EAST PECKHAM
REGULATION 19 COLLECTIVE RESIDENTS' RESPONSE

Tonbridge and Malling Borough Council Draft Local Plan 2024-2042

Publication (Regulation 19) consultation: 11 September to 25 October 2026

This collective response has been signed by 26 residents of East Peckham, Hale Street, Snoll Hatch and the surrounding hamlets, and represents the views of all those who have signed up.

The names and addresses of the residents who have signed this response are emailed to Tonbridge and Malling Borough Council separately, and it is requested that these are appropriately redacted before publication.

22 October 2026

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Representation details

Question	Our answer
To which part of the Local Plan does this representation relate?	Chapter 5 Spatial Strategy and the Sustainable Settlement Study; Policy SP2 (housing requirement); Policy A1 Housing and Employment Allocations; Chapter 13 Infrastructure and the Interim Infrastructure Delivery Plan; the Sustainability Appraisal
Which site allocations?	EP1 (Land West of Hale Street, site 59782) and EP2 (Land South of Church Lane, site 68376)
Which policy section?	Policy A1
Do you consider the Local Plan to be legally compliant?	**No**
Do you consider the Local Plan to be sound?	**No**
On what grounds?	**Not justified; not effective; not consistent with national policy**
Do you wish to participate at the examination hearing sessions?	Yes

Legal compliance. We say the plan is not legally compliant because the Sustainability Appraisal did not assess a reasonable alternative distribution of housing against the two constraints that bind hardest in East Peckham, flood risk and water availability, as the Environmental Assessment of Plans and Programmes Regulations 2004 require; and because several documents the plan expressly relies on were not available when this consultation opened on 11 September 2026.

Soundness. We say the plan is not justified because the evidence supporting the East Peckham allocations contains errors of fact and omits constraints documented in the Tonbridge and Malling Borough Council's (TMBC) own files; not effective because the statutory water undertaker has said in writing that it cannot supply this growth and TMBC's own consultant says there is no five-year housing supply on adoption; and not consistent with national policy because the flood sequential and exception tests have not been applied at plan-making stage.

What we are asking for

We are not asking for a village that never changes. We are asking for a plan that can be delivered without putting people at risk.

1. **Delete allocation EP2** (72 homes, Land South of Church Lane), or apply the flood exception test at plan stage and publish the result before submission.
2. **Delete allocation EP1** (156 homes, Land West of Hale Street), or at minimum add the flood criteria and site-specific flood risk assessment that its policy currently lacks entirely.

3. **Publish the applied borough-wide flood sequential test**, and the modelled flood water level for EP2 in metres above ordnance datum, so that anyone, including the Inspector, can test whether the land is high enough.
4. **Add water supply and wastewater capacity criteria to both allocations**, with a monitoring and trigger framework tying housing tranches to confirmed supply milestones, and publish dated Statements of Common Ground with South East Water and Southern Water during the consultation.
5. **Correct the bus service information** in the Sustainable Settlement Study and its appendices, re-run the affected scoring, and confirm whether the site suitability conclusions survive the correction.
6. **Re-categorise East Peckham (central settlement) from Tier 3 to Tier 4**, and Hale Street from Tier 4 to Tier 5, to reflect the services and access that exist rather than those recorded in error.
7. **Appraise at least one reasonable alternative distribution** constrained by flood risk and water availability, as the Sustainability Appraisal did for Green Belt.
8. **Provide a funded, dated school places solution** agreed with Kent County Council, and assess the cross-boundary primary care load on the practices our village actually uses.
9. **Add a dwelling size and tenure requirement** to any retained allocation, reflecting the evidenced local need for smaller homes and homes for older residents.
10. **Adopt the stepped housing requirement** that TMBC's own consultant recommends, or evidence why it is not needed, so that this plan does not invite the speculative applications it exists to prevent.
11. **Confirm the date each document the plan relies on was first made available**, and extend the representation period for any document first made available after 11 September 2026.

We also **support** four things in this plan, and ask that they be kept: the deletion of sites 59613, 59789 and 58751; the designation of Local Green Space LGS51; the reduction of the parish allocation to 228 homes from the 586 of the superseded Regulation 18 draft; and the water efficiency standards in Policy CC7.

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1. Who we are, and why we are writing again

In December 2025, residents signed a collective response to the Regulation 18 draft of this plan. We set out, in detail, why five sites in our parish were the wrong places to build: flooding, no safe way out, water supply constraints, no GP services within the village, a full school, and roads and buses that could not carry what was proposed.

Much of that was heard. The 586 homes proposed for this parish at Regulation 18, have become 228 in this plan. The Brook Farm land was dropped for flood risk and no safe access. The land at Addlestead Road was dropped. The Coult Stream land was dropped and is now proposed as Local Green Space. On TMBC's own reassessment, three sites recorded as suitable and deliverable in November 2025 are now recorded as unsuitable. That is a 61 per cent reduction, and it happened because residents and the Parish Council put evidence on the table.

So this is not a letter from people who object to everything. It is a letter from people who were right last time, writing about aspects of the revised local plan being progressed under the requirements and transitional arrangements of the National Planning Policy Framework 2024, that remain.

What is left is 228 homes on two sites that TMBC's own documents show it cannot yet demonstrate are safe, supplied with water or other services. One of them, EP1, carries 156 homes and has **no flood requirement of any kind** in its policy, despite thirteen recorded flood incidents within fifty metres of it. The other, EP2, is **wholly inside the extreme flood extent and wholly inside a flood warning area**, and its own escape route is rated **"Significant, Dangerous for Most People"** by TMBC's own consultants.

