

Meeting Notes

Local Plan Overview and Government Intervention

Monday 28 September 2026, 8-9.30pm
Village Hall, Holborough Lakes, Snodland, Kent.

Matt Boughton, leader of Tunbridge Wells Borough Council, outlined the meeting's agenda, focusing on the local plan which defines development up to 2042. The government has set a housing target of 20,106 new houses for Tunbridge and Malling. After deductions for existing builds, permissions, and a 'windfall allowance', the council developed a plan which received over 6,000 responses in a November 2025 consultation.

On 3 September 2026, councillors voted not to proceed with the plan, citing critical concerns over drinking water supply, foul drainage, and transport infrastructure. However, the next day, Planning Minister Matthew Pennycook overruled this decision, directing the council to publish the plan for consultation and submit it for examination by the end of the year, with no option to withdraw.

Exceptional Circumstances: Water Supply Deficit

The council is arguing "exceptional circumstances" based on a severe water shortage. South East Water's official position, from their Water Resource Management Plan, states they can only supply water for 6,318 new homes, a fraction of the 20,106 target. A government-led Water Delivery Task Force was established, but even with proposed solutions like new boreholes and water transfers, the supply could only be increased to support 8,157 homes. The Environment Agency is also restricting borehole licensing due to groundwater concerns. The council will therefore argue at the government inspection that its own plan is "not sound" due to this significant infrastructure gap. It was noted that water companies are only formally consulted at the local plan stage, not for individual applications. The council can use a "grampian condition" to prevent building until a water supply is secured, but this is a reactive measure that doesn't solve the underlying issue.

Current Consultation and Public Involvement

The current Regulation 19 consultation, closing on 25 October 2026, is a technical process focused on whether the plan is legally compliant and "sound" (positively prepared, justified, effective, and consistent with national policy). Residents were advised to submit responses via the council's website, focusing their arguments on the water supply deficit, incomplete highways evidence, and specific site allocations. The quality of arguments is more important than the quantity. It was recommended that residents' associations adopt a clear, unified position to influence outcomes. The public

will have another say at the planning application stage, but the principle of development will have been set.

Site Allocations and Development Constraints

The plan proposes sites to meet the housing target, with 71% of the borough being Green Belt and significant areas within the Kent Downs National Landscape (KDNL). Snodland is classified as a 'Tier 2' settlement.

- **Holborough Lakes (Land North of Holborough Lakes):** This site is allocated for 1,300 homes, a two-form primary school, a community hall, and a convenience store. Vehicle access is restricted to the Peters Bridge roundabout, with pedestrian/cycle routes connecting to Snodland but not into the existing Holborough Lakes development. Due to proximity to the KDNL and Halling SSSI, housing is concentrated in the eastern centre. The community is encouraged to advocate for a specific buffer zone policy and submit evidence of cliff face instability. The 10% Biodiversity Net Gain (BNG) requirement could be used to create this buffer. For green belt sites like this, affordable housing is suggested at 50%.
- **Broadwater Farm, Kings Hill:** Identified as the location for a much-needed eight-form entry secondary school to address a major shortage of places in the north of the borough.
- **Snodland Tesco Site:** A new proposal for 3,000 m² of floorspace and 36 homes has been added since the last consultation.
- **Other Major Sites:** References were made to Holborough Quarry, Borough Green, Broadwater Farm, Hildenborough, Hadlow and North Tonbridge.

Infrastructure and Other Concerns

- **Transport and Highways:** Transport modelling, which incorporates the impact of the Lower Thames Crossing, shows several key junctions will be over capacity.
 - **Peters Bridge Roundabout:** Will turn "red" (over capacity) and requires developer-funded full signalisation and widening.
 - **A228 Junction into Snodland:** Will be pushed far over capacity; proposed signals will only bring it to 98-99% capacity.
 - **Lunsford Lane/Leybourne Way:** Over capacity with limited mitigation options.
 - **M20 Junction 4:** Generally within capacity.

The transport evidence is considered incomplete, with 32 junctions modelled but others (e.g., Ham Hill) not yet assessed. The council noted that practical disruptions from roadworks and land ownership barriers limit road widening options.

- **Secondary School Provision:** There is a critical shortage of secondary school places. A new school at Kings Hill is proposed to serve the area and relieve pressure on Homesdale School, which suffers from a poor reputation. The council has no direct control over school standards, which is a Kent County Council responsibility. New grammar schools are not permitted by law.
- **Healthcare:** The plan does not include a doctor's surgery. Past experiences show that provision of land or buildings does not guarantee a staffed facility. The Integrated Care Board's (ICB) previous response was deemed inadequate, and residents were urged to argue for a surgery.
- **Public Transport:** The Medway Valley train line has capacity for more services. The commercial 71 bus route would likely be extended into new developments without subsidy. Arguments against development based on bus and train services are considered weak.
- **Agricultural and Archaeological Land:** The plan includes policies to protect archaeological finds. However, a government policy decision has prioritised new housing over the preservation of "best and most versatile" agricultural land.
- **Adjacent Medway Development:** Tarmac, the landowner, is also promoting a 2,000-home development in Medway adjacent to the Holborough site. If approved, this would add significant pressure to local infrastructure. The council is monitoring the Medway plan examination.

Development and Construction Management

The developer promoter, Hallam Lands, will sell the land after securing permission, so the final builder is unknown. A build-out period of around 10 years is expected. The council can impose a "construction management plan" at the application stage to control working hours, noise, and disruption. Failure to have an up-to-date local plan makes the area vulnerable to speculative "planning by appeal," as seen with "the Poppies" site in Larkfield.

CALL TO ACTION

Matt Boughton provided specific guidance on how residents should frame their responses to ensure they are as impactful as possible:

- **Use the Official Channels:** Submit responses via the council's website if possible. If not, email them, but be aware that planners will have to manually sort them by policy/chapter¹.
- **Use the Pro-Forma:** Stick to the provided pro-forma/structure to make your argument more impactful with the planning inspector².
- **Focus on "Soundness" and "Legal Compliance":** Do not simply state personal dislike for the development. Argue that the plan is not "justified" or "effective"³.
- **Highlight Key Evidence:** Specifically mention the water supply deficit, as the council believes this is the strongest case for reducing housing numbers⁴. Also, mention incomplete highways evidence and specific junctions that will be over capacity⁵.
- **Opt-in to the Public Inquiry:** When submitting via the website, click "yes" to participate in the public inquiry. This keeps your options open to be heard later in the process without committing to hiring expensive legal representation at this stage.

Speak up for Tonbridge and Malling

Please respond by:

11.59pm on Sunday 25 October 2026

(please allow at least 15mins to complete your submission and read any relevant papers etc.)

This is your final opportunity to comment before the Plan is submitted for independent examination.

Log in to:

<https://reg19tmbcconsult.commonplace.is/en-GB/>

or scan the QR code below:

