Draft 7.10.26

**To which part of the Local Plan does this representation relate to:**
The Spatial Strategy (Chapter 5) and its supporting Sustainable Settlement Study

**If your comments are in relation to a particular site allocation identified in the Local Plan, please select the site you wish to make a representation on:**
EP1 and EP2

**Which policy section does your representation relate to? Select ONE option to ensure your responses are recorded accurately.**
Spatial Strategy Chapter 5 and Policy A1

**Do you consider the Local Plan to be legally compliant**
No

**Do you consider the Local Plan to be sound**
No

**If you do not consider the Local Plan to be sound, please specify on what grounds.**
Not justified

**Comments**
This representation objects to the Spatial Strategy (Chapter 5) and its supporting Sustainable Settlement Study on the basis that East Peckham (including Branbridges) and Hale Street have been wrongly categorised within the Settlement Hierarchy.

East Peckham is listed as a Tier 3 Primary Village and Hale Street is listed as a Tier 4 Secondary Village in the Tonbridge and Malling Borough Council Regulation 19 Local Plan (2024-2042) settlement hierarchy.

The settlement hierarchy that forms part of the Spatial Strategy has been informed by the Sustainable Settlement Study 2026. The settlement hierarchy applied to East Peckham and Hale Street is incorrect and fails to take account of pertinent and relevant information. The designations as a Tier 3 Primary Village and a Tier 4 Secondary Village are fundamentally unsound, they fail the test of being justified by proportionate evidence and overlook critical, acute local baseline constraints, specifically regarding transport and access, flood risk and severe infrastructure deficits.

A review of the August 2026 Sustainable Settlement Study indicates at Appendix B that the scoring for East Peckham and Hale Street has been revised since the 2025 Sustainable Settlement Study. The 2026 Sustainable Settlement Study lists the following:

| |
|---|
| **East Peckham scores 49.66**<br><br>**Hale Street scores 45.00** |

However in the 2025 Sustainable Settlement Study, the following was listed:

| |
|---|
| **East Peckham scored 49.67**<br><br>**Hale Street scored 45.00** |

***A difference of 0.01 only in respect of East Peckham.***

East Peckham Parish Council made representations to TMBC on 10th July 2026 regarding the 2025 Sustainable Settlement Study. These representations continue to be relevant as it does not appear that the Settlement Hierarchy has been amended following those representations to take account of the concerns.

The Parish Council outlined specific corrections that were needed to ensure that the Sustainable Settlement Study was factually correct regarding East Peckham. In addition the wider evidence that we considered relevant to how East Peckham was scored and categorised was provided, drawn from the evidence base we are assembling for our emerging Neighbourhood Development Plan (NDP).

The Sustainable Settlement Study incorrectly inflates the sustainability score of East Peckham and Hale Street by failing to appreciate their unique physical and operational limits. East Peckham is historically and structurally a loose collective of nine distinct hamlets (including Hale Street, Snoll Hatch, and Beltring) rather than a single consolidated, dense urban nucleus. Treating them as unified, sustainable tiers artificially aggregates service access.

## 1. Summary of our response

1.1 The bus service information recorded in Appendix A for East Peckham, Hale Street and Snoll Hatch, and the supporting statement in the main Study, is materially incorrect. The service that actually operates is significantly less frequent and more limited than the documents record. We would ask that the corrected information be reviewed, and the position regarding the level of bus service provision be re-assessed.

1.2 For the reasons set out in Section 3, we consider that the corrected bus service position, taken together with the wider accessibility and demographic evidence, supports re-categorising East Peckham as a Secondary Village.

## 2. Corrections to the bus service information

2.1 The corrections below relate to the bus service information. The source for the corrected position is the Department for Transport Bus Open Data Service (BODS), downloaded on 12 June 2026, confirmed by Kent County Council correspondence received on 12 June 2026. The same underlying error, namely that Service 6 runs Monday to Sunday approximately every 30 minutes with a last bus at 18:27, appears in

all three proformas and in the main Study. Current text is shown on the left, this should be amended in light of the correct position stated on the right.

**2.2 Appendix A, East Peckham proforma (page 21), Accessibility - Bus:**

| Current text (as recorded) | Correct Position |
|---|---|
| Service 6 to Maidstone/Tunbridge Wells operates regular service Mon-Sunday, approx. every 30 minutes. Last bus 18.27pm<br>Go Coach 208 bus service which runs Monday-Saturday, hourly on weekdays and two hourly on a Saturday between approximately 0730 and 1730. School bus services available. | Service 6 (Maidstone to Tunbridge Wells via East Peckham village, operated by Arriva) is the only year-round scheduled bus service that runs through the village itself. It operates Monday to Saturday only, with no Sunday service, and runs approximately every 90 minutes, *not every 30 minutes as currently stated*. Weekday operating hours are approximately 06:30 to 17:40, and Saturday hours are 08:00 to 17:00. The last bus is at approximately 17:40, not 18:27.<br>The Go-Coach Service 208 is the only scheduled service connecting East Peckham to Tonbridge town centre (continuing to Tunbridge Wells Hospital, Pembury and Henwood Green). It runs Monday to Saturday, with approximately nine departures on weekdays and four on Saturdays, and does not serve the village centre stops; it terminates at Stone Court Lane / Branbridges Road on the south-eastern edge of the parish.<br>School bus services operate during term time only (Monday to Friday) and are timed around school start and finish times.<br>Kent County Council has also confirmed a hail and ride arrangement on Seven Mile Lane / Hale Street, where passengers may board or alight anywhere along the road section by flagging the bus. |

