Tonbridge and Malling Local Plan

Publication Stage Representation Form

Ref: (for official use only)

The Regulation 19 Local Plan consultation runs for six weeks from 11th September 2026 to 11.59pm on 26th October 2026. You can return this form to the Planning Policy Team at Tonbridge and Malling Borough Council, Gibson Building, Gibson Drive, Kings Hill, West Malling, Kent, ME19 4LZ. Alternatively, you can return the form by email to localplan@tmbc.gov.uk.

Data protection and confidentiality

We are required to publish and make publicly available all comments submitted in response to this consultation. As such, we are unable to accept anonymous representations or representations from individuals who do not wish for their comments to be made public. Please note that representations submitted to the Council cannot therefore be treated as confidential.

In accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012, all representations received during the Regulation 19 Publication consultation will be submitted to the Secretary of State. This requires the Council to make publicly available copies of all representations received, together with the name of the individual submitting the representation and, where applicable, the organisation they represent.

All other personal information, including postal addresses, email addresses and telephone numbers, will remain confidential and will not be published.

As responses will be published, respondents are asked to ensure that all representations are respectful and appropriate. Comments that are racist, derogatory, offensive or inflammatory in nature should not be submitted.

Information about how the Council processes personal data can be found in the Data protection policy https://www.tmbc.gov.uk/council/data-protection-policy Please also note that information held by public authorities is subject to the provisions of the Freedom of Information Act 2000 and the Environmental Information Regulations 2004. Information may be disclosed in response to a request where it is appropriate and lawful to do so.

Please provide your details below to confirm acceptance of our privacy notice

Name: Mike Taylor	
Signature: 	**Date: 3/10/2026**

This form has two parts:

Part A – Personal Details. This only needs to be completed once if you wish to make more than one representation and representations are returned together.

Part B – Your representation(s). Please fill in a separate Part B form for each matter you wish to make a representation on.

We have also published guidance to assist you in completing this form. This can be accessed via https://reg19tmbcconsult.commonplace.is where you can alternatively complete your representation(s). Completing your representation(s) via our consultation platform is our preferred way for you to take part in the consultation.

Part A - This needs to be completed once if more than one Part B responses are returned together

	1. Personal Details	2. Agent's Details (if applicable)
If an agent has been appointed by you, please complete only the Title, Name and Organisation (if applicable) in the boxes below (in Column 1), but complete the full contact details of the Agent in Column 2.		
Title	**Councillor**	**N/A**
First Name	**Mike**	
Last Name	**Taylor**	
Job Title (if relevant)	**Chairman Borough Green Town Council** **Cabinet Member for Planning TMBC**	
Organisation (if applicable)	**Borough Green Town Council** **Tonbridge & Malling BC**	
Address	**41 Maidstone Rd** **Borough Green** **Kent**	
Post Code	**TN15 8BQ**	
Telephone Number	**01732 882880**	
Email Address	**Mike.taylor@boroughgreen.gov.uk** **Mike. taylor@tmbc.gov.uk**	

Part B – Please use a separate Part B form for each representation

Ref: (for official use only)

1: To which **part** of the Local Plan does this representation relate to?

This is important as it will be assessed by the Planning Inspector against the stated policy/section/site allocation. Reminder: If you would like to comment on more than one matter in the Plan, please complete a separate Form B for each matter you wish to make a representation on. We appreciate this takes additional time, but the Inspector requires comments to be submitted in this format.

Paragraph (please tick)	✓	Policy		Policies Map	

Which Chapter or Annex does this representation relate to? (e.g Chapter 4)	Chapters 2 & 4
Which paragraph or Policy or aspect of the Policies Map would you like to make a representation on? (e.g Paragraph 4.1 or Policy CC1)	2.4 - 2.18 4.3 - 4.18
If your representation relates to a site allocation, please state which site. Please note you will need to make a representation for each site you wish to comment on. (e.g. Site AN1)	

2: Do you consider the Local Plan to be legally compliant? (Please tick)

Yes		No	✓	Unsure	

3: Please provide your comments here. Please also provide a summary of any attachments, such as supplementary evidence, submitted alongside your representation.

