessary.

8.50 The evidence shows that the Plan is contrary to the effective test.

Municipal Waste

8.51 Kent County Council, as the waste disposal authority, expects increased waste throughput as a result of significant housing growth and the associated increase in kerbside

collections, particularly at the North Farm Waste Transfer Station and Household Waste Recycling Centre. KCC advises that:

- North Farm is already considered to be approaching capacity, as evidenced by vehicle turnaround times;
- the location of the site prevents expansion, and changes to access and flow will be insufficient to meet the demand projected from new housing to 2042;
- any growth that results in more waste being sent to the Tunbridge Wells Waste Transfer Station and HWRC will require mitigation; and
- the site will be at capacity within five years, so additional capacity is needed to support housing growth.

8.52 The Plan does not identify how this additional capacity will be provided or funded, or how Hildenborough's 1,254 dwellings, assessed as a single body of development, will contribute to it. The Parish Council asks that the Infrastructure Delivery Plan identify the waste capacity required, the mitigation proposed, the funding mechanism and the timing, and that Policy HP1 and the Annex 6 criteria require proportionate contributions where mitigation is needed.

8.53 The Parish Council requires the addition of waste management to the cumulative infrastructure assessment and delivery schedule and require proportionate contributions towards the identified waste infrastructure.

8.54 The evidence shows that the Plan is contrary to the effective test. Hildenborough lies in the southern half of the borough, and Kent County Council's evidence is that residents and kerbside waste from that area rely on North Farm, which Kent County Council expects to reach capacity within five years.

8.55 If the allocations proceed, and without prejudice to its objection, the Parish Council seeks the following:

i. **Affordable housing** State expressly in Policy HP1 and in the Annex 6 criteria for HP2, HP3, HP4 and HI1 that a minimum of 50% affordable housing is required in accordance with Policy H2(3), with the tenure mix required by Policy H2(4).

ii. **Ancient Woodland** Amend Policy HP1 to require that the pedestrian and cycle link to Hildenborough Station follows a deliverable alignment avoiding Ancient

Woodland, its buffers and root protection areas, or identifies an alternative route where that cannot be demonstrated.

iii. **Ecology** Add a protected species criterion to Policy HP1 and to the Annex 6 criteria for HI1, HP2, HP3, HP4 and Little Trench Farm, requiring survey, avoidance, mitigation and, where appropriate, district level licensing for great crested newts. Confirm that developable areas and yields have been assessed having regard to that constraint.

iv. **Flood risk** Apply the sequential test and, where necessary, the Exception Test to HP1 at plan-making stage, in light of its Red classification in the Level 2 SFRA. Demonstrate safe access and escape for the whole route from the site to land outside the flood zone, taking account of the flooding in the southern area of the site. Confirm the developable area and yield for HP1 after excluding land that cannot be safely accessed, and amend or delete the allocation where safe access and escape cannot be demonstrated. Apply the same tests to HI1, where TMBC's own evidence found that safe access and egress is not possible.

v. **Highways** Amend Policy HP1 and the supporting evidence to require cumulative modelling of the Hildenborough allocations and the North Tonbridge allocations, covering the B245 corridor, Stocks Green Road, Noble Tree Road, Rings Hill and the relevant A21 junctions, together with Tonbridge High Street, Yardley Park Road, The Ridgeway (including its junctions with Shipbourne Road and Hadlow Road) and Dry Hill Park Road, the B245 junctions with Leigh Road and Watts Cross Road, and the vehicular routes from these sites to and from the B245 and Tonbridge town centre, where they meet traffic from planned growth to the south and south-east of Tonbridge. Set out the mitigation, funding mechanism and occupation triggers for each strategic transport intervention. Either demonstrate a deliverable vehicular access from Tonbridge Road or delete that requirement from Policy HP1(3) and identify the access strategy relied on instead. Delete the new road between Tonbridge Road and Stocks Green Road required by Policy HP1(5). If the new road is retained despite the Parish Council's objection, require it to be completed before construction of HP1 or HP3 begins.

vi. **Water supply** Insert an infrastructure criterion into Policy HP1 and the Annex 6 criteria for HP2, HP3, HP4 and HI1 requiring confirmation from the statutory water undertaker that sufficient capacity exists, or that identified upgrades will be

delivered before occupation, with development phased accordingly. TMBC should also confirm the growth quantum and phasing assumed by the water company and amend the housing trajectory to reflect confirmed capacity and, until South East Water has identified the measures (not expected before March 2028), phase the trajectory so that no allocation is occupied ahead of confirmed supply.

vii. **Groundwater** Address groundwater source protection zones in the HP1 masterplan.

viii. **Foul drainage** Insert a foul drainage and wastewater requirement into Policy HP1 and the Annex 6 criteria, requiring a strategy agreed with Southern Water with occupation triggers linked to any necessary off-site sewer upgrades, and show that sewer capacity exists before the land is allocated.

ix. **Waste** Add waste management to the cumulative infrastructure assessment and delivery schedule, and require proportionate contributions towards the waste infrastructure identified at North Farm.

x. **Rail** Show, with Network Rail and Southeastern, that peak services can take the additional demand on which Policy HP1's case relies, and identify committed

funding for the essential Hildenborough Station improvements in the Infrastructure Delivery Plan.

9 NEIGHBOURHOOD AREA HOUSING REQUIREMENT

9.1 TMBC's Neighbourhood Planning Housing Distribution Technical Advice Note (July 2026) gives Hildenborough an indicative figure of 55 dwellings. No housing requirement for the Hildenborough neighbourhood area appears in the Plan. Paragraph 69 of the Framework requires strategic policies to set a housing requirement for designated neighbourhood areas which reflects the overall strategy and any relevant allocations, and such a figure should not need retesting at a neighbourhood plan examination. The guidance quoted at paragraph 3.3 of the Note confirms that an indicative figure, by contrast, must be tested there. The Note's figure makes no allowance for 1,254 dwellings the Plan already allocates in the parish, and the Note itself says the figures may need updating following Regulation 19.

9.2 The Parish Council asks that a housing requirement for the Hildenborough neighbourhood area be set in strategic policy, reflecting the allocations in the parish, and that the Plan

state whether it counts towards the 20,106 dwelling requirement. Without it, the Plan is not consistent with national policy.

10 SOUNDNESS CONCLUSIONS

10.1 The Parish Council considers that the Plan is not sound and cannot be made sound through main modifications. The allocations at HP1, HP2, HP3, HP4 and HI1, and the Little Trench Farm part of TO3, should be deleted, for the reasons given in Section 1. The deficiencies are not matters of wording as they go to the evidence base, the Green Belt and Grey Belt methodology, the spatial strategy, and the cumulative infrastructure assessment. Correcting them requires new evidence, new assessment and, in places, re-consultation.

10.2 For the reasons below, the Plan fails the tests of justification, effectiveness and consistency with national policy, and is not positively prepared. The reasons are summarised in the table at the end of this section.

Reason 1: The Plan's basic data is inconsistent and unreliable (Not justified / Not effective)

10.3 The Plan records HP1 to HP4 in Hildenborough parish but counts them in different totals, and its housing distribution figures do not reconcile between Figures 5.2 and 5.4, Annexes 1 and 3 and Policy A1. The Plan does not record Little Trench Farm in Hildenborough parish or state the parish total of 1,254 dwellings. The Policies Map also does not define where the Hilden Park element of the Tier 1 settlement begins and ends.

10.4 A plan that cannot consistently say where its allocations are or how many homes it directs to them cannot be relied on to deliver them. These errors must be corrected before the Plan is tested.

Reason 2: The spatial strategy and settlement hierarchy are not justified (Not justified / Not consistent with national policy)

10.5 The Plan does not explain why a Tier 3 Primary Village should accommodate almost as much development as Snodland (1,336), a Tier 2 Service Centre. Nor does it show that reasonable alternative distributions were tested to the same level of detail as the preferred strategy. Nor has TMBC shown that brownfield land in Tonbridge has been fully used before releasing Green Belt land in the parish (Section 5).

10.6 The Plan also sets no housing requirement for the Hildenborough neighbourhood area in its strategic policies, as paragraph 69 of the Framework requires. That requirement should

reflect 1,254 dwellings already allocated in the parish, and the Plan should state whether it counts towards the 20,106 dwelling requirement.

Reason 3: Cumulative infrastructure has not been assessed (Not Justified / Not effective)

10.7 The Plan does not assess the 1,254 dwellings in Hildenborough as a single body of development, together with the allocations north and north-west of the Medway crossings (about 3,651 dwellings) and growth in adjoining districts. It does not identify the infrastructure required, the delivery mechanism, the funding or the phasing for that growth. Cross-boundary matters, particularly the A21 and B245 corridors, Hildenborough and Tonbridge stations, secondary school catchments and shared water resources, are not addressed. No school, healthcare facility or community or indoor sport facility is secured on any of the parish allocations.

10.8 Nor does the Plan show that sufficient water supply capacity exists, or that the cumulative transport and surface water effects of concentrating development in Hildenborough and the wider corridor have been properly assessed.

Reason 4: Primary education need is unmet (Not justified / Not effective)

10.9 TMBC's own Interim Infrastructure Delivery Plan identifies a primary education need of 5.8 forms of entry across the wider area. No allocation secures a school and no mechanism addresses the need. The Plan does not secure the expansion of Stocks Green Primary School from 1FE to 2FE, which the Infrastructure Delivery Plan lists but does not fund, nor, failing that, safeguard land for a new two-form entry primary school within Policy HP1(1) or elsewhere in the parish. It also does not demonstrate that primary and secondary forecasts include this Plan's allocations and committed growth across the wider travel-to-school area, including adjoining authorities.

Reason 5: Healthcare and community facilities are not secured (Not justified / Not effective)

10.10 No healthcare facility or community or indoor sport facility is secured on any of the parish allocations. The Plan relies on the GP practice in the Tonbridge Town Centre Masterplan, without showing that it adds capacity for the new homes. The NHS Kent and Medway Integrated Care Board says that a new site for primary and community care will be needed,

and the Plan identifies none in the parish. Without these facilities the allocations cannot be delivered as sustainable development, and the Plan is not effective in this respect.

Reason 6: The Green Belt and Grey Belt conclusions are not justified (Not justified / Not consistent with national policy)

10.11 Exceptional circumstances have not been shown. The allocations of HP1 and HP4 conflict with the conclusions of TMBC's own Stage 2 Green Belt Assessment for sub-areas HI-02, HI-03 and HI-07 to HI-11 (HP1) and TO-07 (HP4), which the Green Belt Exceptional Circumstances Topic Paper accepts, and neither the Topic Paper nor the Exceptional Circumstances Strategic Note gives reasons for departing from them.

10.12 The Framework (Annex 2) defines Grey Belt as land that does not strongly contribute to purposes (a), (b) or (d), and the Plan says the same at paragraph 5.100. Grey belt excludes land where footnote 7 policies would provide a strong reason for restricting development (NPPF December 2024, Annex 2). HP1 contains Ancient Woodland, land in Flood Zones 2 and 3 and part of the Hildenborough Conservation Area; at least those parts cannot be grey belt, as the Plan itself accepts that some allocations are not (paragraph 5.89). The Plan does not weigh the harm to the countryside, purpose (c), that release of the parish allocations would cause, and does not state the Green Belt and Grey Belt classification of each of the five sites. It also does not demonstrate that the new boundaries will follow permanent and readily recognisable physical features and endure beyond the plan period.

Reason 7: Settlement separation is not protected (Not justified / Not effective)

10.13 The Plan proposes to release Green Belt land for 1,254 dwellings in Hildenborough Parish, including much of the land separating Hildenborough, Hilden Park and Tonbridge. The Parish Council asked for a Local Green Gap at Regulation 18 (paragraphs 3.29 to 3.31 of its representations). TMBC's Green Gap Study scoped out settlements in the Green Belt as ‘essentially protected from coalescence’, so this gap was never assessed, and the Plan now removes that protection. The Regulation 19 Plan removes the Green Belt from land which TMBC's 2025 Green Belt Assessment identifies as preventing neighbouring settlements from merging, leaving it with neither Green Belt nor Local Green Gap protection.

10.14 Policy SP9 and paragraph 5.109 accept that land between settlements in close proximity, outside other strategic designations and under development pressure warrants bespoke protection. Paragraph 14.119 acknowledges that development is strengthening the

physical relationship between Hildenborough and Tonbridge. Omitting a gap designation here is therefore inconsistent with TMBC's own policy and evidence. It is not justified against a reasonable alternative, and it leaves the Plan ineffective in maintaining settlement separation over the plan period. If the allocations proceed, the Plan should designate a Local Green Gap between Hildenborough, Hilden Park and Tonbridge through Policy SP9 and the Policies Map, including the land proposed for release (see Section 6).

Reason 8: There is no adequate framework for Local Green Space (Not justified / Not effective / Not consistent with national policy)

10.15 The Plan lacks a clear strategic framework for Local Green Space. Policy NE8 does not recognise that neighbourhood plans may designate further qualifying sites, as the Framework (paragraphs 106 to 108) provides, and the Plan does not explain how designations are safeguarded or brought forward. This matters because TMBC's own Green Belt evidence identifies a shortage of Local Green Space within the Green Belt. The Plan should confirm that existing designations are safeguarded and that additional designations will be supported through neighbourhood plans where the Framework criteria are met.

Reason 9: Transport impacts have not been assessed cumulatively (Not justified / Not effective)

10.16 The Plan does not show that the cumulative transport effects of concentrating development in Hildenborough and the wider corridor have been properly assessed. There is no cumulative junction modelling of the six Hildenborough allocations, the North Tonbridge allocations and the wider growth north and north-west of the Medway crossings. The affected network includes the B245 corridor, the A227 Shipbourne Road/B245 London Road junction, the A26 Hadlow Road/The Ridgeway junction, Stocks Green Road, Noble Tree Road, Rings Hill and the relevant A21 junctions. The Plan sets out no mitigation, funding, section 278 delivery mechanism or occupation triggers. It also does not demonstrate a deliverable vehicular access from Tonbridge Road, yet Policy HP1(3) requires one. The Parish Council also objects to the new road required by Policy HP1(5), which would draw additional traffic onto the B245. TMBC's own modelling identifies the B245 through Hildenborough as a hot spot, above 85% of capacity, but assesses none of the junctions on it or at the HP1 access points. Southeastern advises that the Tonbridge

corridor, including Hildenborough, is at full capacity in the morning peak, and the station improvements the Plan describes as essential are unfunded.

Reason 10: Water, drainage and flood risk are unresolved (Not justified / Not effective / Not consistent with national policy)

10.17 Water supply is the clearest reason the Plan is unsound. On TMBC's stated position most of the Plan's housing cannot at present be supplied with water, and South East Water has planned for about a third of the homes the Plan requires. The Plan does not show that sufficient water supply capacity exists. It lacks a criterion in Policy HP1 and the Annex 6 criteria requiring confirmation from the statutory undertaker that capacity exists or that upgrades will be delivered before occupation. It does not address groundwater source protection zones in the HP1 masterplan, and the Statement of Common Ground with South East Water has not been published. The housing trajectory does not reflect confirmed capacity or the timing of the company's 2027 and 2028 work. There is also no foul drainage or wastewater strategy agreed with the statutory undertaker, and no occupation triggers linked to necessary off-site sewer upgrades. All foul water from HP1 to HP4 would drain to Hawden pumping station, which is nearing capacity, and Southern Water has not shown that sewer capacity exists or can be provided.

10.18 The flood risk sequential test has not been applied at plan-making stage on the basis of a completed Level 2 Strategic Flood Risk Assessment. HP1 is classified Red in that assessment, and the Plan does not apply the Exception Test, demonstrate safe access and escape from each dwelling to land outside the flood zone, or confirm the developable area and yield. For HI1, the Level 1 Assessment found that safe access and egress is not possible. The Plan also does not include a cumulative surface water assessment of the parish allocations, which drain to the same catchment upstream of Tonbridge.

Reason 11: Ancient Woodland and protected species are not addressed (Not justified / Not consistent with national policy)

10.19 The Plan does not address a European Protected Species known to be present on and around the allocations. It lacks any requirement for protected species survey, avoidance, mitigation and, where appropriate, district level licensing for great crested newts, and does not confirm that developable areas and yields have been assessed against that constraint. The proposed pedestrian and cycle link to Hildenborough Station in Policy HP1 does not follow a deliverable alignment that avoids Ancient Woodland, its buffers and root protection

areas. The Plan also does not require Ancient Woodland buffers on HP1 consistent with Natural England standing advice.

Reason 12: The site policies are incomplete and cannot be relied on to deliver (Not effective / Not consistent with national policy)

10.20 Full site allocation policies have not been prepared for HP2, HP3, HP4 and HI1, and there is no single masterplan, infrastructure delivery schedule or phasing programme for HP1 to HP4. Policy HP1 contains no numeric occupancy triggers for the station links or any item of social infrastructure, in a form consistent with delivery by section 278 agreement, and does not import the phasing wording of Policy AY1. The affordable housing requirement is not stated on the face of the site policies. Policy HP1 and the Annex 6 criteria for HP2, HP3, HP4 and HI1 do not state that a minimum of 50 per cent affordable housing is required under Policy H2(3), with the tenure mix required by Policy H2(4). Two-thirds of HP1, including the parcel next to the station on which its case relies, is not expected before 2037/38 (Housing Topic Paper, Appendix 3).

Why main modifications are not sufficient

10.21 The Green Belt and Grey Belt conclusions, the spatial strategy and the cumulative infrastructure assessment underpin the choice of sites. If those assessments change, the allocations, yields and policies built on them would also change. That is not something that can be dealt with through modifications at examination without prejudicing those who have not had the opportunity to comment on the revised evidence. The Parish Council therefore invites the Inspector to find the Plan unsound and to recommend that it is not adopted. Without prejudice to that position, if the Inspector considers that the examination can proceed, the Parish Council asks that it be paused while the evidence on water supply,

sewerage, cumulative transport and the Green Belt is completed and consulted on, and that the modifications set out at the end of each section are made.

10.22 The Parish Council's reasons, and the soundness test each engages, are summarised below.

Reason	Issue	Test Engaged
1	Inconsistent and unreliable basic data (parish attribution, housing distribution figures)	Justified / Effective
2	Spatial strategy and settlement hierarchy; no neighbourhood area housing requirement	Justified / Consistent with national policy
3	No cumulative infrastructure assessment, including waste capacity and cross-boundary matters	Justified/ Effective
4	Primary education need of 5.8 forms of entry not met	Justified / Effective
5	Healthcare, community and indoor sports facilities not secured	Justified / Effective
6	Green Belt and Grey Belt conclusions contradict TMBC's own evidence	Justified / Consistent with national policy
7	No Local Green Gap between Hildenborough, Hilden Park and Tonbridge	Justified / Effective
8	No adequate framework for Local Green Space	Justified / Effective/ Consistent with national policy
9	No cumulative transport assessment; Tonbridge Road access not shown to be achievable; new road objected to; Hildenborough Station's rail capacity not shown	Justified / Effective
10	Water supply capacity not demonstrated (the clearest reason the Plan is unsound); sewerage capacity, surface water and flood risk unresolved	Justified / Effective / Consistent with national policy
11	Ancient Woodland and European Protected Species not addressed	Justified / Consistent with national policy
12	Incomplete site policies, phasing and affordable housing wording	Effective / Consistent with national policy

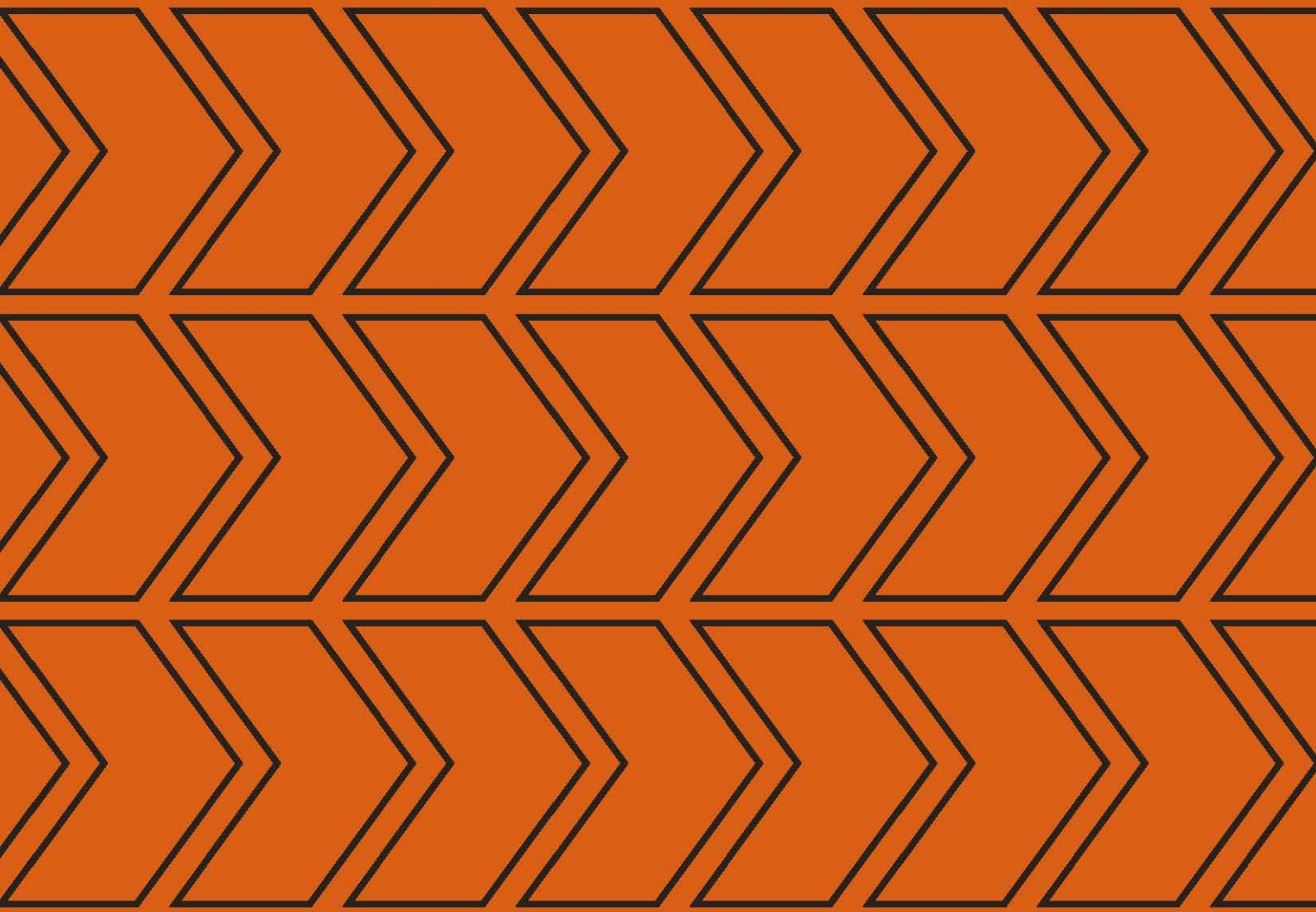
Appendix 1: Regulation 18 Local Plan Representation

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Representations on Tonbridge and Malling Borough Council's Draft Local Plan 2042 - Regulation 18 Consultation

December 2025



WWA

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

Representations on Tonbridge and Malling Borough Council's Draft Local Plan 2042 - Regulation 18 Consultation

On behalf of:

Hildenborough Parish Council

December 2025

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CONTENTS

1 Introduction 4

2 National Planning Policy Context 5

3 Representations to Development Policies and Site Allocations 10

4 Overall Conclusions 46

1 INTRODUCTION

1.1 These representations have been prepared by WWA on behalf of Hildenborough Parish Council in response to the Tonbridge and Malling Borough Council Draft Local Plan 2024-2042 Regulation 18 Consultation.

1.2 The document sets out the key issues facing Tonbridge and Malling, putting forward a Spatial Vision and Strategic Objectives for addressing climate change and setting out the Council's Spatial Strategy for meeting future development needs, including proposed site allocations, design principles and development management policies by which planning applications will be judged.

1.3 This response has been formulated on the following emerging draft policies:

- Policy SP3: Settlement Hierarchy and General Development Principles
- Policy SP8: Managing Development in the Green Belt
- Policy SP9: Local Green Gap
- Policy CC1: Addressing Climate Change
- Policy CC7: Managing Development within Flood Risk
- Policy NE3: Landscape Character
- Policy NE6: Green and Blue Infrastructure
- Policy HE2: Listed Buildings
- Policy HE3: Conservation Areas
- Policy HE5: Historic Parks and Gardens (Designated and Non-Designated)
- Policy D2: Design Codes and Masterplans
- Policy INF1: Provision of Infrastructure and Services

1.4 These representations both comment on draft policies and the proposed allocations for Hilden Park and Hildenborough including:

- Site Allocation HI1 – 77 dwellings
- Site Allocation HI2 – 629 dwellings
- Site Allocation T03 – 30 dwellings
- Site Allocation T04 – 289 dwellings

2 NATIONAL PLANNING POLICY CONTEXT

2.1 The National Planning Policy Framework ("the Framework") sets out the Government's planning policies for England and how these are expected to be applied.

Presumption in Favour of Sustainable Development

2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision taking (paragraph 11). For plan-making, this means:

(a) *Plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas); and adapt to its effects;*

(b) *Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless;*

i. *The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type, or distribution of development in the plan areas; or*

ii. *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework – taken as a whole.*

Plan making

2.3 For plan-making, this means Paragraphs 15 to 38 of the Framework relate specifically to 'plan-making'.

2.4 Paragraph 15 states that the planning system should be genuinely plan-led. Plans should provide a positive vision for the future of each area including addressing housing needs.

2.5 Paragraph 20 requires that strategic policies should set out an overall strategy for the pattern, scale, and quality of development, making sufficient provision for housing (including affordable housing).

2.6 Paragraph 36 states that plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

(a) ***Positively prepared*** *– providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.*

(b) ***Justified*** *– an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

(c) ***Effective*** *– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,*

(d) ***Consistent with national policy*** *– enabling the delivery of sustainable development in accordance with policies in this Framework.*

Planning for housing

2.7 Paragraphs 61 to 84 relate specifically to 'delivering a sufficient supply of homes'.

2.8 Paragraph 61 requires Local Planning Authorities 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 and that land with permission is developed without unnecessary delay.

2.9 Paragraph 62 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the

standard method in national planning guidance as a starting point, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be considered in establishing the amount of housing to be planned for.

2.10 Paragraph 69 requires policy-making authorities to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.

2.11 Paragraph 72 states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability, and likely economic viability. Planning policies should identify a supply of;

(a) Specific, deliverable sites for years one to five of the plan period; and

(b) Specific, developable site or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.

2.12 Paragraph 69 requires local planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown that there are strong reasons why this target cannot be achieved.

2.13 Paragraph 73 sets out that local planning authorities should provide compelling evidence to demonstrate that provision from unidentified sites (i.e., a windfall allowance) will comprise a reliable source of supply. This evidence should have regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

2.14 Paragraph 77 states that supply of large numbers of new homes can be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns - provided they are well located and designed and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities

should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

(a) Consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential, and the scope for net environmental gains;

(b) Ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;

(c) Set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of diverse groups in the community will be provided;

(d) Provide a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally led development corporations); and,

(e) Consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

2.15 In relation to the preparation of strategic policies, Paragraph 22 elaborates on the justification for these considerations. This states that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

2.16 Paragraph 78 states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific sites, sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

(a) 5% to ensure choice and competition in the market for land; or

(b) *10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*

(c) *20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.*

3 REPRESENTATIONS TO DEVELOPMENT POLICIES AND SITE ALLOCATIONS

3.1 These representations assess the Draft Plan against the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF). In accordance with the Framework, a local plan should be positively prepared, justified, effective, and consistent with national policy. Our comments below consider whether the Draft Plan meets these requirements and identify areas where it is considered to fall short.

3.2 Paragraph 36 of the NPPF requires that a plan be:

(a) ***Positively prepared*** *– providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.*

(b) ***Justified*** *– an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

(c) ***Effective*** *– deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,*

(d) ***Consistent with national policy*** *– enabling the delivery of sustainable development in accordance with policies in this Framework.*

3.3 Our detailed policy-specific comments are set out below.

Policy SP3: Settlement Hierarchy and General Development Principles

3.4 The Draft Local Plan identifies Tonbridge including Hilden Park as a Principal Service Centre and Hildenborough is categorised as a Tier 3 - Primary Village. The Plan groups settlements into 5 Tiers (Principal Service Centre, Service Centre, Primary village, Secondary Village and Other Rural Settlement) and states that development will be supported across Tiers 1–4 subject only to other policy requirements in the Draft Plan or Neighbourhood Plans. This approach effectively treats settlements of very different sizes, roles, and capacities as equivalent when it comes to planning for growth.

3.5 This lack of clear differentiation between tiers is problematic. Principal Service Centres such as Tonbridge have greater capacity to accommodate significant growth due to its

existing infrastructure, services, and facilities, whereas villages in lower tiers (such as Hildenborough) are less able to support large-scale development. By failing to recognise these differences, the Plan risks prioritising locations where development cannot be delivered sustainably.

3.6 Furthermore, Tonbridge contains a considerable number of brownfield and previously developed sites capable of accommodating substantial new development. The Plan's current wording does not prioritise these sites, instead allowing development to be supported equally across all tiers, bar Tier 5 – Other Rural Settlements. This approach undermines the efficient use of land, limits the potential for regeneration of urban areas, and results in unnecessary pressure on sensitive greenfield sites in the lower-tier settlements, such as Hildenborough and Hilden Park.

3.7 Revising the draft Plan to differentiate between settlement tiers would ensure that growth is directed to locations where it can be most sustainably delivered, supporting the efficient use of land, regeneration opportunities, and the long-term sustainability of the borough. However, the locations of development proposed and allocated in the Plan do not align with the Settlement Hierarchy, and the Parish Council therefore object to Policy SP3 on the grounds that it is not effective.

3.8 Paragraph 5.57 of the draft Local Plan cites that Tonbridge and Hilden Park and the Medway Gap have continued to be assessed as 'wholes' – that is they function as standalone settlements, sharing services across named areas with close relationships in both proximity, services, and accessibility. The Local Plan goes on to explain (paragraph 5.58) that '*the more sustainable settlements are the higher numbered tiers, given that there are a greater range of services and facilities more easily accessible without the need to travel by car. The settlements with less facilities are at the bottom of the hierarchy, and it is expected that in these locations most people would travel by car to access services and facilities, given that public transport is minimal in these areas also.'*

3.9 It is the Parish Council's view that TMBC are incorrectly classifying Hilden Park as part of Tonbridge. It is a part of Hildenborough which is a village with high car dependency (as recognised by the Sustainability Statement), relying on surrounding settlements for key services including Tonbridge Town Centre. Major housing allocations in and around Hildenborough and Hilden Park (Sites HI1, HI2, TO3 and TO4) would intensify this

pattern, increasing peak-time and school pickup/drop-off traffic, congestion, safety risks, and air-quality pressures.

3.10 Furthermore, Hilden Park should be regarded as part of Hildenborough rather than Tonbridge. Physically, the built-up area of Tonbridge ends well before reaching Hilden Park, leaving a clear landscape break that separates the town from this area. Administratively, Tonbridge is an unparished town, whereas Hilden Park falls primarily within the governance area and community sphere of Hildenborough Parish, reflecting its longstanding association with the village. Historically, Hilden Park formed part of the wider Hildenborough estate landscape, and its name itself derives from the Hildenborough manorial lands, demonstrating that its origins and evolution are tied to the village rather than the urban expansion of Tonbridge. In addition, the physical development of HP has evolved eastwards away from the village and not from Tonbridge inwards. In practical terms, residents of Hilden Park and Hildenborough orient themselves towards Hildenborough for local services, schools, transport (including Hildenborough Station), and community facilities, reinforcing the functional connection to the village. Taken together, the physical, administrative, historical, functional, and community factors all demonstrate that Hilden Park belongs to Hildenborough rather than Tonbridge.