East Peckham Parish Council has submitted four detailed technical representations: including on the settlement hierarchy, on infrastructure and utilities, on EP1 and on EP2. **We support all four in full.** This response does not repeat them. It does two things they cannot: it tells you what this plan means for the people who live here, and it puts that on the examination record in the words of the people it will happen to.

A note on our figures. Everything factual in this response comes from a named published source: TMBC's own evidence base, the Environment Agency, the Department for Transport, South East Water, Southern Water, NHS Kent and Medway, Kent County Council, the Office of Rail and Road, and the 2021 Census. Where we use parish census figures, they are for the eleven Output Areas best fitted to the civil parish boundary, and we say so. Where we use our own residents survey, we say what its limitations are. Where a question is genuinely open, we say that too.

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2. Water: you are asking us to take 228 homes that cannot be supplied

What it is like here

Water pressure and supply in parts of this village is already poor. We are asked to use less in dry summers while being told that hundreds more homes are coming. Residents are not hydrologists, but we can read a straight answer, and the honest position in this plan's own evidence is that nobody can say where the water for these houses is coming from.

What TMBC's own evidence says

- **South East Water, 17 December 2025, in writing to TMBC:** it "cannot accommodate additional growth beyond what was assumed in our Water Resources Management Plan 2024" in areas without a supply surplus; in Tonbridge and Malling this applies "throughout the entire planning period"; and new solutions cannot even be identified until its next plan's work concludes in spring 2028.
- **South East Water's Position and Options Statement, 20 August 2026**, produced after ministerial intervention, puts a number on it: a supply and demand deficit of up to **5.31 million litres per day** at peak by 2041/42, with 4.04 already reached by 2034/35. It offers options and defers the definitive answer to the next statutory plan, producing an updated strategy "from April 2030 onwards". Funding depends on a provisional submission to Ofwat.

- **TMBC's own Infrastructure Delivery Plan** quantifies the interim schemes at **2.0 million litres per day at their peak, falling to 1.0 from 2031/32**, with the substantial transfer from SES Water not arriving until **2038/39**, and concedes that the surplus "drops away in the mid-2030s". On TMBC's own figures the supply schemes never close the gap in any year. The balance rests on demand reduction and on options that do not yet exist.
- **East Peckham draws from South East Water's Cranbrook zone** (water resource zone 7), supplied from local groundwater. The new reservoir and desalination schemes are at Broad Oak and Reculver in East Kent, and Arlington and Peacehaven in East Sussex. **Not one of these serves the zone our taps are on.** South East Water's own statutory tables show that zone in baseline deficit throughout the plan period and, after every planned intervention, at a planned surplus of **0.00 million litres per day** in every year into the early 2030s.
- **The claim that holds the plan together is not in the plan.** The pivotal conclusion quoted in the Infrastructure Delivery Plan, that the "forecast supply-demand balance remains in surplus throughout the Local Plan period", is attributed to a Water Supply Study by AtkinsRealis. When the evidence base was checked on 25 August 2026, TMBC's evidence page listed a "Water Supply Report" with no download link. The study was published on 26 August 2026. Its margins are smallest in 2037/38, and it goes into deficit under two of its own occupancy sensitivities.
- **The Government letter is not a guarantee, and says so.** The joint Defra and MHCLG letter describes "a credible pathway" while expressly "recognising the limits of the reassurance that our departments are able to provide".
- **Neither EP1 nor EP2 contains a water supply requirement at all.** Not a trigger, not a condition, not a phasing clause. Nor is water risk logged in the plan's risk register, against a committee report that calls water the leading challenge.
- **Wastewater is worse.** Southern Water confirmed on 6 August 2026 that the local network can take a foul flow of 0.58 litres per second. Southern Water's own drainage plan rates the East Peckham catchment at **"Very Significant" risk of hydraulic overload**, with no named scheme, no cost and no date. This is a village where sewage has backed up into gardens and drained into the River Medway.

Why this makes the plan unsound

National policy (NPPF December 2024, paragraph 20) requires strategic policies to make sufficient provision for "water supply, wastewater and flood risk". Paragraphs 161 and 162 require plan-making to take full account of climate impacts including water scarcity and the long-term implications for water supply. A plan whose statutory water undertaker has said in writing that it cannot supply the growth, and which contains no water requirement on the allocations concerned, is **not effective** and **not consistent with national policy**.

What we ask

Add water supply and treatment capacity criteria to EP1 and EP2. Insert a monitoring and trigger framework tying housing tranches to confirmed supply milestones, with a defined contingency if they are not met. Address the margins in the published Water Supply Study, including the two sensitivities in which it goes into deficit. Publish dated Statements of Common Ground with South East Water and Southern Water during this consultation, not after it.

3. Flooding: we are the people who get flooded

What it is like here

Residents of East Peckham have stood in floodwater. Some have done it in their own hallways. We carried furniture upstairs in 2000, in 2013 and 2014, and again in 2019 and 2020. We know which lanes go first, which fields hold the water, and how long it takes for the smell to leave a carpet.

When it floods, the people who respond are our three volunteer flood wardens, our neighbours, and emergency services driving on roads that are under water.

Residents have recorded floodwater up to **900 millimetres deep on Church Lane at the entrances to the EP2 site**. In 2013 the river and the surface water came up together. Church Lane flooded from the rivers in 1960 and in 1968. These are not predictions. They are things that happened to people who are still here.