Comments attached below include my thoughts as Cabinet Member for Planning, followed by paragraph comments on Chapters 2 & 4.

Question 4: Do you consider the Local Plan to be sound? (Please tick)

Yes		No	✓	Unsure	

5: If you do not consider the Local Plan to be sound, please specify on what grounds (please select one option).

Positively Prepared		Consistent with National Policy	
Justified		Unsure how to answer	
Effective	✓		

6: Please provide your comments here. Please also provide a summary of any attachments, such as supplementary evidence, submitted alongside your representation.

7: Please set out any modification(s) you consider necessary to make the Local Plan to be legally compliant or sound as relevant to the matter you have identified above. Please state why the modification you suggest will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Plan Housing demand needs to be reduced from 20,106 to 7000, a quantity that would satisfy the real local need, plus some market housing to boost the Local Economy. A reduction could allow time for the Government to discover a bit of Common Sense to fund infrastructure improvements to the existing systems, before adding further unmanageable loads.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. This is because, after this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

8: If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)? (Please tick)

No, I do not wish to participate in the hearing session(s)	
Yes, I wish to participate in the hearing session(s)	✓

9: If you wish to participate in the hearing session(s), please outline why you consider this to be necessary?

We have no faith that Officers and developers will present the true situation.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. If you wish to participate in the hearing, please ensure that you have provided your telephone number in Form A.

Cabinet Member for Planning - Introduction

Most Local Plans will have a forward by the Cabinet Member, usually a piece of PR fluff with a picture and a signature. **This one does not, because I refuse to endorse the Plan**. 6000 to 7000 homes across the Borough, reaching every town and hamlet, would be a boon - providing Social and Affordable housing, and a measure of open market housing to stimulate the economy. 20,106 houses will destroy the Tonbridge & Malling we love and call home.

The Leader tasked me with getting the Plan through to the Reg 19 Consultation start. There were some 500 sites submitted, many of them in smaller villages and hamlets. I made the point to Members that the housing shortage wasn't confined to the urban areas, it was endemic - even the smallest hamlet needed some houses. I coined the phrase " A fair and equitable distribution". That concept, coupled with intense work by officers with Member Engagement sessions, meant that when the Reg 18 Consultation went to Full Council it was approved unanimously, an almost unheard of result.

But Officers wilfully ignored that, concentrating instead on massive housing allocations with none at all in rural areas. I believe Officers manipulated the evidence to bring these large sites forward. Sites such as Borough Green Gardens (BG1) are effectively undeliverable within the time frame of the Plan, but this area of Greenbelt countryside will be opened up to exploitation without any infrastructure benefit.

The Plan was deferred at Reg 19 because of concerns about water supply, foul drainage and highway congestion. But I believe many members, possibly even a majority, would have voted against it anyway. The Leader and I attended many Parish and Community meetings during both consultations, and we did not meet a single soul who supported the Government's Mass Housing Demand. Our job is to represent those people, and that Public Mandate should carry more weight than the demand from Government that is based on economic policy and not housing

need. If the Government really believes we need 1.5 million homes, they should first require Developers to act on the 1.5m extant permissions, before destroying irreplaceable Countryside.

CHAPTER 2 LOCAL PLAN POLICY CONTEXT

Para 2.4. Refers to the Kent Minerals and Waste Local Plan, yet the TMBC Local Plan virtually dismisses Mineral Safeguarding, in particular at BG1 59830 Soft Sand, and Ragstone reserves at Bradbourne in Ditton.

Para 2.9 refers to "*Sustainable development balancing various needs and interests, including Economic, Social and Environmental."*
But in reality the vast numbers demanded are driven by the economic needs of Government and Developers. And there is no social benefit in vast tracts of housing that ordinary people cannot afford, when that housing is destroying our environment with loss of farmland and habitat, our rivers destroyed by sewage pollution.
There are already 1.5 million extant permissions that could meet the Government's Housing Targets at a stroke, but they cannot make developers build them because they fear a collapse in house prices and loss of profit.

Para 2.12 says, *"growth that meets the needs of our area (including housing, employment, infrastructure and other uses)",*
But that completely ignores the simple fact that developers only need to mitigate the impact of the site being developed, not the existing infrastructure. That is why this plan will just use up our failing water resources, and add to the catastrophic state of our Traffic and Sewage infrastructure .

