Every Response

CONSULTATION ANALYSIS · SAMPLE

Draft Local Plan: spatial strategy

Tonbridge and Malling Borough Council · Analysis of the published responses to Question 4 (Policy SP1)

620	620	16	0.85
responses reported by the council	published comments read and coded	quotes checked word for word	agreement on a blind second coding (0.81 and above is almost perfect)

The consultation on one page	AT A GLANCE
What respondents said	SUMMARY
What was asked, when and how	ABOUT
Do you agree with Policy SP1 Spatial Strategy?	QUESTION 4
You said: the issues to respond to	FEEDING BACK
Questions residents asked, and claims to address	FOR THE RESPONSE
Schedule of main issues	FOR YOUR CONSULTATION STATEMENT
What this analysis can and cannot tell you	READING THIS REPORT
How this analysis was done	METHOD
Quality and data protection	ASSURANCE
Terms used in this report	GLOSSARY
Coding frame and audit trail	APPENDICES

An independent sample. Every Response prepared this analysis from the council's published spreadsheet of responses to Question 4, "Do you agree with Policy SP1 Spatial Strategy?", which Tonbridge and Malling Borough Council has published. It was not commissioned by the council and we have no connection with it. Regulation 18 consultation, 10 November 2025 to 2 January 2026. Analysis produced 29 September 2026.

AT A GLANCE

The consultation on one page

620
responses published for Question 4

74%
of those taking a position object to the strategy

335
copies of one template letter, reported as one organised campaign

61%
say infrastructure must come first

Overall position



- Supports the spatial strategy: **10%** (60)
- Supports in principle but asks for changes: **10%** (58)
- Objects to the spatial strategy: **74%** (430)
- Comments without a clear position: **5%** (31)

Who responded

Individuals	521
Developers, landowners and agents	73
Parish and town councils	11
Councils and public bodies	10
Community and other groups	5

Most raised

Too much growth in particular places	65%
Brownfield first has not been tested or prioritised	62%
Infrastructure must come first (roads, GPs, schools, water, trains)	61%
A new standalone settlement should have been considered	60%
Housing numbers are too high or imposed from above	52%

> *There are not good enough provisions existing for transport, health and other infrastructure. These need radical overhauls before developing the spatial strategy.*
>
> T608

SUMMARY

What respondents said

Most responses object, and most of those come from one campaign. 430 of the 579 responses that took a position (74%) object to the strategy. 335 of the 620 responses are copies of a single template letter, with at least 16 more in reworded form.

Infrastructure is the dominant concern. 353 responses (61%) say roads, GP surgeries, schools, water or trains must be sorted before, or alongside, new homes.

Residents feel growth is concentrated in a few places. 379 responses object to how much growth falls on particular places: Tonbridge above all, and also Borough Green, Kings Hill, Hildenborough and Snodland.

Two questions for the consultation statement recur. 349 responses say a standalone new settlement should have been tested, and 358 say "brownfield first" was not properly tested.

Developers largely support the strategy but want more homes. Of 73 responses from developers, landowners and agents, 62 support it in whole or in part. Their main asks are a bigger buffer (14 responses), less reliance on large strategic sites (12) and 31 named sites for allocation.

The Green Belt divides respondents. 46 responses ask for the Green Belt to be protected or oppose "grey belt" release, while 44 agree that exceptional circumstances justify release.

Specific places need specific answers. 30 responses object to named sites (including Land north of Offham Road, the Holborough and East Peckham allocations and E8), 11 say a settlement's tier is wrong (mostly Wouldham), and 10 raise flood risk, led by East Peckham.

Points to consider in the council's response

- Report the template letter as one organised campaign alongside its number of copies, so that its weight is clear without discounting it.
- Explain in the consultation statement why a standalone new settlement was not taken forward. The Spatial Strategy Topic Paper already gives the reason, and restating it would answer the largest single request.
- Set out how brownfield sites from the Call for Sites were assessed and why some were ruled out as unavailable, since this was raised in most responses.
- Publish infrastructure delivery evidence for Tonbridge, Borough Green, Kings Hill and Hildenborough, where concern about roads, GP surgeries and schools concentrates.
- Check the specific factual points raised: the tier given to Wouldham, the parish label for site MG4, and the consistency of the Level 1 and Level 2 flood data for East Peckham.
- For the development industry's points, set out the housing trajectory and the buffer the council intends to plan for at Regulation 19.

ABOUT THIS CONSULTATION

What was asked, when and how

Consulted on	Policy SP1, the spatial strategy in the draft Local Plan: how much growth is planned and where it would go.
When	Regulation 18 consultation, 10 November 2025 to 2 January 2026
Question analysed	Question 4: “Do you agree with Policy SP1 Spatial Strategy?”
Responses	620 responses: 521 from individuals and 99 from developers, parish and town councils, public bodies and groups.
Promotion and channels	Responses were made to the council’s Regulation 18 consultation, and the council published them as a spreadsheet.

This is an independent sample, so it does not cover how the consultation was promoted. In a commissioned report, this section also sets out promotion, events and response channels, using information from the council.

WHO RESPONDED

Positions by type of respondent

Organisation names are as published by the council. Individuals are not named in the published data.

RESPONDENT TYPE	RESPONSES	SUPPORT	SUPPORT WITH CHANGES	OBJECT	NO CLEAR POSITION
Individuals	521	19	26	415	26
Developers, landowners and agents	73	35	27	5	2
Parish and town councils	11	1	2	5	2
Councils and public bodies	10	4	3	1	1
Community and other groups	5	1	0	4	0

Responses that were blank or referred only to a separate document have no position, so rows can add up to less than the total.

QUESTION 4

Do you agree with Policy SP1 Spatial Strategy?

620 responses were published for this question. 41 were blank or referred only to a separate document. Individuals wrote 521 of the responses; the rest came from developers and their agents, parish and town councils, public bodies and groups.

Overall position

POSITION	RESPONSES	SHARE
Supports the spatial strategy	60	10%
Supports in principle but asks for changes	58	10%
Objects to the spatial strategy	430	74%
Comments without a clear position	31	5%

Share is of the 579 responses that took a position. 41 were blank or referred only to a separate document.

