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information, including postal addresses, email addresses and telephone numbers, will remain confidential and will not be published.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: 28/02/2026**

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.
The Planning Inspectorate have also released a guidance note on how to complete the form.
https://www.gov.uk/government/publications/model-representation-form-for-local-plans/model-representation-letter-for-local-plans
Late representations
Representations received after the consultation deadline will be recorded as late representations. The Council is not obliged to treat these as duly made representations. However, late representations will be retained and forwarded

to the Secretary of State as part of the submission documentation, clearly identifying them as having been received after the consultation period closed. The weight to be given to late representations is a matter for the appointed Planning Inspector.

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)
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	
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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 | Chapter 7

representation relate to? (e.g Chapter 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)	Policy NE2 paras 7.2 ++
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)	BG1 59830

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.

I believe there are serious inconsistencies in the application of the National Landscape policies and constraints in the manner they have been applied to BG1.
I have attached a report below that sets out these inconsistencies, and have also included anomalies where open countryside on various sites is being afforded better protections from development impact than BG1 provides for the NDNL.

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.

See above

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.

It is crucial that the protections afforded to National Landscapes across the Local Plan are applied to BG1, and clearly acknowledge the harm this development will do by developing within the NDNL, and the harm to its setting

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?

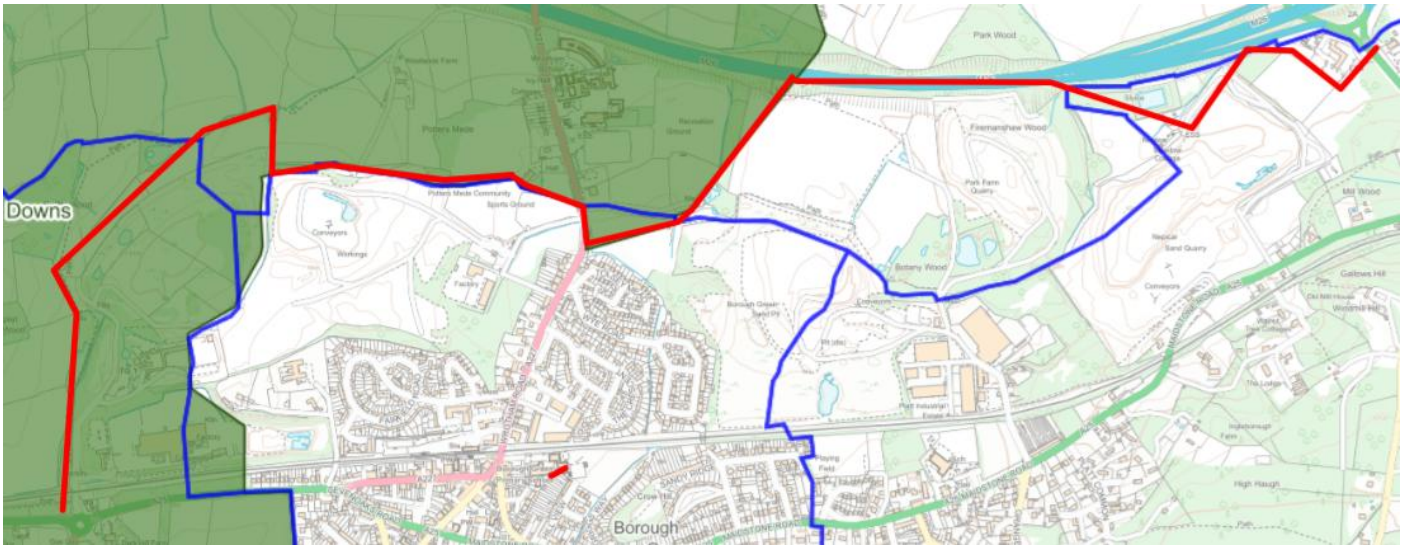
I cannot be sure that the Officers and their Counsel will present the best case to protect the NDNL at BG1 59830

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.