3.11 Appendix A of the Council's 'Sustainable Settlement Study' cites that Hildenborough has the following services:

- Fibre/superfast broadband
- Preschool/nursery
- Stocks Green Primary School
- BP/Harvest Energy Petrol Station
- Village Hall
- Westwood playground
- One Stop convenience Store
- Hildenborough Medical Centre
- Thomsons Pharmacy
- Post Office
- Library
- Other areas of open space
- St Johns Church
- Indoor Sports facilities
- Sackville Secondary School
- Pubs/cafes
- Employment areas
- Bus services

3.12 However, whilst the above may be a fair assessment of the services available at the current time at Hildenborough, Stocks Green Primary School, Stocks Green Nursery School, BP, The Flying Dutchman (which has not traded as a pub for 12+ months) and the Hilden Manor pub/restaurant are **all in Hilden Park**. And notably Sackville is an independent co-ed school for c. 200 students and not a multi form entry secondary school. Moreover, some of the existing Hildenborough facilities – One Stop and the Pharmacy for example - are likely to physically shift towards Tonbridge/Hilden Park if the proposed HI2 & TO4 Allocations proceed (because they would essentially both be extensions to Hilden Park); and that, in turn, **could seriously harm the vitality and character of the historic heart of the village**. The Parish Council therefore requests clear justification for Hildenborough's categorisation within the settlement hierarchy, taking into account both planned growth and the implications for accessibility to key services.

3.13 In summary, the Draft Plan's proposed allocations do not align with the settlement hierarchy or the capacity of settlements to accommodate growth. Tonbridge, as a Principal Service Centre, should be prioritised for larger allocations, while Hildenborough's capacity is limited and should be treated with caution to protect local identity, sustainability, and the Green Belt. The proposed allocations fail to take adequate account of Hildenborough's limited capacity and low sustainability, increasing car dependency and infrastructure pressures while undermining both the village's identity and the integrity of the Green Belt. The Local Plan should therefore reconsider the scale and location of allocations in and around Hildenborough to ensure that growth is directed toward settlements capable of accommodating it sustainably.

3.14 Notwithstanding the above concerns, the Council's approach in delegating allocations to Neighbourhood Plan Areas also lacks consistency as not all designated Neighbourhood Plan Areas have been assigned Housing Requirement Figures. Paragraph 70 of the NPPF (December 2024) states that within the overall housing requirement figure, "*strategic* policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations". Hildenborough Parish is a designated 'Neighbourhood Plan Area' and has not been given a housing requirement figure. The Parish Council formally requested it on 11th July 2025 and The Council responded on 1st August saying: '*we have had some delays in our evidence base work and currently do*

not have sufficient information to be able to calculate an indicative figure for you. We anticipate having the evidence needed to do this in September and would appreciate your forbearance until such time.' The Parish Council chased The Council on 30th September, and they responded on 3rd October as follows: '*The report pack regarding the sites for Hildenborough will be published 1 week before the Housing and Planning Scrutiny Select Committee meeting – which you will be able to locate at the below link from the 14th onwards*'.

3.15 NPPF Para 69 states that within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. It is a requirement for The Council to give The Parish Council the housing requirement figure for the Hildenborough Neighbourhood Area. Para 70 of the NPPF also states that where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority. The Council should therefore give The Parish Council their 'best estimate' if they cannot give the precise figure. For this reason, Policy SP3 is not currently consistent with national policy.

3.16 The Parish Council therefore asks for the Draft Settlement Hierarchy to be amended as follows:

i. *Hilden Park* is removed from '*Tonbridge*' in the list of Principal Service Centres

ii. *Hildenborough* is removed from the list of Tier 3 Principal Villages

3.17 This would reflect reality and fully comply with national planning policy as far as Hildenborough and Hilden Park is concerned. And for the avoidance of doubt, the development plan should also make it clear that for Green Belt Purposes '*Tonbridge'* is a 'large built-up areas**'** and '*Hildenborough and Hilden Park*' a 'small town/settlements',

and if pertinent, Purposes b, c and d (as the case may be) are to be applied to any proposals affecting Hildenborough and Hilden Park.

3.18 Policy SP3 is currently unsound as it is not effective and not consistent with national policy

Policy SP8: Managing Development in the Green Belt

3.19 Policy SP8 sets out a detailed list of local criteria against which development proposals will be considered, to ensure that where development does take place, that it is high quality, well designed, and sustainable.

3.20 However, the proposed site allocations do not reflect, and in several cases directly contradict, the conclusions of the Council's own Green Belt Assessment. The Green Belt Assessment forms a core component of the Local Plan evidence base. Its purpose is to provide an objective, transparent and consistent appraisal of how parcels of land perform against the five purposes of Green Belt as set out in national policy.

3.21 Sites identified for allocation, such as HI2 and TO3, are assessed in the Green Belt Assessment as making a strong contribution to key Green Belt purposes, including preventing the merging of neighbouring settlements; safeguarding the countryside from encroachment; and preserving the setting and special character of settlements. Despite these findings, the Plan allocates such sites without a clear or reasoned explanation as to why their assessed Green Belt harm has been overridden. There is no robust audit trail demonstrating how the conclusions of the Green Belt Assessment have been weighed in the site selection process.

3.22 As a result, the allocations appear to be policy-led rather than evidence-led. The disconnect between the evidence base and the proposed allocations indicates that the Plan is not justified. The Local Planning Authority cannot reasonably commission such evidence and then disregard its conclusions without clear, logical, and proportionate reasoning. Selective reliance on evidence undermines the soundness of the Plan.

3.23 The National Planning Policy Framework is clear that Green Belt boundaries should only be altered in exceptional circumstances, which must be fully evidenced and justified through the preparation or updating of plans (paragraph 145). A Green Belt Assessment is a principal tool for testing whether such exceptional circumstances exist. Where the

Assessment concludes that land performs an important Green Belt function, allocating that land for development requires particularly compelling justification.

3.24 In addition, paragraph 147 of the NPPF requires local planning authorities to demonstrate that they have fully examined all reasonable options for meeting identified development needs before considering Green Belt release. This includes maximising the use of brownfield land, optimising densities in sustainable locations, and exploring non-Green Belt alternatives. Where sites that perform strongly against Green Belt purposes are allocated, the Plan must clearly explain why less harmful alternatives have been discounted. The absence of such an explanation suggests that the Green Belt Assessment has not been properly applied.

3.25 While the draft Plan places significant reliance on the proposed strategic allocation at Borough Green, the Parish Council recognise that this site is challenging. The site lies within the Green Belt and is subject to a number of constraints, including extensive areas of current and former mineral extraction, with mineral permissions remaining in place on parts of the site until at least 2030. In addition, the site is dependent on the delivery of major strategic infrastructure, including a new relief road linking the A25 (Ightham bypass) to the A20, alongside supporting community and employment infrastructure. The timing, funding and certainty of this infrastructure have not been adequately demonstrated.

3.26 For these reasons, the Local Plan fails the tests of soundness set out in paragraph 36 of the NPPF. The allocations within the Parish are not justified, as some are not supported by the conclusions of the Green Belt Assessment and they are not consistent with national policy due to the failure to demonstrate exceptional circumstances for Green Belt release.

3.27 The Draft Plan should therefore be amended either to remove allocations that conflict with the Green Belt Assessment or provide a robust and transparent justification explaining why other sites identified for release are required and why less harmful alternatives cannot meet identified development needs. In the absence of such changes, the proposed Green Belt releases should not proceed.

3.28 Policy SP8 is unsound as it is inconsistent with The National Planning Policy Framework.

Policy SP9: Local Green Gap

3.29 The Parish Council wishes to designate the area between Tonbridge and Hilden Park as a Local Green Gap in line with Policy SP9. The purpose of this designation is to retain the separate identities of the two settlements, prevent coalescence, and protect the long-term openness of the countryside between them. A Green Gap, would ensure that Tonbridge's built-up area does not physically merge with Hilden Park and Hildenborough, preserving the distinct character and setting of each community.

3.30 Within this proposed Green Gap, restrictive policies would apply, meaning that development would only be supported if it demonstrably maintains the integrity of the gap. Any proposals in this area would be expected to contribute positively to the landscape, biodiversity, or recreational value of the land, consistent with the criteria set out under the draft Policy SP9. This approach aligns with the strategy used for other settlements, such as Kings Hill, West Malling, and East Malling, where Local Green Gaps are designated to safeguard settlement patterns and prevent the erosion of local identity.

3.31 The Parish Council seeks to extend the Local Green Gap principle to the Tonbridge - Hildenborough and Hilden Park corridor to protect openness, community separation, and landscape quality, ensuring that both areas retain their distinctiveness and that any future development is carefully controlled.

Policy CC1: Addressing Climate Change

3.32 The PPG sets out that any local requirements for a building's sustainability and for zero carbon buildings should be based on robust credible evidence and assessed for impacts on viability.

3.33 Paragraph 6.34 and Policy CC1 seek to place a responsibility on the Plan to reduce greenhouse gas emissions and address the causes of climate change, and this follows through into subsequent policies (CC4 and CC5). However, the two most significant interventions to deliver that objective would be reducing energy consumption in the existing building stock, and reducing total road traffic by distance travelled. Since the Plan does not have policies that would implement either of those outcomes, the net outcome of the Plan is likely to be to increase carbon emissions through the additional road traffic

associated with new development, unless that development is re-directed to existing built up areas, in particular Tonbridge Town centre.

3.34 As drafted, Policy CC1 aims for '*Prioritisation of brownfield land and reuse of existing buildings, structures and materials where available and feasible, minimising waste and maximising reuse of recycled materials during construction and designing for the reuse of materials at end-of-life strategy in accordance with Circular Economy Policy CC2'* yet the effectiveness of Policy CC1 is likely to be compromised **as the Plan currently has no policy for maximising the use of brownfield land**, **largely ruling it out as a source of land supply**. Additionally, many of the housing allocations are on sites, including HI1, HI2, TO3 and TO4, for which the car will inevitably be the principal mode of travel.

3.35 We agree with these objectives, but they must be supported by policies prioritising the regeneration of allocated brownfield sites in urban locations first, like Tonbridge Town Centre.

3.36 As drafted, Policy CC3 includes the requirement for all major applications to be supported by a full Energy and Climate Change Statement utilising accurate methods for operational energy use prediction. This requirement is also considered to be impractical and disproportionate in the case of an outline application where matters of appearance, layout and scale have been reserved for future determination under a reserved matters application. In such cases it is not feasible to utilise accurate methods to predict operational energy use. We previously recommended that the wording of the policy is reviewed in this context and the requirement for a full energy statement utilising accurate methods for operational energy use prediction should apply only where details of appearance, layout and scale are being sought for approval.

3.37 <u>This Policy is currently unsound as it is inconsistent with the National Planning Policy Framework, and it is not appropriately justified.</u>

Policy CC6: Water Efficiency

3.38 The Parish Council supports Policy CC6: Water Efficiency.

3.39 National policy states that 110 litres per person per day (l/p/d) is sufficient in water stressed areas. The Parish Council welcomes the fact that The Council are not seeking to introduce lower standards ahead of these, recognising that a consistent national

approach is the best way of ensuring improved standards whilst maintaining the delivery of new homes.

3.40 Whilst it is important for water companies to reduce the abstraction of potable water, the impact of new homes on abstraction is likely to be minimal with far greater gains being achieved through the prevention of leaks and improvements to the water efficiency of existing properties to ensure that they are as efficient as those built to the current standard of 110 litres (lpd).

Policy CC7: Managing Development within Flood Risk Areas

3.41 The Parish Council have no objection to Policy CC8 as drafted.

3.42 Paragraph 6.90 cites that The Council has undertaken a Level 1 Strategic Flood Risk Assessment which advises that the borough is at risk from fluvial, tidal, ground water, surface water, and reservoir flooding. Further work to understand flood risk will need to be progressed to help inform the Regulation 19 Pre-Submission Local Plan as Required.

Policy NE3: Landscape Character

3.43 Supporting Policy Text cites that all major development proposals must be supported by a Landscape Appraisal. Landscape assessments are undertaken using methodology and guidance from the Landscape Institute's published Guidance for Landscape and Visual Assessment GVLIA3 2013 and the criteria for undertaking an LVIA are considerably more onerous than for a Landscape and Visual Appraisal (LVA). Within an LVIA, the assessor is required to identify 'significant' effects in accordance with the requirements of the Environmental Impact Assessment Regulations 2017, whilst an LVA does not require a determination of 'significance' and may generally hold less detail. The Guidance does not make reference to Landscape Appraisals.

3.44 It is considered reasonable for the draft Policy NE3 to require the submission of an LVIA in support of all major applications, particularly given the specific nature of the allocations which encompass land released from the Green Belt.

Policy NE6: Green and Blue Infrastructure

3.45 Policy NE6 should require that proposals for major development must be accompanied by an acceptable Green Blue Infrastructure (GBI) plan for the site in accordance with a GBIS (Green and Blue Infrastructure Strategy) and the Master Plan for the site in

accordance with the relevant Area Strategy. This should include stewardship arrangements for not less than 30 years to cover maintenance, management, and funding arrangements.

Policy HE3: Conservation Areas

3.46 The Parish Council acknowledges that a programme of reviewing the existing Conservation Area Appraisals and preparing new Conservation Area Appraisals for the few remaining areas which currently do not have an appraisal in place, is underway and will continue over the plan period. The Parish Council want to play an active part in the review of the Hildenborough Conservation Areas. And seriously consider the extension of the Hildenborough Village Conservation Area to afford better protection to the Listed Buildings lying to the south of the B245.

Policy HE5: Historic Parks and Gardens (Designated and Non – Designated)

3.47 The Parish Council have no objection in principle to Policy HE5 as drafted.

3.48 The Parish Council welcomes the acknowledgement that Non-Designated Historic Parks and Gardens are also relevant and worthy of protection. The specific reference made in Paragraph 8.47 relating to the non-designated Historic Parks and Gardens which are contained within the Kent Gardens Compendium is welcomed.

3.49 The Kent Compendium of Historic Parks and Gardens (KCHPG) for Tonbridge and Malling Borough Council, which is supported by TMBC, Kent Gardens Trust and English Heritage, has not produced a document for Foxbush and Mountains, such as those produced by Kent County Council for other locally registered parks and gardens on the KCHPG. The NDHA forms the setting of a number of Grade II listed buildings, including the former country houses of Foxbush and Mountains from which the NDHA takes its name.

3.50 It is odd that no reference has been made to the NDHA within the Heritage Impact Assessment which forms part of the Local Plan evidence base, particularly given the weight accorded to the designation in the assessment of planning application

21/02831/FL at Fosse Bank School. The Conservation Officer's consultee response considered the proposal's impact on the Historic Park and Gardens and cites:

'***The development as proposed would have, of course, a direct impact on the historic park and garden.*** *Though the statement identifies nature of harm (permanent and sizeable new built form) it then discusses mitigation as though this could negate that harm, and states that the cumulative harm of the school campus and C3 development would be of a moderate order of magnitude, though not fatal to its significance; it also states that harm would be limited, and finally that the NHDA would be sustained (in accordance with the NPPF definition of conservation). Paragraph 203 does not include an assessment of overall planning balance, but rather a 'balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset'. As with the setting of Mountains, this proposal fundamentally alters the character of the open space of parkland and is a permanent change which includes severance of ownership and change of use.* ***Therefore, in our view, a not insignificant amount of harm would be caused.'*** Our emphasis underlined.

3.51 The Parish Council concurs with this view and pointed out at the time that the applicants had caused considerable harm to the Historic Parks and Gardens prior to submitting their application. The Parish Council are therefore mystified why The Council are now proposing to cover the entirety of the Historic Park and Gardens with new homes, and fundamentally, irretrievably, and permanently alter the character of the gardens and open space of parkland? **If these Heritage assets are relevant and worthy of protection, then they must be protected and the new homes must be built elsewhere.** And if they are worthy of protection then they should be incorporated into the Hildenborough Village Conservation Area to afford them the additional protection they deserve.

3.52 The Parish Council would ask that subsequent studies should provide clarity on the specific special character to ensure that any development proposals affecting the setting and /or views into and out of any Historic Parks and Gardens should have particular regard to detrimental effects.

Policy D2: Design Codes and Masterplans

3.53 Hildenborough Parish Council acknowledges the importance the Government attaches to improving the design of new homes and neighbourhoods. Design reviews and Design Codes can prove to be a valuable part of this.

3.54 Policy D2 requires the submission of a masterplan for all sites for significant non-residential development submitted in either full or outline. Design Codes are required for large sites as identified in the spatial strategy and on the Proposals Map (encouraged developments of 100 or more dwellings) and schemes proposing 500 or more dwellings will be referred to a design review panel.

3.55 The Parish Council consider that Design Codes should be required for all applications over 50 dwellings to ensure a consistent, high-quality approach to placemaking, architectural character, layout, and landscape integration. Furthermore, Design Reviews should be mandatory for all schemes of more than 50 dwellings. This approach is particularly important given the scale and sensitivity of the housing allocations now proposed, many of which are located on existing Green Belt sites. These sites will require careful consideration to ensure that the design of new development is appropriate, sensitive to the surrounding landscape, and well-integrated with existing communities.

3.56 The scale and location of these allocations mean that new development will have a substantial and long-term impact on the character and setting of the surrounding area. A robust and transparent design process, incorporating Design Codes and Design Reviews, is therefore essential to secure outcomes that are contextually appropriate, sustainable, and sympathetic to local landscape and settlement patterns. Requiring Design Codes and mandatory Design Reviews for schemes over 50 dwellings will help ensure that the number of dwellings delivered through these allocations is designed to a high standard, respects the sensitive Green Belt context, reinforces local distinctiveness, and results in high-quality, well-designed places for future residents.

3.57 The PPG (paragraph 017) identifies design review as a useful tool for improving design quality and notes that it should be proportionate, it is important to recognise that the significance of a development is not solely determined by scale. In the case of the proposed Green Belt allocations, the combination of site sensitivity and the number of dwellings justifies a clear requirement for both Design Codes and Design Reviews. A blanket application for smaller or less sensitive sites may be unreasonable, but for developments over 50 dwellings in this context, the policy is proportionate, necessary,

and justified to ensure that design outcomes are high quality and fully responsive to their setting.

3.58 The Policy is contrary to National Planning Policy.

Policy INF1: Provision of Infrastructure and Services

3.59 Kent County Council's Early Years and Childcare Sufficient Report 2025 notes a shortfall in the availability of such places in Tonbridge North and Hildenborough which has one of the lowest proportion of children accessing a place within the same district as their home address. Additionally, the most recent figures cite that for children aged 3 and 4 (the funded early education years), there is a shortage of places. This further suggests that some families may need to travel outside Hildenborough or use alternative providers.

3.60 The Interim Infrastructure Delivery Plan (2025) cites that the total primary need arising from developments in the area (we presume Hildenborough and Hilden Park though the Delivery Plan does not explicitly explain) is 5.8FE. However, the Regulation 18 Consultation provides no clear direction as to whether there is capacity available at existing schools to accommodate new pupils and/ or whether the provision of new residential development as part of the proposed Site Allocations would stimulate the provision of new schools and or school places.

3.61 No analysis is provided of the available school places by primary school across the borough. This is critical, as the acceptable commute for primary school aged children is significantly smaller than for secondary schools and other purposes. Any new housing development must be supported by accessible primary school provision. It is not sufficient for there to be available primary school spaces somewhere in the borough, the spaces must be in a school in reasonable proximity from the proposed housing.

3.62 The draft Plan cites that a primary school is proposed to be secured at Grange Farm site, North Tonbridge to provide additional capacity arising from developments in North Tonbridge and Hildenborough.

3.63 Additionally, the Delivery Schedule reports a proposal to expand existing primary school provision at South Tonbridge, but it does not identify which one on the basis that such

identification would need to be subject to feasibility work. The Interim Delivery Schedule cites that *'Further work will be undertaken to inform the Regulation 19 Local Plan by KCC to confirm when and where necessary to clarify the above requirements'.*

3.64 Potential solutions to consider would include expanding the capacity of one of the Hildenborough Primary Schools to 2FE. The Parish Council understands that expanding Stocks Green Primary School is feasible but expanding Hildenborough CoE school is not.

3.65 It is unclear why The Council have not apportioned any specific primary or secondary school capacity within any of the allocations at this point. The Parish Council asks that the Council assess in more detail each of the Site's impacts with the preparation of a health impact assessment and an educational provision assessment for each residential allocation to inform decision making at this stage of the Plan process.

3.66 <u>The Policy is currently contrary to National Planning Policy.</u>

Comments on the Proposed Development Allocation of Site HI1

3.67 Site HI1 is proposed for release from the Green Belt despite planning constraints remaining unresolved. The adopted NPPF requires exceptional circumstances, robust evidence, and a demonstration that all reasonable alternatives have been exhausted before Green Belt land is released. In the case of HI1, this has not yet been demonstrated.

The Green Belt Assessment conclusions are flawed and inconsistent with national policy.

3.68 The GBA assesses HI1 in isolation and recommends it as a potential release. This conclusion is based heavily on the presence of "washed over" development to the east and west and on perceived visual enclosure. HI1 forms part of the open rural setting of Hildenborough, and the Site's release would contribute to outward incremental sprawl northwards along what is essentially a narrow (just 4.9M wide) rural country road.

3.69 **The GBA concludes that the Site is part of a sub-area that performs <u>strongly</u> against the NPPF purposes and its release would contribute to incremental outward sprawl**.

3.70 The Parish Council understand that altering Green Belt boundaries requires the Council demonstrating 'exceptional circumstances' and the Parish Council doubt that the Council's case will stand up to scrutiny in this instance. The '*washed over development*'

to the east for example, comprises the Grade II Listed St Raphael Medical Centre and Gardens (now known as Hollanden Park Hospital), and the 'washed over' development to the west 3 tennis courts on the recreation ground and a handful of rural buildings one would expect to find in the countryside (see Figure1 below). And two recent (May 2024) Appeal Decisions nearby on the former Gatehouse Nursery site in Coldharbour Lane, adjacent to the northeastern boundary of the St Raphael Centre, appear to support the Parish Council's view.

3.71 Both applications proposed the removal of the former nursery buildings and polytunnels, and the erection of 2 & 4 new homes, respectively. And the Planning Inspector stated the following when dismissing both Appeals:

'28. The appellant considers the proposals to be a high quality, attractive design which would not harm the character and appearance of the site or the surrounding area. However, ***this lack of harm is a neutral factor which would not weigh for or against the proposed development****'.*

'29. The proposals ….. would be inappropriate development in the Green Belt in that it would result in new buildings within the Green Belt ***which do not fall under any of the listed exceptions.*** *The Framework establishes that* ***substantial weight should be given to any harm to the Green Belt****, and the development* ***should not be approved except in very special circumstances. Very special circumstances will not exist unless the harm to the Green Belt and any other harm are clearly outweighed by other Considerations****'.*

'30. ***I find that the other considerations in this case do not clearly outweigh the harm to the Green Belt, in terms of a loss to openness and inappropriateness that I have identified. Consequently, the very special circumstances necessary to justify the development in the Green Belt do not exist.*** *Therefore, the development in both appeals conflicts with Policy CP3 of the CS which seeks to protect the Green Belt, along with paragraphs 152, 153 and 154 of the Framework'* (again, our emphasis).



Figure 1: *Aerial photograph of Site HI1. Note: the former Gatehouse Nursery site is partially visible in the top right-hand corner of the Photograph*.

Flood risk evidence is incomplete and insufficient for allocation.

3.72 Although HI1 lies within Flood Zone 1, the Site and the adjacent section of Riding Lane both suffer badly from Surface Water Flooding, particularly during wet winter months. This is due to the naturally high-water table and to two brooks on the western side of Riding Lane converging in the north-eastern corner of the Recreation Ground, before crossing under Riding Lane and running north along the western boundary of the Site before turning east and continuing along the northern site boundary and then becoming a tributary of Hilden Brook. And Figure 2, below, shows the Annual Risk of Surface Water

flooding in his area pictorially (Source – The Government Website, and The Environment Agency's updated (January 2025) National Surface-Water Flood Risk Data)



Figure 2: *Annual Risk of Surface Water Flooding (Key High Risk: Dark Blue, Medium Risk: Mid Blue and Low Risk: Light Blue)*

3.73 The Level 1 Strategic Flood Risk Assessment identifies HI1 as requiring further testing through a Level 2 SFRA. **Importantly, the SFRA scoping exercise categorises HI1 as *'Least Preferable'* and states that *'safe access and egress is not possible.'* This is a critical constraint**. Until a full Level 2 SFRA is completed, The Council cannot demonstrate that the Site is developable, deliverable, or safe over its lifetime. Allocating a site where fundamental flood-risk questions are unresolved is premature and contrary to the NPPF requirement to steer development to areas at lowest flood risk

Other Ground Risks

3.74 The Parish Council understands from former and current residents of the Riding Park Estate, that this Site was formally marshland and now houses the underground cess pits that serve the Riding Park Estate. The Parish Council have been unable to substantiate

this in the time available, but The Council must establish the full facts before confirming the allocation, because both issues could potentially rule the Site out.

Heritage considerations require further assessment.

3.75 HI1 lies adjacent to the Grade II Listed Hollanden Park Farmhouse, and the Grade II Listed St Raphael Medical Centre and Gardens (now known as Hollanden Park Hospital). However preliminary desk-based analysis suggests that intervisibility may be limited and mitigation might be possible, but this would need to be confirmed.

Access constraints and transport impacts remain unresolved

3.76 Access to the Site is proposed from Riding Lane, a semi-rural road lacking footways, street lighting and cycle infrastructure. This raises some serious concerns about pedestrian access, cyclist safety and the ability of the Site to support sustainable travel. At the allocation stage the Local Plan must already demonstrate that no "insuperable" highway problems exist, and the current Strategic Transport Assessment has **not confirmed this**. And that's a concern, because we are aware of at least two previous attempts to redevelop this site (in 1973 & 1997, respectively) which have both been refused on **Green Belt and *Highways grounds***

3.77 Moreover, the proposed site allocation is 77 dwellings and at the very least that would require a secondary site access for emergency vehicles. And it's very doubtful that could be safely accommodated on Riding Lane too.

3.78 A former farm gate adjacent to the Riding Park Estate in the south-eastern corner of the Site – where the red arrow is pointing in Figure 1 – could potentially be re-opened and utilised for this purpose. However, there is now a row of mature trees growing on the Estate side of this former entrance, and ownership of the land on which the trees are growing is uncertain. And the Riding Park Residents are aware of this possibility and are strongly against it; and parking on the Estate is at a premium, particularly overnight and at weekends, and during these periods vehicles park on both sides of the Estate roads and the gap between the parked vehicles is 'tight'; and if vans are parked on both sides of the road the gap may not be wide enough for fire engines to get through.

3.79 Of more concern is the width of Riding Lane, and the potential impacts the additional traffic associated with the development would have, particularly in the proximity of the pharmacy and library (where traffic is already effectively reduced to single lane due to

parked vehicles), the busy B245 road junction, and Hildenborough CoE School during pickup and drop off times.

3.80 Therefore, The Council's detailed Transport Assessment must be carried out as soon as possible to establish if these significant transport and accessibility issues can be satisfactorily overcome or are insurmountable.

Landscape & Biodiversity harm is understated

3.81 The Landscape Sensitivity Assessment acknowledges that although parts of the northern edge of Hildenborough have a residential context, development at HI1 would create some notable adverse effects on key viewpoints, particularly from site access points. The Parish Council concurs with this view, particularly if the trees and hedgerow along the Riding Lane frontage need to be removed to facilitate clear sight lines and a new footpath to make the site sustainable.

3.82 In the wider context of Kent, Hildenborough's broader area is recognised as being strategically important for the conservation of Great Crested Newts (GCNs), a European Protected Species. HI1 Site straddles four of Natural England's/Defra's '*Core Strategic Opportunity Areas*' (CSOA's) where **'***GCNs have been found & recorded during surveys as part of the GCN District Level Licensing Scheme*'; and the Site is also surrounded by other CSOA's. The Scheme's aims is to effectively connect GCN populations, increase numbers and improve habitats; and The Parish Council & Kent County Council both supported a planning application (TM/23/01695/FL) by Hollanden Park Oast to construct a new 200m² pond for GCN's on a '*wildflower meadow*' immediately to the north of the Site (subsequently approved & constructed). And to put the location of the new pond into context, it is situated approximately 60m NNE of the smaller of the two ponds that are

visible at the top of Figure 1, and the larger (partially hidden by trees) and smaller ponds themselves are sited approximately 25m & 50m north of the Site boundary, respectively.

3.83 The confirmed presence of GCN's is a material planning consideration and has significant implications for the developability of Site Allocation HI1.

Conclusion

3.84 The Parish Council have reviewed the HI1 Site allocation with an open mind and can understand how it could have been deemed '*suitable for development'* by Officers carrying out a predominantly desk-based analysis, and unfamiliar with the Site's nuances.

3.85 But the site-specific issues are such that The Parish Council doubts the Site will pass The Council's own detailed site analysis in advance of the Regulation 19 Consultation, which for the avoidance of doubt must include a stringent viability test and confirmation that the necessary infrastructure improvements will be funded and delivered in good time.

3.86 The Parish Council will review the Level 2 SFRA, and the detailed transport analysis when it is available for further consideration of the Site's suitability for allocation.

Comments on the Proposed Development Allocation of Site HI2

3.87 **The Parish Council strongly and unequivocally objects to Site Allocation HI2**.

The allocation is contrary to National Policy and is unjustified.

3.88 Site HI2 is proposed for Green Belt release in the emerging Local Plan despite clear evidence from the Council's own commissioned Green Belt Assessment (GBA) that most of the land performs a strong Green Belt function. National policy requires that Green Belt boundaries should only be altered where *exceptional circumstances* exist and where the harm has been fully assessed and justified. In the case of HI2, the Council's evidence directly contradicts the decision to release this land. **The Parish Council therefore strongly objects to the allocation as it is not justified, is not consistent with national policy, and cannot be considered sound.**

Green Belt Harm Is Clearly Identified in the Evidence Base

3.89 The Council's own Green Belt Assessment shows that the majority of HI2 should not be released. Sub-parcels HI-02 and HI-03 (as shown at Figure 3 below) are explicitly identified as having a strong overall contribution to the Green Belt and consequently are **not recommended for further consideration.** The Assessment goes further by stating

that releasing HI-02 alone would nearly result in Tonbridge merging with Hildenborough, significantly undermining the Green Belt's essential role in preventing sprawl. Releasing HI-02 in combination with HI-03 would, according to the Assessment, lead directly to the physical merging of the two settlements, creating an irregular and indefensible Green Belt boundary and harming the integrity of the wider area. It is evident that these parcels play a critical role in separating Tonbridge, Hilden Park, and Hildenborough.