Issues raised

THEME	COMMENTS	SHARE
Too much growth in particular places	379	65%
Brownfield first has not been tested or prioritised	358	62%
Infrastructure must come first (roads, GPs, schools, water, trains)	353	61%
A new standalone settlement should have been considered	349	60%
Housing numbers are too high or imposed from above	299	52%
Environment, farmland, wildlife and heritage	47	8%
Protect the Green Belt; oppose grey belt release	46	8%
Green Belt release is justified by exceptional circumstances	44	8%
Evidence or site assessments questioned	40	7%
Promotes a specific site for allocation	31	5%
Objects to a specific site (or welcomes its exclusion)	30	5%
Neighbouring authorities and unmet need	24	4%
Allow some development in the National Landscape	20	3%
Delivery risk: buffer, five-year supply, windfall	18	3%
Keep green gaps so settlements do not merge	16	3%
Plan for more homes or a bigger buffer	14	2%
Over-reliance on large strategic sites	12	2%

THEME	COMMENTS	SHARE
Settlement hierarchy is wrong for a named place	11	2%
Employment land and the economy	11	2%
Flood risk	10	2%
Focus growth near railway stations	9	2%
Affordable and social housing	9	2%
Other points	9	2%
The consultation process (timing, website, length)	8	1%
Allow proportionate growth in smaller villages	8	1%
Protect the National Landscape	7	1%
Adopt the plan quickly to stop speculative applications	7	1%
Climate change	6	1%
Policy wording is vague or needs changing	5	1%
Transport modelling and mitigation	4	1%
Prefers large sites that bring their own facilities	4	1%
Remove the Local Green Gap policy	3	1%
Density (too low, or too cramped)	3	1%

Share is of the 579 responses with content (41 were blank or referred only to a separate document). A comment can raise several themes, so shares add up to more than 100%.

In their words

Too much growth in particular places

379 COMMENTS

> *… I want to highlight my objections to the wider impacts of the spatial strategy given the scale of the proposed developments in Tonbridge and the surrounding catchment area of the town. …*
>
> T074 · template letter sent 335 times

Infrastructure must come first (roads, GPs, schools, water, trains) 353 COMMENTS

> *There are not good enough provisions existing for transport, health and other infrastructure. These need radical overhauls before developing the spatial strategy.*
>
> T608

> *… Any new housing and building development projects should be infrastructure driven. …*
>
> T098

A new standalone settlement should have been considered 349 COMMENTS

> *… A serious omission was not to consider the option of a wholly new, separated, large settlement. …*
>
> T074 · template letter sent 335 times

Housing numbers are too high or imposed from above 299 COMMENTS

> *… We believe that this number is unrealistic and undeliverable and does not reflect the property market in the area. …*
>
> T105 · Ightham Parish Council

Protect the Green Belt; oppose grey belt release

46 COMMENTS

> *I think the green belt should be protected at all costs…no exceptions.*
>
> T435

Green Belt release is justified by exceptional circumstances 44 COMMENTS

> *… It is clear that housing needs cannot be met in full using sites outside of the Green Belt …*
>
> T026 · Home Builders Federation

Objects to a specific site (or welcomes its exclusion) 30 COMMENTS

> *There are serious concerns with release of green belt around East Peckham (EP2 and HS1) which will impact Turtle Dove and Nightingale, and affect biodiverse habitat and LNRS Priority Species. …*
>
> T507 · The RSPB

Keep green gaps so settlements do not merge

16 COMMENTS

> *Strongly support the implementation of "green gaps" to maintain the individuality and character of our settlements and in order to manage development. …*
>
> T305

Plan for more homes or a bigger buffer

14 COMMENTS

> *… While this is marginally above the identified need, a headroom of just 30 homes is immaterial. …*
>
> T008 · Tregothnan Estates

Over-reliance on large strategic sites 12 COMMENTS

> *… Whilst we understand the benefits of delivering at scale, the delivery of new settlements and urban extensions is complex. They do not deliver housing quickly and present real risks to the delivery of housing over the plan period …*
>
> T047 · DHA Planning on behalf of Wedgewood Homes

Settlement hierarchy is wrong for a named place

11 COMMENTS

> *… Wouldham should be Tier 5 not tier 3, because Wouldham Village has no services. …*
>
> T475

Flood risk 10 COMMENTS

> *… East Peckham currently experiences the worst flooding of all the Parishes in the Borough. …*
>
> T348

Focus growth near railway stations 9 COMMENTS

> *… Settlements which benefit from railway stations in addition to retaining a good level of shops, services and facilities offer greatest potential to reduce the reliance on private car travel and so should be afforded priority in terms of site allocations …*
>
> T513 · Cooper Estates Strategic Land Limited

The consultation process (timing, website, length)

8 COMMENTS

> *… Publishing so close to Christmas when everyone is otherwise engaged and structuring it in such a way that it takes literally days and days to go through the documents never mind finding where to make your comments, could be perceived as counterintuitive to the stated aims of the process. …*
>
> T080

Adopt the plan quickly to stop speculative applications 7 COMMENTS

> *… I would encourage TMBC to adopt this plan quickly to prevent more planning applications in situations that are not appropriate. …*
>
> T473

Protect the National Landscape 7 COMMENTS

> *No housing development in National Landscape.Need to secure biodiversity and nature conservation. Green Belt within National Landscape cannot be classified as 'grey belt'. Footnote 7 NPPF.*
>
> T372

FEEDING BACK

You said: the issues to respond to

The most raised issues, as a starting point for the council's “you said, we did” feedback. Add the council's response in the last column before publishing.

YOU SAID	RESPONSES	THE COUNCIL'S RESPONSE
Too much growth in particular places	379	*To complete*
Brownfield first has not been tested or prioritised	358	*To complete*
Infrastructure must come first (roads, GPs, schools, water, trains)	353	*To complete*
A new standalone settlement should have been considered	349	*To complete*
Housing numbers are too high or imposed from above	299	*To complete*
Environment, farmland, wildlife and heritage	47	*To complete*
Protect the Green Belt; oppose grey belt release	46	*To complete*
Green Belt release is justified by exceptional circumstances	44	*To complete*

FOR THE RESPONSE

Questions residents asked, and claims to address

Consultation responses often contain direct questions and factual claims. Answering the first and correcting the second, where needed, shows respondents their comments were read.

Questions residents asked the council

QUESTION	COMMENT
Has an impact study been done on 3,000 new homes at Borough Green, and will more trains be provided?	T316
Why is Borough Green planned for proportionally more housing than Tonbridge?	T618
How can Phase 2 of Borough Green Gardens be "absolutely necessary and justified"?	T379
What counts as "exceptional circumstances" for Green Belt release?	T386
Why do the climate study rainfall figures sit below historic events that flooded East Peckham?	T132
Why is Borough Green missing from the settlements whose identity the plan will protect?	T512

Claims you may want to address

CLAIM AS MADE BY THE RESPONDENT	COMMENT
Site MG4 is labelled as Aylesford parish but is in Ditton parish	T112
Network Rail's Strategic Station Plan for Tonbridge is missing from the evidence base	T086
Wouldham is Tier 3 in the hierarchy but has no services (also T477, T515, T552, T554, T555, T564)	T475
Level 2 flood data published mid-consultation is inconsistent with Level 1 (also T132)	T348
Development across the Sevenoaks boundary has not been taken into account	T618

Handling notes

- **Template objection:** 335 responses (54% of all responses) are copies of one template letter objecting to the scale of growth around Tonbridge, the absence of a new-settlement option and the handling of brownfield land. A further 16 use a longer or reworded version (for example T092, T167, T350, T430). All are counted individually in the themes, and the council can also report them as one organised campaign
- **Repeat submissions by agents:** Several planning agents submitted the same text more than once for the same client (for example DHA Planning for Fernham Homes: T001, T007, T019, T024; for Wedgewood Homes: T038, T041, T047, T049). Each submission is counted; the council may prefer to count each client once
- **Not quoted:** T044, T485, T503, T506. These comments were read and counted in the themes but are not quoted, because they contain offensive language, unfounded claims or remarks that could be read as targeting a community.
- **“No” and “None”:** 41 in Question 4. Counted, but excluded from the percentage shares.