Para 2.18 "ensuring the Plan contributes to sustainable development. "
These very earnest words ignore the truth, people will use their cars to drive to work and the shops, even if it is less than 800m. And too many sites have a corner that is just within 800m to the station, but the rest of the site could be kilometres from that point, but the entire site is deemed "sustainable". And apart from mild tinkering with a cycle lane, the Local Plan cannot provide the sustainable infrastructure we need - reliable bus services, continuous and safe cycle and walking routes, and interventions to ensure people can live near their work, or schools, or shops, or doctors.

Chapter 4 "OUR VISION"

Para 4.3 talks about the settlement hierarchy - a completely false picture used by Planners and Developers to promote large developments that are easy to plan and more profitable to build. But the housing shortage is not confined to urban areas - every hamlet and village needs some housing. Tiny places like Shipbourne could benefit from 10, Plaxtol 20, Ightham 50-60, Borough Green 3-400. But these vast developments will swamp rural communities - BG1 will turn the tint group of villages at BG, Ightham, Platt and Wrotham into a vast urban sprawl rivalling Tonbridge in size. Planning Officers ignored a clear instruction by Members at Reg 18 to develop a "Fair and Equitable Distribution across the Borough" - they ignored us.

Para 4.4 says " *Growth will be infrastructure-led, with new development aligned to the timely provision of transport, education, health, utilities and digital infrastructure.* " No it will not, these infrastructure provisions are outwith the control of the Local Plan, and providers will deliver in their timeframe, and they are already decades behind provision for current levels of housing.

Para 4.6 & 4.7 say, " *reinforcing the borough's distinctive landscapes.* " but this is untrue, the level of building planned abutting National Landscapes, and the renaming of significant areas of Greenbelt as grey will not reinforce, it will destroy the borough's distinctive landscapes, the Holmesdale and Medway Valleys a case in point. The levels of mass development proposed will not safeguard the " intrinsic value of the countryside"

Para 4.9 says "*Smaller villages will have experienced proportionate carefully managed growth*". That is completely misleading. Whilst it is true policies like sustainability, NDNL and Greenbelt have save some small villages like Plaxtol, Stansted, Ryarsh and Wateringbury, village like Borough Green, Platt, Ightham, Wrotham, Eccles and Aylesford will have eye-watering volumes of development, that will destroy their rural village life forever.

Borough Green readily accepts the desperate need for housing - our own children have to leave the villages and seek cheaper sub-standard homes in Medway and Maidstone, but any housing delivered locally is sold on the open market to "internal migration" at prices local people cannot afford.

Para 4.10 says " *protecting important agricultural land* " whilst happily condemning swathes of good agricultural land to development. It is true agricultural land is graded, but the grading assumes that anything less than grade one can be sacrificed. Clearly written by a city dweller - all agricultural land is useful whatever its grade - yes vegetable production needs high quality land, but the lower grades provide animal grazing and less demanding cropping, it is not just worthless.

Para 4.14 says "*Development in these locations will make the best use of previously developed land wherever possible and will be supported by the infrastructure necessary to sustain growth*". In BG1 59830 there is no "previously developed land", it is all sandpits, landfills and quarries that have restoration conditions to return them to their previous agricultural use. And planners have been busy for years trying to undermine the infrastructure delivery here, by trying to allow developers to build the houses with the Relief Road, and by planning the sewage system to feed into the evidenced collapsing local sewer system.

Para 4.16 says *"The borough's rural areas will retain their distinctive character and landscapes, with development carefully managed to protect their setting and function"*. Mass housing will destroy our character and landscapes, and we will lose irreplaceable acres of food growing agricultural land, leading to even worse supply problems, and an increase in energy costs shipping imported food.

Para 4.18 says "*Growth will be infrastructure led*" . This sounds great as a principle, but the reality is the Local Plan cannot deal with the collapsing infrastructure we have now, only with the specific impact of individual developments. Developers will also strive to hold back infrastructure provision until the very last minute to save costs and increase profits.

Figure 4.1 is a very pretty table that is completely contradictory. (see all above)