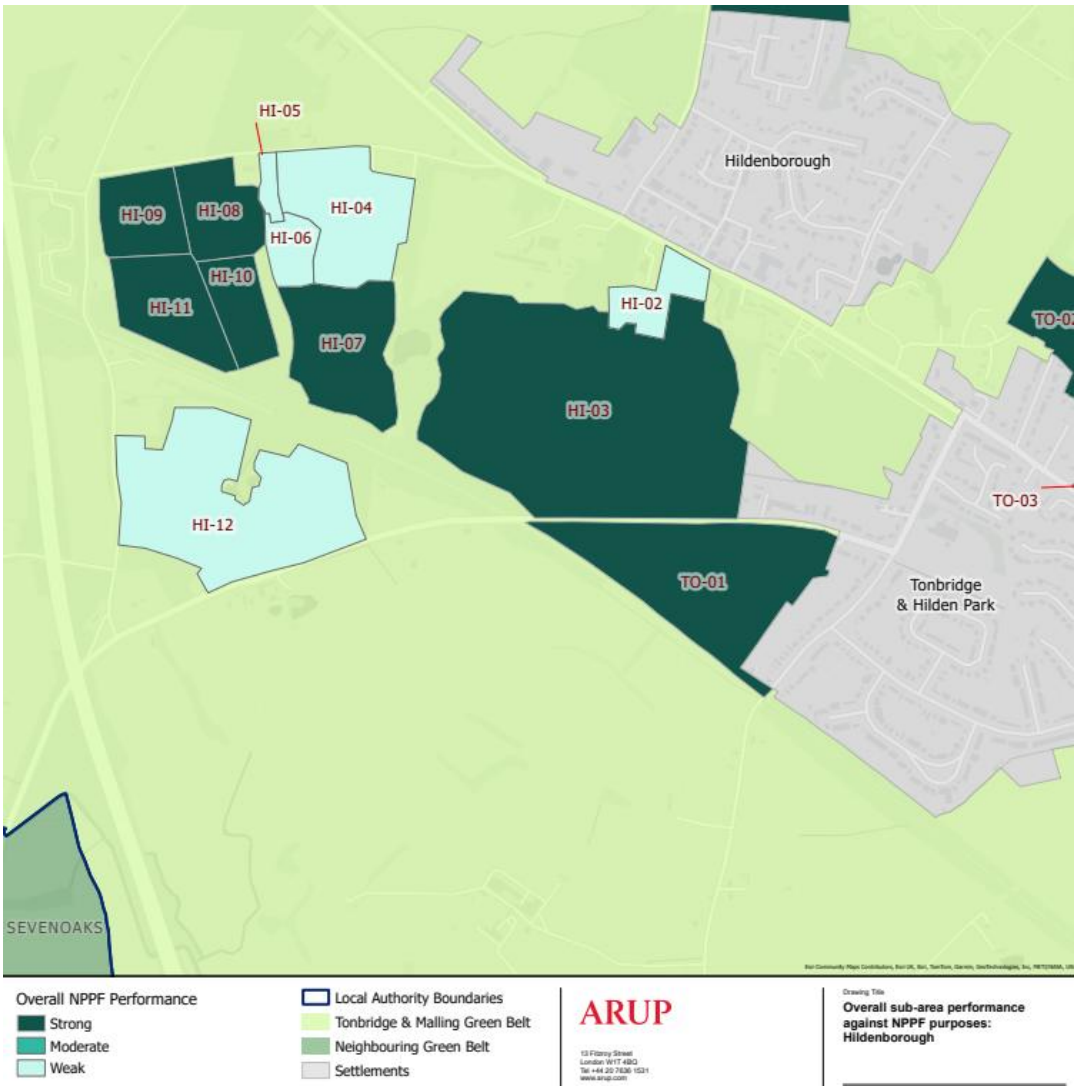


Figure 3: Extract from Green Belt Assessment

3.90 Despite this, the Council has included both parcels in the allocation without justification and runs directly counter to the findings of the Council's own evidence. While TO-01 performs slightly less strongly, it remains integral to the openness of the wider Green Belt

and its removal would compound the cumulative harm. It is for these reasons that the Parish Council strongly objects to their proposed allocation.

Flood Risk Concerns and an Incomplete Evidence Base

3.91 Significant parts of HI2 fall within Flood Zones 2 and 3, and there is additional risk from surface-water flooding. **The Level 1 Strategic Flood Risk Assessment identifies the eastern portion of the site as one of the *"Least Preferable"* locations for development and concludes that safe access and egress cannot be achieved**. This is a fundamental constraint that directly affects the ability of the site to comply with national planning policy. Moreover, the evidence base is incomplete: the site requires a Level 2 SFRA before any conclusions can be reached regarding its suitability. Allocating the site in advance of this essential work is premature and unjustified. The Parish Council therefore strongly objects to Site Allocation HI2 on this basis too.

Significant Heritage Constraints Are Overlooked

3.92 Site Allocation HI2 contains land with recognised heritage sensitivity and lies adjacent to multiple designated and non-designated heritage assets. The Heritage Impact Risk Assessment which forms part of the evidence base identifies sub-parcels within the site as falling within the Moderate Risk Category, where "*harm to heritage assets would remain even after mitigation*". Despite this conclusion the Heritage Assessment makes no reference to the extensive Foxbush and Mountains Non-Designated Historic Park and Garden, despite its well-established heritage value and its role as the setting for several Grade II listed buildings. This omission is particularly striking given the weight accorded to the same designation in the assessment of recent planning applications within the area.

3.93 Furthermore, the northern portion of HI2 lies within the Hildenborough Conservation Area, where the Conservation Area Appraisal stresses the importance of the southern landscape edge to its rural character. The Plan at Figure 10 of the Conservation Appraisal (included below) shows the key features of the Conservation Area which forms part of the townscape appraisal. The Conservation Area Appraisal states that *'…. the hedge and trees lining the southern edge of London [should be Tonbridge] Road are a prominent*

landscape feature enhancing the setting of the listed buildings and reinforcing the rural character of the village. These form an edge to the Conservation Area.'

3.94 The Appraisal goes on to state '*The Landscape setting is important to the character of the Conservation Area with the trees visible over the houses from a number of vantage points. Within the Conservation Area tree belts and woodland run the length of the southern side of the London [Tonbridge] Road forming an edge to Conservation Area and providing a verdant setting for the listed buildings along Tonbridge Road. These trees can also be seen from Mount Pleasant and [Half] Moon Lane providing a green vista.'* This makes clear that the contribution of the Site is not dependent solely on direct or continuous visual permeability, but on the presence of a continuous green backdrop which reinforces rural character, long views, and the setting of heritage assets.

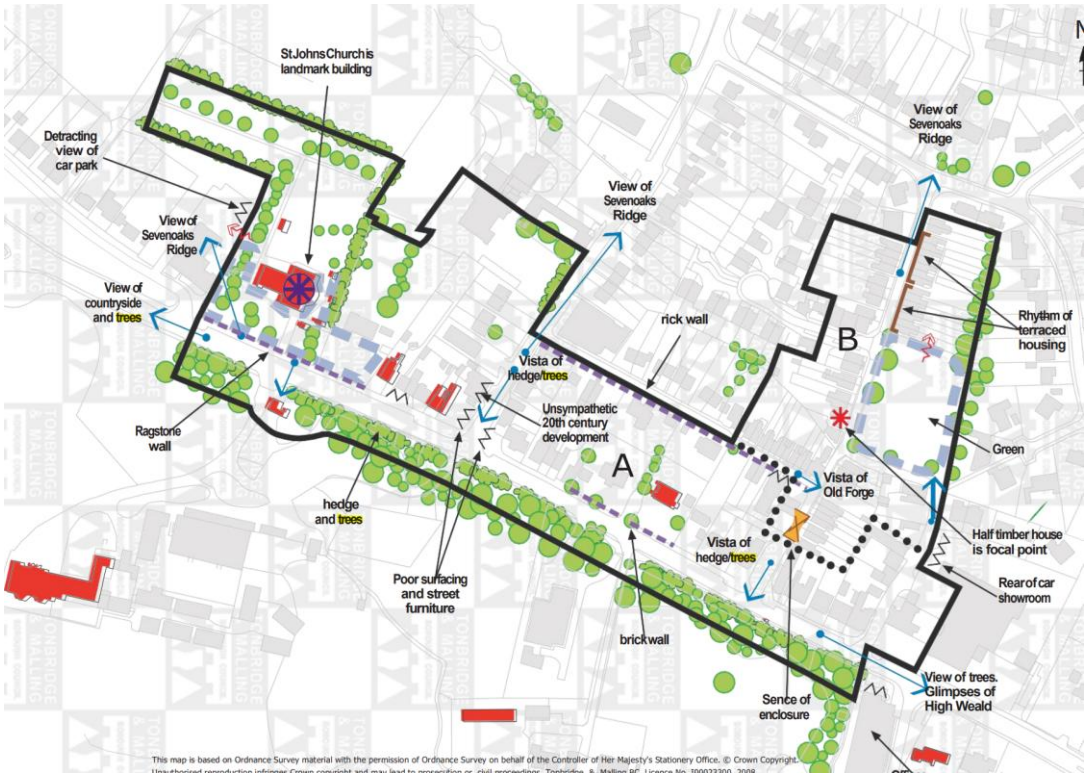


Figure 4: Extract from Hildenborough Conservation Area

3.95 The Conservation Area Appraisal is explicit in that the landscaping to the south of the Conservation Area is essential to its character. Any development that removes or

significantly alters the landscape is highly likely to be viewed as harmful and potentially unacceptable.

3.96 Any access arrangement to/from Tonbridge Road (part of the busy B245) would also likely require the loss of important vegetation that contributes to the Conservation Area's character to achieve the required visibility splay—an element directly related to location and amount of development. Significantly, an appeal decision dated 2005 (APP/H2265/A/04/1170042) identified the inability for an adequate visibility splay to be achieved from the existing Chequers Farm access in a north-westwards direction and that removal of the frontage vegetation would certainly be required. Moreover, any additional development would impose further pressure on the B245, and its cumulative impacts would require detailed analysis.

3.97 In the Parish Council's view, development of this scale and distribution would cause harmful change to Heritage assets and the character of the Conservation Area and therefore is strongly opposed.

Landscape and Setting Impacts

3.98 The allocation would result in significant and unacceptable harm to the landscape, the form of the settlement, and the integrity of the remaining Green Belt. The site includes land with parkland characteristics, including mature oaks and historic landscape features and on this basis, the Landscape Sensitivity Assessment identifies '*only limited capacity for small-scale development in this area*', which is inconsistent with the substantial scale of growth proposed in HI2. Development at any larger scale would materially erode the gap between Hildenborough and Hilden Park/Tonbridge, creating coalescence and undermining the rural edge of the village.

3.99 Furthermore, it is noted that the trees bordering the southern side of Tonbridge Road are protected by Tree Preservation Order Area 81/10077/TPO. Any proposal to remove, damage or otherwise conduct works to these trees to facilitate a new access would require the prior consent of the Local Planning Authority and be subject to rigorous scrutiny. The removal of TPO-protected trees should only be permitted where it can be clearly demonstrated that there are no reasonable alternatives and that the loss of protected trees is justified by an overriding need. To enable any point of access from Tonbridge Road into the Site, the resulting loss of trees protected for their collective amenity value would result in harm to the character and appearance of the area, and the

Conservation Area in particular. It is noted that an application in 2011 (TM/11/01847/TPOC) allowed the felling of some dying Horse Chestnut trees along the northern boundary of the Site allocation, but the Supplementary Report for the Area Planning Committee confirmed that the replacement Oak trees continue to be subject of the group TPO.



Figure 5: Extract from Tonbridge and Malling Borough Council Protected Tree Map

3.100 As can be seen from Figure 5 above, the removal of vegetation along Tonbridge Road to create access and the necessary sight lines would expose views into the Site and significantly alter the character of the approach into the Conservation Area.

3.101 Natural England/Defra are currently classifying the entirety of the northern and southern parts of HI2 Site as CGN '*Fringe*' and '*Core' Strategic Opportunity Areas,* respectively. But a pond within Parcel HI-02 is highly likely to function as CGN breeding or foraging habitat too, as CGN's have been established in the two Oakhill Ponds on the northern side of the B245 for some time, and have recently (Summer 2025) been confirmed as - being present in the West Wood Pond to the west of the proposed HI2 allocation too as shown in Figure 6 below. The Habitat Suitability Index (HIS) on West Wood Pond was undertaken by Medway Valley Countryside Partnership (on behalf of Natural England),

and the confirmed presence of Great Crested Newts on the southern part of the Site, and in the Oakhill and West Wood Ponds has significant implications for the developability of Site HI2.

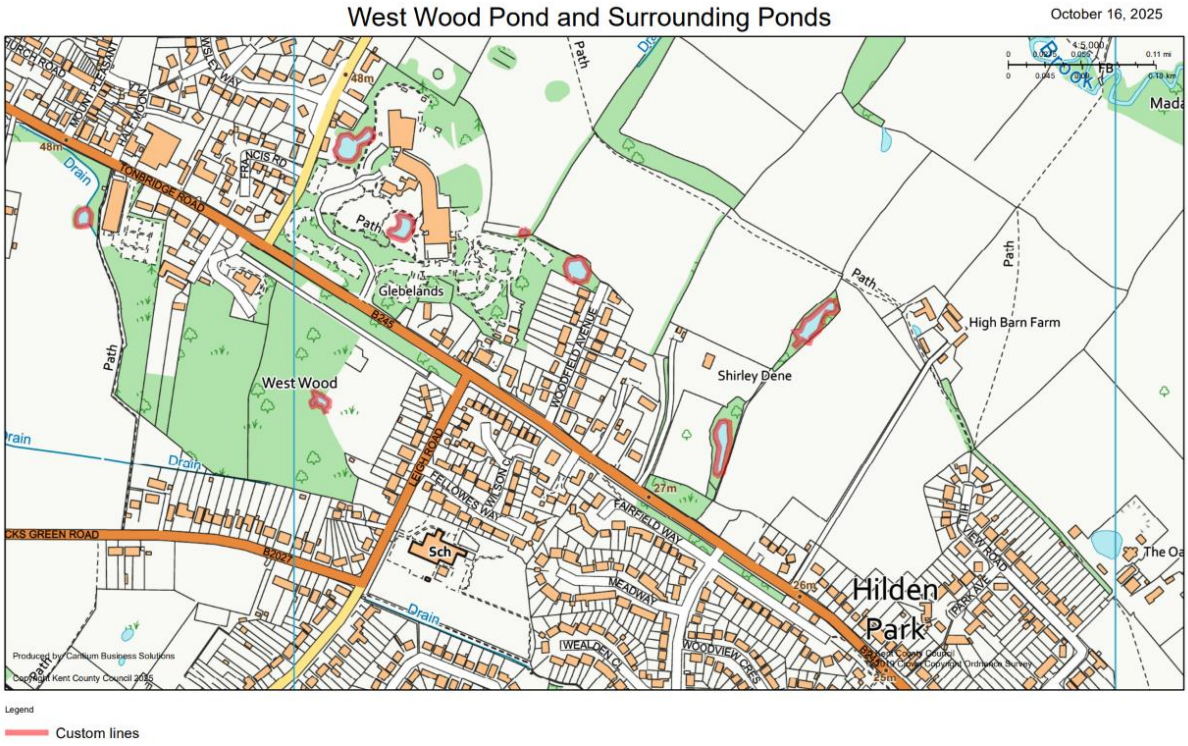


Figure 6: Plan showing location of West Wood Pond in vicinity to the site allocation

3.102 **In the Parish Council's view, large-scale development at HI2 is wholly inappropriate and harmful, and is therefore strongly opposed.**

Education and Early Years Capacity and GP services

3.103 The evidence shows that local education infrastructure is already under considerable pressure, with no clear solution identified to accommodate further growth. The Interim Infrastructure Delivery Plan identifies a primary requirement of 5.8 Forms of Entry generated by development in the area, yet the Local Plan offers no clarity on whether this need can be met through existing schools.

3.104 The Parish Council understands that Stocks Green Primary School may be capable of expansion, but Hildenborough Church of England School is not, and no new school provision is embedded within any of the Parish's allocations. Although a new primary school is proposed at Grange Farm in North Tonbridge, it is intended to address needs

generated in North Tonbridge itself and not the substantial additional requirements arising from Hildenborough/Hilden Park allocations.

3.105 In this context, the Local Plan fails to demonstrate how education demand arising from HI2 will be accommodated. The Parish Council therefore also strongly objects to the allocation on the grounds of inadequate and unjustified infrastructure planning.

Wastewater Capacity and Deliverability

3.106 The wastewater network represents a substantial and unresolved constraint.

3.107 The Interim Infrastructure Delivery Plan confirms that several of the sub-parcels within HI2, including LAA references 59653 and 68332, are subject to limited network capacity. Off-site upgrades will be required, and these works depend on the water company's investment cycles which extend beyond the control of landowners and developers and often involve multi-year delays. As a result, occupation of the full number of dwellings would need to be phased, undermining the certainty and deliverability of the allocation.

3.108 Given these capacity constraints and uncertainties, the Parish Council strongly objects to the allocation.

Fragmented Land Parcels and Ownerships

3.109 HM Land Registry records showed the respective land ownerships on 9th December 2025 to be as follows:

- Title number: TT55076 (LAA Ref part 68432?) Chequers 1 PTE. Ltd (controlled by Mr Sebastian Tibbles, with Corinthian Mountfield Ltd acting as site promoters)
- Title No K138552 (LAA Ref part 68432?) - Chequers 2 PTE. Ltd (as above)
- Title No K788187 (LAA Ref part 68432?) - David and Victoria Grimshaw
- Title No TT160821 (LAA Ref 59653) – Mr Andrew Golding
- Title No K824832 (LAA Ref 59615) - Golding & Co. Limited (but the entry implies that Fernham Hornes exercised an option to purchase on 5th July 2023)
- Title No K513770 (LAA Ref 59692) - Raymond Victor Chadwick, deceased but the Parish Council understands that this land has recently been transferred to Mr Chadwick's heirs, and he previously owned Golding & Co., and Companies House are showing Mr Andrew Golding as currently being an active Director of the company.

Mixed Delivery Timelines and Weak Deliverability

3.110 The Land Availability Assessment demonstrates that the Site comprises several parcels with inconsistent timescales. The southern parcel is currently expected to come forward in the short term (1–5 years), whereas the northern parcels are not anticipated to come forward until 11+ years into the Plan period. This fragmented delivery and ownership profile increases uncertainty and weakens confidence that the entirety of the allocation can be delivered within the Plan period. Such inconsistency raises significant concerns about the soundness of allocating HI2. The Parish Council therefore objects on the grounds that the Site is not deliverable.

3.111 Furthermore, it has been brought to our attention that Mr and Mrs Grimshaw have no intention of developing their land which occupies a strategic central position in the northern part of the Site – see Figure 7 below - and therefore do not endorse its inclusion within the development Site HI2.

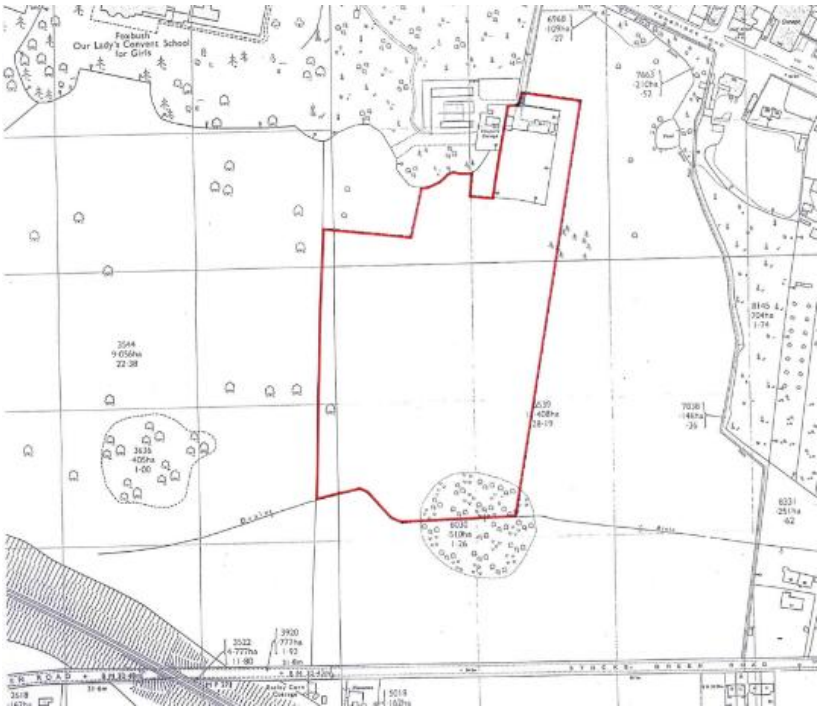


Figure 7 – Extract from Land Registry Title Plan No K788187 showing Mr & Mrs Grimshaw's Landholdings which have been withdrawn from the HI2 Site Allocation.

Serious Access and Movement Constraints

3.112 Site Allocation HI2 suffers from substantial access constraints that have not been addressed in the evidence supporting the Draft Plan. The location of the railway line and

the presence of Flood Zones 1, 2 & 3 all restrict the feasibility of a safe vehicular access to the northern part of the Site from Stocks Green Road, which is itself a narrow country road lacking footways and cycle facilities, and is itself constrained to the west by an equally narrow listed railway bridge.

3.113 A new site access from Tonbridge Road in the north would require the removal of mature trees and vegetation that contribute directly to the character and setting of the Conservation Area. And a previous appeal decision (APP/H2265/A/04/1170042) confirms that an adequate visibility splay is not possible from Tonbridge Road in a north-westwards direction from the existing Chequers Farm access.

3.114 Furthermore, any proposed new access into the Site from along Tonbridge Road would also raise safety concerns given the proximity of the Site frontage to Mount Pleasant and the existing Chequers Farm access. An excessive concentration of access points would increase vehicle conflict, reduce driver reaction time, and harm highway safety. It would also erode the visual continuity and character of the street frontage, which is currently enhanced by landscaping and mature trees.

3.115 Turning to the southern part of the Site, the curvature of the road and existing development along the southern side of Stocks Green Road may prevent adequate visibility splays being provided on the Railway Field (LAA Ref 59692) part of the Site. And the elevated Railway line to the southwest and existing development along Leigh Road both rule out alternative access points.

3.116 The SFRA scoping report also indicates that safe access and egress cannot be achieved for parts of the site, and we strongly concur with that view.

3.117 A Highways Technical Appraisal (which we understand was submitted to the Council at the time) was carried out by Les Henry Associates on behalf of the Hildenborough Village Preservation Association and Stocks Green Road Residents jointly in October 2018, when 109 dwellings were being proposed on Railway Field (LAA Ref 59692) which

comprises the eastern parcel of the southern part of site HI2. And, amongst other things, the Technical Appraisal concluded that:

- *The proposed development would generate in the region of 800 vehicular trips to the highway network each weekday*'; and
- '*The development proposals will significantly harm highway safety as traffic generated by the development cannot be adequately served by the highway network*'.

The current HI2 allocation is for **629 Dwellings**, **which is a 577% increase on the 2018 proposals** and if everything else was equal the proposed development would generate circa '**4,600 *vehicular trips each weekday***'. And the Hildenborough/Hilden Park highway network today is essentially the same as it was in 2018, and if the highway network couldn't adequately serve an additional 800 trips per day in 2018, **then it is very clearly not going to be able to serve the proposed HI2 development in the draft Local Plan.**

3.118 The Parish Council therefore objects strongly, as safe site access must be demonstrated at the allocation stage, and the evidence suggests that this is not possible for HI2.

Conclusion

3.119 For all the reasons set out above, the proposed Site Allocation HI2 is fundamentally flawed. It has mixed ownerships, conflicts with national policy on the basis that the Site performs an essential Green Belt function, is subject to unresolved flood risk constraints, has serious deficiencies in the evidence base relating to heritage, education, wastewater infrastructure, landscape, biodiversity and access, and is likely not deliverable within the timescales required.

3.120 In addition, Mr & Mrs Grimshaw have now confirmed that they have no intention of developing their land which effectively forms the nucleus of the northern part of the Site, and its omission has serious master planning repercussions, particularly for site access

and internal accessibility, as well as the permanent loss of a significant number of the proposed new dwellings.

3.121 **The Parish Council therefore strongly urges the Borough Council to remove Site HI2 from the Local Plan.**

Comments on the Proposed Development Allocation of Site TO3

The Allocation Is Contrary to National Planning Policy and is Unjustified

3.122 Site Allocation TO3 is unsound as it directly conflicts with the requirements of the National Planning Policy Framework and is not supported by the evidence base. The Site lies within land that has been assessed as performing a demonstrably **strong Green Belt function**, yet the draft Local Plan proposes releasing it without establishing exceptional circumstances or demonstrating that the harm to the Green Belt has been minimised. In The Parish Council's view, the allocation is therefore fundamentally contrary to the National Planning Policy Framework.

Green Belt Assessment Confirms the Site Should Not Be Released

3.123 The Council's Green Belt Assessment (GBA) makes clear that sub-parcel TO-07, which includes the land proposed for Site Allocation TO3, plays a vital role in safeguarding the countryside and maintaining the integrity of the wider Green Belt.

3.124 The GBA concludes that removing TO-07 in combination with surrounding parcels [including the site allocation] would represent a significant encroachment into open countryside, undermine the openness of the Green Belt, create highly irregular boundaries, and in some cases form an isolated 'island' of retained Green Belt. The Assessment notes that these changes would diminish the Green Belt's ability to prevent sprawl and protect rural character. On this basis, the GBA explicitly states that the sub-parcels **should not be taken forward for development**. Allocating TO3 therefore runs directly counter to the Council's own assessment, and The Parish Council objects to the allocation on this basis.

Heritage Considerations

3.125 Site Allocation TO3 lies to the north of the Grade II listed Hilden Cottages at 83 and 85 London Road. Initial desktop analysis suggests that existing vegetation may limit direct

intervisibility and The Parish Council recognises that a sensitively designed scheme may avoid direct harm to the listed buildings.

Landscape and Settlement-Form Harm

3.126 The Landscape and Visual Appraisal (LVA) confirms that development of TO3 would give rise to significant adverse effects in several key viewpoints, despite some screening from existing tree cover and landform. The landscape evidence consistently demonstrates that the Site has capacity only for very small-scale development, yet the allocation proposes a scale of development that is incompatible with the sensitivity identified.

3.127 And the entirety of T03 is also covered by two of Natural England's/Defra's '*Core Strategic Opportunity Areas*' (CSOA's) where '*GCNs have been found & recorded during surveys as part of the GCN District Level Licensing Scheme*'. And, as before, the confirmed presence of GCN's is a material planning consideration and it has significant implications for the developability of Site T03.

Local Resident's Comments

3.128 Residents cannot understand why The Council have allocated this Site for housing in the draft Local Plan. They point out that a popular public footpath crosses the southernmost part of the Site, and that the developable parts of the Site are not capable of taking the number of dwellings proposed.

3.129 Residents are also concerned that some trees have recently been felled on the Site, and they believe that the Site Owner's strategy is to obtain an access route in principle, south from Site TO3 via Hilden Avenue to the B245, to facilitate or enable future development of their substantial landholdings to the north. And the Residents also stress that the trees on the Site do an invaluable job of slowing down and retaining rainwater during the wet winter months and other periods of sustained heavy rain.

Conclusion

3.130 Site Allocation TO3 was explicitly rejected by the GBA, and The Parish Council strongly agrees with the Green Belt Assessment that this Site plays a '*vital role in safeguarding the countryside and maintaining the integrity of the wider Green Belt'*. The Parish Council

also strongly agrees with the Landscape and Visual Appraisal, that development of Site TO3 '*would give rise to significant adverse effects in several key viewpoints*'.

3.131 Additionally, the allocation overestimates the Site's development potential and fails to respect the area's landscape sensitivity and CSOA status.

3.132 National planning policy dictates that Green Belt boundaries should only be altered where '*exceptional circumstances exist'* and '*the harm has been fully assessed and justified'.* But in this instance, The Council's own evidence strongly contradicts the decision to release this land and acknowledges that significant harm will result to the integrity of the wider Green Belt if the Site Allocation proceeds.

3.133 The Parish Council therefore strongly objects to the allocation of Site TO3 on the grounds that it is not justified, is inconsistent with national planning policy and cannot be considered sound.

Comments on the Proposed Development Allocation of Site TO4

The Allocation Is Contrary to National Planning Policy and is Unjustified

3.134 Site Allocation TO4 is unjustified and contrary to national planning policy because the draft Local Plan fails to demonstrate exceptional circumstances for the release of this Green Belt land. The proposed allocation is based on selective interpretation of the Green Belt Assessment and does not establish that the harm caused by development has been minimised or that alternative, less harmful options have been properly explored. The Parish Council therefore considers that the allocation cannot be justified in policy terms and conflicts directly with the NPPF.

Green Belt Assessment: Evidence Confirms the Wider Land Performs a Strong Green Belt Function

3.135 The Council's Green Belt Assessment (GBA) confirms that the wider cluster of sub-parcels surrounding TO4—extending across TO-03 to TO-10—forms an important and continuous area of Green Belt that prevents sprawl between Hildenborough and Tonbridge and Hilden Park and safeguards the countryside. The GBA is explicit that releasing this larger northern cluster would result in disproportionate and irregular sprawl, creating a highly irregular Green Belt boundary and undermining openness over a wide area, including land visible from the ridgeline. However, TO-02, TO-03 and TO-04 sub parcels (which encompass the Site Allocation TO3) are described as being somewhat

visually enclosed and more closely related to the settlement edge. This may be the case, but there are also important views from the ridgeline across these sub-parcels and Tonbridge, to Bidborough Ridge, and those views will be permanently lost if these sites are developed.

Heritage Impacts

3.136 The site lies immediately north of the Grade II Listed Barn west of Latters Farmhouse, and development on TO4 would inevitably alter the rural setting of this heritage asset. While it may be possible to design a scheme that avoids direct physical harm, this does not negate the fact that the allocation could erode the open agricultural landscape that forms part of the building's setting. The Parish Council would be keen to understand the proposals for theoretical mitigation to support the allocation.

Landscape, Biodiversity and Settlement-Form Harm

3.137 The Landscape and Visual Appraisal (LVA) acknowledges that while some visual effects may be partially contained, several viewpoints in and around the Site would still experience significant adverse landscape change if TO4 were developed. The LVA is clear that while there may be capacity for limited small-to-medium scale development, the magnitude of change associated with the proposed allocation would exceed what the landscape may be able to reasonably accommodate.

3.138 The entirety of T04 is also covered by Natural England's/Defra's '*Core Strategic Opportunity Areas*' (CSOA's) where '*GCNs have been found & recorded during surveys as part of the GCN District Level Licensing Scheme*'. And, as before, the confirmed presence of GCN's is a material planning consideration and has significant implications for the developability of the Site T04.

3.139 The allocation therefore overestimates the site's development potential and fails to respect the area's landscape sensitivity, settlement pattern, and the amenity of the Public Right of Way that crosses the site. Full development at the scale proposed would alter the semi-rural character of this part of Hilden Park, encroach into the countryside, and contribute to cumulative coalescence pressures between Tonbridge, Hilden Park, and

Hildenborough. This represents a clear conflict with the evidence base and provides strong grounds for objection.

Access constraints and transport impacts remain unresolved

3.140 The housing allocation for Site TO4 is 289 new homes, and development of this magnitude will have a significant impact on the already stretched local highway network for the reasons already explained. And as stated previously, the Local Plan must demonstrate that no "insuperable" highway problems exist at allocation stage, and the current Strategic Transport Assessment has not confirmed this. Therefore, The Council's detailed Transport Assessment must be carried out as soon as possible to establish if the transport and accessibility issues can be satisfactorily addressed including the cumulative impacts on the B245 and the wider road network.

Conclusion

3.141 Site Allocation TO4 has Policy concerns, transport and accessibility issues, landscape and biodiversity sensitivities and the Site's development would likely contribute to harmful settlement expansion. But notwithstanding this, the Parish Council is amenable to considering the evidence base further to justify the Site's suitability for allocation.

4 OVERALL CONCLUSIONS

4.1 The draft Local Plan entirely overlooks the fact that Hildenborough and Hilden Park is essentially a one road settlement. The B245 road junctions already suffer from bad congestion and excessively long waiting times during morning & evening peaks and school drop off/pick up times, and long tailbacks into Tonbridge (including weekends) are depressingly regular too. And it's not just the impacts of the 1,025 new homes proposed for Hildenborough and Hilden Park that seriously concerns The Parish Council, it's also the significant amount of additional traffic from the Coblands and North Tonbridge allocations that would inevitably need to utilise the B245 too. Any additional development would impose significant further pressure on the B245, and this cumulative impact would require detailed assessment.

4.2 Hildenborough Parish Council objects in the strongest and unequivocal terms to the proposed allocation of Site HI2. The allocation is fundamentally unsound, unjustified, and inconsistent with national planning policy. It directly conflicts with the findings of the Council's own evidence base, particularly the Green Belt Assessment, which identifies the site as performing a strong and essential Green Belt function and warns that its release would lead to settlement coalescence and serious harm to openness and landscape character.