What TMBC's own evidence says

The parish. On the Environment Agency's current flood data (2025), **244 of about 1,400 homes in this parish are at medium or high risk of river flooding, about one in six**. That is the **highest proportion of any parish in Tonbridge and Malling**, and the fourth highest number of homes after Tonbridge town, Aylesford, and East Malling and Larkfield. **505 homes in the parish sit in Flood Zone 3** on the Environment Agency's planning map. We note that TMBC's Sustainability Appraisal instead relies on a 2017 Kent County Council figure derived from first-generation 50 metre grid modelling. On either dataset, this is the borough's most flood-exposed parish by proportion. East Peckham also sits in a catchment that TMBC's own cumulative flood impact mapping ranks **"High"**, a fact that **neither allocation's criteria mention**.

EP2 (72 homes, Land South of Church Lane). TMBC's own site screening records this site as:

- **100 per cent** within the extreme (0.1 per cent annual probability) flood event with climate change
- **100 per cent** within the wet-day reservoir flood extent
- **100 per cent** within an Environment Agency Flood Alert and Flood Warning Area, with **eight recorded flood incidents within 50 metres**
- **70.07 per cent** in Flood Zone 2, **13.74 per cent** in Flood Zone 3a and **0.17 per cent** in functional floodplain (Flood Zone 3b)

TMBC's own Level 2 flood assessment rates access along Church Lane up to **"Significant, Dangerous for Most People"** in the design event, and the mapping puts that hazard band **over the built-up part of Hale Street, on the escape route**. It records flow velocities below 0.25 metres per second in every modelled event. In plain terms the water is effectively static, which means **raising the floor levels of the new houses does nothing to stop people being cut off**. Surface water concentrates on Church Lane in all six modelled scenarios and worsens with climate change, while the site interior stays dry, so the low site-area screening figure understates the access problem rather than answering it.

EP1 (156 homes, Land West of Hale Street). The same screening records **24.83 per cent** of the site within the extreme event with climate change, **42.36 per cent** within the wet-day reservoir extent, 17.5 per cent within a Flood Alert and Flood Warning Area, and **thirteen recorded flood incidents within 50 metres**, the highest count of any screened parcel in this parish. **No Level 2 site report was produced for EP1, and its allocation policy contains no flood criteria of any kind.** Hale Street itself floods where it crosses the Coult Stream and lies in Flood Zone 3, so safe dry access and egress in a severe event cannot be assumed.

The test that has not been done. National policy requires the sequential test, which asks whether there is anywhere safer to build, and the exception test, which asks whether the benefits outweigh the risk and whether the site can be made safe, to be applied **when the plan is made**. The Level 1 Strategic Flood Risk Assessment states in terms that it does not include the sequential test. Only a methodology is published. No applied test exists in the public domain. EP2's own criteria **defer both tests to the future planning application**, which is the reverse of what national policy requires for an allocation. The first limb of the exception test, that wider sustainability benefits outweigh the flood risk, is evidenced nowhere.

And safer land plainly exists. Of the **80 allocation parcels TMBC screened, 59 are wholly in Flood Zone 1** with no exposure even in the extreme event with climate change. The plan carries a **surplus of some 958 dwellings** above the 1,117 dwellings a year required by Policy SP2. EP2 ranks fifth worst for flood exposure of every allocated parcel in the borough, and the four worse are Tonbridge parcels of between 0.06 and 0.51 hectares.

What our own work shows

TMBC's flood mapping is published as borough-wide tiles with layers switched off by default, so it does not show what either allocation faces. The Parish Council therefore produced its own site-level overlay, and derived ground levels from the same Environment Agency 1 metre LiDAR data that TMBC's consultants used. Three things follow, and we think the first matters most.

TMBC's figures check out. Our independent flood coverage for EP2 is within about one percentage point of TMBC's, and our ground levels match TMBC's stated maximum and minimum almost exactly. **We are not disputing the arithmetic.** What is missing is the published mapping, not the numbers.

The "higher ground" at EP2 is barely higher. The policy requires development to be steered to "the northern, higher ground". Measured against the LiDAR surface, the whole site falls only **2.46 metres** from end to end, the northern part averages about **0.9 metres** above the southern edge, and **93.7 per cent of the site lies at or below 14.5 metres above ordnance datum**. It is a plateau, not a rise.

Nobody can test whether that is high enough. TMBC's Level 2 report gives ground levels but publishes **no modelled flood water level in metres above ordnance datum for any event**. Without that single figure, neither residents nor the Inspector can say whether the northern ground is safe, or how much land would be left once the flood requirement and the northern heritage buffer were both honoured. On a site with 2.46 metres of fall from one end to the other, that is not a technicality.

And it does not stop at our boundary

Both allocations are greenfield sites draining towards the village and the river. Hard surfacing them will accelerate surface water run-off into the Medway system, and the communities downstream of us, Yalding among them, will carry part of that. National policy requires development in a flood risk area to be made safe "without increasing flood risk elsewhere". Nothing in either allocation demonstrates that.

Why this makes the plan unsound

NPPF December 2024 paragraph 170 requires development to be directed away from areas at highest risk. Paragraph 171 requires strategic policies to be informed by a strategic flood risk assessment managing flood risk from all sources and considering cumulative impacts. Paragraph 172 requires all plans to apply a sequential, risk-based approach. The Sustainability Appraisal's own Objective 8 is "to reduce the risk of flooding to existing communities and ensure no new developments are at risk". Allocating 228 homes in the borough's most flood-exposed parish without applying either flood test, while 59 screened parcels sit wholly in Flood Zone 1 and the plan carries a 958-dwelling surplus, is **not justified**, **not consistent with national policy**, and contradicts the plan's own appraisal objective.