Report attached below

NORTH DOWNS NATIONAL LANDSCAPE - INCONSISTENCIES

I have extreme concerns about the consistency of the application of the constraints required to develop in or near areas of National Landscapes, in particular relating to BG1 Land North of Borough Green.
Of the 3km northern boundary of the site 2km is within or abutting the North Downs National Landscape.



It is of extreme concern that the only reference in 14.42 to NDNL protection is specifically land at Ightham Sandpit, wholly within the NDNL and not included in the housing proposal. Apart from the boundary line, there are two intrusions of NDNL into the allocation, north of the Horsefield, and northwest of the open fields above BG Sandpit. If these two areas within the allocation were afforded the protection National Landscapes are given elsewhere in the Borough, with 800 metre buffers and planting it cuts the site into two unconnected parcels, and renders the entire site and its proposed Relief Road undeliverable.

BG1 Allocation

14.42 The west of the allocation site, as shown in the green hatching on the policy map and **specifically land at Ightham Sandpit,** excluding any proposed access/new road, is to be safeguarded for natural and amenity green space to preserve the National Landscape. Any use or development **within this part of the site** must accord with the requirements of the Kent Downs Management Plan, and any associated guidance, to improve the quality of the land and demonstrate how the overall development can demonstrate conserving and enhancing the National Landscape in line with the duty.

This failing is particularly noticeable when compared with other allocated sites, where buffer zones and planting are mandated to protect the setting of National Landscapes, both North Downs and High Weald. The NDNL assessment for BG1 59830 is inconsistent with the approach noted below for Sites SN1, TO2, EC2, AY2, AY3, SN2, WO1 WR1 and E5, where strong protections and buffers are demanded.

There is even a glaring inconsistency between 14.42 above, and the Land Availability Assessment (below) that says "*The site is partially within the Kent Downs National Landscape and where the setting would be affected.* "

It is also worthy of note that protections requested for sites HP2, HP4, HI1, KH2, TO3, WO1, E1(SN2), & E5 require the inclusion of a strong, permanent and defensible landscape boundary and buffer between built form and the open countryside to the north of the allocation to avoid abrupt or exposed urban edges.

Whilst laudable in the sense of protecting the Countryside, countryside at these allocations is being afforded stronger protections than the North Downs National Landscape north of Borough Green.

SN1 Snodland Holborough

This assessment concluded that development in the southern and western areas would significantly harm levels of tranquillity and remoteness, with adverse effects extending into the Kent Downs National Landscape. In response, the allocation has been limited to the eastern part of the site, closer to the existing built-up area of

Snodland, with a substantial green buffer retained to the west to protect landscape character and the setting of the National Landscape. apx 250m

14.54 …..incorporate a landscape led approach to design, ensuring the site respects its location within and the setting of the Kent Downs National Landscape.

TO2 South Tonbridge adjacent High Weald NDNL. built development and A21 embankment blocking view



14.79…a significant change to the landscape character of the site, subject to a well-considered scheme including appropriate set-backs and strategic buffer landscaping, and careful assessment and appropriate responses to that analysis of the views from the National Landscape, there is some potential in landscape character terms for development without undue harm to the landscape character of the surrounds.
14.82.. Given the site's sensitive location, particularly in relation to the setting of the High Weald National Landscape, landscape and visual impacts are a key consideration and will inform the form and layout of development at the site.

EC1 Hale Place Eccles Development proposals will need to minimise effects upon the setting of the Kent Downs National Landscape by locating development in the southernmost part of the site and by introducing a significant amount of strategic buffer planting. 265m buffer zone and planting

AY2 North of Pratling Street Development proposals will be landscape-led design and effective landscape integration, including consideration of layout, scale, and density to preserve the setting of the nearby Kent Downs National Landscape.

AY3 east of Pratling St Development proposals will be landscape-led design and effective landscape integration, including consideration of layout, scale, and density to preserve the setting of the nearby Kent Downs National Landscape.

SN2 Hays site. 2 small points east boundary 50m ish from NDNL boundary. The site lies within the setting of the North Downs National Landscape. However, the assessment confirms that medium scale employment typology could be accomodated in the southern part of the site provided adequate mitigation measures are implemented.