4.3 The allocation is further undermined by unresolved and significant constraints relating to flood risk, heritage impact, access, infrastructure capacity, wastewater provision, and deliverability, none of which have been adequately addressed at this stage of plan-making. Exceptional circumstances for Green Belt release have not been demonstrated, reasonable alternatives have not been exhausted, and the cumulative harm arising from development at this scale would significantly and demonstrably outweigh any purported benefits. For these reasons, the Parish Council strongly urges Tonbridge and Malling Borough Council to remove Site Allocation HI2 from the Draft Local Plan before it progresses to the next stage.

4.4 Notwithstanding this firm objection, the Parish Council has sought to engage constructively with the Draft Local Plan by providing detailed comments on all other proposed site allocations affecting Hildenborough and Hilden Park. In doing so, the Council has recognised where impacts may be more limited, where issues may be capable of mitigation, or where modifications to scale, layout, access, design, or

supporting infrastructure could make certain smaller or less harmful sites more acceptable should the Borough Council remain determined to allocate development in Hildenborough.

4.5 In addition, the Parish Council has provided comprehensive comments on all relevant draft policies within the Plan, assessing them against the tests of soundness and identifying where policies are supported, where clarification or amendment is required, and where policies are considered inconsistent with national planning policy. Taken together, these representations are intended to assist the Borough Council in producing a Local Plan that is sound, evidence-led, and capable of delivering development in the most sustainable and least harmful locations.

4.6 The Parish Council would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents.

Appendix 2: 2010 Report to the Planning and Transportation Advisory Board

TONBRIDGE & MALLING BOROUGH COUNCIL

PLANNING and TRANSPORTATION ADVISORY BOARD

28 July 2010

Report of the Director of Planning, Transport and Leisure

Part 1- Public

Matters for Recommendation to Cabinet - Non-Key Decision (Decision may be taken by the Cabinet Member)

1 CHARACTER AREA APPRAISALS SUPPLEMENTARY PLANNING DOCUMENT (SPD)

Summary
Character Area Appraisals are being undertaken for the whole Borough pursuant to a policy in the Managing Development and the Environment DPD. This report describes the process and progress with this project and recommends approval of Character Area Appraisals for Tonbridge, Hildenborough and Hadlow for the purposes of public consultation which will take place in the autumn.

1.1 Introduction

1.1.1 Policy SQ1 in the Managing Development and the Environment DPD (MDE DPD) seeks to protect, conserve and enhance the environment and character of the Borough. This policy is to be supported by a Supplementary Planning Document (SPD) which it is intended will ultimately contain, in a series of separate volumes, Character Area Appraisals for the entire built-up parts of the Borough.

1.1.2 The principle purpose of the Character area Appraisals is to provide a comprehensive and consistent approach to assessing the character of localities that will prove a valuable tool in the development control process and in considering other proposed changes or interventions. As such, it is very much in line with the new Coalition Government's localism agenda. How much more local can you get than a detailed street-by-street assessment of the character of all of the main built-up areas of the Borough? In this respect, we seem to be ahead of the game again and will certainly be more than ready to address positively the new planning regime as it materialises (see separate report).

1.1.3 However, it must be emphasised that the Character Area Appraisals only appraise the character of an area, drawing out those main elements that distinguish one locality from another and identifying important positive features to be conserved and negative features that are worthy of enhancement when the opportunity arises. What the Appraisals specifically do **not** do is identify development

opportunities or make development proposals. However, they do provide the context for considering any such proposals, whether these be promoted through a planning application or as a Development Plan proposal.

1.2 The Project

1.2.1 Work on preparing the SPD is now well underway. The SPD will eventually comprise separate volumes for:

- The main urban areas:-

  - Tonbridge (including the Hilden Park part of Hildenborough Parish) and

  - The Medway Gap (including Snodland, Kings Hill and Aylesford Forstal) and Walderslade.

- The Rural Service Centres –

  - Hildenborough, Hadlow, East Peckham, West Malling and Borough Green.

1.2.2 For resource reasons, we do not intend to carry out Character Area Appraisals of the remaining villages at this stage, though it has previously been indicated through the Parish Partnership Panel that we will be able to provide support to any Parish Council which wishes to take forward its own character assessment in the form of a **Village Design Statement**, though this would need to be produced to a format compatible with the rest of the character area appraisal work. Action with Rural Communities in Kent has indicted its willingness to assist any Parish Council that wishes to take this matter forward, and we would be relying to a great extent upon that assistance. Likewise, for resource reasons, we do not, at the present time intend to progress work on a **Landscape Character Area Appraisal** of the Borough. Instead, we will continue to rely, for the time being, on the Landscape Character Area Assessments previously prepared by the County Council.

1.2.3 As mentioned elsewhere on the agenda, **Conservation Area Appraisals** (where these have not already been done) are being prepared as an integral part of the character area appraisal process. Whilst the on-site assessment and public/stakeholder involvement is very similar, the level of detail in the published documents is greater and the statutory processes for adoption and the legislation under which they are adopted is different. Conservation Area Appraisals therefore need to be read alongside the Character Area Appraisals SPD and consequently appear as “holes” in the Character Area SPD.

1.3 The Process

1.3.1 The first task is to determine, in consultation with local Members, Parish Councils (where they exist) and other local interest groups the general extent of each

discrete character area – the way in which the urban area or rural service centre can be sub-divided into areas of identifiable character. This is normally done at a First Stakeholder Meeting. This is mainly a desktop exercise using maps and aerial photographs but checked on site where necessary. However, any such sub-division is provisional and dependent upon the next task which is the detailed, street-by-street appraisal of each area, the boundaries of which may be changed as a result. Local Members, Parish Councils (where they exist) and any other local interest group are invited to join the technical assessors on a walkabout, so that features regarded as important locally can be identified.

1.3.2 Once the initial appraisals have been completed a Second Stakeholder Workshop is arranged at which the initial findings of the Appraisals for the area can be discussed and refined. A draft set of Appraisals for those areas is then prepared and, if necessary and if there is time, shared with the stakeholder consultees before being reported to this Board so that they can be approved for the purposes of wider public consultation. Formal consultation under Regulation 17 will involve a press release, posters, and a series of small scale, manned, public exhibitions/displays which will be promoted in each main area as well as direct consultation with interested parties. The response to consultation will then be reported back to this Board which will then recommend adoption of the revised Appraisals to Council via Policy Overview Committee and Cabinet.

1.4 Progress

1.4.1 Because of the overall scale of the task the Appraisals are being progressed in a series of tranches. The first tranche of documents, which have been prepared in liaison with local Members, Parish Councils and other interest groups include the following:

- The Tonbridge Urban Area
- Hildenborough (which at this stage in the process includes both the original village and Hilden Park, which technically lies within the urban confines of Tonbridge), and
- Hadlow

These three documents (some of which were sent out to Members of this Board, Cabinet and APC1 in advance of the agenda for the meeting) are therefore recommended for Members' consideration and approval for the purposes of wider public consultation. This is planned to take place during September and October (thereby avoiding the main holiday period).

1.4.2 Work is currently under way on the next tranche of documents which will include Appraisals for Borough Green, East Peckham, West Malling (outside of the Conservation Area), Snodland, Kings Hill, Walderslade and the main Medway Gap urban area. This work will be carried out over the summer with a view to reporting as many as possible of these documents to your next meeting on 17

November 2010. At that same meeting it is intended that you will also consider the response to consultation in respect of the first tranche of documents so that these can be recommended for adoption by Council in February 2011.

1.5 Legal Implications

1.5.1 SPD's are prepared pursuant to, and have to follow the procedures set out in, the Town and County Planning (Local Development)(England) Regulations 2004 (as amended).

1.6 Financial and Value for Money Considerations

1.6.1 The cost of this exercise is covered by existing budgets with the external costs being covered by a contribution from the Housing and Planning Delivery Grant.

1.7 Risk Assessment

1.7.1 The greatest risk is that, because of the scale of the overall project, we will not be able to deliver on programme. However, the phased approach means that documents can be adopted in a series of tranches and can therefore start being used at the earliest opportunity.

1.8 Recommendation

1.8.1 The draft Character Area Appraisals for Tonbridge, Hildenborough and Hadlow be approved for the purposes of public consultation.

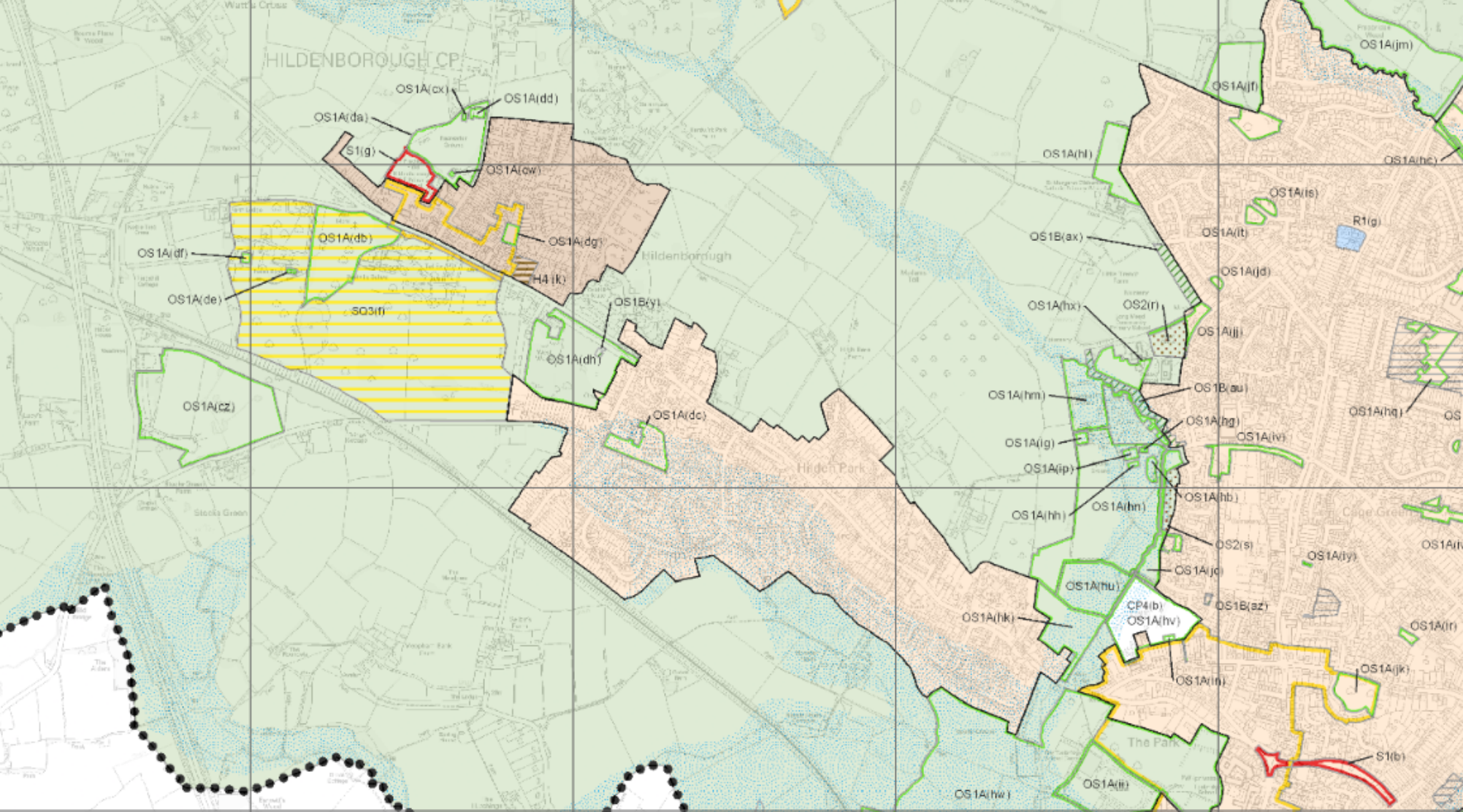
The Director of Planning, Transport and Leisure confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and Policy Framework.

Background papers: contact: Brian Gates

Core Strategy and MDE DPD

Steve Humphrey
Director of Planning, Transport and Leisure

Appendix 3: 2011 Proposals Map


HILDENBOROUGH CP
OS1A(cx)
OS1A(dd)
OS1A(da)
S1(g)
OS1A(cw)
OS1A(db)
OS1A(df)
OS1A(dg)
H4 (k)
OS1A(de)
SQ3(f)
OS1B(y)
OS1A(dh)
OS1A(cz)
OS1A(dc)
OS1A(jm)
OS1A(jf)
OS1A(hl)
OS1A(hc)
OS1A(is)
R1(g)
OS1A(it)
OS1B(ax)
OS1A(jd)
OS1A(hx)
OS2(r)
OS1A(jj)
OS1A(hm)
OS1B(au)
OS1A(hq)
OS1A(hg)
OS1A(iv)
OS1A(ig)
OS1A(ip)
OS1A(hb)
OS1A(hh)
OS1A(hn)
OS2(s)
OS1A(iy)
OS1A(jc)
OS1A(hu)
OS1B(az)
CP4(b)
OS1A(hv)
OS1A(hk)
OS1A(ir)
OS1A(jk)
OS1A(in)
S1(b)
OS1A(hw)
OS1A(it)

Appendix 4: TMBC's Site Selection Topic Paper

Appendix 1 – LAA Conclusions

LAA Reference	Site Name or Address	Parish	Ward	Settlement or Nearest Settlement	Conclusion
59592	Land South and East Of 108 Tonbridge Road and North of Tonbridge Road, Hildenborough, Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	Site is a priority habitat and forms part of green infrastructure. Unsuitable.
59593	Land At and South of Rosador, London Road, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham Heath	Site is located away from existing settlement. Unsuitable.
59594	Land East of Teston Road and North of St Leonards Street, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural Land. Unclear safe access can be achieved. Unsuitable.
59595	Existing premises at Small Vines, Matthews Lane, West Peckham, Maidstone	West Peckham	East and West Peckham, Mereworth & Wateringbury	West Peckham	Site is located away from existing settlements.
59596	Land Rear of Barfield House, Teston Road, Offham, West Malling	Offham	East Malling, West Malling & Offham	Offham	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable
59597	Land Off Mereworth Road and West of Seven Mile Lane, Mereworth	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	Site is agricultural land outside of existing settlement. Unsuitable.

59598	Land West of Seven Mile Lane and South Of 241 Seven Mile Lane, Mereworth	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	Site is located away from existing settlements in agricultural use. Unsuitable.
59599	Land West of Seven Mile Lane and North of Alders Wood, Mereworth	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	Site is located away from existing settlements in agricultural use. Unsuitable.
59600	Existing premises at Rosador, London Road, Wrotham, Sevenoaks	Wrotham	Pilgrims with Ightham	Wrotham Heath	Site is located away from existing settlement. Unsuitable.
59601	Land At Bourne Bridge, Tonbridge Road, Tonbridge	Hadlow	Bourne	Hadlow	Site is within flood risk area. Unsuitable.
59602	Existing premises at 44 The Crest, King Hill, West Malling	West Malling	East Malling, West Malling & Offham	Kings Hill	This site is considered to be suitable, available, and achievable.
59603	Land West of King Hill and Northwest of Ashton Way / Malling Road roundabout, West Malling	West Malling	East Malling, West Malling & Offham	Kings Hill	This site is considered to be suitable, available, and achievable.
59604	Land East of Mayhill Bungalow, London Road, West Malling	Addington	Pilgrims with Ightham	Addington	Site is located away from existing settlements. Unsuitable.
59607	Land East of Hadlow Road at Parkers Green	Tonbridge	Higham	Tonbridge and Hilden Park	Site is located away from existing settlement and subject to TPOs and forms part of green infrastructure. Unsuitable.
59608	Land at and South and Rear of The	Ightham	Pilgrims with Ightham	Ightham	The site is not in a sustainable or suitable location. Unsuitable.

	Laurels, Ismays Road, Ivy Hatch, Ightham				
59609	Land at Little Trench Farm, Trench Road, Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59610	Land at Campions Wood, Park Road, Addington, West Malling	Addington	Pilgrims with Ightham	Addington	Site is located away from existing sustainable settlements. Unsuitable.
59612	Land At Coblands Nurseries, Trench Road, Tonbridge	Tonbridge	Trench	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59613	Land West of Addlestead Road, East Peckham, Tonbridge	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	Site is within flood risk area. Unsuitable.
59615	Land South of Stocks Green Road, Hildenborough	Hildenborough	Hildenborough	Hildenborough	This site is considered to be suitable, available, and achievable.
59616	Lane South Of the River Medway and West of Boyle Way, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	Site is within flood risk area. Unsuitable.
59617	Land South of Potash Lane and North of Paddock Orchard, Platt	Platt	Borough Green & Platt	Platt	This site is considered to be suitable, available, and achievable.
59618	Land East of A229 and West of Chatham Road, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	Site is located away from existing sustainable settlements. Unsuitable.

59619	Land at Appledene Farm (whole area), Norman Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural land and priority habitat. Unclear a safe access can be achieved. Unsuitable
59620	Land at Appledene Farm (Eastern parcel), Norman Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural land and priority habitat. Unclear a safe access can be achieved. Unsuitable
59621	Land at Appledene Farm (Eastern parcel), Norman Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural land and priority habitat. Unclear a safe access can be achieved. Unsuitable
59622	Land at Appledene Farm (Southeast parcel), Norman Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural land and priority habitat. Unclear a safe access can be achieved. Unsuitable
59623	Existing premises at 2 Yardley Park Road, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Existing residential property in low density area. Unsuitable.
59624	Land North of Nettlestead Lane and East of Pizien Well Road, Wateringbury	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	Site is Grade 1 agricultural land and is located outside existing settlement.
59625	Little Trench Farm, Trench Road, Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59627	Land at Grove Wood, London Road, Tonbridge	Hildenborough	Hildenborough	Hildenborough	Site is located away from existing sustainable settlements.
59629	Land East of Hadlow Road East and South of White House Cottage, Tonbridge	Hadlow	Higham	Hadlow	Site is located away from existing settlement and subject to TPOs and forms part of green infrastructure.

59630	Land North of Amber Lane, West Malling	East Malling & Larkfield	East Malling, West Malling & Offham	Kings Hill	Site is priority habitat and part of green infrastructure outside existing settlement. Unclear a safe access can be achieved. Unsuitable.
59631	Land at Heath Farm, Wateringbury Road, West Malling	East Malling & Larkfield	East Malling, West Malling & Offham	East Malling & Mill Street	Site is located away from existing sustainable settlements.
59633	Land at Great Cossington Farm, Pratling Street, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	Site is located away from existing sustainable settlements.
59634	Land at Hoath Wood, Lavenders Road, West Malling	Kings Hill	Kings Hill	Kings Hill	Loss of Ancient Woodland and priority habitat, unclear a safe access can be achieved. Loss of a lawful G&T site. Unsuitable.
59636	Land South of Railway At, Stickens Lane, East Malling	East Malling & Larkfield	East Malling, West Malling & Offham	East Malling & Mill Street	The site is not in a sustainable or suitable location. Unclear a safe and suitable access can be achieved. Unsuitable.
59637	Land Adjoining Bassetts Oast, Maidstone Road, Tonbridge	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
59638	Land East of Maidstone Road, Tonbridge	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
59639	Land East of Bush Road and South Of 134 Bush Road, Peckham Bush	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	Site is in the Green Belt remote from a sustainable settlement with poor access. Unsuitable.
59640	Land East of Bush Road and North Of 72 Bush Road, Peckham Bush	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	Site is in the Green Belt remote from a sustainable settlement with poor access. Unsuitable.

59644	Land East of Yardley Close, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Heavily constrained site. Unclear a safe access can be achieved. Unsuitable.
59646	Land South of The River Medway and West of The Hop Farm, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	The site is within Flood Zone 3b and is covered by a mixture of grassland and woodland designated as priority habitat. The site is remote from any defined settlement boundary. Unsuitable.
59647	Land North of Court Lane and rear of (East of) Chesfield Close, Hadlow	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
59648	Land at White Ladies, Teston Road, West Malling	Offham	East Malling, West Malling & Offham	Offham	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
59649	Land North of Greenways Landfill and South of Teston Road	Offham	East Malling, West Malling & Offham	Offham	The site is not in a sustainable or suitable location. Loss of woodland and priority habitat. Unclear a safe access can be achieved. Unsuitable.
59653	Land North of Stocks Green Road, Hildenborough	Hildenborough	Hildenborough	Hildenborough	This site is considered to be suitable, available, and achievable.
59654	Land East of Red Hill, Wateringbury, Maidstone	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	Most of the site is Grade 1 agricultural land with a nearby AQMA. Unsuitable.
59657	Land Opposite Higham Lane, Hadlow Road, Tonbridge	Tonbridge	Higham	Tonbridge and Hilden Park	Loss of priority habitat. Unsuitable.
59658	Existing premises at 237, London Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Unclear a safe access can be achieved. Unsuitable.

59660	Existing premises at Tannery Road Industrial Estate, Sovereign Way, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Uncertainty over availability. Loss of employment provisions. Unsuitable.
59661	Land At Postern Lane, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Unclear a safe access can be achieved. Unsuitable.
59664	Land West of Red Hill, Wateringbury, Maidstone	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	A large portion of the site is Grade 1 agricultural land and is close to an AQMA. Unsuitable.
59666	Land Rear of Mackenders Lane, Eccles, Aylesford	Aylesford	Aylesford North & North Downs	Eccles	The site has access constraints and setting of the National Landscape is a major issue that means the site is unsuitable.
59667	Land East of London Road Opposite Brookside Garage, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
59668	Land West of Whitepost Lane, Aylesford	Aylesford	Aylesford South & Ditton	Medway Gap	This site is considered to be suitable, available, and achievable.
59671	Land West of South Ash Road and South of Westwood Lodge, Stansted	Stansted	Pilgrims with Ightham	Fairseat	The site is not in a sustainable or suitable location. Unsuitable
59672	Land East of Brickfields, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Unclear a safe access can be achieved. Out of character. Unsuitable
59674	Land West of 115 High Street, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	The site is located within a Conservation Area and is partially wooded with priority habitat designation. It also has access issues.

59675	Land At Northern Fields and East of Bull Lane, Aylesford	Aylesford	Aylesford North & North Downs	Eccles	This site is considered to be suitable, available, and achievable.
59676	Land East of Bull Lane, North of High Street and West of Rochester Road, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	This site is considered to be suitable, available, and achievable.
59677	Land North of Plough Hill and east of Old Basted, Plough Hill, Crouch	Plaxtol	Bourne	Crouch	The site is not in a sustainable or suitable location. Unsuitable.
59678	Land North and East of Aylesford Wastewater Treatment Works and West of Bull Lane, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	This site is considered to be suitable, available, and achievable.
59679	Existing premises at Fosse Bank School, Noble Tree Road, Hildenborough, Tonbridge	Hildenborough	Hildenborough	Hildenborough	This site is considered to be suitable, available, and achievable.
59680	Land South of London Road and Whitehill, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Unsuitable.
59681	Land South of London Road, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Unsuitable.
59683	Land (extensive area) covering Tonbridge Cricket Pavilion on Welland Road, Allotments Rear of Longmead	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Loss of sporting, community and leisure provisions. Unsuitable.

	Way, and Tonbridge Farm Sportsground at Darenth Avenue, Tonbridge				
59684	Land At Aylesford Lakes, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	This site is considered to be suitable, available, and achievable.
59685	Land West of Hadlow Road East and South of Cuckoo Lane, Tonbridge	Tonbridge	Higham	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59686	Land East (Rear) Of James Close, Maidstone Road, Hadlow	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
59690	Land North of Tonbridge and West of Higham Lane (Grange Farm), Tonbridge	Tonbridge	Higham	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59691	Land Rear Of 155 And 163, Castle Way, West Malling	Birling	Birling, Leybourne & Ryarsh	Medway Gap	The site is within the National Landscape and development at the site is unlikely to preserve the setting of the National Landscape or wider landscape. In addition, development at the site would be either significantly constrained or result in the loss of large areas of established woodland, trees and hedgerows, including areas of priority habitat raising ecological concerns. Unsuitable.
59692	Land West of Leigh Road, Stocks Green, Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.

59693	Land South of Kerromoor, Higham Lane, Tonbridge	Tonbridge	Higham	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59697	Land Adjacent to Tonbridge Bypass at Vauxhall Roundabout	Tonbridge	Vauxhall	Tonbridge and Hilden Park	Unclear a safe and suitable access can be achieved. Noise constraints. Detrimental impact upon National Landscape and trees. Unsuitable.
59702	Land Opposite Hale House, Pilgrims Way, Aylesford	Aylesford	Aylesford North & North Downs	Eccles	This site is considered to be suitable, available, and achievable.
59704	Land Between A21 And Rings Hill, North of Lower Street, Tonbridge	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Nosie and ecological constraints. Unsuitable.
59705	Land South (Rear) Of the Moat Public House, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Unsuitable.
59706	Land West of London Road, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. The site is heavily constrained. Unsuitable.
59709	Land Adjoining Windy Nob, Staleys Road, Sevenoaks	Ightham	Pilgrims with Ightham	Borough Green	Significant adverse landscape effects. Unsuitable.
59714	Land Known as Blenheim Orchard Adjoining 99 Offham Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Performs strongly against Green Belt purposes. Unclear a safe access can be achieved. Unsuitable.
59717	Land Adjacent Glebe Lodge, Maidstone Road, St Mary?s Platt, Sevenoaks	Platt	Borough Green & Platt	Platt	Loss of priority habitat. Unsuitable.
59718	Larkfield And New Hythe Sports and	East Malling & Larkfield	Larkfield	Medway Gap	The site contains important sporting, community and leisure facilities with no

	Social Club, 251 New Hythe Lane, Larkfield, Aylesford				clear safe and suitable access demonstrated.
59721	Land At Little Peppyns Orchards, Higham Lane, Tonbridge	Tonbridge	Higham	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59722	Land South of Tonbridge Road, North of Old Road, Pizien Well, Wateringbury	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	The site is Grade 1 agricultural land located remote from a sustainable settlement in the Green Belt. Unsuitable.
59723	Land West of Pizien Well Road and North Of 144 Pizien Well Road, Pizien Well, Wateringbury	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	The site is Grade 1 agricultural land located remote from a sustainable settlement in the Green Belt. Unsuitable.
59725	Gate House Wood Touring Park, Ford Lane, Wrotham Heath	Platt	Wrotham Heath	Addington Clearway	The site is not in a sustainable or suitable location. Unsuitable.
59726	Land South of Hillberry Farm, Wateringbury Road, West Malling	East Malling & Larkfield	East Malling, West Malling & Offham	East Malling & Mill Street	The site is not in a sustainable or suitable location. Unsuitable.
59727	Land Adjacent Brookland Car Park, Brook Street, Snodland	Snodland	Snodland East & Ham Hill	Snodland	Loss of Common Land. Unsuitable.
59728	Land West of Orchard Cottages Home Farm, Red Hill, Maidstone	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	The site is Grade 1 Agricultural Land and development likely leading to the worsening of air quality in the nearby AQMA. Unsuitable.
59729	Land South of Redhill Farm, Red	Wateringbury	East and West Peckham,	Wateringbury	The site is agricultural land with part Grade 1. Development would likely

	Hill and off (West of) Red Hill, Wateringbury		Mereworth & Wateringbury		worsen air quality in the nearby AQMA. Unsuitable.
59730	Land at Trosley Farm, Addington Lane, West Malling	Trottiscliffe	Pilgrims with Ightham	Trotiscliffe	The site is not in a sustainable or suitable location. Unsuitable.
59731	Land South of Kemsing Road, Sevenoaks	Wrotham	Pilgrims with Ightham	Wrotham	Significant adverse landscape effects. Unsuitable.
59732	Land at Fairfield Road, Borough Green, Sevenoaks	Borough Green	Borough Green & Platt	Borough Green	This site is considered to be suitable, available, and achievable.
59736	Land at Trosley Farm, Addington Lane, West Malling	Trottiscliffe	Pilgrims with Ightham	Trotiscliffe	The site is not in a sustainable or suitable location. Impact upon the National Landscape. Unsuitable.
59737	Land Fronting Ingleborough Farm, Maidstone Road, Sevenoaks	Platt	Borough Green & Platt	Platt	Heavily constrained and restricted. Loss of woodland, TPOs and priority habitat. Unsuitable.
59738	Land South of Hermitage Court, Hermitage Lane, Maidstone	Aylesford	Aylesford South & Ditton	Medway Gap	This site is considered to be suitable, available, and achievable.
59740	Land at Broadwater Farm, Kings Hill, West Malling	East Malling & Larkfield	East Malling, West Malling & Offham	Kings Hill	This site is considered to be suitable, available, and achievable.
59743	Land North of Lucks Hill and West of Winterfield Lane, East Malling, West Malling	East Malling & Larkfield	East Malling, West Malling & Offham	Medway Gap	This site is considered to be suitable, available, and achievable.
59744	Land West of Chapel Street, Ryarsh, West Malling	Ryarsh	Birling, Leybourne & Ryarsh	Ryarsh	The site is in the National Landscape with a LVIA finding that development would cause significant adverse landscape effects. In addition, no safe and suitable

					access has been demonstrated. Unsuitable.
59745	Hilden Farm Road, Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59746	Coblands Nursery, Trench Road, Tonbridge	Tonbridge	Trench	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59747	Land West of Maidstone Road and South of Forge Farm	East Peckham	East and West Peckham, Mereworth & Wateringbury	West Peckham	The site is remote from a sustainable settlement and contains priority habitat and ancient woodland. Unsuitable.
59748	Land off (East of) Dryland Road and South of Borough Green Bowles Club, Borough Green	Borough Green	Borough Green & Platt	Borough Green	Unclear a safe access can be achieved. Unsuitable.
59749	Land Northeast of Seven Mile Lane and Southeast of Tonbridge Road, Mereworth	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site is considered remote from the built confines of any settlement and thus is therefore not considered to be within a sustainable or suitable location.
59750	Land Northwest of Maidstone Road and South of The Street, Mereworth	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	Landscape Visual Appraisal (October 2025) concluded that in summary both small and medium scale development typologies would be inappropriate as adverse landscape and visual impacts could not be adequately mitigated.
59752	Land Southwest of Kings Hill / East of Kent Street, Mereworth, Maidstone	Mereworth	East and West Peckham, Mereworth & Wateringbury	Kings Hill	Although the site is adjacent to a sustainable settlement, the northern part of the site lacks access to Kings Hill, and the southern part is remote from the defined boundary of any settlement. Therefore, the site is not considered suitable.

59753	Land West of Bush Road and South Of 159 Bush Road, Peckham Bush	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	The site is considered remote from the built confines of any settlement and thus is therefore not considered to be within a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
59754	Land West of Seven Mile Lane and East of Weald Granary	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site is considered remote from the built confines of any settlement and thus is therefore not considered to be within a sustainable or suitable location.
59755	Land North of Beech Road and East of Seven Mile Lane, Mereworth	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site is considered remote from the built confines of any settlement and thus is therefore not considered to be within a sustainable or suitable location.
59756	Land Between Ashton Way and London Road, Leybourne, West Malling	Leybourne	Birling, Leybourne & Ryarsh	Medway Gap	This site is considered to be suitable, available, and achievable.
59757	Land East of Newpound Lane and South of Beech Road, Mereworth	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site is considered remote from the built confines of any settlement and thus is therefore not considered to be within a sustainable or suitable location.
59758	Land adjacent (North of) Beech Road and South of Mereworth Forest / Roadside Wood, Mereworth	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	Landscape Visual Appraisal (October 2025) concluded that in summary both small and medium scale development typologies would be inappropriate as adverse landscape and visual impacts could not be adequately mitigated.
59759	Land West of Kent Street, Mereworth, Maidstone	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	Whilst adjacent to a sustainable settlement the poor highway access leads it to be remote from facilities in existing settlements therefore it is considered unsuitable.