FOR YOUR CONSULTATION STATEMENT

Schedule of main issues

The main issues raised about Policy SP1 (spatial strategy), in the layout the Planning Advisory Service recommends for the consultation statement that goes to the Inspector with the plan: the issue, how many raised it, who raised it, and columns for the council's response and any change to the plan.

REGULATION 22(1)(C) ASKS FOR	WHERE TO FIND IT
(iii) A summary of the main issues raised	"What respondents said" and the schedule below
(iv) How the representations have been taken into account	The council response and action columns below, for the council to complete
(v) At Regulation 19: the number of representations and a summary of the main issues	The counts and the schedule below. At Regulation 19, each issue is also tagged to the tests of soundness
(i) and (ii) Who was invited to comment, and how	The council's own consultation records: not covered by this analysis

MAIN ISSUE RAISED	COMMENTS	REPRESENTATIONS FROM	COUNCIL RESPONSE	ACTION
Too much growth in particular places	379	Kings Hill Parish Council (T127); Save Higham Wood Group (T069); Snodland Town Council (T116); 376 individuals, 329 of them using the template letter	*To complete*	*To complete*
Brownfield first has not been tested or prioritised	358	DHA behalf of Gallagher Group (T033); DHA Planning OBO Leander holdings (T059); Kings Hill Parish Council (T127); Quod on behalf of Royal British Veterans Enterprise (T052); Save Capel (T020); Save Higham Wood Group (T069); Sponden Estates obo Espalier Property Projects 009 Ltd. (T058, T063); Tunbridge Wells Borough Council (T003); 349 individuals, 319 of them using the template letter	*To complete*	*To complete*
Infrastructure must come first (roads, GPs, schools, water, trains)	353	Ditton Parish Council (T112); East Peckham Parish Council (EPPC) (T132); Ightham Parish Council (T105); Kings Hill Parish Council (T127); Member of Parliament for Chatham & Aylesford (T502); NHS Kent and Medway Integrated Care Board (T441); Ryarsh Parish Council (T106); Save Capel (T020); Teston Parish Council (T107); 344 individuals, 277 of them using the template letter	*To complete*	*To complete*
A new standalone settlement should have been considered	349	Save Capel (T020); Save Higham Wood Group (T069); 347 individuals, 329 of them using the template letter	*To complete*	*To complete*

MAIN ISSUE RAISED	COMMENTS	REPRESENTATIONS FROM	COUNCIL RESPONSE	ACTION
Housing numbers are too high or imposed from above	299	Ightham Parish Council (T105); Member of Parliament for Chatham & Aylesford (T502); Save Capel (T020); 296 individuals, 276 of them using the template letter	*To complete*	*To complete*
Environment, farmland, wildlife and heritage	47	East Peckham Parish Council (EPPC) (T132); Kings Hill Parish Council (T127); Member of Parliament for Chatham & Aylesford (T502); Natural England (T027, T082); The RSPB (T507); 41 individuals	*To complete*	*To complete*
Protect the Green Belt; oppose grey belt release	46	East Peckham Parish Council (EPPC) (T132); Member of Parliament for Chatham & Aylesford (T502); Nexus planning on behalf of Ramac Holdings Ltd (T061); The RSPB (T507); 42 individuals	*To complete*	*To complete*
Green Belt release is justified by exceptional circumstances	44	APC (T538); Boyer Planning obo Croudace Homes Ltd (T032); Carter Jonas LLP obo *client* (T031); David Lock Associates, for Hallam Land (T055, T067); DHA - West Malling Golf Club (T006); DHA behalf of Gallagher Group (T033); DHA on behalf of our client Mirambeau Properties (T039); DHA Planning OBO *client* (T045); DHA Planning obo *client* and Wrenbridge Land Limited (T056); DHA Planning obo *client*, and Wrenbridge Land Limited (T060); DHA Planning OBO Bellway Homes Ltd (T035); DHA Planning obo Fernham Homes Operations Ltd (T001, T007, T019, T024, T054, T057, T130); DHA Planning OBO Leander holdings (T042, T059); DHA Planning on behalf of Wedgewood Homes (T034, T038, T041, T047, T049, T051, T062, T065); Elivia Homes (T510); Gladman Jones (T050); Henry Adams LLP (T490); Home Builders Federation (T026); LRM Planning OBO Hallam Land (T030); Marrons OBO CALA HOMES SOUTHERN COUNTIES (T046); Roebuck Land and Planning Ltd (T295, T297); Tregothnan Estates (T008, T418); Turley obo Taylor Wimpey Strategic (T040, T048); Vistry (T072, T402); 1 individual	*To complete*	*To complete*

MAIN ISSUE RAISED	COMMENTS	REPRESENTATIONS FROM	COUNCIL RESPONSE	ACTION
Evidence or site assessments questioned	40	Barrat David Wilson Homes (T002); Boyer obo Barratt David Wilson Homes - Kent (T012); Boyer Planning obo Vistry Strategic (T018, T330); DHA Planning obo Kent County Council (T028); Ditton Parish Council (T112); East Peckham Parish Council (EPPC) (T132); Elivia Homes (T510); Kings Hill Parish Council (T127); Network Rail Property (Southern) (T086); Redrow Homes Ltd (T131); Roebuck Land and Planning Ltd (T295, T297); Save Capel (T020); Stantec UK LTD OBO Trenport Investments Ltd (T036); Tregothnan Estates (T008, T418); 23 individuals, 4 of them using the template letter	*To complete*	*To complete*
Promotes a specific site for allocation	31	Boyer Planning obo Croudace Homes Ltd (T032); Boyer Planning obo Vistry Strategic (T018, T330); Carter Jonas LLP obo *client* (T031); Carter Jonas on behalf of Berkeley Strategic Land Limited (T010); Cooper Estates Strategic Land Limited (T513); DHA Planning OBO Bellway Homes Ltd (T035); DHA Planning OBO Leander holdings (T042, T059); DHA Planning on behalf of Bellway Homes (T021); DHA Planning on behalf of Wedgewood Homes (T034, T038, T041, T047, T049, T065); Gladman Jones (T050); Henry Adams LLP (T490); Marrons OBO CALA HOMES SOUTHERN COUNTIES (T046); Nexus planning on behalf of Ramac Holdings Ltd (T061); Quod on behalf of Royal British Veterans Enterprise (T052); Roebuck Land and Planning Ltd (T295, T297); Sponden Estates obo Espalier Property Projects 009 Ltd. (T058, T063); Stantec UK LTD OBO Trenport Investments Ltd (T036, T043); Trenport Investments Limited (T417); Twenty5 Planning (T073); Vistry (T072, T402)	*To complete*	*To complete*
Objects to a specific site (or welcomes its exclusion)	30	Ditton Parish Council (T112); East Peckham Parish Council (EPPC) (T132); Snodland Town Council (T116); Teston Parish Council (T107); The RSPB (T507); 25 individuals, 3 of them using the template letter	*To complete*	*To complete*
Neighbouring authorities and unmet need	24	Boyer Planning obo Vistry Strategic (T018, T330); Cooper Estates Strategic	*To complete*	*To complete*

MAIN ISSUE RAISED	COMMENTS	REPRESENTATIONS FROM	COUNCIL RESPONSE	ACTION
		Land Limited (T513); East Peckham Parish Council (EPPC) (T132); Elivia Homes (T510); Redrow Homes Ltd (T131); Save Capel (T020); Sevenoaks District Council (T442); Teston Parish Council (T107); Tregothnan Estates (T008, T418); Vistry (T072); 12 individuals		
Allow some development in the National Landscape	20	DHA - West Malling Golf Club (T006); DHA Planning OBO *client* (T045); DHA Planning obo Fernham Homes Operations Ltd (T001, T007, T019, T024, T054, T057, T130); DHA Planning OBO Leander holdings (T042, T059); DHA Planning on behalf of Wedgewood Homes (T034, T038, T041, T047, T049, T051, T062, T065); Vistry (T072)	*To complete*	*To complete*
Delivery risk: buffer, five-year supply, windfall	18	Cooper Estates Strategic Land Limited (T513); David Lock Associates, for Hallam Land (T055, T067); DHA Planning obo Fernham Homes Operations Ltd (T130); DHA Planning OBO Leander holdings (T042); DHA Planning on behalf of Wedgewood Homes (T047, T049, T065); Elivia Homes (T510); Ightham Parish Council (T105); Quod on behalf of Royal British Veterans Enterprise (T052); Roebuck Land and Planning Ltd (T295, T297); Savills on behalf of the East Malling Trust (T053); Sevenoaks District Council (T442); Terance Butler Holdings obo Aylesford Heritage Limited (T025); Tregothnan Estates (T008, T418)	*To complete*	*To complete*
Keep green gaps so settlements do not merge	16	APC (T538); Ditton Parish Council (T112); East Peckham Parish Council (EPPC) (T132); Ryarsh Parish Council (T106); West Malling Parish Council (T009); 11 individuals	*To complete*	*To complete*
Plan for more homes or a bigger buffer	14	Carter Jonas on behalf of Berkeley Strategic Land Limited (T010); Cooper Estates Strategic Land Limited (T513); DHA behalf of Gallagher Group (T033); DHA Planning OBO Bellway Homes Ltd (T035); DHA Planning obo Fernham Homes Operations Ltd (T130); DHA Planning obo Kent County Council (T028); Elivia Homes (T510); Henry Adams LLP (T490); Redrow Homes Ltd	*To complete*	*To complete*

MAIN ISSUE RAISED	COMMENTS	REPRESENTATIONS FROM	COUNCIL RESPONSE	ACTION
		(T131); Roebuck Land and Planning Ltd (T295, T297); Tregothnan Estates (T008, T418); 1 individual		
Over-reliance on large strategic sites	12	Carter Jonas on behalf of Berkeley Strategic Land Limited (T010); DHA Planning obo Fernham Homes Operations Ltd (T130); DHA Planning OBO Leander holdings (T042); DHA Planning on behalf of Wedgewood Homes (T047, T049, T065); Roebuck Land and Planning Ltd (T295, T297); Stantec UK LTD OBO Trenport Investments Ltd (T036); Terance Butler Holdings obo Aylesford Heritage Limited (T025); Tunbridge Wells Borough Council (T003); 1 individual	*To complete*	*To complete*
Settlement hierarchy is wrong for a named place	11	Tonbridge and Malling Green Party (T016); 10 individuals	*To complete*	*To complete*
Employment land and the economy	11	DHA behalf of Gallagher Group (T033); DHA on behalf of our client Mirambeau Properties (T039); DHA Planning obo *client* and Wrenbridge Land Limited (T056); DHA Planning obo *client*, and Wrenbridge Land Limited (T060); Sponden Estates obo Espalier Property Projects 009 Ltd. (T058); Stantec on behalf of CP Logistics UK Sevenoaks Propco Ltd (Panattoni) (T037); 5 individuals	*To complete*	*To complete*
Flood risk	10	East Peckham Parish Council (EPPC) (T132); Save Capel (T020); Southern Water (T083); 7 individuals	*To complete*	*To complete*
Focus growth near railway stations	9	Barrat David Wilson Homes (T002); Boyer obo Barratt David Wilson Homes - Kent (T012); Boyer Planning obo Vistry Strategic (T018, T330); Cooper Estates Strategic Land Limited (T513); DHA Planning on behalf of Bellway Homes (T021); Network Rail Property (Southern) (T086); Nexus planning on behalf of Ramac Holdings Ltd (T061); 1 individual	*To complete*	*To complete*
Affordable and social housing	9	Cooper Estates Strategic Land Limited (T513); Member of Parliament for Chatham & Aylesford (T502); Roebuck Land and Planning Ltd (T295, T297); Tregothnan Estates (T418); 4 individuals	*To complete*	*To complete*

MAIN ISSUE RAISED	COMMENTS	REPRESENTATIONS FROM	COUNCIL RESPONSE	ACTION
Other points	9	9 individuals	*To complete*	*To complete*
The consultation process (timing, website, length)	8	Ditton Parish Council (T112); 7 individuals	*To complete*	*To complete*
Allow proportionate growth in smaller villages	8	Carter Jonas LLP obo *client* (T031); DHA behalf of Gallagher Group (T033); DHA Planning obo Fernham Homes Operations Ltd (T130); LRM Planning OBO Hallam Land (T030); Stantec UK LTD OBO Trenport Investments Ltd (T036); 3 individuals	*To complete*	*To complete*
Protect the National Landscape	7	Kent Downs National Landscape (T022); Natural England (T027, T082); 4 individuals	*To complete*	*To complete*
Adopt the plan quickly to stop speculative applications	7	7 individuals	*To complete*	*To complete*
Climate change	6	East Peckham Parish Council (EPPC) (T132); 5 individuals	*To complete*	*To complete*
Policy wording is vague or needs changing	5	Elivia Homes (T510); Roebuck Land and Planning Ltd (T298); 3 individuals	*To complete*	*To complete*
Transport modelling and mitigation	4	Kent County Council (T011); National Highways (T015); Network Rail Property (Southern) (T086); Sevenoaks District Council (T442)	*To complete*	*To complete*
Prefers large sites that bring their own facilities	4	4 individuals	*To complete*	*To complete*
Remove the Local Green Gap policy	3	DHA Planning on behalf of Bellway Homes (T021); Home Builders Federation (T026); Savills on behalf of the East Malling Trust (T053)	*To complete*	*To complete*
Density (too low, or too cramped)	3	3 individuals	*To complete*	*To complete*

Organisations are named as the council published them, with their comment IDs. Individuals are counted, not named. The layout follows the Planning Advisory Service's template for Regulation 22 statements (April 2020), prepared with the Planning Inspectorate. A Word version of this table is supplied for the council to complete.

