

## TMBC presentation of the Regulation 18 Local Plan, Friday 12 Dec 2025

### Introduction

These notes are from the public meeting where Matt Boughton, leader of Tonbridge and Malling Borough Council, presented and discussed the borough's emerging Local Plan. The meeting covered:

- What a local plan is and why it is legally required
- How a national planning policy and government-set housing numbers shape local choices
- The council's site-call process and site assessment (including many submissions and constraints such as greenbelt/greybelt, agricultural land, Areas of Natural Beauty (AONB)/national landscape, Sites of Special Scientific Interest (SSSI) and minerals/quarry history)
- Allocations and highlighted a large allocation being reduced from 3,800 to 1,300 homes
- Infrastructure and deliverability concerns (highways, NHS/GP capacity, schools, drainage/flooding)
- The current consultation process and how residents should respond
- The next regulatory and examination steps (including the role of planning inspectors)

The consultation window was stated to close on 2 January 2026. The plan's programme includes a council deadline/reference of 12 December next year for progressing the plan.

### Key Points

1. The Local Plan is legally required; without it the government can impose its own plan for the area.
2. National planning policy and a government-set housing requirement drive the borough's target (gross figure cited, then reduced by permissions, completions and windfall to a net requirement presented as 12,664).
3. The council ran a call-for-sites: over 600 sites were submitted; the plan must allocate enough deliverable land to meet the housing need.
4. Brownfield capacity is limited (~13% stated), so substantial greenfield /greenbelt /greybelt land is being considered.
5. A large proposed allocation (initially 3,800 homes) has been reduced in the draft to about 1,300 homes because of constraints (agricultural grade, landscape, SSSI, minerals/quarry history).
6. Settlement hierarchy (tiers 1–5) guides where growth is prioritised, but very large housing numbers require looking across tiers.

7. Infrastructure and deliverability (highways, GP/NHS, schools, drainage/flooding, utilities) are critical—evidence from infrastructure providers will be needed and may determine whether sites can be allocated.
8. **Quality of consultation responses and robust local evidence (highways, flooding, heritage, landscape) is more influential than volume of responses.**
9. Next stages: consultation (closes 2 January 2026), further testing and an Infrastructure Delivery Plan, regulation stages, and independent examination by planning inspectors (deadline mentioned: 12 December 2026).

#### ***Next steps and call to action***

- **Residents / Local Groups:** Submit consultation responses by 2 January 2026. Focus responses on planning considerations: highways, flooding/drainage, heritage, landscape, ecology, and deliverability rather than property value alone.
- **Local Residents (living near affected sites):** Provide lived-experience evidence (e.g., travel times at junctions, local drainage/flooding incidents, impact on services) and add these details to consultation responses.

Templated responses have been provided by HLRA and can be downloaded and edited by visiting the following Link

#### ***Detailed notes from the presentation***

##### ***Item 1: Meeting purpose & participants***

- Public meeting introducing the Local Plan consultation.
- Presentation provided by Matt Boughton.
- Audience included local residents asking questions about allocations and impacts.

The meeting served to present the council's draft Local Plan work and to collect community feedback during the Regulation 18 consultation stage. Matt explained why a Local Plan exists (legal requirement and local control versus government imposition), described the consultation mechanics (QR code, website, email/hard-copy options mentioned), and invited local people to respond. The meeting consisted of a 25–30 minute slide presentation followed by a Q&A where residents raised site-specific concerns (traffic, flooding, services) and policy-level questions (housing numbers, greenbelt/greybelt changes, deliverability). The meeting emphasised that local input now—especially evidence-based submissions—will shape the council's position through to the examination stage.

- Presentation followed by an extended Q&A focused on site impacts.
- Consultation practicalities (how to respond).

##### ***Item 2: What the Local Plan is and legal context***

- The Local Plan guides planning decisions and includes policies (housing, employment, retail, etc.).
- Must be consistent with government national planning policy.

- Without a plan, government can step in and create a plan for the area.