59760	Land Southwest of Kent Street, Mereworth, Maidstone	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site is remote from existing settlements and facilities and lacks scope for an appropriate road and pedestrian access.
59761	Timber Yard, Malling Road, Kings Hill	Mereworth	East and West Peckham, Mereworth & Wateringbury	Kings Hill	The site is located within the Green Belt with the northern part of the woodland designed Ancient Woodland and a Priority Habitat. Although the site is adjacent to a sustainable settlement, the northern part of the site is Ancient Woodland, and the southern part would be remote from the defined boundary of any settlement.
59762	Land at Heron Court, Hawley Drive, West Malling	Leybourne	Birling, Leybourne & Ryarsh	Leybourne Chase	The site is considered remote from the built confines of any settlement and thus is therefore not considered to be within a sustainable or suitable location.
59763	Land South of 372 Bull Lane and West of Bull Lane, Aylesford	Aylesford	Aylesford North & North Downs	Eccles	This site is considered to be suitable, available, and achievable.
59765	Land Part of Manor Farm, Lower Haysden Lane, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59766	Land Southwest of Bushy Wood, Aylesford	Aylesford	Aylesford North & North Downs	Eccles	Due to the sites detached location ecological and accessibility constraints it is unsuitable.
59767	Land East of Allingham Close, Borough Green	Borough Green	Borough Green & Platt	Borough Green	Heavily constrained and restricted site. Unsuitable.
59769	Land Between the River Medway And, Whetsted Road, Tonbridge	Hadlow	Bourne	East Peckham	Heavily constrained site. Unsuitable.

59770	Land South of Bramleys, Rectory Lane, Ightham, Sevenoaks	Ightham	Pilgrims with Ightham	Ightham	Significant adverse landscape effects. Unsuitable.
59771	Gatehouse Nursery, Coldharbour Lane, Tonbridge	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
59772	Land South of Tonbridge Road, North of Old Road, Pizien Well, Wateringbury	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	The site is Grade 1 agricultural land remote from the confines of a sustainable settlement. Unsuitable.
59773	Land North of Basted Lane, Crouch, Sevenoaks	Platt	Borough Green & Platt	Crouch	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
59775	Gosling Riding Farm, Riding Farm Equestrian Centre, Riding Lane, Tonbridge	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
59776	Land North of The Paddock and East of Carpenters Lane, Tonbridge	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
59777	Land West of Ryarsh Primary School and East of Old School Lane, Ryarsh	Ryarsh	Birling, Leybourne & Ryarsh	Ryarsh	Site is in Flood Zone 3b and is considered unsuitable.
59778	Land Adjoining Coppers Oak, The Street, Plaxtol, Sevenoaks	Plaxtol	Bourne	Plaxtol	Significant landscape effects. Unsuitable.

59781	Land Off Hall Road, Royal British Legion Industries, Aylesford	Aylesford	Aylesford South & Ditton	Medway Gap	This site is considered to be suitable, available, and achievable.
59782	Land west of Hale Street, East Peckham, Tonbridge	East Peckham	East and West Peckham, Mereworth & Wateringbury	Hale Street	This site is considered to be suitable, available, and achievable.
59783	Land At Philpots Lane, Tonbridge	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
59788	Land West of Ford Lane and North of M26, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Unsuitable.
59789	Brook Farm, Church Lane, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	Most of the site is located within the flood zone with poor accessibility adding to the constraint. Unsuitable.
59792	Land At Wouldham Allotments and Rear of Oldfield Drive, Wouldham, Rochester	Wouldham	Aylesford North & North Downs	Wouldham	This site is considered to be suitable, available, and achievable.
59796	Land At Waterloo Road and Quarry Hill, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	Uncertainty over availability. Loss of employment and retail provisions. Unsuitable.
59797	Land (extensive area) North of Tonbridge Road and South of Kings Hill covering Danns Lane, Parts of Kings Hill Golf Club and Hermitage Farm	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	The site contains leisure and employment uses alongwith grade 1 agricultural land and ancient woodland. Unsuitable.

59799	Land West of Pizien Well Road and North Of 144 Pizien Well Road, Pizien Well, Wateringbury	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	Site is remote from a sustainable settlement and is grade 1 agricultural land. Unsuitable.
59800	Land West of Canon Lane, Maidstone	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Kings Hill	The site would also feel remote from the existing Kings Hill settlement with safe and suitable access not demonstrated. The site is therefore considered unsuitable. The development of the site would result in the loss of sporting facilities.
59802	Land East of Canon Lane, Kings Hill	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Kings Hill	This site is adjacent to a sustainable settlement (Kings Hill), but it has poor highway access via a single track, non-classified route, with no vehicular links into Kings Hill, and would feel remote from the existing settlement. The site is in the Green Belt and is considered unsuitable.
59803	Land east of Red Hill, Wateringbury, Maidstone	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	The site is remote from an existing sustainable settlement and close to a AQMA. Unsuitable.
59804	Land West of Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	The site is heavily constrained and restricted. Unsuitable.
59805	Land North of Tonbridge Between Higham Lane, Cuckoo Lane and Barchester Way	Tonbridge	Higham	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59806	Land (extensive area) East of Maidstone Road	East Peckham	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site is remote from an existing sustainable settlement. Unsuitable.

	and North of Peckham Bush				
59807	Land Southwest of West Malling Railway Station, Station Approach, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural land. Unsuitable.
59808	Land North Of, Woodfield Avenue, Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59811	Gover Hill, Tonbridge	West Peckham	Bourne	Hadlow	The site is not in a sustainable or suitable location. Unsuitable.
59812	Jubilee Bungalow, London Road, Addington	Addington	Pilgrims with Ightham	Addington Clearway	The site is not in a sustainable or suitable location. Unsuitable.
59814	Land West of Ashton Way and South of Eden Farm, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
59815	Riverside Business Centre, River Lawn Road, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	Uncertainty over availability. Loss of employment provisions. Unsuitable.
59816	Land Northeast of The Street, Mereworth, Maidstone	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site has no direct access to the settlement of Mereworth and would be remote and represent a form of back land development. The access to the site would also require the removal of some of the Ancient Woodland. Unsuitable.
59818	Land East of New Court Road and Margetts Lane, North of Scarborough Lane and West of Rochester Road	Burham	Aylesford North & North Downs	Peter's Village	The site has a number of constraints including groundwater flooding, Special Area of Conservation, SSSI and lack of clear safe and suitable access. Unsuitable.

59822	Land East of Platt Industrial Estate, Platt	Platt	Borough Green & Platt	Platt	Unclear a safe access can be achieved. Heavily constrained site. Unsuitable.
59823	Oast Lane, Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	Uncertainty over availability. Unclear a safe access can be achieved. Unsuitable.
59825	Land North of Back Lane, Shipbourne, Tonbridge	Shipbourne	Bourne	Shipbourne	The site is not in a sustainable or suitable location. Unsuitable.
59827	Land South of Back Lane, Shipbourne	Shipbourne	Bourne	Shipbourne	The site is not in a sustainable or suitable location. Unsuitable.
59829	Former Joco Pit, Wrotham Road, Sevenoaks	Borough Green	Borough Green & Platt	Borough Green	Heavily constrained and restricted site. Unsuitable.
59830	Land North of Borough Green, Sevenoaks	Borough Green	Borough Green & Platt	Borough Green	This site is considered to be suitable, available, and achievable.
59831	Land East of Bull Lane and South of Mackenders Close, Eccles, Aylesford	Aylesford	Aylesford North & North Downs	Eccles	A safe and suitable access has not been demonstrated to serve any notable scale of development on this parcel.
59834	Land (extensive area) North Postern Lane and South of the River Medway, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
59836	Land south of Vantage Point, Holborough Road, Snodland	Snodland	Snodland East & Ham Hill	Snodland	Uncertainty over availability, lack of pedestrian/cycle links to the settlement, unclear a safe access can bae achieved. Unsuitable.
59837	Land Northeast of Bower Mount Oast, Snoll Hatch Road, East Peckham, Tonbridge	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	Site is within flood risk area. Unsuitable.

59838	Land at Mabledon, South of A21, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	The site is not in a sustainable or suitable location. The site is heavily constrained. Unsuitable.
59840	Land off Sandy Lane, West Malling	Birling	Birling, Leybourne & Ryarsh	Snodland	The site is in remote location with numerous constraints including ecological, woodland, access and loss of leisure facilities.
59841	Land East of Mackenders Lane and South of 27 To 45 Greenfield Close, Eccles, Aylesford	Aylesford	Aylesford North & North Downs	Eccles	The site is designated as a priority habitat with uncertainty over deliverability and is considered unsuitable.
59842	Land South of Common Road, Hadlow	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
59843	Land South and West of Tillmans Off, Crouch Lane, Sevenoaks	Borough Green	Borough Green & Platt	Borough Green	Unclear a safe access can be achieved. Unsuitable.
59844	Land Between Ashton Way and London Road, Leybourne, West Malling	Leybourne	Birling, Leybourne & Ryarsh	Medway Gap	This site is considered to be suitable, available, and achievable.
59846	Land West of Maidstone Road and North of Grove Farm, Hadlow	East Peckham	East and West Peckham, Mereworth & Wateringbury	West Peckham	The site is considered remote from the built confines of any sustainable settlement and thus is therefore not considered to be within a sustainable or suitable location.
59847	Land North, South and West of Bushey Wood, Eccles	Aylesford	Aylesford North & North Downs	Eccles	The northern part of the site is remote from the existing settlement with the southern part is located adjacent to existing employment uses and sewage

					treatment works. It also has access constraints.
59848	Land at Bournemill Farm, Vauxhall Lane, Tonbridge	Tonbridge	Vauxhall	Tonbridge and Hilden Park	The site is remote from settlement confines and not in a sustainable location. Unclear a safe and suitable access can be achieved. Impact upon National Landscape and ecological impact. Unsuitable.
59849	Land West of Windmill Lane East, West Malling, ME19 6HS	West Malling	East Malling, West Malling & Offham	West Malling	The site is not in a sustainable or suitable location. Unsuitable.
59851	Land North, West and South of Aylesford Wastewater Treatment Works, Aylesford	Aylesford	Aylesford North & North Downs	Eccles	The site has numerous constraints on access, flooding and as a standalone development would be remote from Eccles. A safe and suitable access has not been demonstrated.
59852	Land At Bunyards, Beaver Road, Allington, Maidstone	Aylesford	Aylesford South & Ditton	Medway Gap	This site is considered to be suitable, available, and achievable.
59856	East Malling Research Station, New Road, East Malling	Ditton	Aylesford South & Ditton	East Malling & Mill Street	This site is considered to be suitable, available, and achievable.
59860	Land at corner of Lavenders Road and Swan Street, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	The site is not in a sustainable or suitable location. Loss of priority habitat. Heritage impact. Unsuitable.
59861	Land east of Kiln Barn Road and west of Hermitage Lane, Aylesford	Aylesford	Aylesford South & Ditton	Medway Gap	This site is considered to be suitable, available, and achievable.

59862	Land South of The Street and East of Coppiers Oak, Plaxtol	Plaxtol	Bourne	Plaxtol	Significant landscape effects. Unsuitable.
59863	Land at Spider Hall Farm, Bull Road, Leybourne, West Malling	Leybourne	Birling, Leybourne & Ryarsh	Medway Gap	The site is remote from the sustainable settlement of the Medway Gap with uncertainties over availability. Unsuitable.
59868	Existing premises at 125-127 Hermitage Lane, Barming, Aylesford	Aylesford	Aylesford South & Ditton	Medway Gap	The site is a safeguarded employment site and loss of employment use is not supported in this location.
59870	Existing premises at Potts Ltd, Kiln Barn Road, East Malling	Ditton	Aylesford South & Ditton	Medway Gap	The site is remote from an existing settlement and in employment use. Unsuitable.
59871	Land Known as Churchfields Farm and Coney Field, Fen Pond Road, Ightham	Ightham	Pilgrims with Ightham	Ightham	Significant adverse landscape effects. Unsuitable.
59873	The Spinney, Kiln Barn Road, East Malling	Ditton	Aylesford South & Ditton	Medway Gap	The site is considered remote from the built confines of any settlement and thus is therefore not considered to be within a sustainable or suitable location.
59874	Land West of Hays Road, Snodland	Snodland	Snodland East & Ham Hill	Snodland	This site is considered to be suitable, available, and achievable.
59876	Land South of Snoll Hatch Road, West Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	The site is largely in the flood zone with constraints including adjacency to a Conservation Area. Unsuitable.
59877	Existing premises at Basted House, Harrison Road, Borough Green	Borough Green	Borough Green & Platt	Borough Green	Heavily constrained and restricted site. Unsuitable.

59878	Land North of Priory Road, South of The Railway, Tonbridge	Tonbridge	Vauxhall	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59879	Land South of Vale Road, North of The Railway, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Uncertainty over availability. Unsuitable.
59880	Ivy Hall Farmland, St Marys Road, Wrotham, Sevenoaks	Wrotham	Pilgrims with Ightham	Wrotham	Unclear if a safe access can be achieved. Development in easter part would appear at odds with the locality. Unsuitable.
59881	Land South of Wrotham Bypass, Sevenoaks	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Unsuitable.
59883	Land East of Plaxdale Green Road and North of Rose Cottage, Stansted	Stansted	Pilgrims with Ightham	Fairseat	The site is not in a sustainable or suitable location. Unsuitable.
59893	Land north of Tonbridge Road, Hildenborough	Hildenborough	Hildenborough	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59894	Land West of Boyle Way and East of Branbridges Road, Tonbridge	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Unsuitable.
59895	Lane East of Hale Street, Hale Street	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	The majority of the site is in the flood zone and is therefore unsuitable.
59896	East of Riding Lane, Hildenborough	Hildenborough	Hildenborough	Hildenborough	This site is considered to be suitable, available, and achievable.
59904	Land West of East Street (North) And	Addington	Pilgrims with Ightham	Ryarsh	The site is not in a sustainable or suitable location. The site is heavily constrained. Unsuitable.

	North of The Willows, Ryarsh				
59905	Land East of Maistone Road, Hadlow	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
59907	Land East of Old School Lane and North of The M20, Ryarsh	Ryarsh	Birling, Leybourne & Ryarsh	Ryarsh	The site is in the National Landscape with poor access. An LVIA found that development would lead to significant adverse landscape effects. Unsuitable.
59909	Land South of Cemetery Lane, Hadlow	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
59911	Land At Shelmerdene, Addington Green, Addington	Addington	Pilgrims with Ightham	Addington	The site is not in a sustainable or suitable location. Loss of TPO trees and priority habitat. Unsuitable.
59912	Bonheure, London Road, Addington, West Malling	Addington	Pilgrims with Ightham	Addington Clearway	The site is not in a sustainable or suitable location. Unsuitable.
59913	West Malling Golf Club, London Road, West Malling	Addington	Pilgrims with Ightham	Addington Clearway	The site is not in a sustainable or suitable location. The site is heavily constrained. Unsuitable.
59915	Land South of Clearheart Lane, Kings Hill	Kings Hill	Kings Hill	Kings Hill	Large parts of the site have TPO (Group) and Priority Habitat. It is not clear or has been demonstrated at this time that a safe and suitable access can be achieved to serve any notable development at this parcel. Any access point to serve the site and development would likely result in the substantial loss of a significant level of established trees and planting, raising ecological concerns. Unsuitable.
59916	Orchard House, Old London Road,	Wrotham	Pilgrims with Ightham	Wrotham	Significant adverse landscape effects. Unsuitable.

	Wrotham, Sevenoaks				
59917	Land South of Plaxdale Green Road, Stansted	Stansted	Pilgrims with Ightham	Fairseat	The site is not in a sustainable or suitable location. Unsuitable.
59919	Land North of Drayhorse Meadow and West of Wastewater Treatment Works, Wateringbury	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	The site is heavily constrained and would result in the loss of priority habitat and TPO trees. Unclear a safe access can be achieved. Unsuitable.
59922	Hollands Farm, Plaxdale Green Road, Stansted, Sevenoaks	Stansted	Pilgrims with Ightham	Fairseat	The site is not in a sustainable or suitable location. Unsuitable.
59923	Land north of Old Lane, Siththam Common	Ightham	Pilgrims with Ightham	Ightham	The site is not in a sustainable or suitable location. Unsuitable.
59928	Grove Farm Cottages, Maidstone Road, Tonbridge	East Peckham	East and West Peckham, Mereworth & Wateringbury	West Peckham	The site is not in a sustainable or suitable location. Unsuitable.
59929	Land north of Tonbridge Road, Little Mill, Snoll Hatch	East Peckham	East and West Peckham, Mereworth & Wateringbury	Snoll Hatch	The site is in the Green Belt, Flood Zones 2 and 3 and the Little Mill Conservation Area. The property to the east of the site is listed. The site is considered remote from the built confines of any sustainable settlement. Unsuitable.
59932	Land At Trottiscliffe Road, West Malling	Addington	Pilgrims with Ightham	Addington	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
59935	Land East of East Street, Addington, West Malling	Addington	Pilgrims with Ightham	Addington	The site is not in a sustainable or suitable location. Unsuitable.

59938	Land west of Wateringbury Road, East Malling	East Malling & Larkfield	East Malling, West Malling & Offham	East Malling & Mill Street	This site is considered to be suitable, available, and achievable.
59940	Land South of Kemsing Road, Sevenoaks	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Detrimental impact upon the National Landscape. Unsuitable.
59943	Land East of Trottiscliffe Road, Addington	Addington	Pilgrims with Ightham	Addington	The site is not in a sustainable or suitable location. Unsuitable.
59944	Existing premises at 6 Alexander Grove, Kings Hill, West Malling	Kings Hill	Kings Hill	Kings Hill	Uncertainty over availability. Unsuitable.
59945	Lane West of Seven Mile Lane and North of Mount Pleasant Farm	East Peckham	East and West Peckham, Mereworth & Wateringbury	Hale Street	The site is not in a sustainable or suitable location. Unsuitable.
59947	Land South of Cuckoo Lane and West of Greentrees House, Tonbridge	Tonbridge	Higham	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59949	Land West of 301 Seven Mile Lane, Mereworth	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site is not in a sustainable or suitable location. Unsuitable.
59950	Land adjacent Dark Hill Farm, Borough Green Road, Sevenoaks	Ightham	Pilgrims with Ightham	Ightham	Significant adverse landscape effects. Unsuitable.
59951	Land Adjoining the Bungalow 139, Offham Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Performs strongly against Green Belt purposes. Unclear a safe access can be achieved. Unsuitable.
59954	Land At Little Lunsford Farm, Off	East Malling & Larkfield	Larkfield	Medway Gap	The site is heavily constrained and restricted. Unsuitable.

	Lunsford Lane, Leybourne				
59956	The Grain Store, Cuckoo Lane, Tonbridge	Tonbridge	Higham	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
59957	Land East of Town Hill, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Significant landscape effects. Substantial harm to heritage assets, Unsuitable.
68338	Existing Premises at 157 Offham Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Restricted site. Unclear a safe access can be achieved. Unsuitable.
68339	Existing premises at Gibson Building, Gibson Drive, Kings Hill	Kings Hill	Kings Hill	Kings Hill	Uncertainty over availability. Unsuitable.
68341	Land East of Allingham Close, Borough Green	Borough Green	Borough Green & Platt	Borough Green	Heavily constrained and restricted site. Unsuitable.
68344	Land adjacent to Allingham House, Park Drive, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Detrimental impact upon the National Landscape. Unclear a safe access can be achieved. Unsuitable.
68345	Land Adjoining The Ashes, Ashes Lane, Hadlow, Tonbridge	Hadlow	Bourne	Hadlow	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
68348	Land east of Offham Road and south of 157 Offham Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Significant landscape effects. Unclear a safe access can be achieved. Unsuitable.
68349	Land East of Platt Common and south of Maidstone Road, Platt	Platt	Borough Green & Platt	Platt	Uncertainty over availability. Unsuitable.
68350	Existing premises at Crab Tree Corner,	Ightham	Pilgrims with Ightham	Ightham	Unclear a safe access can be achieved. Unsuitable.

	Oldbury Lane, Ightham				
68351	Existing premises at Heart of Kent Hospice, Preston Hall, Aylesford	Aylesford	Aylesford South & Ditton	Medway Gap	The existing uses on the site including healthcare that there is a need to retain and enhance the provision of result in uncertainties over availability and suitability for development.
68352	Existing premises at The Moody Mare public house, Seven Mile Lane, Mereworth	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site is not in a sustainable or suitable location. Unsuitable.
68353	Land north of Walnut Cottage and east of Bullen Lane, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	Unclear a safe access can be achieved. Unsuitable.
68354	Existing premises at Nepicar Oast, London Road, Wrotham, Sevenoaks	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Unsuitable.
68355	Land south of Hathan Green Lane and east of Amber Prospect, Stansted	Stansted	Pilgrims with Ightham	Stansted	The site is not in a sustainable or suitable location. Unsuitable.
68357	Existing premises at Amber Prospect, Hathan Green Lane, Stansted	Stansted	Pilgrims with Ightham	Stansted	The site is not in a sustainable or suitable location. Unsuitable.
68358	Existing premises at recycling centre (Canham Aggregates), Sanderson Way, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.

68359	Land East of Town Hill, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Substantial landscape effects. Harmful heritage impacts. Unsuitable.
68360	Existing premises at Tanglewood, Sevenoaks Road, Ightham	Ightham	Pilgrims with Ightham	Ightham	The site is not in a sustainable or suitable location. Unsuitable.
68361	Land Opposite 170 Offham Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Loss of Grade 1 Agricultural land. Unsuitable.
68362	Land East of Broadwater Road and South of Clare Lane, West Malling	East Malling & Larkfield	East Malling, West Malling & Offham	East Malling & Mill Street	This site is considered to be suitable, available, and achievable.
68363	Land around Broadwater Hall, south of Lucks Hill and west of Broadwater Lane, East Malling	East Malling & Larkfield	East Malling, West Malling & Offham	East Malling & Mill Street	This site is considered to be suitable, available, and achievable.
68365	Land rear of Court Lane Farmhouse and north of Court Lane, Hadlow	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
68366	Land off Syants Bottom Road and east of The Groom, Ightham	Ightham	Pilgrims with Ightham	Ightham	The site is not in a sustainable or suitable location and contains Ancient Woodland and SSSI. Unsuitable.
68368	Land West of Teston Road and North of King Hill, St. Leonards Street	West Malling	East Malling, West Malling & Offham	Kings Hill	The site is not in a sustainable or suitable location. Significant landscape impact. Unsuitable.
68369	Land at Junction of Horns Lodge Lane	Tonbridge	Trench	Tonbridge and Hilden Park	Presence and loss of irreplaceable habitat renders development of the site unfeasible and makes the remaining area

	and Shipbourne Road, Tonbridge				unsustainable. Unclear that a safe and suitable access can be achieved.
68370	Land West of Teston Road and North of King Hill, St. Leonards Street	West Malling	East Malling, West Malling & Offham	Kings Hill	The site is not in a sustainable or suitable location. Significant landscape impact. Unclear a safe access can be achieved. Unsuitable.
68371	Land (extensive area) between of Syants Bottom and Ightham	Ightham	Pilgrims with Ightham	Ightham	The site is not in a sustainable or suitable location. Unsuitable.
68372	Land South of London Road and Rear of Howlands Court, Wrotham, Sevenoaks	Wrotham	Pilgrims with Ightham	Wrotham	This site is considered to be suitable, available, and achievable.
68373	Land south of Philpots Lane and west of Rings Hill, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Loss of employment and community provisions. Unsuitable.
68374	Existing premises at The Vineyard, London Road, Addington	Addington	Pilgrims with Ightham	Addington Clearway	The site is not in a sustainable or suitable location. Unsuitable.
68375	Land At Brookside Garden Centre, Seven Mile Lane, Hale Street	East Peckham	East and West Peckham, Mereworth & Wateringbury	Hale Street	The site is not in a sustainable or suitable location. Unsuitable.
68376	Land South of Church Lane, Hale Street	East Peckham	East and West Peckham, Mereworth & Wateringbury	Hale Street	This site is considered to be suitable, available, and achievable.
68377	Land west of Unit 4 Arnold Business Park, Branbridges	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	Most of the site is within the flood zone with no clear safe or suitable access demonstrated. Unsuitable.

	Road, East Peckham				
68378	Land Opposite Kallangur Lodge, Lower Haysden Lane, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
68382	Land north of Noble Tree Road and east of Watt's Cross Road, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
68383	Land north of Philpots Lane and east of Eggpie Lane, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
68384	Land south of Fairseat and west of Platts House Lane, Fairseat	Stansted	Pilgrims with Ightham	Fairseat	The site is not in a sustainable or suitable location. Unsuitable.
68387	Land adjacent to Allingham House, Park Drive, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Unsuitable.
68388	Land South of Cuckoo Lane and West of Greentrees House, Tonbridge	Tonbridge	Higham	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
68389	Land South of Boroughs Oak Roundabout and Opposite, Hale Street, Tonbridge	East Peckham	East and West Peckham, Mereworth & Wateringbury	Hale Street	The site is not in a sustainable or suitable location. Unsuitable.
68391	Land north of Redlands Farm and South of Yates	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural Land. Unclear a safe access can be achieved. Unsuitable.

	Gardens, West Malling				
68392	Land (extensive area) east of Hadlow Cricket Ground and north of Common Road, Hadlow	Hadlow	Bourne	Hadlow	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
68393	Existing premises at Rose And Crown 125 High Street Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Loss of tourist accommodation. Unsuitable.
68394	Land east of Seven Mile Lane, south of Beech Road and west of Newpound Lane	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site is not in a sustainable or suitable location. Unsuitable.
68395	Land (extensive area) north of Hazel Wood, west of West Peckham	West Peckham	East and West Peckham, Mereworth & Wateringbury	West Peckham	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
68396	Land north (rear of) 4 to 14 Pepinstraw Close and west of Church Road, Offham	Offham	East Malling, West Malling & Offham	Offham	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
68397	Land Northeast of The Street, Mereworth, Maidstone	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site has no direct access to the settlement of Mereworth and would therefore be remote from the existing settlement and represent a form of back land development. The access to the site would also need the removal of some of the Ancient Woodland. Unsuitable.
68398	Land off Willow Wents and west of	Mereworth	East and West Peckham,	Mereworth and Herne Pound	The site is not in a sustainable or suitable location. Unsuitable.

	Seven Mile Lane, Mereworth		Mereworth & Wateringbury		
68399	Land north of Hope Meadow and West of Carpenters Lane	Hadlow	Bourne	Hadlow	The site is not in a sustainable or suitable location. Unsuitable.
68401	Land West of Hillview Road, Hildenborough	Hildenborough	Hildenborough	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
68403	Land (extensive area) south of Court Wood and west of Tumblefield Road, Stansted	Stansted	Pilgrims with Ightham	Stansted	The site is not in a sustainable or suitable location. Unsuitable.
68404	Existing premises at 204a New Hythe Lane, Larkfield	East Malling & Larkfield	Larkfield	Medway Gap	Unclear a safe access can be achieved. Unsuitable.
68405	Land East of Fatherwell Road, off (West of) Fatherwell Avenue and Northwest of Offham Road, West Maling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agriculutral Land. Significant landscape effects. Unsuitable.
68406	Land east of 4 Pratling Street and south of Pratling Street, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	This site is considered to be suitable, available, and achievable.
68407	Land At East Park Road, Royal British Legion Village, Aylesford	Aylesford	Aylesford South & Ditton	Medway Gap	This site is considered to be suitable, available, and achievable.
68410	Land East of Oaktrees Farm,	Wrotham	Pilgrims with Ightham	Borough Green	Loss of employment provisions. Likely detrimental impact upon the National Landscape. Unsuitable.

	Borough Green Road, Sevenoaks				
68411	Existing premises at 75 Vale Rd, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Loss of employment provisions. Unsuitable.
68412	Land west of Rochester Airport, Rochester	Wouldham	Aylesford North & North Downs	Walderslade	This site is considered to be suitable, available, and achievable.
68413	Land Between Rings Hill and Stocks Green Road, Hildenborough, Tonbridge	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Loss of sporting, leisure, community and employment provisions. Unsuitable.
68414	Land at Little Postern, Postern Lane, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
68415	Land South (Rear) Of the Moat Public House, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham Heath	The site is not in a sustainable or suitable location. Unsuitable.
68416	Land Adjoining the Old Barn, Stocks Green Road, Hildenborough, Tonbridge	Hildenborough	Hildenborough	Hildenborough	Uncertainty over availability. Unsuitable.
68417	Land south of A20 and rear of former Jungle Café, Addington	Addington	Pilgrims with Ightham	Addington	The site is not in a sustainable or suitable location. Unsuitable.
68418	Land North of Church Lane, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	The development relies on third party land to access and would not form a logical extension to either Hale Street or East Peckham. Unsuitable.
68419	Land Adjacent to Vauxhall Gardens and The Vauxhall	Tonbridge	Vauxhall	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.

	Inn, Vauxhall Lane, Tonbridge				
68420	Land South of Redhill Farm, Red Hill and off (West of) Red Hill, Wateringbury	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	There are a number of on-site and adjacent constraints, including the loss of Grade 1 Agricultural Land and the likely worsening of air quality in the nearby AQMA. The site is considered unsuitable for development
68421	Land South of Teston Road, Kings Hill, West Malling	Kings Hill, Wateringbury	Kings Hill	Kings Hill	Unclear a safe access can be achieved. Unsuitable.
68422	Land West of Borough Green Road, Ightham	Ightham	Pilgrims with Ightham	Ightham	Unclear a safe access can be achieved. Unsuitable.
68423	Land north of Holborough Lakes, Snodland	Snodland	Snodland West & Holborough Lakes	Snodland	This site is considered to be suitable, available, and achievable.
68424	Land North of Wrotham Bypass, Sevenoaks	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Unsuitable.
68425	Land Around Dark Hill Farm, Borough Green Road, Sevenoaks	Ightham	Pilgrims with Ightham	Ightham	Significant adverse landscape effects. Unsuitable.
68426	Land at corner of Lavenders Road and Swan Street, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	The site is not in a sustainable or suitable location. The site is heavily constrained. Unsuitable.
68427	Land East of New Court Road and Margetts Lane, North of Scarborough Lane and West of Rochester Road	Burham	Aylesford North & North Downs	Burham	The site has flooding and contamination constraints with no safe and suitable access demonstrated.

68428	Land north of Pratling Street and east of Rochester Road Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	This site is considered to be suitable, available, and achievable.
68429	Land North of Wrotham Bypass, Sevenoaks	Wrotham	Pilgrims with Ightham	Wrotham	Unclear a safe access can be achieved. Unsuitable.
68431	Land Between Borough Green Road and National Railway, East of Dark Hill Cottage	Ightham	Pilgrims with Ightham	Borough Green	The site is heavily constrained. Unsuitable.
68432	Land between Tonbridge Road and Stocks Green Road, Hildenborough	Hildenborough	Hildenborough	Hildenborough	This site is considered to be suitable, available, and achievable.
68433	Land fronting Stocks Green Road, Hildenborough	Hildenborough	Hildenborough	Hildenborough	This site is considered to be suitable, available, and achievable.
68434	Land west of Church Road, Offtham	Offham	East Malling, West Malling & Offham	Offham	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
68436	Land At Wouldham Allotments and Rear of Oldfield Drive, Wouldham, Rochester	Wouldham	Aylesford North & North Downs	Wouldham	This site is considered to be suitable, available, and achievable.
68437	Existing premises at 1 Tower View, Kings Hill, West Malling	Kings Hill	Kings Hill	Kings Hill	This site is considered to be suitable, available, and achievable.
68438	Land strip between the London-Ashford railway	Ightham	Pilgrims with Ightham	Ightham	The site is not in a sustainable or suitable location. Unsuitable.

	and A25, Borough Green				
68439	Land fronting Tonbridge Road, Hildenborough	Hildenborough	Hildenborough	Hildenborough	This site is considered to be suitable, available, and achievable.
68440	Land east of Church Road and north of 2 Church Road, Offham	Offham	East Malling, West Malling & Offham	Offham	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
68441	Land at High Barn, Hildenborough	Hildenborough	Hildenborough	Hildenborough	Unclear a safe access can be achieved. Significant landscape effects. Unsuitable
68442	Land east of Church Road and north of 2 Church Road, Offham	Offham	East Malling, West Malling & Offham	Offham	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
68443	Existing premises at 32 Tower View, Kings Hill, West Malling	Kings Hill	Kings Hill	Kings Hill	This site is considered to be suitable, available, and achievable.
68444	Land East of Coldharbour Lane (Junction 5 Of M20) And South of M20, Aylesford	Aylesford	Aylesford South & Ditton	Medway Gap	This site is considered to be suitable, available, and achievable.
68445	Land At Culand Farm, Pilgrims Way, Burham	Aylesford	Aylesford North & North Downs	Burham	The site is in a remote location forming part of the setting of the National Landscape and is in employment use. Unsuitable.
68446	Land east of Coldharbour Lane	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
68447	Existing premises at 34 Tower View, Kings Hill, West Malling	Kings Hill	Kings Hill	Kings Hill	This site is considered to be suitable, available, and achievable.