READING THIS REPORT

What this analysis can and cannot tell you

- A consultation is not a vote or an opinion poll. People choose whether to respond, so the results show the views of those who took part, not of everyone affected.
- Counts show how often an issue was raised, not how strongly it is felt or whether a point is correct. One well-evidenced response can matter more than many brief ones.
- Where people responded through an organised campaign, every response is counted and the campaign is identified, so its weight is clear without discounting anyone.
- No statistical weighting is applied: every response counts once.

What happens next

1. The council considers every response to the Regulation 18 draft.
2. It prepares the Regulation 19 version of the Local Plan, taking the main issues into account.
3. At Regulation 19, people can comment on whether the plan is legally compliant and sound.
4. The plan is submitted for independent examination, with a consultation statement setting out the main issues raised and how they were addressed.

METHOD

How this analysis was done

What we did

- **Every comment was read in full.** Nothing was sampled or skipped.
- **A coding frame was built from the comments themselves** (Appendix A) rather than from a preset list, so unexpected issues are captured.
- **Each comment was coded to every theme it raised.** Counts are numbers of comments; shares are of comments that said something.
- **Quotes are exact.** Each one is reproduced as published, including spelling, carries its comment ID, and was checked word for word against the source document. Where a quote is shortened, "…" marks the cut.
- **Every coding decision is traceable.** Appendix B lists every comment with its themes, and a spreadsheet version accompanies this report.
- **Built for publication.** The PDF meets the PDF/UA accessibility standard (ISO 14289-1, checked with veraPDF), with headings, bookmarks, table headers and a set reading order for screen readers. An editable Word version is supplied, to help the council publish it under the accessibility regulations.

Source and limits

- Source: the council's published spreadsheet of responses to Question 4, "Do you agree with Policy SP1 Spatial Strategy?".
  https://www.tmbc.gov.uk/downloads/file/4431/question-4-do-you-agree-with-policy-sp1-spatial-strategy
- This analysis covers Question 4 (Policy SP1) only. The consultation asked many other questions, and the council has published a summary for each.
- Ten responses refer to separate documents or emails that are not included in the published spreadsheet, so their content could not be analysed.
- The published data does not link a respondent's answers across questions, and individuals are not named, so results are reported per response.
- Comment IDs (T001 onwards) number the comments in the order they appear in the source document.

ASSURANCE

Quality and data protection

Quality assurance

- **Every figure is recalculated** from the coded data by the program that builds this report, so no number is typed by hand.
- **Every quote is checked** word for word against its source (16 quotes).
- **A second, blind coding** of a random 40 of the 285 original comments (template copies excluded) agreed with the first on 90% of positions. For themes, agreement was 0.85 on Cohen’s kappa, and 0.95 for the five most raised, where 0.81 and above counts as almost perfect. Where the two differed, the second coding more often added a minor theme than dropped one, so the counts here are, if anything, cautious.
- **Version 1.1**, produced 29 September 2026. The source, the assumptions (how campaigns and comments that only point to another document are counted) and the coding frame are all set out in this report.
- **Standards.** Built to the principles of HM Treasury’s Aqua Book for quality analysis, the Consultation Institute’s Charter (fair interpretation and publication) and the Planning Advisory Service’s guidance on consultation statements. The PDF meets the PDF/UA accessibility standard (ISO 14289-1), checked with veraPDF.

Data protection

- This sample uses only information the council has already published. Individuals are not named in that data, and organisations are named as the council published them.
- Quotes were checked for personal details such as addresses, phone numbers and email addresses, and none is reproduced.

GLOSSARY

Terms used in this report

Regulation 18	The early stage of a Local Plan, when the council consults on its draft plan and the options it is considering.
Regulation 19	The publication stage, when people can comment on whether the finished draft plan is legally compliant and sound, before it is submitted for examination.
Spatial strategy	The overall approach to how much development is planned and where it goes.
Green Belt	Protected open land around towns, kept open to prevent urban sprawl. Its boundaries can only be changed through a Local Plan, in exceptional circumstances.
Grey belt	Green Belt land that makes little contribution to Green Belt purposes, such as previously developed land. National policy since December 2024 allows it to be considered for development.
Brownfield land	Land that has been built on before, also called previously developed land.
Buffer	Extra housing sites planned above the requirement, in case some sites do not come forward.
Windfall	Homes built on sites not allocated in the plan.
National Landscape	The name, since 2023, for an Area of Outstanding Natural Beauty.
Consultation statement	A document submitted with the plan that summarises who was consulted, the main issues raised and how they were taken into account.

APPENDIX A

Coding frame

Every theme used, with the number of comments coded to it.

Question 4: Do you agree with Policy SP1 Spatial Strategy?

THEME	COMMENTS
Supports the spatial strategy	60
Supports in principle but asks for changes	58
Objects to the spatial strategy	430
Comments without a clear position	31
Infrastructure must come first (roads, GPs, schools, water, trains)	353
Too much growth in particular places	379
Brownfield first has not been tested or prioritised	358
A new standalone settlement should have been considered	349
Housing numbers are too high or imposed from above	299
Environment, farmland, wildlife and heritage	47
Protect the Green Belt; oppose grey belt release	46
Green Belt release is justified by exceptional circumstances	44
Evidence or site assessments questioned	40
Promotes a specific site for allocation	31
Objects to a specific site (or welcomes its exclusion)	30
Neighbouring authorities and unmet need	24
Allow some development in the National Landscape	20
Delivery risk: buffer, five-year supply, windfall	18
Keep green gaps so settlements do not merge	16
Plan for more homes or a bigger buffer	14
Over-reliance on large strategic sites	12
Settlement hierarchy is wrong for a named place	11
Employment land and the economy	11
Flood risk	10
Focus growth near railway stations	9
Affordable and social housing	9
The consultation process (timing, website, length)	8
Allow proportionate growth in smaller villages	8
Protect the National Landscape	7
Adopt the plan quickly to stop speculative applications	7
Climate change	6
Policy wording is vague or needs changing	5
Transport modelling and mitigation	4
Prefers large sites that bring their own facilities	4
Remove the Local Green Gap policy	3
Density (too low, or too cramped)	3
Other points	9
Refers only to a separate document	10
Blank or test entry	33

APPENDIX B

Audit trail: every comment and its themes

The first 80 of 620 responses are shown here; the accompanying spreadsheet lists every response in full with its themes.