What we ask

Publish the applied sequential test. Publish the modelled flood level for EP2 in metres above ordnance datum, together with the developable area that remains once both the flood and heritage requirements are applied. Apply the exception test at plan stage for EP2, or delete the allocation. Add flood criteria and a site-specific flood risk assessment requirement to EP1. Require any retained allocation to demonstrate no increase in flood risk downstream.

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4. The bus that does not exist

This section matters more than it looks, because a single wrong line in a spreadsheet is what put our village in Tier 3 and put 228 houses on these fields.

What the Study says, and what actually happens

The Sustainable Settlement Study records, for East Peckham, Hale Street and Snoll Hatch alike, that "Service 6 to Maidstone/Tunbridge Wells operates regular service Mon-Sunday, approx. every 30 minutes. Last bus 18.27pm."

Here is the real service, taken from the operator's own registered data in the Department for Transport's Bus Open Data Service, downloaded on 12 June 2026 and confirmed by Kent County Council correspondence of the same date:

	Recorded in the Study	**What actually runs**
Days	Monday to Sunday	**Monday to Saturday only. No Sunday service at all.**

	Recorded in the Study	What actually runs
Frequency	about every 30 minutes	**about every 90 minutes**
Last bus	18:27	**about 17:40**
Weekday hours	not stated	about 06:30 to 17:40
Saturday hours	not stated	about 08:00 to 17:00
Evening service	implied	**none**

The only other scheduled service, Go-Coach route 208, makes about **nine weekday and four Saturday trips**, and **does not serve the village centre stops at all**: it terminates on the south-eastern edge of the parish. School buses run in term time only, Monday to Friday, timed to the school day.

In the 2021 Census, **8 residents of this parish travelled to work by bus. 808 travelled by car.**

Why one wrong line did so much damage

The Study awards East Peckham a bus accessibility rating of **3**, the highest available. That is the same rating given to the Principal Service Centres of Tonbridge and the Medway Gap, and **higher** than the rating of 2 given to Kings Hill. Applying the Study's own criteria to the service that actually runs in East Peckham gives a **Fair** rating of 2, **NOT** Good.

That rating fed a single whole number into the scoring table, which is published only as an image. And the Study's conclusion that East Peckham "does offer good bus services to other nearby settlements" is then **quoted verbatim in the Land Availability Assessment's suitability case for both EP1 and EP2**. The error did not stay in the Study. It became the justification for the allocations.

We note too that the plan's own transport assessment separately misdescribes route 6 as running "once a day", which is wrong in the opposite direction. So the evidence base does not agree with itself about the one bus we have.

The Parish Council wrote to TMBC on 10 July 2026 setting out these corrections. Between the 2025 and 2026 Studies the score for East Peckham changed by **0.01 points**, and Hale Street did not change at all. The corrections were not made.

Rail is not an answer either

Beltring is an unstaffed halt train station about 2.4 kilometres away with no car park. The Office of Rail and Road records **14,532 entries and exits in 2024/25, about 40 a day**. There is no parking, secure cycle lockers, no footway and no lighting on its approach roads. To reach it on foot you must cross the **A228 Branbridges Bypass, a national speed limit dual carriageway with no pedestrian crossing on that stretch**. In the twelve months to June 2026, **four people died in two collisions on that road**. **Yalding** has a 21-space car park and is reached by narrow lanes with no footways, unsuitable for cycling under the national design standard LTN 1/20.

Walking: measured, not estimated

Measured on the actual network, not in circles drawn on a photograph:

- **From EP1**, the nearest convenience store is about **1.27 kilometres** via Hale Street, or **1.66 kilometres, over 20 minutes each way**, along unlit Church Lane and Pound Road.
- **From EP2**, it is about **1.05 kilometres, about 15 minutes each way** along unlit Church Lane and Pound Road, or **1.65 to 1.8 kilometres, over 20 minutes**, via Hale Street and Old Road.
- The Chartered Institution of Highways and Transportation's preferred maximum walking distance to local facilities is **800 metres**.
- At evidence-based walking speeds for older and less mobile people, the shop is a **23 to 35 minute walk each way**.
- A Parish Councillor measured the Church Lane footway either side of the proposed EP2 access. There is a footway **on one side only**: about **1.3 metres** clear of the kerb towards the school, about **1.12 metres** usable towards Hale Street, reducing to about **0.80 metres** where vegetation encroaches. **A wheelchair or a mobility scooter cannot pass a pedestrian on that footway, and it cannot be widened within the highway boundary.**
- This is not only our measurement. **TMBC's own East Peckham Walking Audit of August 2025** records effective footway widths frequently below 1.5 metres on the routes serving these sites, and TMBC's **Active Travel Strategy scores Hale Street the worst walking route in the borough and proposes nothing for it.**
- The public right of way along the Coult Stream is unlit, unsurfaced, very narrow and extremely uneven with prominent tree roots, and lies within the flood extents. It cannot form part of an everyday route.
- The Parish Council's walking audit found **Hale Street is 21 minutes or more from the village centre one way for an adult walking at normal speed, and over 30 minutes for older residents.** For many of our neighbours the village centre is already effectively unreachable on foot.

Car dependency is not a lifestyle choice here

At the 2021 Census, of about 1,350 parish households (eleven Output Area best fit): **90.7 per cent had at least one car or van**, against 76.5 per cent across England; **56.1 per cent (758 households) ran two or more**; and **126 households (9.3 per cent) had none**. Those 126 households are the ones this plan should worry about, because there is nothing for them after 17:40 and nothing at all on a Sunday.