68448	Existing premises at 50 Kings Hill Avenue, Kings Hill	Kings Hill	Kings Hill	Kings Hill	This site is considered to be suitable, available, and achievable.
68449	Court Lane Nurseries, Court Lane, Hadlow, Tonbridge	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
68450	Existing premises at 11 Tower View, Kings Hill, West Malling	Kings Hill	Kings Hill	Kings Hill	This site is considered to be suitable, available, and achievable.
68452	Land Adjacent River Bourne at Hadlow College, Tonbridge Road, Tonbridge	Hadlow	Bourne	Hadlow	Heavily constrained site. Unsuitable.
68454	Land (extensive area) north of Goose Green and south of West Peckham	East Peckham, West Peckham	East and West Peckham, Mereworth & Wateringbury	West Peckham	The site is not in a sustainable or suitable location. Unsuitable.
68455	Land South of Back Lane Shipbourne	Shipbourne	Bourne	Shipbourne	The site is not in a sustainable or suitable location. Unsuitable.
68456	Land Opposite Masefield Way, Upper Hayesden Lane, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
68457	Land South of Back Lane and East of Stumble Hill, Shipbourne	Shipbourne	Bourne	Shipbourne	The site is not in a sustainable or suitable location. Unsuitable.
68458	Land off Sandy Lane, West Malling	Birling	Birling, Leybourne & Ryarsh	Snodland	The site remote from the built confines of any settlement, in current leisure use and in the National Landscape. In addition, development at the site would

					be either significantly constrained or result in the loss of large areas of established woodland, trees and hedgerows, including areas of priority habitat raising ecological concerns. Unsuitable
68459	Land Southeast of Junction of Noble Tree Road and Watts Cross Road, Hildenborough, Tonbridge	Hildenborough	Hildenborough	Hildenborough	This site is considered to be suitable, available, and achievable.
68460	Land North of Drayhorse Meadow Fields Lane Maidstone	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	The site is grade 1 agricultural land and close to an AQMA. Unsuitable.
68461	Land East of The Telephone Exchange, Tonbridge Road, Wateringbury, Maidstone	Wateringbury	East and West Peckham, Mereworth & Wateringbury	Wateringbury	The site is grade 1 agricultural land and close to an AQMA. Unsuitable.
68462	Land east of Maidstone Road, Hale Street, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	Hale Street	Site constraints include the oil pipeline, adjacent woodland and large parts of the site within Flood Zones 2 and 3. Development at the site would be heavily constrained and restricted.
68463	Land West of Rochester Road and Opposite 468 Rochester Road, Burham	Burham	Aylesford North & North Downs	Burham	The site is in a remote location within the setting of the National Landscape and is therefore not in a sustainable or suitable location.
68471	Soverign Way North	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.

68472	Angel Centre	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
68466	Land east of Masters Lane and west of Bull Road, Birling	Birling	Birling, Leybourne & Ryarsh	Birling	The site is within the National Landscape with a LVIA finding that development would cause significant adverse landscape effects. In addition, no safe and suitable access has been demonstrated. Unsuitable.
68467	Existing premises at The Warren, Trottiscliffe Road, Addington	Addington	Pilgrims with Ightham	Addington	The site is not in a sustainable or suitable location. Unsuitable.
68468	Land rear of 8 Foxbush and north of London Road, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
68469	Existing premises at Rouses Farm, Taylors Lane, Trottiscliffe	Trottiscliffe	Pilgrims with Ightham	Trottiscliffe	The site is not in a sustainable or suitable location. Unsuitable.
68470	Land north of Sevenoaks Road (A25) and west of Spring Lane, Oldbury	Ightham	Pilgrims with Ightham	Ightham	The site is not in a sustainable or suitable location. Unsuitable.
75120	Land east of Boyles Way, Hale Street	East Peckham	East and West Peckham, Mereworth & Wateringbury	Hale Street	The site is not in a sustainable or suitable location. Unsuitable.
75128	Existing premises at 170 Birling Road, Leybourne	Leybourne	Birling, Leybourne & Ryarsh	Leybourne Chase	The site is remote from the sustainable settlement of the Medway Gap with no safe and suitable access demonstrated. Availability and delivery are also unclear. Unsuitable.

75129	Existing premises at 125 Willow Wents, Mereworth	Mereworth	East and West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site is not in a sustainable or suitable location. Unsuitable.
75130	Existing premises at Amber Prospect, Hatham Green Lane, Stansted	Stansted	Pilgrims with Ightham	Stansted	The site is not in a sustainable or suitable location. Unsuitable.
75131	Land off Seven Mile Lane and rear of Mount Pleasant Farm, Seven Mile Lane, Peckham Bush	East Peckham	East and West Peckham, Mereworth & Wateringbury	Hale Street	The site is not in a sustainable or suitable location. Unsuitable.
75132	Land east of Dryland Road, Borough Green	Borough Green	Borough Green & Platt	Borough Green	Unclear a safe access can be achieved. Unsuitable.
75133	Land south of Little Cossington Farm and west of Pratling Street, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	The site is not in a sustainable or suitable location. Unsuitable.
75134	Land north of Foxbush and east of London Road, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
75135	Land east of London Road, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
75136	Land East of Trottiscliffe Road, Addington	Addington	Pilgrims with Ightham	Addington	The site is not in a sustainable or suitable location. Unsuitable.
75137	Land rear of Henham Gardens/Coult	East Peckham	East and West Peckham,	East Peckham	Uncertainty over delivery due to vast number of owners of the site meaning the site is considered to be unavailable.

	Stream, East Peckham		Mereworth & Wateringbury		
75138	Land east of Bull Lane and south of Pilgrims Way, Eccles	Aylesford	Aylesford North & North Downs	Eccles	The site is remote from the existing settlement of Eccles and thus unsuitable.
75139	Land North of Court Lane and rear of (East of) Chesfield Close, Hadlow	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
75140	Land at Brookside Garden Centre, Seven Mile Lane, Hale Street	East Peckham	East and West Peckham, Mereworth & Wateringbury	Hale Street	The site is not in a sustainable or suitable location with part of the site in the flood zone. Unsuitable.
75141	Existing premises at Weald Court, 103 Tonbridge Road, Hildenborough	Hildenborough	Hildenborough	Hildenborough	This site is considered to be suitable, available, and achievable.
75142	Land at Appledene Farm, Normal Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural Land and priority habitat. Unclear a safe access can be achieved. Unsuitable.
75143	Existing premises at Quince Cottage, Common Road, Hadlow	Hadlow	Bourne	Hadlow	The site is not in a sustainable or suitable location. Unsuitable.
75144	Land at White Ladies, Teston Road, Offham, West Malling	Offham	East Malling, West Malling & Offham	Offham	The site is not in a sustainable or suitable location. Unsuitable.
75145	Land Southeast of Junction of Noble Tree Road and Watts Cross Road,	Hildenborough	Hildenborough	Hildenborough	This site is considered to be suitable, available, and achievable.

	Hildenborough, Tonbridge				
75146	Oast Lane, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Unclear a safe access can be achieved. Unsuitable.
75147	Existing premises at The Angel Centre, Angel Lane, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
75148	Land (car park) south of Sovereign Way and east of Avenue Du Puy, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Uncertainty over availability. Unsuitable.
75149	Land (car park) east of Avenue Du Puy, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
75150	Land north of Rocks Hill	East Malling & Larkfield	East Malling, West Malling & Offham	East Malling & Mill Street	This site is considered to be suitable, available, and achievable.
75151	Paris Farm, Rocks Road, East Malling	East Malling & Larkfield	East Malling, West Malling & Offham	East Malling & Mill Street	This site is considered to be suitable, available, and achievable.
75329	Land off Rochester Road and west of Anchor Barn, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	This site is considered to be suitable, available, and achievable.
75330	Land south of Anchor Barn and West of Rochester Road, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	The site is remote from an existing settlement with no safe and suitable access demonstrated. Unsuitable.
59926	Land West of Teston Road and North of King Hill, St. Leonards Street	West Malling	East Malling, West Malling & Offham	Kings Hill	The site is not in a sustainable or suitable location. Significant landscape effects. Unclear a safe access can be achieved. Unsuitable.
59937	Land West of Birling Road and	Leybourne	Birling, Leybourne & Ryarsh	West Malling	Due to constraints including flooding and existing woodland developable part of the site would be remote from the

	North of London Road, West Malling				existing sustainable settlement of West Malling.
60039	The Spinney, London Road, Wrotham Heath	Wrotham	Borough Green & Platt	Wrotham Heath	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Loss of a lawful G&T site. Unsuitable.
60040	Alans Hectare, Cemetery Lane, Hadlow	Hadlow	Bourne	Hadlow	Loss of a lawful G&T site. Unsuitable.
60041	Laxton Farm, Common Road, Hadlow	Hadlow	Bourne	Hadlow	Loss of a lawful G&T site. Unsuitable.
60162	Springfield Place, Cemetery Lane, Hadlow	Hadlow	Bourne	Hadlow	Loss of a lawful G&T site. Unsuitable.
60163	The Horseshoes, Sandy Lane, Ryarsh	West Malling	East Malling, West Malling & Offham	West Malling	The site is not in a sustainable or suitable location. Loss of a lawful G&T site. Unsuitable
65311	Land East of Hadlow Road and South of St Andrew's Church, Tonbridge	Tonbridge	Higham	Tonbridge and Hilden Park	Landscape harm and out of character. Unsuitable.
58485	Wouldham Allotments	Wouldham	Aylesford North & North Downs	Wouldham	The current use as an allotment and therefore unsuitable.
58491	Land east of A229 and south of Common Road, Blue Bell Hill	Burham	Aylesford North & North Downs	Blue Bell Hill	Located within the National Landscape and SSSI in a remote location.
58492	Land rear of 1 to 5 Laurie Gray Avenue, Blue Bell Hill	Aylesford	Aylesford North & North Downs	Blue Bell Hill	Availability is a concern and permission has been refused with appeal dismissed previously.

58493	Land west of Collingswood Road and south of Vincent Road, Blue Bell Hill	Aylesford	Aylesford North & North Downs	Blue Bell Hill	The site is located in the National Landscape and remote from existing sustainable settlements.
58497	Land north of Pratling Street and east of Rochester Road, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	This site is considered to be suitable, available, and achievable.
58498	Aylesford Quarry, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	This site is considered to be suitable, available, and achievable.
58499	Land east of Aylesford Priory and south of High Street, Aylesford	Aylesford	Aylesford North & North Downs	Aylesford Village	Remote from the built confines of Aylesford Village and not sustainably located. Unclear that a safe and suitable access can be achieved.
58501	465 Station Road, Aylesford	Aylesford	Aylesford North & North Downs	Medway Gap	Site is located within Flood Zones 2 and 3 with no clear mitigation.
58502	Castledene Transport and Pickfords Removals	Aylesford	Aylesford North & North Downs	Medway Gap	Existing employment site with active use. Unsuitable.
58507	Land and existing premises at Sheldon Way, Larkfield	East Malling & Larkfield	Larkfield	Medway Gap	Loss of employment provisions. Uncertainty over availability. Unsuitable.
58508	Land north (rear of) 23 to 29 Cobdown Close and south of M20 motorway, Ditton	Ditton	Aylesford South & Ditton	Medway Gap	Safe and suitable access has not been demonstrated for this site.
58510	Ferns Surfacing	Larkfield	East Malling and Larkfield	Medway Gap	Loss of employment provisions. Uncertainty over availability. Unsuitable.
58513	Land at and north (rear of) 14 to 62 Park Road, Leybourne	Leybourne	Birling, Leybourne & Ryarsh	Medway Gap	The site is in the Green Belt with infrastructure constraints and is not considered to be sustainably located. Unsuitable.

58517	Land north of Woodgate Road and west of Workhouse Road, Ryarsh	Ryarsh	Birling, Leybourne & Ryarsh	Ryarsh	The site is remote from a sustainable settlement and is located within the National Landscape. Unsuitable.
58518	adj The Chestnuts, Addington	Addington	Pilgrims with Ightham	Addington	The site is not in a sustainable or suitable location. Unsuitable.
58519	North of Mill House Lane, Addington	Addington	Pilgrims with Ightham	Addington	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
58520	242 London Road	Leybourne	Birling, Leybourne & Ryarsh	West Malling	Site is an existing employment site in a sustainable location and is therefore considered unsuitable due to the loss of employment land.
58521	East Street, Addington	Addington	Pilgrims with Ightham	Addington	The site is not in a sustainable or suitable location. Unsuitable.
58524	Existing premises at Redlands Farm and Old Ryarsh Lane, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural land. Unclear a safe access can be achieved. Unsuitable.
58525	Land at and surrounding Leybourne Chase	Leybourne	Birling, Leybourne & Ryarsh	Leybourne Chase	The site is in the Green Belt and includes TPOs, listed buildings and areas of priority habitat with multiple users. Availability has not been demonstrated. Unsuitable.
58526	263 -265 London Road	West Malling	East Malling, West Malling & Offham	West Malling	Uncertainty over availability. Loss of employment provisions. Unsuitable
58528	Land east of Callis Court Bungalow and south of London Road, West Malling	Ryarsh	Birling, Leybourne & Ryarsh	West Malling	The site is considered remote from the built confines of West Malling and thus is therefore not considered to be within a sustainable or suitable location. Unsuitable.
58530	opposite the Village Hall, Norman Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural land. Unclear a safe access can be achieved. Unsuitable.

58531	Land east of Fatherwell Road and south of Norman Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural land. Unclear a safe access can be achieved. Unsuitable.
58533	Appledene Farm, Norman Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural land. Unclear a safe access can be achieved. Unsuitable.
58534	North of Norman Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural land. Unclear a safe access can be achieved. Unsuitable.
58538	Land north of Lucks Hill and west of Winterfield Lane, East Malling	East Malling & Larkfield	East Malling, West Malling & Offham	Medway Gap	This site is considered to be suitable, available, and achievable.
58539	Land south of The East Malling Centre and west of Chapman Way, East Malling	East Malling & Larkfield	East Malling, West Malling & Offham	Medway Gap	Heavily constrained site and there is uncertainty over its availability. Unsuitable.
58540	Land east of Winterfield Lane and west (rear of) 2 to 7 Clarewood Drive, East Malling	East Malling & Larkfield	East Malling, West Malling & Offham	Medway Gap	Significant Landscape character effects. Impact upon Conservation Area. Tree and ecological concerns. Unsuitable.
58548	Clare Park Service Station and B&Q Store	Larkfield	East Malling and Larkfield	Medway Gap	Uncertainty over availability. Loss of employment provisions. Unsuitable.
58550	Existing premises east of Magpie Close and south of Martin Square, Larkfield	East Malling & Larkfield	Larkfield	Medway Gap	Site is considered to be unavailable due to existing community use on the site.

58551	East of Cobdown Close, Ditton	Ditton	Aylesford South & Ditton	Medway Gap	Site has significant flood constraints with ecological and accessibility constraints resulting in the site being unsuitable.
58552	Land north of London Road and east of 562 London Road, Ditton	Ditton	Aylesford South & Ditton	Medway Gap	Site is considered unavailable as it was not promoted by the landowners and would negatively impact open space provision.
58553	613 London Road	Ditton	Aylesford South & Ditton	Medway Gap	This site is located within a sustainable settlement, but uncertainty remains over its availability.
58554	Existing premises at 737 London Road, Larkfield	East Malling & Larkfield	Larkfield	Medway Gap	Uncertainty over availability. Unsuitable.
58555	Land at 6&8 Downderry Way	Ditton	Aylesford South & Ditton	Medway Gap	Site is designated as a priority habitat with poor accessibility. Unsuitable.
58556	Existing premises at 11 Bradbourne Lane, Larkfield	East Malling & Larkfield	Aylesford South & Ditton	Medway Gap	Delivery of the site is unproven and considered to be unavailable. Unsuitable.
58558	TA Centre	Ditton	Aylesford South & Ditton	Medway Gap	There is uncertainty over the availability and delivery of the site due to current use. Unsuitable.
58559	Land west of Station Road and rear of 113 to 131 Station Road, Ditton	Ditton	Aylesford South & Ditton	Medway Gap	The site is open space and located within a flood zone with current sports uses on the site. Unsuitable.
58560	Land west of Station Road and south of 113 Station Road, Ditton	Ditton	Aylesford South & Ditton	Medway Gap	The site is open space and located within a flood zone with current sports uses on the site. Unsuitable.
58565	Existing and surrounding premises at Preston Hall and	Aylesford	Aylesford South & Ditton	Medway Gap	Site is considered to be unavailable due the number of users of the site which include employment, community and health. Unsuitable.

	Royal British Legion Village				
58566	West of Coldharbour Lane, Aylesford	Aylesford	Aylesford South & Ditton	Medway Gap	This site is considered to be suitable, available, and achievable.
58568	Millbrook House	East Malling & Larkfield	East Malling, West Malling & Offham	East Malling & Mill Street	The site is considered unavailable given its current employment use and existing users on the site.
58575	Land (extensive area) between East Malling, Bradbourne House, Kiln Barn Lane and Hermitage Lane	East Malling & Larkfield	East Malling, West Malling & Offham	Medway Gap	The substantial landscape impacts and coalescence of three settlements together with uncertainty over delivery make this site unavailable.
58576	Paris Farm, Rocks Road, East Malling	East Malling & Larkfield	East Malling, West Malling & Offham	East Malling & Mill Street	This site is considered to be suitable, available, and achievable.
58579	West of Whitepost Wood Lane, Aylesford	Aylesford	Aylesford South & Ditton	Medway Gap	This site is considered to be suitable, available, and achievable.
58580	Land south of London Road and west of Beaver Road, Allington	Aylesford	Aylesford South & Ditton	Medway Gap	This site is considered to be suitable, available, and achievable.
58581	Barming Depot, Hermitage Lane	Aylesford	Aylesford South & Ditton	Medway Gap	The site has a number of constraints including existing employment use, priority habitat on the site and uncertainty over availability.
58582	Detling Field, Hermitage Lane, Aylesford	Aylesford	Aylesford South & Ditton	Medway Gap	This site is considered to be suitable, available, and achievable.
58584	Land south of Hermitage Court, Hermitage Lane	Aylesford	Aylesford South & Ditton	Medway Gap	This site is considered to be suitable, available, and achievable.

58585	Land off Hermitage Lane	Aylesford	Aylesford South & Ditton	Medway Gap	The site is designated as an Ancient Woodland and priority habitat and is unsuitable for development.
58587	Land (extenstive area) known as Broadwater Farm at Broadwater Road, north of Kings Hill	East Malling & Larkfield	East Malling, West Malling & Offham	Kings Hill	Joining of Conservation Areas. Unsuitable.
58589	Water Lane, Kings Hill	Kings Hill	Kings Hill	Kings Hill	Loss of irreplaceable habitat. Unclear a safe access can be achieved. Loss of a lawful G&T site. Unsuitable.
58592	Land at 123 & 125 Teston Road and rear of 119 to 139 Teston Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Access constraints. Unsuitable.
58593	Existing premises at 2 to 12 River Lawn Road and Tonbridge Medical Group, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	Uncertainty over availability. Unsuitable.
58594	Land at Eden Farm, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	The site is not in a sustainable or suitable location. Unsuitable.
58596	Land east of Lavenders Road and south of Swan Street, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	The site is unsuitable due to its location adjacent to various heritage assets.
58597	East of Offham Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Performs strongly against Green Belt purposes. Unclear a safe access can be achieved. Unsuitable.
58599	West of Fatherwell Avenue, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural land. Significant landscape effects. Unsuitable.

58600	West of West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural Land. Significant Landscape effect. Unclear a safe access can be achieved. Unsuitable.
58602	North of Offham Road, West Malling	West Malling	East Malling, West Malling & Offham	West Malling	Loss of Grade 1 Agricultural land. Significant landscape effects. Unsuitable.
58603	Land east of Church Road and north of 2 Church Road, Offham	Offham	East Malling, West Malling & Offham	Offham	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
58606	Land at Ladylees South and west of Windmill Hill, Wrotham Heath	Platt	Wrotham Heath	Wrotham Heath	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Loss of priority habitat Unsuitable.
58607	Ingleborough Lane, Platt	Platt	Borough Green & Platt	Platt	Heavily constrained and restricted site. Unsuitable.
58608	Land north of Maidstone Road between Holly Cottage and Glebe Lodge	Platt	Borough Green & Platt	Platt	Loss of priority habitat. Unsuitable.
58609	Existing premises at 83 Maidstone Road, Borough Green	Borough Green	Borough Green & Platt	Borough Green	Uncertainty over availability. Unsuitable.
58613	Land south (rear of) 4 to 13 Platt Mill Close, Platt	Platt	Borough Green & Platt	Platt	Unclear a safe access can be achieved. Unsuitable.
58614	Crouch Lane, Borough Green	Borough Green	Borough Green & Platt	Borough Green	Unclear a safe access can be achieved. Unsuitable.
58615	Land south of Birchin Napps Farm and The Old Saw Mill, Platt	Platt	Borough Green & Platt	Crouch	The site is not in a sustainable or suitable location. Loss of Ancient Woodland Unclear a safe access can be achieved. Unsuitable

58617	Land at Little Harps and south of Crouch Lane, St. Mary's Platt	Platt	Borough Green & Platt	Borough Green	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
58619	Land north of Copt Hall Road and south of Roquebrune, Common Road, Ightham	Ightham	Pilgrims with Ightham	Ightham	The site is not in a sustainable or suitable location. Unsuitable
58621	Dark Hill Farm, Borough Green	Ightham	Pilgrims with Ightham	Borough Green	Significant adverse landscape effects. Unsuitable.
58625	Land east of Borough Green Road and west of Dark Hill Road, Borough Green	Ightham	Pilgrims with Ightham	Borough Green	The site is not in a sustainable or suitable location. Unsuitable.
58630	Land north and west of Borough Green & Wrotham Train Station	Borough Green	Borough Green & Platt	Borough Green	Uncertainty over availability. Unsuitable.
58631	Existing premises at Celcon Works, Borough Green Road, Borough Green	Ightham	Borough Green & Platt / Pilgrims with Ightham	Borough Green	Unclear a safe independent access can be achieved. Unsuitable.
58633	St Mary's Road, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham	Unclear a safe access can be achieved. Development restricted by surrounding heritage assets and TPO trees. Unsuitable.
58635	Existing premises at Crickets Farm, Borough Green Road, Ightham	Ightham	Pilgrims with Ightham	Borough Green	The site is not in a sustainable or suitable location. Unsuitable.

58637	West of Wrotham Road, Borough Green	Borough Green	Borough Green & Platt	Borough Green	This site is considered to be suitable, available, and achievable.
58638	Joco Pit East, Borough Green	Borough Green	Borough Green & Platt	Borough Green	Heavily constrained and restricted site. Unsuitable.
58639	Land (extensive area) north of Borough Green and south of M26 motorway	Ightham	Borough Green & Platt / Pilgrims with Ightham	Borough Green	This site is considered to be suitable, available, and achievable.
58640	North of Tolsey Mead, Borough Green	Borough Green	Borough Green & Platt	Borough Green	This site is considered to be suitable, available, and achievable.
58641	Existing premises at Ladylees North and east of Walnut Tree Cottages, Wrotham Heath	Platt	Wrotham Heath	Wrotham Heath	The site is not in a sustainable or suitable location. Unclear a safe access can be delivered. Unsuitable.
58643	Land east of Seven Mile Land and south of London Road, Wrotham Heath	Addington	Pilgrims with Ightham	Addington Clearway	The site is not in a sustainable or suitable location. Development would result in the loss of Ancient Woodland and priority habitat. Unclear that a safe access can be achieved. Unsuitable
58645	Existing premises at Nepicar Park, east of London Road, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham Heath	The site is not in a sustainable or suitable location. There is also uncertainty over the availability of the site due to the number of owners. Unsuitable.
58646	Existing premises at Wentshaw Lodge, north of Vigo Road and west of Gravesend Road, Fairseat	Stansted	Pilgrims with Ightham	Fairseat	The site is not in a sustainable or suitable location. Unsuitable.

58654	Existing premises at Yaldham Manor, Kemsing Road, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. The site is heavily constrained. Unsuitable.
58655	Existing premises west of Yaldham Manor, Kemsing Road, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Development would likely have a detrimental impact upon the National Landscape. Unsuitable.
58656	Land east of Labour-in-Vain Road and south of Wrotham Hill Road, Wrotham	Wrotham	Pilgrims with Ightham	Wrotham	The site is not in a sustainable or suitable location. Detrimental impact upon the National Landscape. Unsuitable.
58658	Existing premises at Wentfield, Gravesend Road, Fairseat	Stansted	Pilgrims with Ightham	Fairseat	The site is not in a sustainable or suitable location. Unsuitable.
58660	Existing premises off (south of) Crabtree Close, Fairseat	Stansted	Pilgrims with Ightham	Fairseat	The site is not in a sustainable or suitable location. Unsuitable.
58661	Land east of Pinesfield Lane and south of Coldrum Lane, Trottiscliffe	Trottiscliffe	Pilgrims with Ightham	Trotiscliffe	The site is not in a sustainable or suitable location. Unsuitable.
58662	Land east of Trottiscliffe House and south of Green Lane, Trottiscliffe	Trottiscliffe	Pilgrims with Ightham	Trotiscliffe	The site is not in a sustainable or suitable location. Unsuitable.
58663	Existing premises at Trosley Farm, Addington Lane, Trottiscliffe	Trottiscliffe	Pilgrims with Ightham	Trotiscliffe	The site is not in a sustainable or suitable location. Detrimental impact upon the National Landscape. Unsuitable.
58664	Ryarsh Place Farm, Ryarsh	Ryarsh	Birling, Leybourne & Ryarsh	Ryarsh	The site is within the Green Belt and Kent Downs National Landscape. The site is

					almost entirely within Flood Zones 2 and 3 and deemed unsuitable.
58665	Existing premises at Holmes Paddock, off (west of) The Street, Ryarsh	Ryarsh	Birling, Leybourne & Ryarsh	Ryarsh	The site is located within the National Landscape with poor access. LVIA indicates significant adverse landscape effects. Unsuitable.
58668	Land east of Chapel Street and east (rear of) 88 & 89 Chapel Street, Ryarsh	Ryarsh	Birling, Leybourne & Ryarsh	Ryarsh	The site is located within the National Landscape with poor access. LVIA indicates significant adverse landscape effects. Unsuitable.
58669	Land east of Ryefields and south of Chapel Street, Ryarsh	Ryarsh	Birling, Leybourne & Ryarsh	Ryarsh	The site is remote from a sustainable settlement and within the National Landscape. Unsuitable.
58670	Land west of 92 Ryarsh Road and north of Ryarsh Road, Birling	Birling	Birling, Leybourne & Ryarsh	Birling	The site is located within the National Landscape with poor access. LVIA indicates significant adverse landscape effects. Unsuitable.
58672	Bull Road, Birling (Option A)	Birling	Birling, Leybourne & Ryarsh	Birling	The site is located within the National Landscape with poor access. LVIA indicates significant adverse landscape effects. Unsuitable.
58673	Land between 10 & 74 Ryarsh Road and north of Ryarsh Road, Birling	Birling	Birling, Leybourne & Ryarsh	Birling	The site is located within the National Landscape with poor access and is partially wooded. LVIA indicates significant adverse landscape effects. Unsuitable.
58675	Land east of Castle Way and west of Leybourne Lake, Leybourne	Leybourne	Birling, Leybourne & Ryarsh	Medway Gap	The site is a highway depot with priority habitat along its edge. It is unclear whether the site is available for development. Unsuitable.
58677	Bushey Wood	Aylesford	Aylesford North & North Downs	Medway Gap	The site is a large area with multiple owners with access issues to large parts and proximity to existing employment

					and sewage treatment works. The site is unavailable, undeliverable and unsuitable.
58678	Land south and west of Mackenders Lane and off (south of) Mackenders Close, Eccles	Aylesford	Aylesford North & North Downs	Eccles	No safe and suitable access has been demonstrated, and the site is considered undeliverable and unsuitable at this time.
58681	294 Malling Road and land adjacent	Snodland	Snodland East & Ham Hill	Snodland	Uncertainty over availability and loss of employment provisions. Unsuitable.
58686	Land east of May Street and south of East Street, Snodland	Snodland	Snodland East & Ham Hill	Snodland	Uncertainty over availability and deliverability. Unsuitable.
58687	Land at Snodland Common, Snodland	Snodland	Snodland East & Ham Hill	Snodland	Uncertainty over availability and unclear if a safe access is achievable. Unsuitable.
58692	Paddlesworth Road Green, Snodland	Snodland	Snodland West & Holborough Lakes	Snodland	Loss of amenity greenspace. Unsuitable.
58693	Land at (Mill Fields Farm) and adjacent to junction of Holborough Road and A228, Snodland	Snodland	Snodland East & Ham Hill	Snodland	Uncertainty over availability, loss of leisure provisions, unclear a safe access is achievable, loss of tress. Unsuitable.
58695	Land east of Mill Lane and south of Great Hollanden Cottages, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
58698	Land east of Rochester Road and south of 402 Rochester Road, Burham	Burham	Aylesford North & North Downs	Burham	The site is remote from a sustainable settlement and in the National Landscape.

58699	Land north of Fieldview House and west of Riding Lane, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
58706	Land south of Knowle Road and off (north of)	Wouldham	Aylesford North & North Downs	Peter's Village	The site is unsuitable due to the topography of the land.
58708	Land north of Woodland Barn and west of Mill Lane, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unsuitable.
58709	Land north of Huntsmoor and west of Mill Lane, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unsuitable.
58710	Land east of London Road and south of Whitestepps, London Road, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
58712	East of Riding Lane, Hildenborough	Hildenborough	Hildenborough	Hildenborough	This site is considered to be suitable, available, and achievable.
58714	Chequers Farm, Hildenborough	Hildenborough	Hildenborough	Hildenborough	This site is considered to be suitable, available, and achievable.
58715	Land west (rear of) Noble Tree End, Philpots Lane, Hildenborough	Hildenborough	Hildenborough	Hildenborough	The site is not in a sustainable or suitable location. Unsuitable.
58717	Land east of Bridge Cottage and south of Stocks Green Road, Hilden Park	Hildenborough	Hildenborough	Tonbridge and Hilden Park	The site is not in a sustainable or suitable location. Unsuitable.

58720	Land west (rear of) Bourne House, Leigh Road, Hildenborough	Hildenborough	Hildenborough	Tonbridge and Hilden Park	Uncertainty over availability and not a logical extension. Unsuitable.
58721	Land south of Stocks Green Road and west of Chapel Cottage, Stocks Green Road, Hilden Park	Hildenborough	Hildenborough	Tonbridge and Hilden Park	The site is not in a sustainable or suitable location. Unsuitable.
58723	Land at Hawden Farm, west of Hawden Lane and south (rear of) 1 to 30 Hawden Close, Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	Uncertainty over availability and not a logical extension. Unsuitable.
58724	Land at and south (rear of) 40 Greenview Crescent, Hildenborough	Hildenborough	Hildenborough	Tonbridge and Hilden Park	Back land development at odds with the character of the locality. Unsuitable.
58725	Existing premises at 'Six-in-One' darts venue, Northwood Road, Tonbridge	Tonbridge	Trench	Tonbridge and Hilden Park	Uncertainty over availability and loss of asset of community value. Unsuitable.
58726	North of Dryhill Park Road, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Uncertainty over availability. Loss of education provision. Unsuitable.
58727	Land at Tile Barn Corner, Tonbridge	Tonbridge	Higham	Tonbridge and Hilden Park	The site has a large are of priority habitat with a high risk of groundwater flooding. Unsuitable.
58731	Existing premises at Cage Green Primary School, Tonbridge	Tonbridge	Trench	Tonbridge and Hilden Park	Uncertainty over availability and loss of education provisions. Unsuitable.

