



# **Tonbridge and Malling Borough Council Local Plan 2011-2031**

## **Regulation 19 Publication Version**

### **Representation Form**

*Tonbridge and Malling Borough Council respects your privacy and is committed to protecting your personal data. Further details of our Privacy Notice following the introduction of the General Data Protection Regulation can be found on our website: [www.tmbc.gov.uk/privacy-notice-localplan](http://www.tmbc.gov.uk/privacy-notice-localplan)*

# A



Ref:

*(For office use only)*

## Tonbridge and Malling Borough Council Local Plan 2011-2031 Regulation 19 Publication Version – Representation Form

Please return by **4pm on Monday 19<sup>th</sup> November 2018** to: [localplan@tmbc.gov.uk](mailto:localplan@tmbc.gov.uk) or by post to: Planning Policy Manager, Tonbridge and Malling Borough Council, Gibson Building, Gibson Drive, Kings Hill, West Malling, Kent ME19 4LZ

This form has two parts:

**Part A** – Personal Details

**Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make. Please see guidance note at the back of the form for definitions and details.

	1. Personal Details *	2. Agent's Details (if applicable)
Title	MRS	
First Name	SARAH	
Last Name	HUSEYIN	
Job Title (where relevant)	PARISH CLERK	
Organisation representing (where relevant)	SHIPBOURNE PARISH COUNCIL	
Address Line 1	GABLE COTTAGE	
Address Line 2	ISMAYS ROAD	
Address Line 3	IGHTHAM	
Postal Town	SEVENOAKS	
Post Code	TN15 9BE	
Telephone Number	01732 886402	
Email Address	shipbourneparishcouncil@gmail.com	

*\* If an agent is appointed, please complete only the Title, Name and Organisation boxes above in 1 but complete the full contact details of the agent in 2.*

**Please note:** Where an email address is given, this will be used as the primary means of contact.

Would you like to hear from us in the future? *Please tick appropriate box*

I would like to be added to the database to receive updates of the Local Plan

B



REF:  
  
(For office use only)

**Tonbridge and Malling Borough Council**  
**Local Plan 2011-2031**  
**Regulation 19 Publication Version – Representatic**

*Please note: Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations will be available for public viewing at our council office by prior appointment, as soon as reasonably practicable after the Local Plan and supporting documents have been submitted to the Secretary of State.*

**Part B – Please use a separate sheet for each representation**  
(Please note: Part A must also be completed)

Name or Organisation:

3. To which consultation document does this representation relate? *Please tick appropriate box*

<b>Local Plan (inc. Policies Map)</b>	<input checked="" type="checkbox"/>	<b>Sustainability Appraisal</b>		<b>Habitat Regs Assessment</b>	
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4. Topic. *Please select topic (also listed in guidance note) and then state policy/section*

Topic	HOUSING ALLOCATIONS
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Policy	
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Policy Map	
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Paragraph	
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Sustainability Appraisal (SLAA ref number)	
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5. Do you consider the Local Plan is:  
*Please tick appropriate box, see guidance note for definitions and details*

5. (1) Legally compliant	YES		No		Don't Know	
5. (2) Sound	YES		No		Don't Know	
4. (3) Compliant with the Duty to Co-operate	YES		No		Don't Know	

6. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

There are 10 sites in Shipbourne Parish that were brought forward at the call for sites, both encircling the village conservation area of Shipbourne and out towards its wider boundaries. These have not been allocated, and we support the Local Authority's assessment of these sites as being unsuitable. SHIPBOURNE PARISH COUNCIL SUPPORTS THE LPA'S ASSESSMENT OF SITE REFERENCES 338,340-344,347,348,352 & 361 THESE SITES AS 'UNSUITABLE'.

The possibility of future threat to Shipbourne for development is apparent from the call for sites information and the response of the developer to the Reg.18 consultation on site 347 highlights our concerns. With specific reference to SITE 347 we would like to make the following comments in support of the LPA's assessment:

Back Lane on which SITE 347 is located is an important linier feature and encloses the village with its original houses historically related to agriculture and forestry employment dotted along it with wide agricultural gaps between. Further development along this tree lined and wide verged road would impact hugely on the character this rural road in the AONB and its setting. Furthermore turning traffic along Back Lane opposite the school would increase the danger to users of the school, already dangerous at school drop off and pick up times.

The AONB Management Plan and it supporting guidance the Kent adopted Rural Roads Handbook, the Kent Downs AONB Landscape Design Handbook and the Tonbridge and Malling Borough Council adopted Supplementary Planning Guidance Shipbourne Design Statement 2002 indicate many reasons why development beyond the southern boundary of Back Lane would be unacceptable.

There are no reasons why the 'confines of the village' and an intrusion into the Green Belt should be countenanced. There is no identified need for affordable housing in Shipbourne and there are insufficient services provided in the village to support this development. Its release would conflict with the emerging Local Plan policies.

'Review of village boundary': Shipbourne does not have a village boundary as such as it is washed over by both Green Belt and the AONB; and therefore

a review of the village boundary does not apply.

Housing need: There is no unprecedented need for housing that provides exceptional circumstances for the release of this land. The identified 'objectively assessed need' for 696 new homes per year does not represent the exceptional circumstances that warrants the release of sites around Shipbourne as there are other alternatives available with less constraints that are deliverable within the Borough. Its release would be in conflict with the NPPF and emerging Local Plan and policies.

(Continue on separate page/expand box if necessary)

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 6 above.

**Please note:** any non-compliance with the Duty to Cooperate is incapable of modification at examination.

*You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

(Continue on separate page/expand box if necessary)

**Please note:** your representation should cover succinctly all the information, evidence and information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? *Please tick appropriate box*

**NO**, I do not wish to participate at the oral examination

**YES**, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Shipbourne Parish Council wish a representative of the Parish Council to participate in the oral part of the examination in the event that further evidence is required to support the LPA's assessment of sites in Shipbourne, and to support the need for robust policies to conserve and enhance Shipbourne Parish, as indicated under representations made under other topic headings.

(Continue on separate page/expand box if necessary)

**Please note:** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:	
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Date:	
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