ID	RESPONDENT	THEMES	COMMENT (START)
T001	DHA Planning obo Fernham Homes Operation	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape	4.2SPATIAL STRATEGY AND GROWTH SCENARIOSPolicy SP1: Spatial Strategy4.2.1TMBC's proposed Spatial ...
T002	Barrat David Wilson Homes	Supports in principle but asks for changes; Focus growth near railway stations; Evidence or site assessments questioned	Policy SP1, under the heading 'growth', indicates the DLP aspires to balance housing andemployment ...
T003	Tunbridge Wells Borough Council	Comments without a clear position; Over-reliance on large strategic sites; Brownfield first has not been tested or prioritised	TWBC notes that criterion 5 of this policy makes provision to meet the housing need requirement in a way ...
T004	Maidstone Borough Council	Blank or test entry	-
T005	Individual	Comments without a clear position; Climate change; Evidence or site assessments questioned	•I note that the Spatial Strategy for the draft Local Plan emerged through consultation in 2022/2023. In ...
T006	DHA - West Malling Golf Club	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape	Policy SP1: Spatial Strategy1.4.6 TMBC's proposed Spatial Strategy is to focus most growth within or ...
T007	DHA Planning obo Fernham Homes Operation	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape	Policy SP1: Spatial Strategy4.2.1TMBC's proposed Spatial Strategy, as set out through Policy SP1, is to ...
T008	Tregothnan Estates	Objects to the spatial strategy; Plan for more homes or a bigger buffer; Green Belt release is justified by exceptional circumstances; Delivery risk: buffer, five-year supply, windfall; Evidence or site assessments questioned; Neighbouring authorities and unmet need	TE notes that the proposed Spatial Strategy seeks to appropriately distribute development within the ...
T009	West Malling Parish Council	Supports in principle but asks for changes; Keep green gaps so settlements do not merge	While generally agreeing with SP1, we think the use of a Green Gap to North of Kings Hill does not ...
T010	Carter Jonas on behalf of Berkeley Strat	Supports in principle but asks for changes; Promotes a specific site for allocation; Plan for more homes or a bigger buffer; Over-reliance on large strategic sites	Policy SP1: Spatial StrategyBerkeley welcomes the Council's commitment in draft Policy SP1: Spatial ...
T011	Kent County Council	Supports in principle but asks for changes; Transport modelling and mitigation	Highways and TransportThe County Council supports the allocation of growth in and around settlements in ...
T012	Boyer obo Barratt David Wilson Homes - K	Supports in principle but asks for changes; Focus growth near railway stations; Evidence or site assessments questioned	4.1 Policy SP1, under the heading 'growth', indicates the DLP aspires to balance housing andemployment ...
T013	Individual	Objects to the spatial strategy; Too much growth in particular places; A new standalone settlement should have been considered; Brownfield first has not been tested or prioritised	Of the 8 spatial options that were considered the final3 (numbers 6-8) are clearly non-starters due to ...
T014	Kent County Council	Supports the spatial strategy	The County Council, as Local Highway Authority, supports - in principle - the Tonbridge and Malling ...
T015	National Highways	Supports the spatial strategy; Transport modelling and mitigation	The spatial strategy is confirmed to be in alignment with the supporting

ID	RESPONDENT	THEMES	COMMENT (START)
			evidence, we acknowledge that as ...
T016	Tonbridge and Malling Green Party	Objects to the spatial strategy; Settlement hierarchy is wrong for a named place	We strongly object to the decision to merge the settlements of Tonbridge and Hildenborough together as ...
T017	Hildenborough Parish Council	Comments without a clear position	3.1These representations assess the Draft Plan against the tests of soundness set out in paragraph 36 of ...
T018	Boyer Planning obo Vistry Strategic	Supports in principle but asks for changes; Focus growth near railway stations; Promotes a specific site for allocation; Neighbouring authorities and unmet need; Evidence or site assessments questioned	4. SPATIAL STRATEGYQ4. Do you agree with Policy SP1 Spatial Strategy?4.1 Policy SP1, under the heading ...
T019	DHA Planning obo Fernham Homes Operation	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape	TMBC's proposed Spatial Strategy, as set out through Policy SP1, is to focus the majority of growth ...
T020	Save Capel	Objects to the spatial strategy; Housing numbers are too high or imposed from above; Infrastructure must come first (roads, GPs, schools, water, trains); A new standalone settlement should have been considered; Brownfield first has not been tested or prioritised; Evidence or site assessments questioned; Flood risk; Neighbouring authorities and unmet need	2.1 SC shares the concerns of many, particularly those in the South East, regarding the national housing ...
T021	DHA Planning on behalf of Bellway Homes	Objects to the spatial strategy; Remove the Local Green Gap policy; Focus growth near railway stations; Promotes a specific site for allocation	POLICY SP1: SPATIAL STRATEGY2.2.1Object. Criterion 3 and 20 must be amended.2.2.2In principle many of the ...
T022	Kent Downs National Landscape	Supports in principle but asks for changes; Protect the National Landscape	Paragraph 5.8 of the supporting text to Policy SP1 states that the spatial strategy 'looks to protect the ...
T023	Individual	Objects to the spatial strategy; Infrastructure must come first (roads, GPs, schools, water, trains)	With reference to Paragraph 3, the strategy may be unsound, as it is unlikely to deliver sustainable ...
T024	DHA Planning obo Fernham Homes Operation	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape	Policy SP1: Spatial Strategy4.2.1 TMBC's proposed Spatial Strategy, as set out through Policy SP1, is to ...
T025	Terance Butler Holdings obo Aylesford He	Supports the spatial strategy; Over-reliance on large strategic sites; Delivery risk: buffer, five-year supply, windfall	Spatial Strategy for the Borough•the Growth Strategy is noted and, in principle, is supported. In ...
T026	Home Builders Federation	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Remove the Local Green Gap policy	4.HBF broadly supports the spatial strategy and agrees with the Council that in order to meet needs it ...
T027	Natural England	Supports in principle but asks for changes; Environment, farmland, wildlife and heritage; Protect the National Landscape	Further detail required:Natural England advise that the wording of Point 1 should be strengthened to ...
T028	DHA Planning obo Kent County Council	Comments without a clear position; Plan for more homes or a bigger buffer; Evidence or site assessments questioned	Policy SP1 – Spatial StrategyPolicy SP1 seeks to deliver homes sufficient to meet the district housing ...
T029	Individual	Blank or test entry	(blank)
T030	LRM Planning OBO Hallam Land	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow proportionate growth in smaller villages	4 Spatial Strategy4.1 The consultation document proposes a spatial strategy that underpins the ...
T031	Carter Jonas LLP obo *client*	Supports in principle but asks for changes; Green Belt release is justified by exceptional circumstances; Allow proportionate growth in smaller villages; Promotes a specific site for allocation	Policy SP1: Spatial StrategyPart 5 of Policy SP1 acknowledges that TMBC cannot meet its housing ...
T032	Boyer Planning obo Croudace Homes	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Promotes a specific site for allocation	2.1 The draft Local Plan's overall proposed vision to achieve