58732	Tonbridge Alotments, Waveney Road, Tonbridge	Tonbridge	Trench	Tonbridge and Hilden Park	Uncertainty over availability. Unsuitable.
58733	North of Barchester Way	Tonbridge	Higham	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
58734	North of Hilden Park, Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	The site is heavily constrained. Unclear a safe access can be achieved. Unsuitable.
58735	Land east of 5, Three Elm Lane, and south of Three Elm Lane, Golden Green	Hadlow	Bourne	Golden Green	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
58736	Tonbridge and Little Trench Farm	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Loss of community provisions. Unsuitable.
58738	Land east of Hartlake Road and south of Three Elm Lane, Golden Green	Hadlow	Bourne	Golden Green	The site is not in a sustainable or suitable location. Unsuitable.
58741	West of Elmhurst Gardens, Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	The site is heavily constrained. Unclear a safe access can be achieved. Unsuitable.
58742	Frogbridge Wood, Tonbridge	Tonbridge	Trench	Tonbridge and Hilden Park	Presence and loss of irreplaceable habitat renders development of the site unfeasible and makes the remaining area unsustainable. Unclear that a safe and suitable access can be achieved. Unsuitable.
58743	Greentrees Farm, Tonbridge	Tonbridge	Higham	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
58744	Grange Farm, Tonbridge	Tonbridge	Higham	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
58745	Land east and south of Cuckoo Lane, adjacent to junction with	Tonbridge	Higham	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.

	Higham Lane, Tonbridge				
58746	Land (extensive area) east of Tonbridge Road and West of Snoll Hatch, Snoll Hatch	East Peckham	East and West Peckham, Mereworth & Wateringbury	Snoll Hatch	The site is in the Green Belt with a large part in the flood zone. In addition, a safe and suitable access has not been demonstrated. Unsuitable.
58748	Land south of Stretitt Gardens and west of Pinkham, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	The site is located within flood zone 3b and no safe and suitable access has been demonstrated. Unsuitable.
58750	Arnolds Lodge Farm, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	The site is in the Green Belt with a large part in the flood zone. Unsuitable.
58751	Land north of Henham Gardens and west of Hale Street, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	Most of the site is located within the flood zone. There are also other ecological and landscape constraints on the site that make it unsuitable.
58752	Land north (rear of) 4 to 14 Pepinstraw Close and west of Church Road, Offham	Offham	East Malling, West Malling & Offham	Offham	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
58752	North of The Freehold, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	The site is in the flood zone with poor access. Unsuitable.
58755	Land at Snoll Hatch, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	Most of the site is located in the flood zone with uncertainty over delivery due the number of owners. Unsuitable.

58756	Land east (rear of) 1 to 6 Caysers Croft and south of Tonbridge Road, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	The site is detached from the settlement of East Peckham with a safe and suitable access to be demonstrated. Unsuitable.
58757	Land south of Church Lane and west (rear of) 97 to 117 Hale Street, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	Hale Street	This site is considered to be suitable, available, and achievable.
58758	South of Church Lane, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	This site is considered to be suitable, available, and achievable.
58759	Existing premises at 39 Bells Farm Road, East Peckham	East Peckham	East and West Peckham, Mereworth & Wateringbury	East Peckham	The site is remote from an existing sustainable settlement with potential impact on a listed building. Unsuitable.
58760	Land north (rear of) 37 to 53 Smithers Lane and east of Beechwood Close, Hale Street	East Peckham	East and West Peckham, Mereworth & Wateringbury	Hale Street	Site constraints including the oil pipeline, areas of woodland and trees and that large parts of the site are within Flood Zones 2 and 3 it is considered that development at the site would be heavily constrained and restricted.
58761	Land at Hope Farm, east of High House Lane, Hadlow	Hadlow	Bourne	Hadlow	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
58762	Land north of Hope Meadow and west of Carpenters Lane, Hadlow	Hadlow	Bourne	Hadlow	The site is not in a sustainable or suitable location. Unsuitable.
58763	Land south of Oak Cottage and west (rear of) Palmers Brook, Hadlow	Hadlow	Bourne	Hadlow	Unclear a safe access can be achieved. Unsuitable.

58765	Land east of Steers Place and south of Common Road, Hadlow	Hadlow	Bourne	Hadlow	Loss of priority habitat. Unclear a safe access can be achieved. Unsuitable.
58766	Existing premises at Duck Cottage & Goose Green Farm, Maidstone Road, Hadlow	Hadlow	Bourne	Hadlow	The site is not in a sustainable or suitable location. Impact upon heritage assets. Unsuitable.
58771	Goblands Farm, Court Lane, Hadlow	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
58775	Land at Horns Lodge Lane and west of Horns Lodge Farm, Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	The site is not in a sustainable or suitable location. Unclear a safe access can be achieved. Unsuitable.
58778	North of the Paddock, Hadlow	Hadlow	Bourne	Hadlow	This site is considered to be suitable, available, and achievable.
58779	Land south of Dene Park Farmhouse, Shipbourne Road and west of Shipbourne Road, Shipbourne	Hadlow	Bourne	Shipbourne	The site is not in a sustainable or suitable location. Loss of priority habitat. Unsuitable.
58780	Land at and west (rear of) Northbridge House & Southbridge House, Coldharbour Lane, Shipbourne	Shipbourne	Bourne	Shipbourne	The site is not in a sustainable or suitable location. Loss of irreplaceable habitat. Unsuitable.
58781	Tinley Cottage at Tinley Lodge Farm, off (south of)	Shipbourne	Bourne	Shipbourne	The site is not in a sustainable or suitable location. Unsuitable.

	Hildenborough Road, Shipbourne				
58782	Land west of, north (rear of) and east of Callis Cottages, Hildenborough Road, Shipbourne	Shipbourne	Bourne	Shipbourne	The site is not in a sustainable or suitable location. Unsuitable.
58783	Land north of Upper Manor Farm, Old Soar Road and east of Old Soar Road, Plaxtol	Plaxtol	Bourne	Plaxtol	The site is not in a sustainable or suitable location. Unsuitable.
58785	Land north of Reeds Lane and east (rear of) 10 to 20 Upper Green Lane, Shipbourne	Shipbourne	Bourne	Shipbourne	The site is not in a sustainable or suitable location. Unsuitable.
58786	Land (known as Point Corner) south of School Lane and west of Hampton Road, Shipbourne	Shipbourne	Bourne	Shipbourne	The site is not in a sustainable or suitable location. Unsuitable.
58787	Land south of Puttenden Cottage, Hampton Road and west of Puttenden Road, Dunks Green	Shipbourne	Bourne	Dunks Green	The site is not in a sustainable or suitable location. Unsuitable.
58790	Land east of Tonbridge Road and south of Back Lane, Shipbourne	Shipbourne	Bourne	Shipbourne	The site is not in a sustainable or suitable location. Unsuitable.
58791	Existing premises at Roughway Mill, Roughway Lane, Dunks Green	Plaxtol	Bourne	Dunks Green	The site is not in a sustainable or suitable location. Unsuitable.

58792	Land east of Stable Court, Roughway Lane and north of Roughway Lane, Dunks Green	Plaxtol	Bourne	Dunks Green	The site is not in a sustainable or suitable location. Unsuitable.
58793	Land north of Mereworth Road and east of Stan Lane, West Peckham	West Peckham	East Peckham, West Peckham, Mereworth & Wateringbury	West Peckham	The site is not within a sustainable or suitable location and a safe and suitable access has not been demonstrated. Unsuitable.
58794	Land (known as Hurst Wood) north (off of) Roughway Lane and west of The Hurst, Dunks Green	Plaxtol	Bourne	Dunks Green	The site is not in a sustainable or suitable location. Unsuitable.
58796	Land east (rear of) Long Mill Lane, Plaxtol	Plaxtol	Bourne	Plaxtol	Loss of established woodland. Harmful to the National Landscape. Unclear a safe access can be achieved. Unsuitable.
58797	Land east and south of Plaxtol Allotments	Plaxtol	Bourne	Plaxtol	Significant landscape effects. Unsuitable.
58798	Land west of Long Mill Lane, Dunks Green	Plaxtol	Bourne	Dunks Green	The site is not in a sustainable or suitable location. Unsuitable.
58799	Land north of Highstones and east of Sheet Hill, Plaxtol	Plaxtol	Bourne	Plaxtol	The site is not in a sustainable or suitable location. Heavily constrained. Unsuitable.
58800	Existing premises at industrial site 'Plasterite Mouldings', Redwell Lane, Ightham	Ightham	Pilgrims with Ightham	Ightham	The site is not in a sustainable or suitable location. Unsuitable.

58802	Hut Field, The Street, Mereworth	Mereworth	East Peckham, West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site is in the Green Belt with no direct access to the settlement of Mereworth, meaning it would be remote and represent a form of back land development. A safe and suitable access has not been demonstrated. Unsuitable.
58803	The Street, Mereworth	Mereworth	East Peckham, West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	Landscape Visual Appraisal (October 2025) concluded that both small and medium scale development typologies would be inappropriate as adverse landscape and visual impacts could not be adequately mitigated.
58809	A21 Vauxhall intersection, Tonbridge	Tonbridge	Vauxhall	Tonbridge and Hilden Park	Unclear a safe and suitable access can be achieved. Noise constraints, impact upon National Landscape and trees. Unsuitable.
58813	Land north of Vale Road and east of Strawberry Vale, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Uncertainty over availability. Unsuitable.
58824	West of The Orpines, Wateringbury	Wateringbury	East Peckham, West Peckham, Mereworth & Wateringbury	Wateringbury	The site is Grade 1 Agricultural Land. In addition to the loss of priority habitat and the likely worsening of air quality in the nearby AQMA the site is considered unsuitable for development.
58825	East of The Orpines, Wateringbury	Wateringbury	East Peckham, West Peckham, Mereworth & Wateringbury	Wateringbury	The site is remote from a sustainable settlement and will likely impact on an AQMA. Unsuitable.
58827	Land north of Pelican Court and east (rear of) 10 to 28 Red Hill, Wateringbury	Wateringbury	East Peckham, West Peckham, Mereworth & Wateringbury	Wateringbury	The site is Grade 1 Agricultural Land and lead to the likely worsening of air quality in the nearby AQMA. Unsuitable.

58828	Land at and south of Red House Cottage, Old Road, Wateringbury	Wateringbury	East Peckham, West Peckham, Mereworth & Wateringbury	Wateringbury	It is not clear or has been demonstrated at this time that a safe and suitable access can be achieved to serve development of any notable scale at this parcel. Unsuitable.
58830	Land east of Love Lane and south of 203 Tonbridge Road, Wateringbury	Wateringbury	East Peckham, West Peckham, Mereworth & Wateringbury	Wateringbury	The site has several on-site and adjacent constraints, including the loss of priority habitat, the likely worsening of air quality in the nearby AQMA, flood zone designation and impact upon the Conservation Are. The site is considered unsuitable for development.
58831	Brewers Hall Farm, Mereworth	Mereworth	East Peckham, West Peckham, Mereworth & Wateringbury	Mereworth and Herne Pound	The site is remote from a sustainable settlment with LVIA concluding that small and medium scale development would be inappropriate as adverse landscape and visual impacts could not be adequately mitigated.
58832	Existing premises at depot site, north of the A21 and west of Upper Haysden Lane, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	Uncertainty over availability. Loss of employment provisions. Unsuitable.
58834	South of Vauxhall Gardens. Tonbridge	Tonbridge	Vauxhall	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
58835	Land east North Lodge, Pembury Road and south of Woodgate Way, Tonbridge	Tonbridge	Vauxhall	Tonbridge and Hilden Park	Site is located away from existing settlement and heavily constrained. Unsuitable.
58841	Land parcel (east) at Weald of Kent Grammar School, Tudeley Lane, Tonbridge	Tonbridge	Vauxhall	Tonbridge and Hilden Park	Uncertainty over availability. Unsuitable.

58842	Land north of Postern Lane and west of 1 Postern Lane, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Site has poor access with no safe or suitable access demonstrated. Unsuitable.
58843	Existing premises at The Bank House, Medway Wharf Road, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	Uncertainty over availability. Unsuitable.
58844	Existing premises (including car park) at Waitrose & Iceland supermarkets, High Street, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Uncertainty over availability. Loss of employment provisions. Unsuitable.
58845	Tannery Trading Estate	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Uncertainty over availability. Loss of employment provisions. Unsuitable.
58846	Land adjacent to the River Centre, Medway Wharf Road, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
58850	Existing premises at 10 to 12c Sovereign Way, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Uncertainty over availability. Loss of employment provisions. Unsuitable.
58851	Existing premises at Munday Industrial Estate, Morley Road, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Uncertainty over availability. Loss of employment provisions. Unsuitable.
58852	Existing premises north of Priory Road and west of Strawberry Vale, Tonbridge	Tonbridge	Vauxhall	Tonbridge and Hilden Park	Uncertainty over availability and loss of employment provisions. Unsuitable.
58856	Farm Ground Allotments	Tonbridge	Vauxhall	Tonbridge and Hilden Park	Uncertainty over availability and loss of employment provisions. Unsuitable.

58857	Drayton Road Industrial Estate, Tonbridge	Tonbridge	Vauxhall	Tonbridge and Hilden Park	Uncertainty over availability and loss of employment provisions. Unsuitable.
58858	Existing premises north of Priory Road and east of Strawberry Vale, Tonbridge	Tonbridge	Vauxhall	Tonbridge and Hilden Park	Uncertainty over availability and loss of employment provisions. Unsuitable.
58863	54 Quarry Hill Road	Tonbridge	Vauxhall	Tonbridge and Hilden Park	Uncertainty over availability and loss of employment provisions. Unsuitable.
58867	Fishponds Farm, Lower Haysden Lane, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
58869	Tonbridge Station	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Uncertainty over availability. Unsuitable.
58870	Manor Farm, Upper Haysden Lane	Tonbridge	Judd	Tonbridge and Hilden Park	This site is considered to be suitable, available, and achievable.
58872	Land (extensive area) covering existing premises east of High Street and north of Vale Road, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Uncertainty over availability and loss of employment provisions. Unsuitable.
58873	Existing premises south of Avebury Avenue and west of High Street, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	Uncertainty over availability. Loss of employment provisions. Unsuitable.
58876	Existing premises east of Holford Street and south of Avebury Avenue, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	Uncertainty over availability. Loss of employment provisions. Unsuitable.
58877	Existing premises at The Pavilion,	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Uncertainty over availability. Unsuitable.

	between High Street and Angel Lane, Tonbridge				
58879	Existing premises at Forsyth Hall, Bradford Street, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	Uncertainty over availability. Unsuitable.
58897	Land north of St. Gile's Lodge and west of Lovers Walk, Tonbridge	Tonbridge	Cage Green & Angel	Tonbridge and Hilden Park	Unclear a safe access can be achieved. Uncertainty over availability. Unsuitable.
58902	Existing premises at Langley Hotel, London Road, Tonbridge	Hildenborough	Hildenborough	Tonbridge and Hilden Park	Uncertainty over availability. Unsuitable.
58903	Land (extensive area) north and east of A21 and south of Lower Haysden Lane, Tonbridge	Tonbridge	Judd	Tonbridge and Hilden Park	The site is heavily constrained. Unclear a safe access can be achieved. Loss of education provisions. Unsuitable.

Appendix 5: Southeastern email to the Parish Council, 4 February 2026

From: Paterson, George <George.Paterson@southeasternrailway.co.uk>
Sent: 04 February 2026 15:38
To: Hildenborough Clerk <clerk@hildenboroughparishcouncil.gov.uk>
Subject: Response to request for information

Dear Louise

In response to your request for information, please see below answers to your questions:

What is the current train provision and capacity within Tonbridge and Malling?

The Tonbridge corridor is at full capacity during the high peak hour, for trains arriving into London between 08:00-09:00, with 10 trains per hour. There is some capacity during the hours either side of this, and during the quieter off-peak times. We are constrained at the current time by the availability of our rolling stock – with all train units currently deployed.

During the busiest days of the week (Tues/Weds/Thurs), half the trains departing Tonbridge at the busiest time of the day are loading above seating capacity, meaning there is an excess of passengers to seating and some passengers will be standing. However, during off-peak hours, on Mondays, Fridays, and weekends, the service is less busy and will not be loading to full capacity.

What is the current train provisions and capacity specifically to Hildenborough?

Hildenborough has 4 trains per hour during this same timeframe, which is the busiest part of the day. Hildenborough is subject to the same constraints as above, however it receives a lower service frequency as patronage is less than 10% of Tonbridge.

Regarding the sufficiency of the rail network accommodating passenger growth; we want our railway to grow and see more passengers on the railway. The Tonbridge route is a particularly busy one and we are looking into options to increasing service frequency on this route during the Off-Peak hours and at the weekend. However, it remains at full capacity during the busiest time of day (08:00-09:00 London arrivals) with every train path utilised and maximum train formations (train lengths) in service.

Kind regards

George

George Paterson

Senior Stakeholder Engagement Manager

Mob: [removed]

southeasternrailway.co.uk

Appendix 6: TMBC Leader's presentation, Hildenborough public meeting, 30 September 2026

Regulation 19 Local Plan Consultation

TONBRIDGE & MALLING BOROUGH COUNCIL

www.tmbc.gov.uk

Who am I and why am I here?



Matt Boughton

Leader, Tonbridge and Malling Borough Council

matt.boughton@tmbc.gov.uk

@MattBoughton93

What is a Local Plan, and why do we need one?

Housing Supply	Number of Dwellings
Completions (from 1st April 2024-2025)	689
Completions (from 1st April 2025 – 2026)	1,058
Extant permissions	3,786
Windfall allowance	2,062
Site allocations	13,469
Total supply	21,064
Housing requirement	20,106
Surplus / buffer	958 (5%)

- The Local Plan guides decisions on future development proposals
- Local Plans are the main consideration in deciding planning applications.
- The Local Plan must be consistent with the Government's National Planning Policy Framework.
- The Government also mandates a housing figure – called Objectively Assessed Need – for each Council to deliver. These figures were updated since the consultation last year and at present the Council's overall need is **1,117 properties per annum**, or **20,106** within the Local Plan.

TONBRIDGE & MALLING BOROUGH COUNCIL

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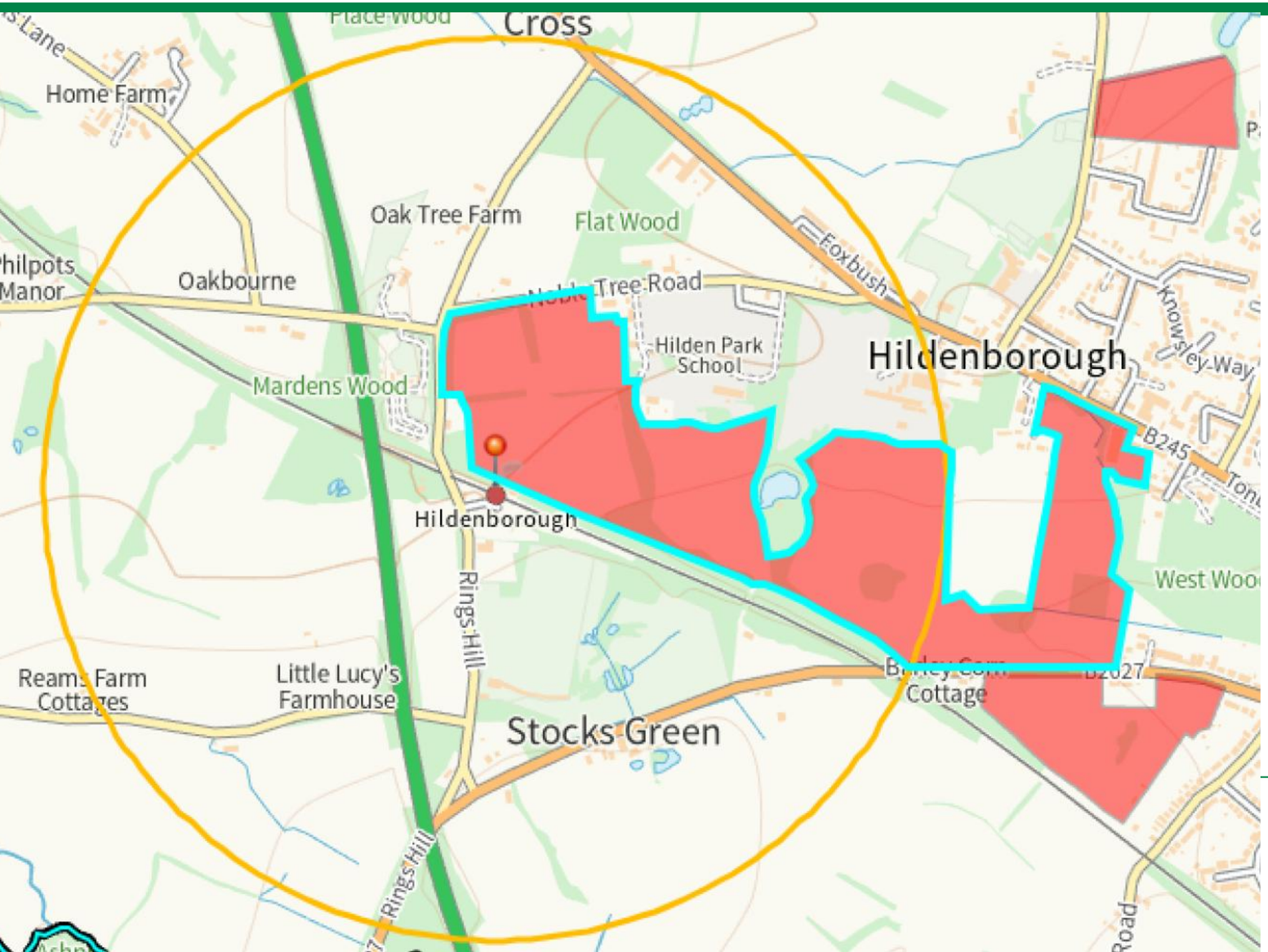
Key National Planning Policy Changes – Grey Belt

National Planning Policy Framework Paragraph 143. Green Belt serves five purposes:
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.

For the purpose of plan-making, ‘grey belt’ is determined as land that does not strongly contribute to a), b) and d) of the above definition.

Essentially, it brings into play development around the edge of most communities within Tonbridge and Malling

Key National Planning Policy Changes – Train Stations



NPPF Policy S5 sets out that only certain forms of development should be approved outside settlements.

i) Be within reasonable walking distance of a well-connected station
ii) Be physically well-related to the station or the settlement within which the station is located;
iii) Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and
iv) Not prejudice any proposals for long-term comprehensive development in the same location.

TONBRIDGE & MALLING BOROUGH COUNCIL
www.tmbc.gov.uk

What is the point of the Regulation 19 consultation and how do I make my views known?



- This is **not** a general consultation on planning matters.
- The purpose of this consultation is to seek representations on the **legal compliance and soundness** of the Plan before submission for examination.
- Paragraph 36, National Planning Policy Framework sets out the tests of soundness:
  - Positively prepared - as a minimum, seeks to meet the area's objectively assessed needs
  - Justified
  - Effective
  - Consistent with national policy

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Land East of Riding Lane – HI1 (96 Homes)

- Current agricultural use
- Access from Riding Lane
- Footway south towards B245
- Landscape Visual Appraisal, moderate to low impact
- Green belt, wider area performs strongly, this site less important contribution
- Adjacent to Hildenborough
- Suitable, available and achievable

OUTCOME

- Suitable, available and achievable
- Change to 96 homes



Land at Hilden Farm Road – HP4 (66 homes)

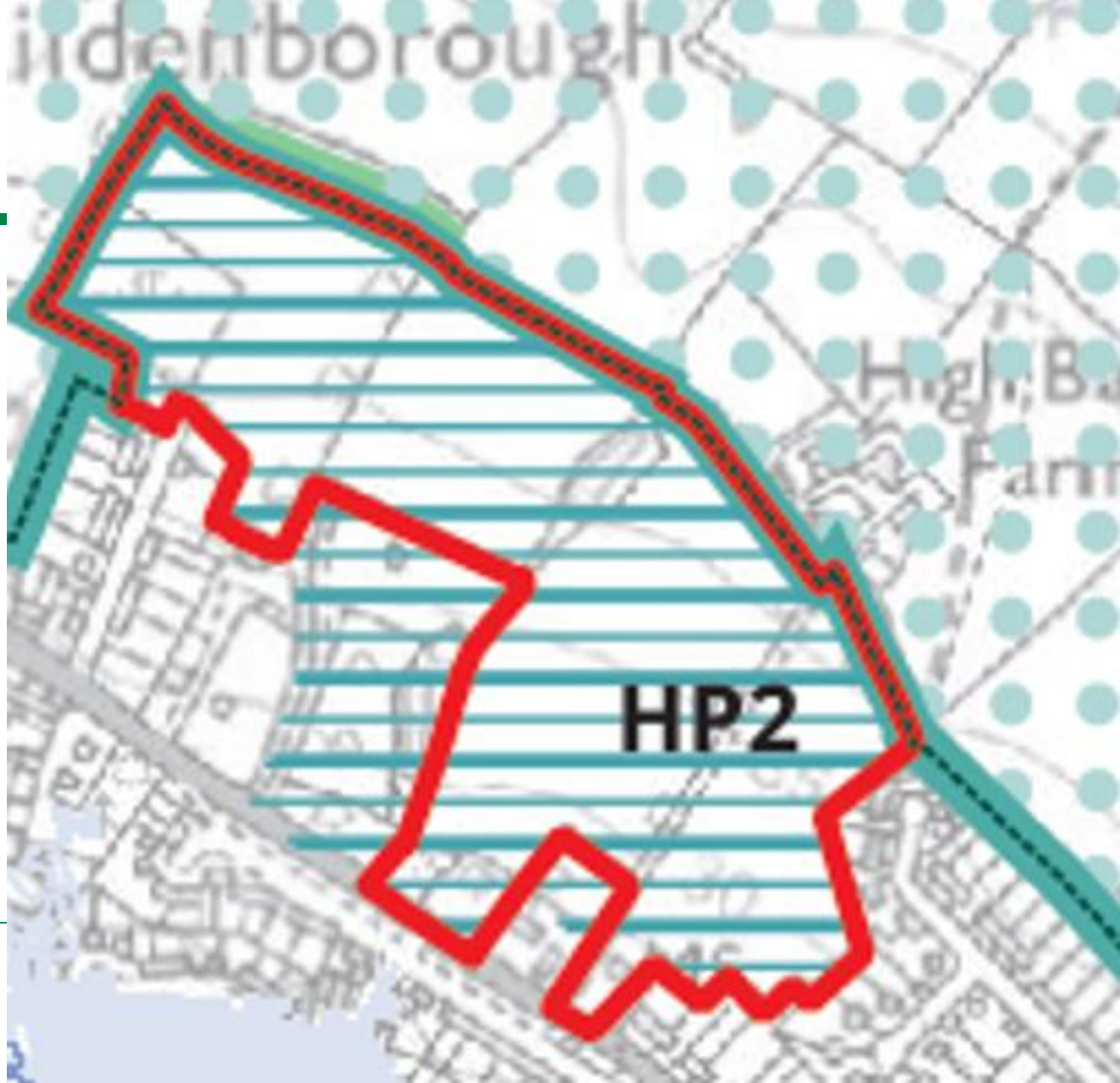
- Suitable, available and achievable
- No known legal or operational barriers to development
- ‘Grey belt’ as adjacent to settlement
- While there is harm to the landscape character, there is the potential for small and medium scale development
- Issues with landscape, ecology, trees, heritage, drainage and ground conditions capable of mitigation through design



TMBC LAA Reference	59745
Site Address	Hilden Farm Road, Tonbridge

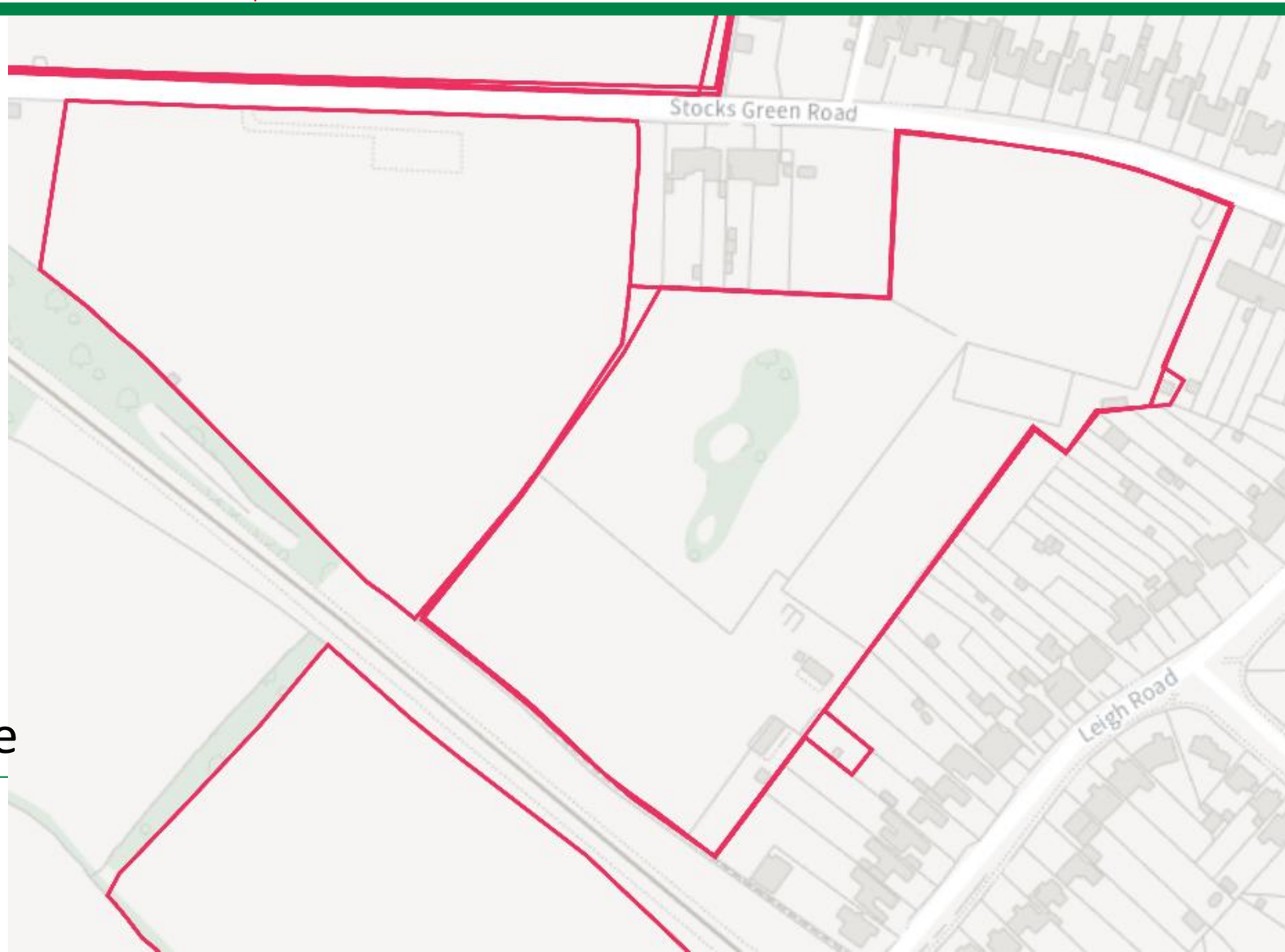
Land Northwest of Hilden Park– HP4 (290 homes)

- Planning application submitted on eastern part of the site
- 230 homes on western parcel of land
- TPO trees to be untouched
- ‘Grey belt’
- Landscape, ecology, heritage, drainage issues can be mitigated through design
- Suitable, available, achievable



Land South of Stocks Green Road, Hildenborough – HP3 (156 Homes)