The Department for Transport's Connectivity Metric (2025) scores this area at **45.05, against 55.35 for Tonbridge and Malling and 64.81 for England**; the underlying figures for the parish's two Lower Layer Super Output Areas are 44.9 and 36.8 against a borough average of 55.4. The English Indices of Deprivation 2025 place us among the **most service-isolated 10 to 20 per cent of areas in England** on the Geographical Barriers measure. Those are independent national measures, and they cannot be reconciled with a description of "good bus services" or with a Primary Village categorisation.

And the mitigation does not exist

TMBC's traffic model tested **482 dwellings plus employment floorspace** at East Peckham against published allocations of **228 dwellings and no employment**. **No junction serving this parish was modelled in detail.** The only corridor scheme is unfunded and is recorded in the TMBC's own Infrastructure Delivery Plan as **"not feasible"**. **Neither allocation contains a single transport requirement.** Maidstone Borough Council objected to the East Peckham allocations at Regulation 18 on cross-boundary transport grounds.

On road safety, Hale Street is already on the local Highways Improvement Plan for speeding and road safety. Adding the traffic of 156 homes to it is a risk the evidence base does not recognise, let alone mitigate.

Why this makes the plan unsound

NPPF December 2024 paragraph 109 requires "a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places". Paragraph 110 requires significant development to be focused on locations that "are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes". Paragraph 115 requires sustainable transport modes to be prioritised in assessing sites for allocation. An allocation justified by a bus service which in reality does not exist is **not justified**. An allocation with no transport criteria and no funded mitigation is **not effective**.

What we ask

Correct the bus service information in the Study, its three proformas and the main text. Re-run the affected scoring and confirm whether the suitability conclusions for EP1 and EP2 survive the correction. Re-categorise East Peckham (central settlement) from Tier 3 to Tier 4, and Hale Street from Tier 4 to Tier 5. Model the junctions serving this parish. Add transport criteria and funded mitigation to any retained allocation, or explain their absence.

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5. Growing older in a village with no doctor

What it is like here

There is no GP surgery in East Peckham. The practice many of us use is the Woodlands Health Centre, which is in Paddock Wood, not in our parish. To get there without a car you need a bus that runs about every ninety minutes, stops at about 17:40, and does not run on Sundays. For a great many of our neighbours, a routine appointment means asking someone for a lift.

This is not a complaint about convenience. It is the central fact about this village's demography.

What the evidence says

- At the 2021 Census, **821 residents, 25.0 per cent of the parish, were aged 65 or over** (eleven Output Area best fit).

- On the Parish Council's current population projection (version 2.0, July 2026), that rises to **31.1 per cent by 2041, about 1,057 people, of whom about 584 will be 75 or over and about 181 will be 85 or over**.
- **541 residents, 16.5 per cent, reported fair, bad or very bad general health** at the 2021 Census.
- In the Parish Council's 2026 residents survey, **inadequate GP and healthcare access was among the most frequently cited concerns**, and **pharmacy and healthcare was the single most-demanded additional service**. That concern was sharpest among the oldest respondents.
- **NHS Kent and Medway confirmed on 16 July 2026** that development here "will increase demand on primary and community healthcare services".
- **Paddock Wood Town Council has formally objected** on the basis that East Peckham's new residents would place further pressure on its already stretched health centre.
- TMBC's Infrastructure Delivery Plan contains **no primary care scheme covering this ward**, and **no health delivery risk is logged in the plan's risk register**.

So the plan proposes 228 homes in a parish with no surgery, where a quarter of residents are already over 65 and nearly a third will be by the end of the plan period, and the cross-boundary load on the practice we actually use is dismissed rather than assessed.

The compound effect nobody has assessed

Each of these facts appears somewhere in the evidence base. Their combination appears nowhere. For an eighty-year-old resident of Hale Street without a car:

- the village centre is **over 30 minutes away on foot**, on a footway too narrow for a mobility scooter to pass a pedestrian;
- the bus is **about every ninety minutes, with nothing after about 17:40 and nothing on a Sunday**;
- the doctor is **in another parish**; and
- several of the roads between them **flood, periodically isolating the hamlets and compromising emergency vehicle access**.

That is not a sustainable location for a Primary Village. It is a place where the oldest residents are already stranded, and the plan proposes to add 228 households to the same services without adding one of them.

What we ask

Assess the cross-boundary primary care load on the practice this parish actually uses, rather than dismissing it. Provide a funded primary care response in the Infrastructure Delivery Plan before these allocations are found sound. Log health delivery as a risk in the plan's risk register.

6. Our school is full

East Peckham Primary School is a one-form entry school: 30 places a year, 210 in total. TMBC's own infrastructure evidence records it as holding **7 spare places**, the tightest position in fifteen years of records, with **Reception oversubscribed**.

228 homes will bring roughly **60 to 80 primary-age children**.

The plan's answer is a half-form-of-entry expansion at **Wateringbury**. On TMBC's own evidence that scheme is categorised Critical but is **uncosted, unfunded and undated**; it sits **outside the Kent County Council planning group that serves this village**; it is **absent from Kent County Council's own Commissioning Plan 2026-2030**; and the Infrastructure Delivery Plan cites a **superseded edition** of that plan.