WO1 Wouldham allotments reduced size site…… Development proposals shall concentrate built form and development to the western part of the site, along the settlement edge, subject to mitigation, and provide strategic planting along the northern and eastern edges to preserve the setting of the Kent Downs National Landscape.

Inclusion of a strong, permanent and defensible landscape boundary and buffer between built form and the open countryside to the north, east and south of the allocation to avoid abrupt or exposed urban edges.

WR1 Howlands Wrotham Development proposals shall provide strategic planting along the western boundary to integrate the development into the landscape, minimise visual impacts and preserve the setting of the Kent Downs National Landscape. Howlands is actually within the NDNL

Inclusion of a strong, permanent and defensible landscape boundary and buffer between built form and the open countryside to the west of the allocation to avoid abrupt or exposed urban edges.

E5 Little Postern Development proposals will be landscape-led design and effective landscape integration, setbacks, strategic buffer planting, sensitive access arrangements, consideration of layout, scale, and density to preserve the setting of the nearby High Weald National Landscape.

Inclusion of a strong, permanent and defensible landscape boundary and buffer between built form and the open countryside to the east of the allocation to avoid abrupt or exposed urban edges.

LAA extract BG1 59830

The site stretches from the A20 in the east to the Dark Hill roundabout in the south west crossing over the A227 Wrotham Road. It comprises of a series of former [now landfill] and operational quarries, together with a mixture of agricultural land and farm buildings, woodland and hedgerows.

The typography is undulating and gently rises to the north. Located to the north is the M26 motorway and Wrotham village, to the south are the built environments of Borough Green and Platt with the railway line

running in an east-west direction, to the west is open countryside with the Celcon factory in the south west corner and to the east is open countryside and the built environment of Wrotham Heath.

The site is located to the north of Borough Green and Platt, on the edge of the settlements the site is considered to be a relatively sustainable location and is considered to have very good accessibility being in close proximity to a range of public services and facilities.

The site is partially within the Kent Downs National Landscape and where the setting would be affected.

The site is within the Green Belt, with the functioning of this land varying across the site.

There are some small parcels that are agricultural land, whereby two small parcels within the eastern section are grade 1, A small parcel upon the far west boundary is grade 2 and a parcel up in the NE corner is grade 3a. Given the locations within old and current quarries, these areas of former agricultural land are unlikely to be used now for modern farming.

The site is also within a mineral safeguarding area for silica sand and sub alluvial river terrace deposits. The presence of the active minerals working will mean that a minerals assessment will be required, and potential extraction of the mineral is likely to be required prior to the commencement of any future development to prevent sterilisation.

Concerning ecology and trees, there are two areas of ancient woodland within the approximate centre of the site as well as various pockets of priority habitat and numerous areas of group tree preservation orders.

Concerning flood risk, the site is at risk from several sources. A small area in the far south west is in indicative flood zone 3b as well as flood zone 2 and 3a. The whole southern half is in an area of high risk ground water flood risk and the majority of the area is at high risk of surface water flooding.

With regard to heritage, there are no assets within the site but there is a small group of listed buildings in the Northeast corner adjacent to the site (Nepicar House). The site is also partly within an area of archaeological potential in the western half. This will all need a heritage assessment to consider the setting of the listed buildings and the potential presence of archaeology.

Given the proximity to the M26 to the north, the railway to the south and current quarrying operations, there is likely to be issues surrounding noise and amenities.

There is some land within the site which is used for landfill and due to the potential for contamination further assessment will be required.

For access, various locations are available. Vehicular access can be achieved off the A20 to the east, locations off the A25 to the south, sections of the A227 and the road serving the Dark Hill roundabout in the south west corner.

Overall, it is considered that the site would be suitable for development subject to the developable area taking into considerations the constraints of the site with regard to Green Belt, National Landscape, noise, protected trees and ancient woodland, the safeguarded mineral deposits and flood risk.