ID	RESPONDENT	THEMES	COMMENT (START)
	Ltd		sustainable growth thataddresses housing ...
T033	DHA behalf of Gallagher Group	Supports in principle but asks for changes; Plan for more homes or a bigger buffer; Allow proportionate growth in smaller villages; Green Belt release is justified by exceptional circumstances; Brownfield first has not been tested or prioritised; Employment land and the economy	1.3 RESPONSE TO THE REGULATION 18 DRAFTPolicy SP1 – Spatial Strategy1.3.1Policy SP1 seeks to deliver ...
T034	DHA Planning on behalf of Wedgewood Home	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape; Promotes a specific site for allocation	1.1.8In terms of suitability for growth, Wateringbury is a small rural village with the necessary local ...
T035	DHA Planning OBO Bellway Homes Ltd	Supports in principle but asks for changes; Plan for more homes or a bigger buffer; Green Belt release is justified by exceptional circumstances; Promotes a specific site for allocation	Policy SP1: Spatial Strategy – Support with comments4.2.1The Spatial Strategy proposed by TMBC, as set ...
T036	Stantec UK LTD OBO Trenport Investments	Supports in principle but asks for changes; Over-reliance on large strategic sites; Evidence or site assessments questioned; Promotes a specific site for allocation; Allow proportionate growth in smaller villages	Q4 – Do you agree with Policy SP1 Spatial Strategy?2.1.2 Trenport Investments Ltd broadly supports the ...
T037	Stantec on behalf of CP Logistics UK Sev	Supports the spatial strategy; Employment land and the economy	Q.4 – Do you agree with Policy SP1: Spatial Strategy?3.3 We agree with the spatial strategy which ...
T038	DHA Planning on behalf of Wedgewood Home	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape; Promotes a specific site for allocation	Spatial StrategyTMBC's proposed Spatial Strategy is to focus most growth within or adjacent to ...
T039	DHA on behalf of our client Mirambeau Pr	Supports the spatial strategy; Employment land and the economy; Green Belt release is justified by exceptional circumstances	Policy SP1: Spatial Strategy3.2.1We support TMBC's proposed Spatial Strategy, as set out through Policy ...
T040	Turley obo Taylor Wimpey Strategic	Supports in principle but asks for changes; Green Belt release is justified by exceptional circumstances	Given the Plan and supporting evidence base concedes that there are exceptional circumstances to justify ...
T041	DHA Planning on behalf of Wedgewood Home	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape; Promotes a specific site for allocation	Policy SP1: Spatial Strategy1.4.5TMBC's proposed Spatial Strategy is to focus most growth within or ...
T042	DHA Planning OBO Leander holdings	Supports in principle but asks for changes; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape; Over-reliance on large strategic sites; Delivery risk: buffer, five-year supply, windfall; Promotes a specific site for allocation	Policy SP1: Spatial Strategy1.4.6 TMBC's proposed Spatial Strategy is to focus most growth within or ...
T043	Stantec UK LTD OBO Trenport Investments	Supports the spatial strategy; Promotes a specific site for allocation	Wealden Land Ltd supports Policy SP1 and considers that the spatial strategy represents asound and ...
T044	Individual	Supports in principle but asks for changes; Infrastructure must come first (roads, GPs, schools, water, trains); Flood risk; Climate change; Housing numbers are too high or imposed from above; Environment, farmland, wildlife and heritage; Other points	Spatial Strategy Policy SP1.Growth, Paragraph 3. To have the majority of settlement growth in the ...
T045	DHA Planning OBO *client*	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape	Policy SP1: Spatial Strategy1.4.6TMBC's proposed Spatial Strategy is to focus most growth within or ...
T046	Marrons OBO CALA HOMES SOUTHERN COUNTIES	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Promotes a specific site for allocation	Chapter 5 – Spatial Strategy for the Borough3.15 We support the proposed spatial strategy.3.16 It is ...
T047	DHA Planning on behalf of Wedgewood Home	Supports in principle but asks for changes; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape; Over-reliance on large strategic sites; Delivery risk: buffer, five-year supply, windfall; Promotes a specific site for allocation	Policy SP1: Spatial Strategy1.4.6TMBC's proposed Spatial Strategy is to focus most growth within or ...

ID	RESPONDENT	THEMES	COMMENT (START)
T048	Turley obo Taylor Wimpey Strategic	Supports in principle but asks for changes; Green Belt release is justified by exceptional circumstances	Given the Plan and supporting evidence base concedes that there are exceptional circumstances to justify ...
T049	DHA Planning on behalf of Wedgewood Home	Supports in principle but asks for changes; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape; Over-reliance on large strategic sites; Delivery risk: buffer, five-year supply, windfall; Promotes a specific site for allocation	Policy SP1: Spatial Strategy1.4.6TMBC's proposed Spatial Strategy is to focus most growth within or ...
T050	Gladman Jones	Supports in principle but asks for changes; Green Belt release is justified by exceptional circumstances; Promotes a specific site for allocation	Housing Figures and RequirementDraft Policy SP1, in its explanatory text, confirms that the housing ...
T051	DHA Planning on behalf of Wedgewood Home	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape	1.4.6TMBC's proposed Spatial Strategy is to focus most growth within or adjacent to the Borough's urban ...
T052	Quod on behalf of Royal British Veterans	Supports the spatial strategy; Brownfield first has not been tested or prioritised; Promotes a specific site for allocation; Delivery risk: buffer, five-year supply, windfall	Spatial Strategy for the Borough2.1 RBVE supports the general approach to growth outlined within Policy ...
T053	Savills on behalf of the East Malling Tr	Supports in principle but asks for changes; Remove the Local Green Gap policy; Delivery risk: buffer, five-year supply, windfall	4.4. Policy SP1 states that during the plan period, the Local Plan will: 'Meet our housing need ...
T054	DHA Planning obo Fernham Homes Operation	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape	TMBC's proposed Spatial Strategy, as set out through Policy SP1, is to focus themajority of growth within ...
T055	David Lock Associates, for Hallam Land	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Delivery risk: buffer, five-year supply, windfall	The NPPF (February 2025) is clear about the Government's commitment to significantly boosting the supply ...
T056	DHA Planning obo *client* and Wrenbridge	Supports the spatial strategy; Employment land and the economy; Green Belt release is justified by exceptional circumstances	We support TMBC's proposed Spatial Strategy, as set out through Policy SP1,which seeks to allocate and ...
T057	DHA Planning obo Fernham Homes Operation	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape	TMBC's proposed Spatial Strategy, as set out through Policy SP1, is to focus the majority of growth ...
T058	Sponden Estates obo Espalier Property Pr	Supports the spatial strategy; Employment land and the economy; Brownfield first has not been tested or prioritised; Promotes a specific site for allocation	We support the principles of Chapter 3, which recognises the context, constraints and challenges of the ...
T059	DHA Planning OBO Leander holdings	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape; Brownfield first has not been tested or prioritised; Promotes a specific site for allocation	TMBC's proposed Spatial Strategy is to focus most growth within or adjacent to theBorough's urban and ...
T060	DHA Planning obo *client*, and Wrenbridg	Supports the spatial strategy; Employment land and the economy; Green Belt release is justified by exceptional circumstances	We support TMBC's proposed Spatial Strategy, as set out through Policy SP1,which seeks to allocate and ...
T061	Nexus planning on behalf of Ramac Holdin	Supports the spatial strategy; Focus growth near railway stations; Promotes a specific site for allocation; Protect the Green Belt; oppose grey belt release	Agree.Policy SP1 seeks to direct growth within the Borough in accordance with both a hierarchy of policy ...
T062	DHA Planning on behalf of Wedgewood Home	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape	TMBC's proposed Spatial Strategy is to focus most growth within or adjacent to the Borough's urban and ...
T063	Sponden Estates obo Espalier	Supports the spatial strategy; Brownfield first has not been tested or prioritised; Promotes a specific site for allocation	We support the over-arching principles of this Chapter. We