NPPF December 2024 requires strategic policies to make sufficient provision for community facilities including education. The August 2026 Framework requires plan-making to be informed by an understanding of existing deficits in community facilities and public service infrastructure. A plan that answers a full village school with an uncosted, undated expansion of a different village's school, which the education authority has not programmed, is **not effective**.

What we ask. A funded, dated school places solution agreed with Kent County Council, phased against occupations, before these allocations are found sound.

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7. The homes being built are not the homes we need

This is the part of the plan that frustrates residents most, because it is the one place where more housing would genuinely help us, and the plan does not deliver it.

What residents actually said

The Parish Council's 2026 residents survey drew **236 responses, about 17.5 per cent of parish households**, by post and online. Its clearest housing message was this: residents overwhelmingly want **smaller homes of one and two bedrooms, and housing designed for older residents**. Nearly one in five respondents (**19.1 per cent**) expected a housing need in the next five years, most often because they want to **downsize and cannot**.

We should be straight about this survey's limits. Its respondents skew older, longer-established and more likely to own their home than the parish as a whole: 49.2 per cent were aged 65 or over against 25.0 per cent in the census, and 91.1 per cent were owner-occupiers against about 74 per cent. Renters and younger adults are under-represented. We set that out so the Inspector can weigh it properly. But on this particular question the survey agrees with the census, which does not skew at all.

What the census shows

At the 2021 Census, **1,091 of about 1,350 parish households, 80.7 per cent, had at least one spare bedroom**, and **660 had two or more**. That is a village of people living in houses larger than they need, because there is nothing here to move into.

What the market shows

- Residential sales recorded in this parish since 2021 (HM Land Registry Price Paid data): median **£550,000** for a detached house, **£407,500** semi-detached, **£330,000** terraced.
- For the wider statistical area that contains this parish (Hadlow and East Peckham, which also includes Hadlow), the median price in the year ending March 2026 was **£400,000**, with a lower quartile of **£325,750** (Office for National Statistics).
- Across Tonbridge and Malling in 2025, the lower quartile house price was **£320,000** against lower quartile earnings **of people living in the borough** of **£30,600**: a **lower quartile affordability ratio of 10.5**.
- **265 households were on TMBC's housing register at 31 March 2025**, of whom **96 needed one bedroom** and 52 needed two.
- Only **165 parish households rented from a social landlord** at the 2021 Census.

Why this makes the plan unsound

Policy A1 allocates 228 homes to this parish without any requirement as to **dwelling size or tenure mix tied to the local need TMBC's own evidence identifies**. The predictable outcome is 228 market-led family houses on flood-exposed Green Belt land: homes that will not house the 96 households on the register who need one bedroom, and will not let a single one of our older residents downsize and release a family home.

That is a plan that increases the parish's housing stock by about 17 per cent without meeting its housing need. It is **not justified** by the evidence of local need and it is **not effective** in meeting it.

What we ask

Add a dwelling size and tenure requirement to any retained allocation, reflecting the evidenced need for one and two bedroom homes and homes for older residents, including a proportion built to accessible and adaptable standards. If that cannot be secured, reduce the allocation to what can.

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8. The fields between us are not spare land

What it is like here

East Peckham Parish is not one village. It is a loose collection of nine hamlets, including Hale Street, Snoll Hatch and Beltring, with open farmed land between them. That is not a planning abstraction. It is why people recognise where they live. You can stand in the gap between East Peckham and Hale Street and see two separate places. Build on it and there is one place, for ever.

Both allocations sit in that gap. TMBC's own landscape photographs show open farmed grassland in which settlement reads only as a low skyline.

What TMBC's own evidence says

- TMBC's Green Belt Assessment rates **both East Peckham sites as performing strongly** against Green Belt purposes, including **the highest score against safeguarding the countryside from encroachment**.
- The assessors recommended sub-area HS-03, which becomes **EP2**, for release **only in combination with four neighbouring sub-areas**, warning that isolated release "would harm the performance of the wider Green Belt". **The plan releases it alone, and the supporting Topic Paper does not disclose that caveat.** We should add that the recommended combination is a single L-shaped block filling the whole gap between East Peckham and Hale Street, so completing it would be worse, not better. **The remedy is deletion, not completion.**
- The assessment sheet for the adjoining sub-area HS-01 states that its release in isolation, or with HS-02, would also harm the wider Green Belt. We ask that this be recorded now, so that no later case can be made for rounding the allocation off westward.
- Both sites qualify as "grey belt" only because that definition disregards the encroachment purpose on which they score highest. On TMBC's approach, **144 of the borough's 146 sub-areas are provisional grey belt**, so the label does almost no selective work.
- The Green Gap Study **scoped East Peckham out expressly because the Green Belt prevented coalescence**, and the plan then releases that Green Belt. There is a direct precedent for revisiting this: the 2026 Green Gap addendum was produced precisely because a Green Belt extension combined with new allocations changed the position at **East Malling**, and the gap there was redrawn. The identical combination arises here and was not revisited.
- The **updated Stage 1 Green Belt Assessment, the document that underpins the whole Green Belt case, was served corrupted from TMBC's own website** and could not be read at the start of the current consultation period. A readable copy appeared on 21 September 2026, ten days after this consultation opened.

Agricultural land and nature

EP1 is **Grade 2, "very good quality" agricultural land**, with the whole site within an Area of Archaeological Potential, and the policy requires protection of three Local Wildlife Sites. EP2 is also best and most versatile agricultural land, about **3.2 hectares of Grade 2**. National policy requires the economic and other benefits of best and most versatile agricultural land to be recognised, and, where significant development of agricultural land is necessary, areas of **poorer quality land to be preferred**. With a 958-dwelling surplus, that choice can be made without these fields.