Matt set out that a Local Plan is the statutory document that guides planning decisions at all scales—from large housing allocations to individual householder extensions—by setting policies and allocations. It must conform to national policy (so councils cannot set policies outside government requirements). Having an up-to-date plan preserves local control (including the ability to secure developer contributions and infrastructure requirements). If a council lacks a plan, government intervention or less favourable outcomes for local communities are more likely. Therefore preparing a legally sound plan with robust evidence (housing need, sustainability, deliverability, infrastructure) is a central council priority.

- Emphasis on legal tests and consistency with national policy.
- Local policies determine most planning decisions at application stage.
- Local plan lifetime mentioned as to 2042.

### ***Item 3: Housing numbers, site selection and constraints***

- Government's starting housing figure is adjusted by completions, permissions and windfall to a net figure (presented as 12,664).
- Windfall allowance and existing permissions reduce the gross requirement.
- Brownfield capacity is limited (cited ~13%); many greenfield/greenbelt/greybelt sites are therefore being considered.
- Over 600 sites were submitted in the call-for-sites; allocations were assessed by high-level criteria.
- Settlement hierarchy informs preferred locations, but sheer numbers force consideration across tiers.

The council must deliver a housing requirement driven by a government-derived need. Matt walked through how the gross government figure is reduced by completions since the base date, extant planning permissions, and a windfall allowance to derive a local quantum (the figure quoted was 12,664 to be found). Because brownfield capacity is small, the council must look at greenfield land, including areas previously protected (greenbelt/greybelt), which is a significant policy shift and creates tension locally. The council ran a call-for-sites receiving hundreds of submissions; these were evaluated against criteria (proximity to settlements, constraints like AONB/national landscape, agricultural grade, SSSIs, minerals/quarry history, access and deliverability). The settlement hierarchy (tiers 1–5) guides priorities, but large targets mean many settlements will see allocations.

- The council mentioned a specific large site reduced from 3,800 to ~1,300 homes after constraints assessment.
- Many sites are adjacent to settlement boundaries (important for greybelt eligibility).
- Agricultural land classification, SSSI, national landscape and mineral history are material constraints.

#### ***Item 4: Infrastructure, deliverability and evidence requirements***

- Infrastructure Delivery Plan (IDP) is central: highways, GP/NHS, schools, drainage, utilities must be assessed.
- The council will consult infrastructure providers (e.g., Kent County Council highways, NHS, national highways) for evidence.
- Robust, evidence-based objections are more effective than volume of responses.
- If infrastructure cannot cope, that can justify excluding/reshaping allocations, but providers' evidence will be decisive at examination.

Matt emphasised that whether a site can be allocated depends on deliverability, which rests on infrastructure capacity and the ability to fund necessary upgrades. The council will compile an Infrastructure Delivery Plan and ask statutory providers to confirm capacity or required mitigations. For transport, initial modelling looked at key junctions; more detailed testing follows and residents' evidence about local congestion will be fed in. For health (GP capacity) and other services, commitments from providers are required; past examples show risks where a building is provided but services (e.g., GPs) do not follow. Flooding/drainage evidence must show on-site mitigation, sustainable drainage strategies and that development will not increase flood risk. At examination, planning inspectors weigh the statutory providers' technical evidence heavily, so well-documented local evidence and technical reports are critical.

- Highways evidence: work done with Jacobs and KCC; next stage is detailed junction modelling.
- Health provision (GPs) is complex: land/buildings can be provided, but recruitment/funding of GP services is controlled by NHS arrangements.
- Flooding/drainage: evidence required on sustainable on-site management and impacts downstream.

#### **LINKS AND ADDITIONAL INFORMATION:**

- Tonbridge and Malling Draft Local Plan consultation website - [Have Your Say Today - Tonbridge And Malling Local Plan - Commonplace](#)
- HLRA Website – news articles, editable templates for Resident Responses and copy of the TMBC presentation by Matt Boughton. There is a dedicated page in the website menu as well as information in the News page - [Home | Holborough Lakes Residents Association](#)

Alternatively, you can scan the QR codes below:



QR code for  
TMBC Local Plan  
website



QR code for HLRA  
website