ID	RESPONDENT	THEMES	COMMENT (START)
	Property Pr		provide our summary response to each of the ...
T064	Individual	Objects to the spatial strategy; Too much growth in particular places; A new standalone settlement should have been considered; Brownfield first has not been tested or prioritised; Infrastructure must come first (roads, GPs, schools, water, trains); Housing numbers are too high or imposed from above; Evidence or site assessments questioned; Protect the Green Belt; oppose grey belt release; Keep green gaps so settlements do not merge; Employment land and the economy; Other points	Re Policy SP1: Of the eight spatial options that were considered the final three (numbers 6-8) are ...
T065	DHA Planning on behalf of Wedgewood Home	Supports in principle but asks for changes; Green Belt release is justified by exceptional circumstances; Allow some development in the National Landscape; Over-reliance on large strategic sites; Delivery risk: buffer, five-year supply, windfall; Promotes a specific site for allocation	Policy SP1: Spatial Strategy1.4.5TMBC's proposed Spatial Strategy is to focus most growth within or ...
T066	Carter Jonas (on behalf of Cemex UK)	Supports the spatial strategy	Local Plan Policy and Site representationsParagraph 36 of the NPPF (December 2024) states that local ...
T067	David Lock Associates, for Hallam Land	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Delivery risk: buffer, five-year supply, windfall	Spatial Strategy Options (Chapter 5)The NPPF (February 2025) is clear about the Government's commitment ...
T068	Individual	Objects to the spatial strategy; Too much growth in particular places; A new standalone settlement should have been considered; Brownfield first has not been tested or prioritised	Of the 8 spatial options that were considered the final3 (numbers 6-8) are clearly non-starters due to ...
T069	Save Higham Wood Group	Objects to the spatial strategy; Too much growth in particular places; A new standalone settlement should have been considered; Brownfield first has not been tested or prioritised	Spatial Strategy - where and how will we growDo you agree with Policy SP1 Spatial Strategy?Of the 8 ...
T070	Individual	Objects to the spatial strategy; Too much growth in particular places; A new standalone settlement should have been considered; Brownfield first has not been tested or prioritised	Of the 8 spatial options that were considered the final 3 (numbers 6-8) are clearly non-starters due to ...
T071	Individual	Objects to the spatial strategy; Too much growth in particular places; A new standalone settlement should have been considered; Brownfield first has not been tested or prioritised	Spatial Strategy - where and how will we growDo you agree with Policy SP1 Spatial Strategy?Of the 8 ...
T072	Vistry	Supports the spatial strategy; Green Belt release is justified by exceptional circumstances; Promotes a specific site for allocation; Neighbouring authorities and unmet need; Allow some development in the National Landscape	Chapter 5 Spatial Strategy6.2.6Vistry reserve the right to comment on all Spatial Strategy and ...
T073	Twenty5 Planning	Supports the spatial strategy; Promotes a specific site for allocation	Policy SP 1 - Spatial Strategy6.1.6 Support is given to the identified spatial strategy which proposes to ...
T074	Individual	Objects to the spatial strategy; Infrastructure must come first (roads, GPs, schools, water, trains); Too much growth in particular places; A new standalone settlement should have been considered; Brownfield first has not been tested or prioritised; Housing numbers are too high or imposed from above	2)The Spatial StrategyI want to highlight my objections to the wider impacts of the spatial strategy ...
T075	Individual	Objects to the spatial strategy; Infrastructure must come first (roads, GPs, schools, water, trains); Too much growth in particular places; A new standalone settlement should have been considered; Brownfield first has not been tested or prioritised; Housing numbers are too high or imposed from above	2) The Spatial StrategyI want to highlight my objections to the wider impacts of the spatial strategy ...
T076	Individual	Objects to the spatial strategy; Infrastructure must come first (roads, GPs, schools, water, trains); Too much growth in particular places; A new standalone settlement should have been considered; Brownfield first has not been tested or prioritised; Housing numbers are too high or imposed from above	2)The Spatial StrategyI want to highlight my objections to the wider impacts of the spatial strategy ...

ID	RESPONDENT	THEMES	COMMENT (START)
T077	Individual	Objects to the spatial strategy; Infrastructure must come first (roads, GPs, schools, water, trains); Too much growth in particular places; A new standalone settlement should have been considered; Brownfield first has not been tested or prioritised; Housing numbers are too high or imposed from above	2)The Spatial StrategyI want to highlight my objections to the wider impacts of the spatial strategy ...
T078	Individual	Objects to the spatial strategy; The consultation process (timing, website, length); Infrastructure must come first (roads, GPs, schools, water, trains); Evidence or site assessments questioned; A new standalone settlement should have been considered; Too much growth in particular places; Climate change; Flood risk	I would like to highlight that I have found the process difficult to follow, with two factors being ...
T079	Individual	Comments without a clear position; Brownfield first has not been tested or prioritised; Protect the Green Belt; oppose grey belt release; Affordable and social housing	Tonbridge & Malling should be a beacon of creative, public sector-led, affordable housing production. ...
T080	Individual	Objects to the spatial strategy; The consultation process (timing, website, length); Evidence or site assessments questioned; Protect the Green Belt; oppose grey belt release; Environment, farmland, wildlife and heritage; Too much growth in particular places; Infrastructure must come first (roads, GPs, schools, water, trains)	I would like to point out that I , like many, am disappointed in the timing and construction of your ...

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