EP2 also performs a flood conveyance role, which gives it a specific habitat function, and is recognised as important to a number of species including bats. These are dark rural edges. There is no lighting strategy for either allocation.

Height and character, recommended and then dropped

TMBC's own landscape consultants support only **small scale development of two to two and a half storeys** at these sites, and warn that more would exceed the landscape's capacity even with strong mitigation. The 2025 Heritage Impact Risk Assessment separately recommends a **two-storey limit at**

EP1. The 2026 Heritage Impact Assessment finds a high risk of harm to the settings of Grade II listed buildings from both allocations and prescribes landscape buffers.

None of this appears in the allocation criteria. Worse, the Sustainability Appraisal **raised both sites' heritage scores expressly because of criteria that do not contain the mitigation**. EP2 has no mitigation drawing at all, where 11 of 19 assessed sites have one.

At EP2 the criteria also contradict each other. The flood criterion pushes building onto the northern higher ground. The heritage buffer needs that same northern strip, opposite the listed buildings on the north side of Church Lane, kept open. Both cannot be honoured, and the plan does not say which gives way.

What we ask

Justify the isolated release of HS-03 against the assessors' own caveat, or delete EP2. Assess a green gap between East Peckham and Hale Street, applying the same approach used at East Malling. Explain the 5.32 hectare EP1 allocation against the 4.85 hectare assessed sub-area. Write the heritage buffers and a height limit of two to two and a half storeys into the criteria of any retained allocation, and resolve the conflict between the flood and heritage requirements at EP2. Require a lighting strategy.

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9. Counting our growth against a village that is not receiving it

All **228 homes are recorded in the plan's tables against Hale Street** (Tier 4, Secondary Village), with **Tier 3 East Peckham shown as receiving zero allocations**, although both sites adjoin both settlements and the entire case for developing them rests on **East Peckham's** shops, school and buses.

The effect is that the growth pressure on East Peckham's services is understated in every settlement-level table in the plan, while the sustainability credit for East Peckham's services is claimed in full. You cannot put the houses in Hale Street for the accounting and in East Peckham for the justification.

For scale: 228 homes against about 1,350 parish households is roughly **17 per cent growth**, about **555 additional residents**, in the borough's most flood-exposed parish, served by one bus.

We also repeat a question from our Regulation 18 response that was never answered. At Regulation 18, East Peckham carried about **95 per cent of the ward's entire allocation**. West Peckham and Mereworth had none. Wateringbury had 30, despite at least eight sites being promoted there, **all eight entirely in Flood Zone 1**. We ask again, plainly: **how was the housing requirement apportioned within this ward, and why?**

What we ask. Consistent settlement accounting for the 228 homes. Publication of the post-allocation settlement boundary. A clear statement of how the ward's housing requirement was apportioned between parishes, and why.

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10. Five-year supply: a weak plan is dangerous for us

Residents have learned something uncomfortable over the last two years: a plan that cannot defend itself is worse for us than a plan we dislike. While this plan has been in preparation we have been fighting a stand-alone application for 64 homes on the EP2 land, and the developer's case leans on the plan's own weakness.

On TMBC's own evidence:

- The **Housing Delivery Study Addendum (August 2026)** concludes that a five-year housing supply on adoption is **impossible with the mandatory 20 per cent buffer unless the requirement is stepped**, and recommends the steps. **Policy SP2 contains no step.**
- The plan is **silent on the Housing Delivery Test results of 0.54 and 0.63**, both of which trigger the presumption in favour of sustainable development, which is what makes that buffer mandatory in the first place.
- On the plan's own trajectory, the first five years deliver **4,768 dwellings against a plain requirement of 5,585**: about **71 per cent of the buffered five-year requirement**. Delivery then has to peak at **1,748 in 2030/31, 156 per cent of the annual requirement**, before falling to 421 by 2041/42.
- In the rural sub-area, the trajectory assumes roughly **200 to 260 dwellings a year against about 30 historically**.
- There is **no lapse rate** applied to 3,786 extant permissions.

A plan that cannot demonstrate a five-year supply on the day it is adopted invites exactly the speculative applications it exists to prevent, and we are the village that will receive them.

This is why we want this plan fixed rather than abandoned. We understand that if TMBC misses the statutory window, a new plan begins against the August 2026 Framework and the current standard method, very likely with higher numbers, with the presumption in favour of development running in the meantime. That is the worst outcome for East Peckham. We are asking for repairs, not for collapse.

What we ask. Adopt the stepped requirement TMBC's own consultant recommends, or evidence why it is unnecessary. Apply a lapse rate to extant permissions.

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11. Alternatives that were never tested

The Sustainability Appraisal tested **eight spatial options**, structured by settlement hierarchy, Green Belt and National Landscape. **Not one of them varied the distribution of housing by flood risk or by water availability.**

That omission is not explained by difficulty, because the appraisal shows it was achievable: **option 6 is mapped with a Green Belt constraint layer and gives East Peckham no growth at all**. The appraisal could map a constraint-led distribution, and did so, for one constraint but not for the two that bind hardest here.

And the arithmetic was available. With a **958-dwelling surplus**, an alternative that omitted the 228 East Peckham homes existed on TMBC's own numbers and was **never appraised**. The appraisal's own baseline already identified East Peckham as the borough's most flood-exposed settlement, on the 2017 figure it uses; the Environment Agency's current data confirms this parish has the highest proportion of homes at medium or high risk of river flooding of any parish in the borough. The water undertaker had already written to say it could not supply the growth. Both facts were in TMBC's hands, and neither shaped a single tested option.