- Separated from sites north of Stocks Green Road
- ‘Grey Belt’
- Strong boundaries with railway line, Leigh Road and Stocks Green Road
- No known legal issues
- Landscape, ecology, heritage, drainage issues can be mitigated through design
- Suitable, available and achievable



Land off Stocks Green Road, Hildenborough – HP1 (602 Homes)



- Convenience store towards B245
- Outdoor playing pitches
- Vehicle access from B245, Stocks Green Road and Noble Tree Road. No vehicle access from Rings Hill. B245 and Stocks Green Road must connect
- Direct walking and cycling link to Station
- Buffer areas to Conservation Area
- Flood Risk Assessment required

- Much of site in Area of Archaeological Potential. Ancient Woodland, TPO and Conservation Area issues too. Ancient Woodland prevents east-west road
- Southeast of the site in Flood Zones 2 and 3. Underlying groundwater issues.
- Developers must co-operate on a Strategic Masterplan

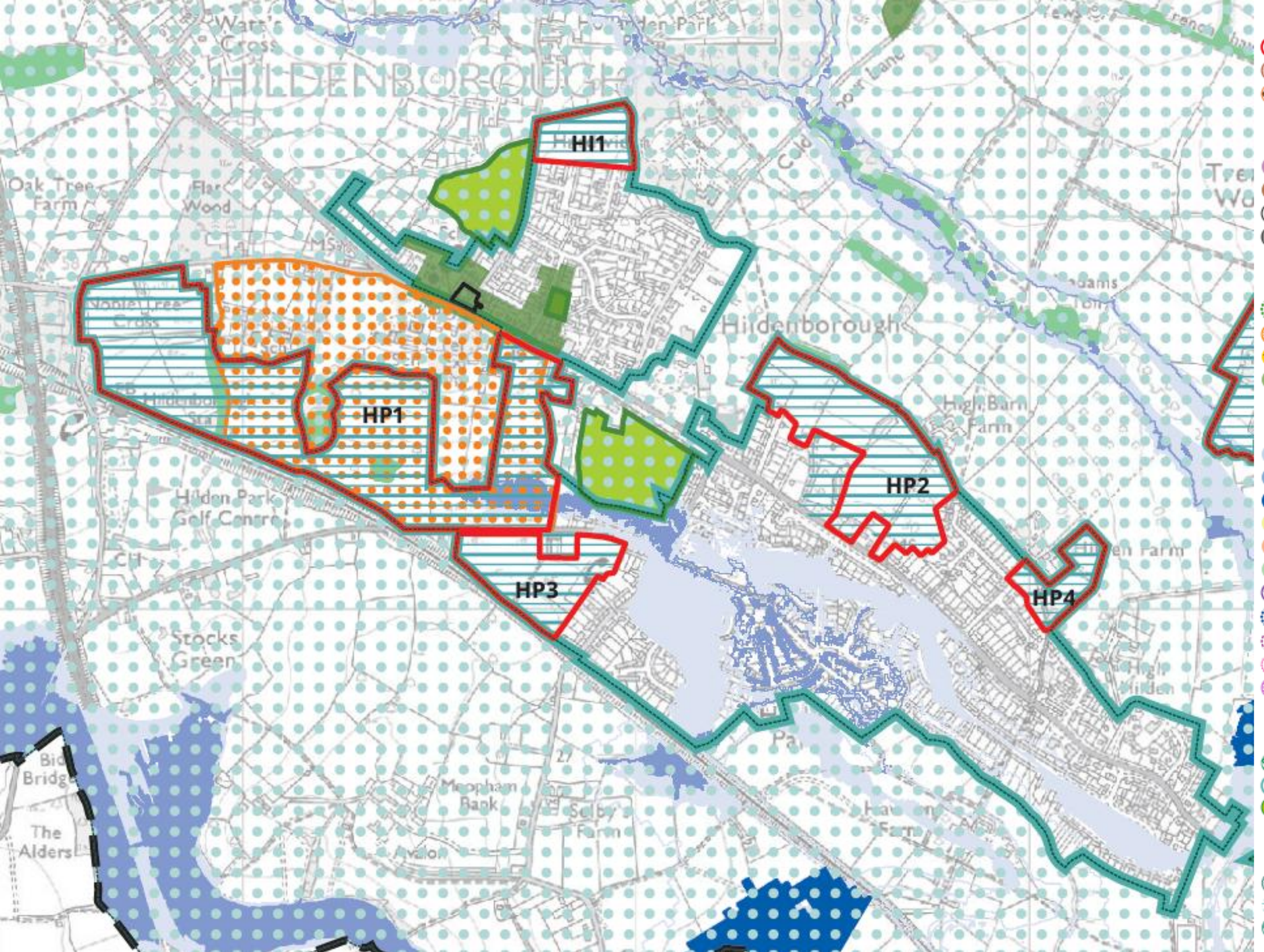
Health and School provision

North of Tonbridge/East of Hildenborough

3000 dwelling proposed in the plan period resulting in approximately 7700 additional population. Existing infrastructure will not have capacity to meet the additional demand and a new site for a facility for primary and community care will need to be identified with a masterplan for this area. Developer contributions will be expected to fully fund the new facility to mitigate the impact, and also to contribute to expansion of capacity in the acute hospitals. Further discussions will be required with the Council to inform requirements and timing of delivery.

There is a smaller amount of growth in the centre/south of Tonbridge from which the ICB will seek developer contributions to expand existing premises for primary, community and acute care.

Planning Group name	2024/25 capacity	2024/25 (A)	2025/26 (F)	2026/27 (F)	2027/28 (F)	2028/29 (F)	2029/30 (F)	2030/31 (F)	2031/32 (F)	2032/33 (F)	2033/34 (F)	2034/35 (F)	2034/35 capacity
Tonbridge South	210	27	20	14	45	43	24	23	22	22	24	28	210
Tonbridge North and Hildenborough	270	71	35	46	44	52	40	35	31	28	26	25	225



Residential and Mixed Use
- Housing and Mixed Use Allocation
- Safeguarded land for natural and amenity green space
- Proposed New Road

Economy and Employment
- Strategic Employment Areas
- Employment Allocation
- Town Centre Boundary
- Primary Shopping Area

Heritage
- Historic Parks and Gardens
- Historic Parks and Gardens non-designated
- Scheduled Ancient Monuments
- Conservation Area

Natural Environment and Green Infrastructure
- Flood Zone 2
- Flood Zone 3
- Flood Zone 3b
- Kent Downs National Landscape
- High Weald National Landscape
- Ancient Woodland
- Local Wildlife Sites
- Regionally Important Geological Sites
- Local Nature Reserve
- Special Area of Conservation
- Site of Special Scientific Interest

Other Policies
- Green Gap Boundary
- Settlement Boundaries
- Local Green Space

Green Belt
- Proposed Green Belt
- Green Belt Release
- Green Belt Extension

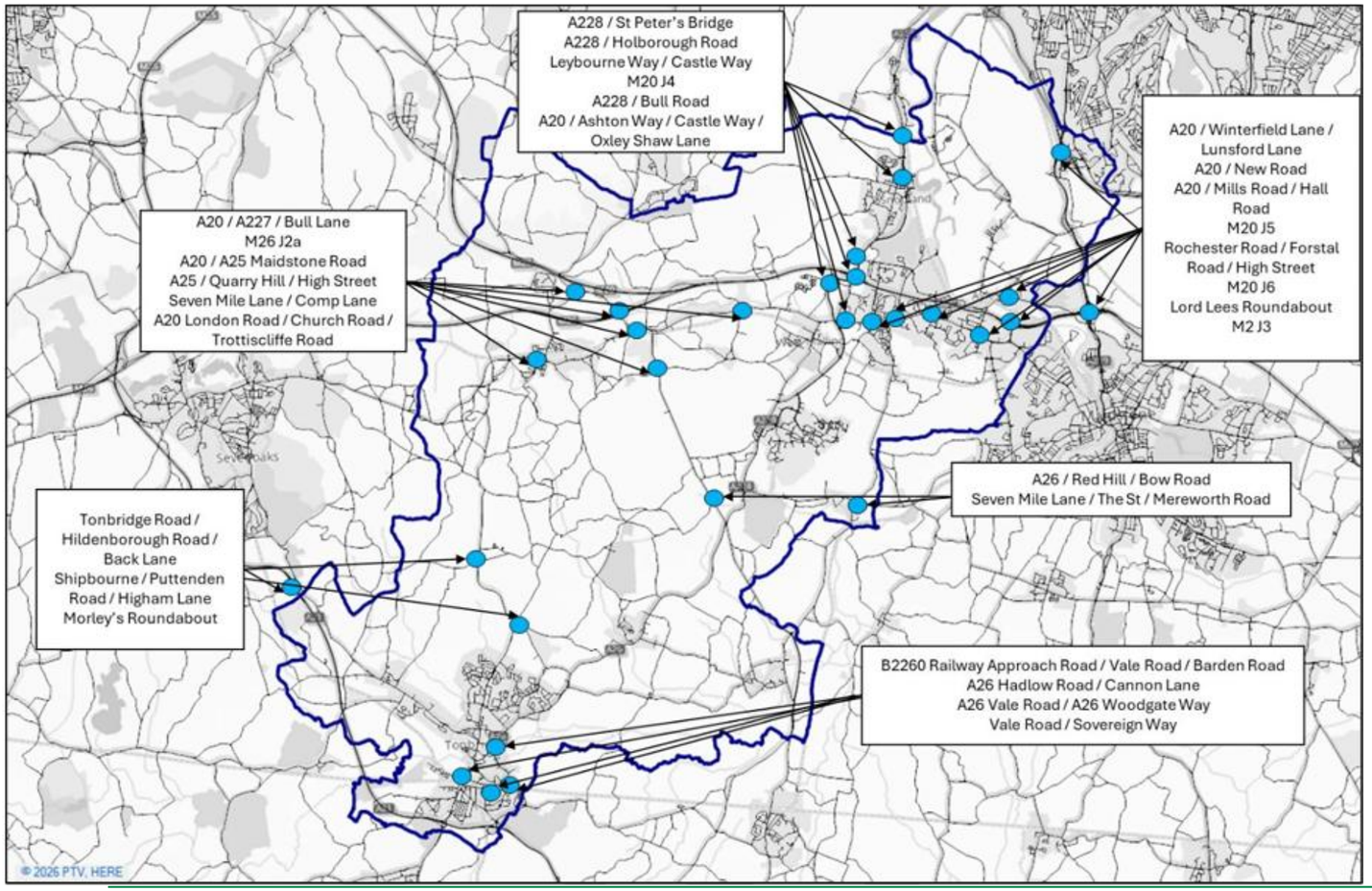
Junction Capacity – Morleys Roundabout

Scenario	NRC Results	
	AM	PM
2019 Base	25%	65%
2042 Forecast Baseline	14%	27%
2042 Local Plan	-2%	15%
2042 Local Plan with Modal Shift	-1%	15%

- Local Plan's cannot resolve existing issues
- Junction would exceed capacity in the AM peak
- Ongoing monitoring recommended

Approach / Scenario	2042 Forecast Baseline		2042 Local Plan		2042 Local Plan with Modal Shift	
	AM	PM	AM	PM	AM	PM
A21 North	0.64	0.59	0.79	0.69	0.79	0.69
River Hill	0.47	0.51	0.50	0.55	0.49	0.55
B245	0.43	0.28	0.54	0.34	0.53	0.34
A21 South	0.72	0.47	0.92	0.56	0.91	0.56
Morleys Road	0.40	0.23	0.50	0.28	0.50	0.27

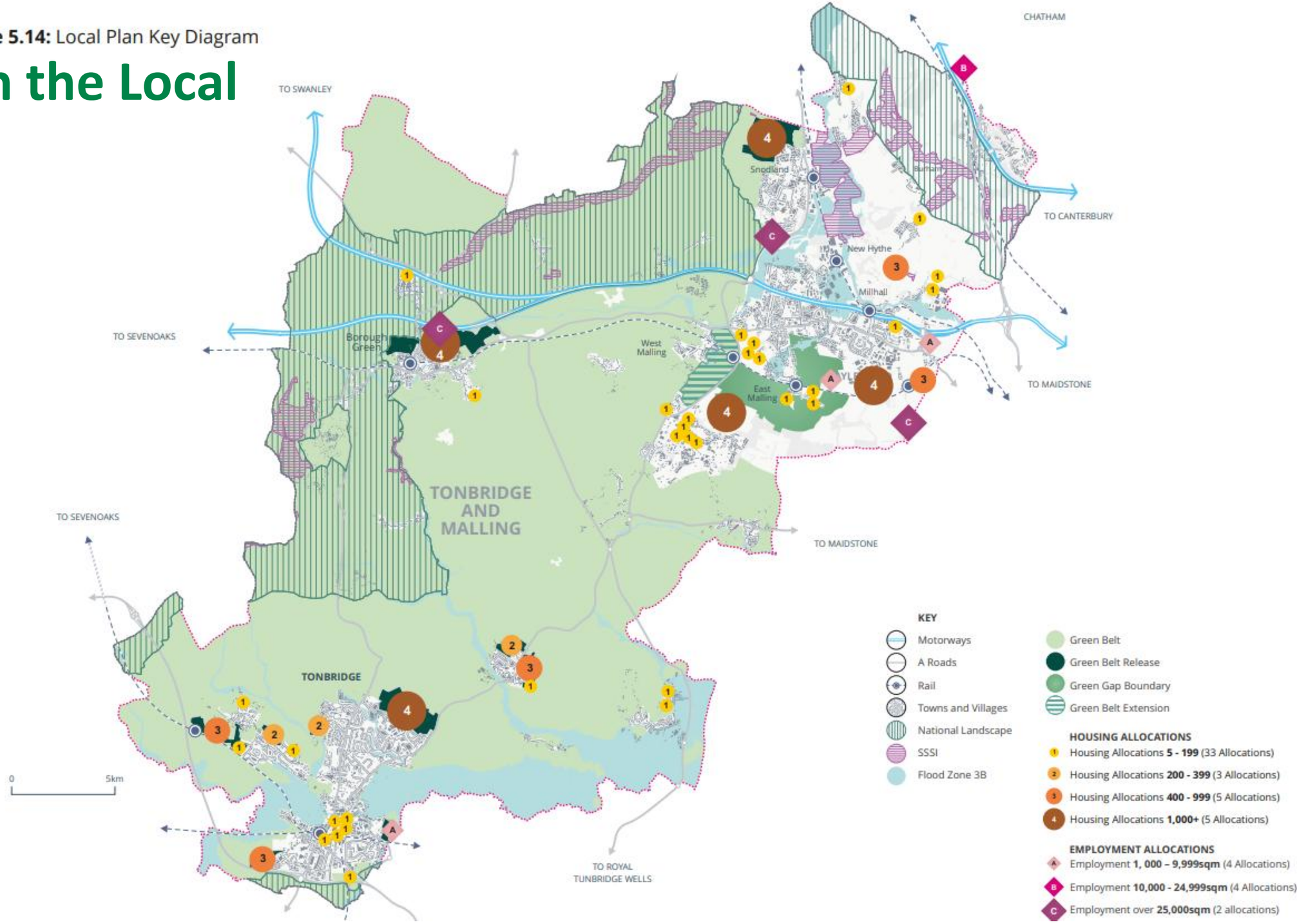
Wider Highways Concerns



- 32 junctions analysed in detail
- However, key junctions missing from the list. This work remains ongoing
- This is one of the key reasons why the Council also indicated it had concerns about highways evidence when taking a decision not to proceed on 3 September.

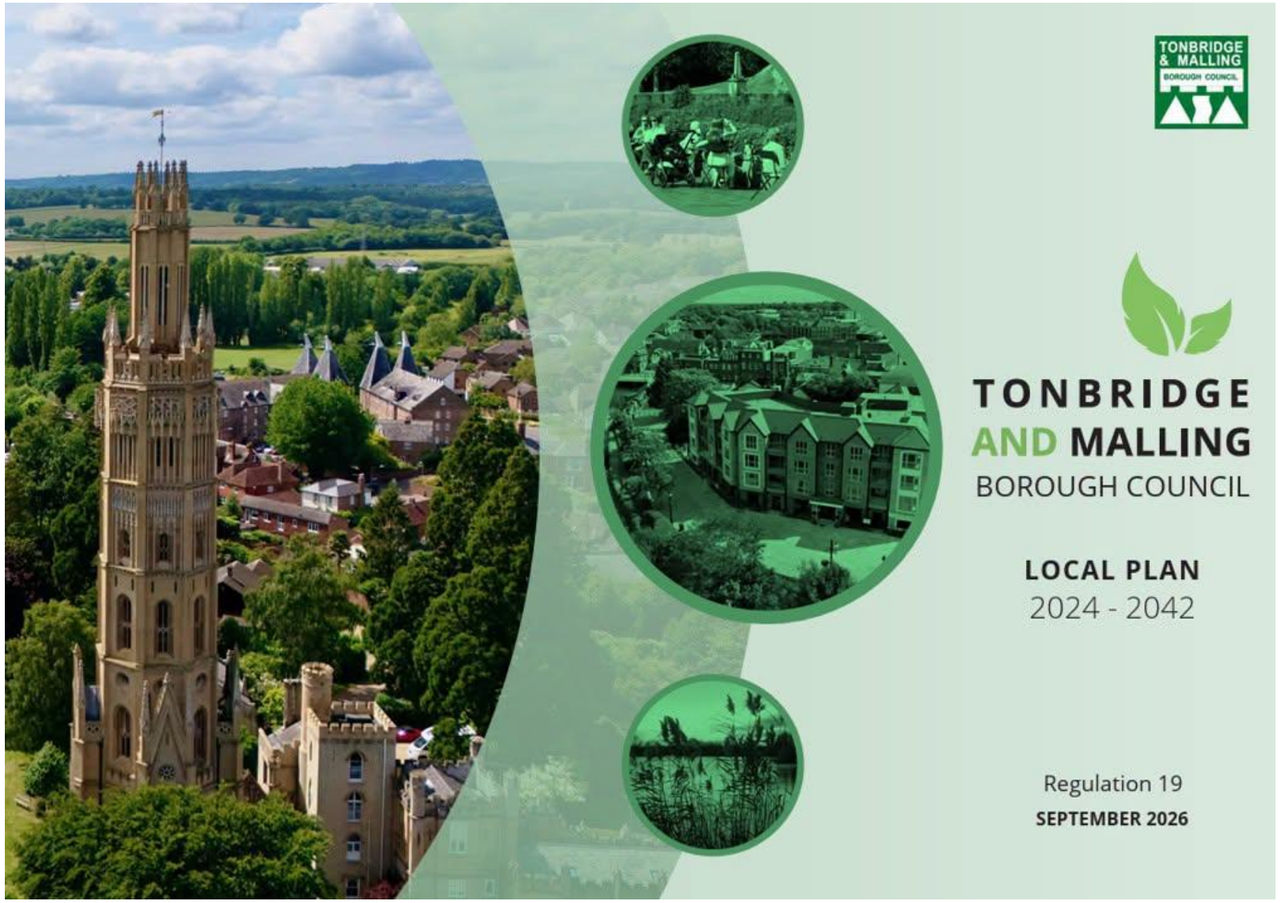
What else is in the Local Plan?

Figure 5.14: Local Plan Key Diagram



What did the Council decide?

- Following the consultation last year, the Council has been progressing the Local Plan.
- The Government have required the Local Plan be submitted by the end of 2026, for examination.
- On 3 September Councillors considered a draft Local Plan. However, it was felt we could not progress because of key concerns relating to:
  - **Drinking water supply**
  - Foul drainage
  - Transport infrastructure



How did the Government respond?

- On Friday 4 September, the Government intervened to **direct** the Council to do a number of things;
  - Publish the Regulation 19 Plan for consultation no later than Friday 11 September
  - To submit the Plan before 31 December deadline
  - Not to withdraw the Plan
  - To progress up to the end of the examination process
- On Friday 11 September, the consultation started in line with the Government direction, as it would have been **unlawful** not to comply.



Ministry of Housing, Communities & Local Government

Rt Hon Matthew Pennycook MP
Minister of State for Housing and Planning
2 Marsham Street
London
SW1P 4DF

Cllr Matt Boughton
Leader of Tonbridge and Malling Borough Council
Gibson Building, Gibson Drive
Kings Hill
West Malling
ME19 4LZ

04 September 2026

Dear Cllr Boughton,

I am writing to you regarding the progress of the emerging Tonbridge and Malling Borough Council Local Plan ('the Plan').

The plan-led approach is, and must remain, the cornerstone of our planning system. This government remains determined to drive local plans to adoption as quickly as possible in order to achieve our ambition of universal plan coverage and to ensure that plans contribute positively to increasing rates of housebuilding and infrastructure delivery.

I am therefore concerned by the Council's decision not to progress the Regulation 19 Local Plan for consultation and subsequent submission for examination. I recognise and appreciate the considerable effort that has gone into the preparation of this emerging Plan, particularly the collaborative work undertaken by the Council and other relevant parties to identify solutions to the issues surrounding water supply. However, given the limited time remaining before the 31 December 2026 deadline for plans to be submitted under the legacy plan-making system, I am extremely concerned that the decision taken by the Council on 3 September places the Council's ability to meet that deadline in serious jeopardy.

This decision risks undermining the time and resources invested in the Plan's preparation to date and increases the likelihood that plan-making would need to restart under the new system, resulting in further delay to getting an up-to-date local plan in place. It also deprives local communities of a timely opportunity to consider and comment on the Council's Regulation 19 draft Plan, creating further uncertainty for residents, businesses and stakeholders alike.

In light of these circumstances, I have considered the options available to me under the 2004 Act, including exercising the Secretary of State's powers of intervention.

Section 27 of the 2004 Act provides the Secretary of State with broad default intervention powers where they believe a local planning authority is failing or omitting to do anything it is necessary for them to do in connection with the preparation, revision or adoption of its Local Plan.

I consider the Council's failure to support the Regulation 19 Local Plan consultation to be clear evidence of a failure to do something necessary in connection with the preparation of the Plan

Do we have Exceptional Circumstances?

- At the same time, a letter explaining the **exceptional circumstances** that the Council believes exists for not progressing the Plan at this time was sent to the Minister.
- Our case is that South East Water have responded to the Local Plan consultation last year to confirm there **isn't the water infrastructure** to cope with the level of development the Government demands in Tonbridge and Malling
- The Council doesn't have confidence there is enough drinking water for this level of development.



TONBRIDGE & MALLING BOROUGH COUNCIL

Matt Boughton

Councillor for East Peckham, West Peckham, Mereworth and Wateringbury

Leader of The Council

11 September 2026

The Rt Hon Matthew Pennycook MP
Minister of State for Housing and Planning
Ministry for Housing, Communities and Local Government
2 Marsham Street
London
SW1P 4DF

Dear Matthew,

Tonbridge and Malling BC – Intervention pursuant to Section 27 of the Planning and Compulsory Purchase Act 2004 in respect of the emerging Tonbridge and Malling Local Plan

I write following your letter dated 4 September 2026, informing Tonbridge and Malling Borough Council ('the Council') that you have determined to exercise the powers available to the Secretary of State under Section 27(2) and (3) of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') to intervene in the Council's local plan preparations and issue directions. This is said to be in response to the Council's decision of 3 September 2026 to determine that the emerging local plan should not at this stage progress to publication and consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ('the 2012 Regulations') which apply to the emerging plan under the transitional 'legacy plan' provisions.

In your letter of 4 September ('the Intervention letter') you state that the *"directions will remain in force until withdrawn"*; and warn that if the Council should *"fail to comply with the directions"* you *"will consider taking further action"*. Nevertheless, you provide the *"opportunity to set out by 18 September any exceptional circumstances which in your view suggest that intervention is not appropriate in this case"*.

This letter sets out those exceptional circumstances and confirms that in the circumstances that obtain in this case it is clear that it is not appropriate for the intervention to be made at this point.

Gibson Building, Gibson Drive, Kings Hill, West Malling, Kent ME19 4LZ
Email: matt.boughton@tmbc.gov.uk

What did South East Water say last year?

From our review of the latest housing forecast figures, which have been increased to meet government targets and provided to us by local authorities within our supply area, we have identified that we cannot accommodate additional growth beyond what was assumed in our Water Resources Management Plan 2024 (WRMP24) in areas where we do not have a supply-demand surplus.

Specifically, in the Tonbridge and Malling area, where we currently lack available headroom in our supplies, we would be unable to accommodate any growth exceeding our WRMP24 forecast assumptions throughout the entire planning period. This is because our WRMP24 was developed to balance supply and demand based solely on the growth forecasted and provided to us in recent years.

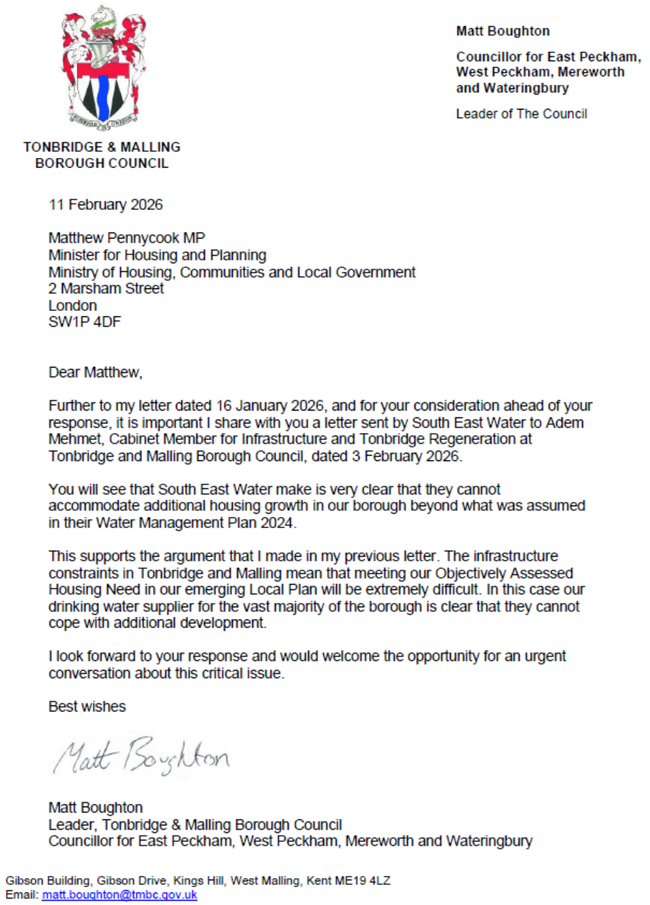
We have completed an assessment to compare your latest growth forecast figures (using your IDP datasets) against the forecast we used in our published WRMP24, please see the comparison below:

Source	Local Planning	2025	2026	2027	2028	2029	2030	2031	2032	2033
WRMP24	Tonbridge and Malling	901	554	382	399	330	295	272	252	252
LPA IDP	Tonbridge and Malling	1090	1090	1090	1090	1090	1090	1090	1090	1090
Percentage difference	*Tonbridge and Malling*	*20.98%*	*96.75%*	*185.34%*	*173.18%*	*230.30%*	*269.49%*	*300.74%*	*332.54%*	*332.54%*

Source	Local Planning	2034	2035	2036	2037	2038	2039	2040	2041	2042	Total
WRMP24	Tonbridge and Malling	252	252	322	298	298	298	298	320	343	**6,318**
LPA IDP	Tonbridge and Malling	1090	1090	1090	1090	1090	1090	1090	1090	1090	**19,620**
Percentage difference	*Tonbridge and Malling*	*332.54%*	*332.54%*	*238.51%*	*265.77%*	*265.77%*	*265.77%*	*265.77%*	*240.15%*	*217.88%*	***210.52%***

- Government sets the housing target for Tonbridge and Malling
- Water companies are required to produce Water Resources Management Plans (WRMPs).
- South East Water (SEW) maintain that increases to housing targets cause '*significant stress to our water supply system*'
- There is a significant discrepancy between the figures in SEWs WRMP and the housing target set by Government for TMBC.

What has the Council done since the last consultation?



TONBRIDGE & MALLING
BOROUGH COUNCIL

Matt Boughton

Councillor for East Peckham, West Peckham, Mereworth and Wateringbury

Leader of The Council

11 February 2026

Matthew Pennycook MP
Minister for Housing and Planning
Ministry of Housing, Communities and Local Government
2 Marsham Street
London
SW1P 4DF

Dear Matthew,

Further to my letter dated 16 January 2026, and for your consideration ahead of your response, it is important I share with you a letter sent by South East Water to Adem Mehmet, Cabinet Member for Infrastructure and Tonbridge Regeneration at Tonbridge and Malling Borough Council, dated 3 February 2026.

You will see that South East Water make is very clear that they cannot accommodate additional housing growth in our borough beyond what was assumed in their Water Management Plan 2024.

This supports the argument that I made in my previous letter. The infrastructure constraints in Tonbridge and Malling mean that meeting our Objectively Assessed Housing Need in our emerging Local Plan will be extremely difficult. In this case our drinking water supplier for the vast majority of the borough is clear that they cannot cope with additional development.

I look forward to your response and would welcome the opportunity for an urgent conversation about this critical issue.

Best wishes

Matt Boughton

Matt Boughton
Leader, Tonbridge & Malling Borough Council
Councillor for East Peckham, West Peckham, Mereworth and Wateringbury

Gibson Building, Gibson Drive, Kings Hill, West Malling, Kent ME19 4LZ
Email: matt.boughton@tmbc.gov.uk

- On 11 February 2026 we put the Government on notice that we have a statutory consultee response confirming they cannot supply water for the housing target the Government have imposed on TMBC
- Westminster Hall debate in Parliament - '*Water supply and housing targets in West Kent'* – 24 March 2026
- DEFRA/MHCLG 'Water Delivery Taskforce' – late April 2026
- An Interim Position Statement was put together for consideration with the Local Plan on 3 September 2026

What does the Interim Position Statement say?

Table 1 Comparison of WRMP24 to latest TMBC housing growth forecasts and SDB impact

	Completions (2021-22 to 2024-25)	Forecast			
		by 2029/30	by 2034/35	by 2039/40	by 2041/42
WRMP24 Growth Forecast	2,754	4,712	5,992	7,498	8,157
TMBC Latest Trajectory	2,138	10,025	17,201	22,066	22,896
Supply-Demand Balance impact (DYAA) Ml/d	*0.18*	*-1.71*	*-3.59*	*-4.66*	*-4.72*
Supply-Demand Balance impact (DYCP) Ml/d	*0.21*	*-1.92*	*-4.04*	*-5.25*	*-5.31*

- New boreholes at Saints Hill WTW. Likely 2027/28. Smaller upgrades at Lilleys Farm and Decoys Wood
- Bulk transfer from SES Water, and intra-SEW transfer from Butler WTW to 'Zone 6'
- 90/l/h/d water efficiency standard in new homes, rather than 110/l/h/d

- Despite this, there remains a shortfall. South East Water say they can supply an additional **317 homes a year**. The housing target is **1,117 homes a year**

So why do we have to go ahead?

- Section 27 of the Planning and Compulsory Purchase Act 2004 gives the Government the ability to ‘direct’ the Council to proceed with the Local Plan.
- **The Council will be arguing the Plan isn’t sound** because of water supply.
- We would welcome representations supporting the Councils position with regards to water supply.
- However, you are able to comment on all aspects of the Plan too.

What will happen during and after the Regulation 19 consultation?

- The Council is required to continue the Local Plan
- The Regulation 19 consultation will run for 6 weeks and will close on Sunday 25 October 2026.
- As responses are submitted, the Council is required to ‘box up’ the consultation material in the format required by the Planning Inspectorate – this includes materials being grouped by policy, chapter or issue and ensuring that all of the required information is included, such as names and contact details. This material must then be submitted before **31 December 2026**.
- The Council does not have any control over the timing of the subsequent Examination.

What can you do?

- Respond! www.tmbc.gov.uk/localplan
- Remember, this is not a general planning consultation. So as many responses as possible need to come through the website. You can upload documents to it.
- Stick to **legal compliance** and **soundness** arguments
- Indicate whether you wish to participate at the public inquiry
- Please mention water supply in your responses

Questions?