This is our principal legal compliance point. The Environmental Assessment of Plans and Programmes Regulations 2004 require reasonable alternatives to be identified, described and evaluated. An appraisal that tests eight options and never varies the distribution against the plan area's two binding constraints has not done that.

What we ask. Appraise at least one reasonable alternative distribution constrained by flood risk and water availability before the plan is submitted.

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12. What we could not check

A consultation is only meaningful if the public can read what the plan relies on. Several things we needed were not there.

- Six documents the plan or its appraisals expressly rely on were unavailable when the evidence base was checked on 25 August 2026. All have since been published, and we acknowledge that. But **three carry server dates after this consultation opened on 11 September 2026**: the Duty to Cooperate Statement (11 September), the Draft Policies Map (16 September), Inset Map 8 (17 September), and a readable copy of the updated Stage 1 Green Belt Assessment (21 September).
- **EP1 and EP2 are the only allocations in this plan with no site plan.** Each of the ten strategic allocations has a red-line plan. Ours appear only as rows in a table in Chapter 14. Residents are being consulted on 228 homes without a drawing of where they go.
- The **Level 1 flood assessment's mapped appendix is published as borough-wide tiles with every layer switched off by default**, so it does not show what either allocation faces.
- The **Sustainable Settlement Study's scoring table is published only as an image**, so the arithmetic that produced our Tier 3 categorisation cannot be checked.
- **No modelled flood water level in metres above ordnance datum is published for EP2**, so the "higher ground" requirement cannot be tested by anyone.
- **Statements of common ground are deferred to submission.** NPPF December 2024 paragraph 28 says they should be "made publicly available throughout the plan-making process to provide transparency". Deferring them means the cooperation record with the water companies cannot be tested during the one period in which the public may comment.
- At Regulation 18, residents asked for specific information about the **use of artificial intelligence to assess consultation responses**: the models used, how the output is audited, whether generative models were excluded, the prompts used, how they can be independently reviewed,

and how officers' own judgement is preserved. **That information has not been published. We ask again.** Public authorities must base decisions on rational, lawful reasoning and consider relevant evidence; residents are entitled to know how their words were read.

What we ask. Confirm the date each document the plan relies on was first made available on TMBC's website, and extend the representation period for any document first made available after 11 September 2026. Publish site plans for EP1 and EP2. Publish the Sustainable Settlement Study scoring table as data. Publish the statements of common ground now. Publish the information requested about the assessment of consultation responses.

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13. What we support

We want this on the record as clearly as the objections, because these decisions were right and they must survive examination.

12. **The deletion of sites 59613, 59789 and 58751.** We support each one. We ask the TMBC to record **flood risk and the Local Green Space designation**, not merely land availability, as the reasons site 58751 is unsuitable. The current wording that there are "no constraints that would preclude development" leaves the door open if ownership consolidates, and landowners are likely to seek reinstatement at examination.
13. **The designation of Local Green Space LGS51** on the land adjacent to the Coult Stream. This was a community bid and it succeeded. We ask TMBC to correct the duplicated LGS51 reference, which is also used for a Tonbridge recreation ground, and to reconcile the 4.97 and 4.85 hectare boundary, so the designation is watertight at examination.
14. **The reduction of the parish allocation from the 586 homes of the superseded Regulation 18 draft to 228.** We support it, and we ask that the flood and access evidence that produced it be carried into the submission documents.
15. **The water efficiency standards in Policy CC7.** We support the standard. We question only the trajectory-level reliance on the savings it is assumed to produce.

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14. In conclusion

We are not asking TMBC to protect East Peckham from change. We are asking it to apply its own evidence to its own allocations.

On TMBC's own documents, in this plan:

- the statutory water undertaker has said in writing that it **cannot supply this growth**, and neither allocation contains a water requirement;
- the sewer catchment is rated **"Very Significant" for hydraulic overload**, with no scheme, no cost and no date;
- the **flood sequential test has not been applied**, 59 of 80 screened parcels sit wholly in Flood Zone 1, and the plan carries a **958-dwelling surplus**;

- **EP2 is wholly within the extreme flood extent and wholly within a flood warning area**, and its escape route is rated **"Significant, Dangerous for Most People"**;
- **EP1 has thirteen recorded flood incidents within 50 metres and no flood criteria at all**;
- the allocations are justified in part by a **bus service that does not run**;
- the school is **full**, and the answer is an **uncosted, undated expansion of another village's school** that the education authority has not programmed;
- there is **no GP surgery in the parish**, a quarter of residents are over 65, and no primary care scheme covers this ward;
- the Green Belt was released **against the assessors' own written advice**; and
- **no alternative distribution was ever tested** against flood risk or water availability.

Every one of those sentences comes from TMBC's own evidence base. None of them is a matter of local opinion.

The people who will live with the consequences are the people who have signed this response. We ask TMBC to make the modifications set out above before submitting this plan to the Secretary of State. If it does not, we ask the Inspector to find the East Peckham allocations unsound and to recommend their deletion.

We support the four detailed representations submitted by East Peckham Parish Council in full, and we add our names below as residents who know this land, this river and these roads.

Signatures

This collective response is signed by the 26 residents. Names and addresses to be supplied under separate cover, and it is requested that they are appropriately redacted before publication.

Collective Response from Residents of East Peckham, Hale Street, Snoll Hatch and the surrounding hamlets, October 2026.