**2.3 Appendix A, Hale Street proforma (page 31), Accessibility - Bus:**

| Current text (as recorded) | Correct Position |
|---|---|
| Walkable to stops within East Peckham, service 6 to Maidstone/Tunbridge Wells operates regular service Mon-Sunday approx. every 30 minutes. Last bus 18.27pm. School bus services available in East Peckham. | Hale Street is walkable to stops within East Peckham and is served by Service 6, which operates Monday to Saturday only (no Sunday service), approximately every 90 minutes, with a last bus at approximately 17:40. *It does not run every 30 minutes, and the last bus is not at 18:27, as currently stated*. Kent County Council has confirmed a hail and ride arrangement on Seven Mile Lane/Hale Street. |

| Current text (as recorded) | Correct Position |
|---|---|
| | School bus services in East Peckham operate during term time only (Monday to Friday). |

**2.4 Appendix A, Snoll Hatch proforma (page 60), Accessibility - Bus:**

| Current text (as recorded) | Correct Position |
|---|---|
| Walkable to stops within East Peckham, service 6 to Maidstone/Tunbridge Wells operates regular service approx. every 30 minutes Mon-Sunday. Last bus 18.27pm. School bus services available in East Peckham. | Snoll Hatch is walkable to stops within East Peckham and is served by Service 6, which operates Monday to Saturday only (no Sunday service), approximately every 90 minutes, with a last bus at approximately 17:40. *It does not run every 30 minutes, and the last bus is not at 18:27, as currently stated*.<br>School bus services in East Peckham operate during term time only (Monday to Friday). |

2.5 The Sustainable Settlements Study page 20, paragraph 6.14 (East Peckham) provides a score for East Peckham of 49.67. It states that "*Whilst it doesn't have a train station it does offer good bus services to other nearby settlements.*"

In fact, East Peckham has a year-round scheduled bus service through the village (Service 6) which runs Monday to Saturday only, approximately every 90 minutes, with no evening or Sunday service.

Applying the Study's own bus accessibility criteria (Figure 7), this represents a Fair bus rating (2) rather than Good (3). It does not have a train station.

2.6 East Peckham's bus rating of 3 is the highest available, and matches that given to the Principal Service Centres of Tonbridge and the Medway Gap. It is higher than the rating of 2 given to Kings Hill and the same as Snodland, which are both categorised as Service Centres and which offer more frequent bus services across a greater number of routes. This illustrates that the recorded data has overstated East Peckham's bus provision.

## 3. Wider evidence relevant to East Peckham's sustainability

3.1 The points below draw on the evidence assembled for our emerging Neighbourhood Development Plan. They are pertinent to how East Peckham should be categorised and should have been considered in preparing the Sustainable Settlement Study.

**3.2 Objective measures of connectivity.**

The Department for Transport Connectivity Score for East Peckham is 45.05, against 64.81 for England and 55.35 for Tonbridge and Malling as a whole. The 2025 Indices of Deprivation place East Peckham in the bottom 15% nationally on the Geographical

Barriers measure, which reflects physical access to services. These independent measures cannot be reconciled with a description of good bus services, or with a Primary Village categorisation.

**3.3 A forced reliance on the private car.**

90.7% of households in East Peckham own at least one car or van, compared with an England average of 76.5%. This reflects a forced reliance on the private car rather than genuine transport choice, which is the opposite of the sustainable, non-car access that the NPPF, and the Study's own methodology at paragraph 5.18, seek to prioritise.

NPPF December 2024 paragraph 109 requires "*a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places*." Paragraph 110 states that "*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health*." Further, paragraph 115 requires that assessment of sites "*that may be allocated for development in plans*" should ensure that "*sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location*."

**3.4 Demographic weighting and health services.**

East Peckham has an aging population, significantly weighted towards the older age groups. The key services and facilities that are vital for this demographic are healthcare services. The lack of local GP services for East Peckham is therefore more significant and impactful than it would be in a more balanced population. The absence of this fundamental frontline service has a greater impact due to the demographics, and increases the reliance on transport to reach healthcare elsewhere.

**3.5 Reliance on transport and the road network.**

The lack of key health services within East Peckham means that the reliance on transport is even more fundamental. This includes the weighting being given to the availability of public transport at the right times of day, and with the necessary frequency. Given the limited bus service, it raises particular difficulties for older people, who are then reliant on car ownership. This in turn raises issues in relation to the road network, its infrastructure and its capacity, which we highlighted in detail as part of our Regulation 18 consultation feedback. We would also note that there have been four fatalities on the A228 (Boyle Way) within the twelve months to June 2026. A number of roads flood regularly, which periodically isolates hamlets and compromises the very car-based access on which the settlement depends, as well as emergency vehicle access. This further undermines the reliability of access to and from the settlements.

**3.6 Flood Risk Realities.**

A defining principle of any sustainable settlement hierarchy is that higher-tier settlements must be capable of sustainably accommodating growth. East Peckham and Hale Street are constrained by extensive Medway flood risk zones.

This forces allocations onto highly vulnerable land, creating direct conflict with NPPF sequential testing and the plan's own Sustainability Appraisal (Objective 8), which explicitly mandates reducing flood risk to existing communities. A settlement structurally constrained by severe flood risks cannot logically be categorised as a primary focus for sustainable strategic growth.

**3.7 A dispersed settlement.**

East Peckham is a dispersed settlement, spread across nine hamlets, and is larger in extent than the separate settlement entries for East Peckham, Hale Street and Snoll Hatch might suggest. It is spread across those hamlets in a way that exacerbates the issues above, because not all hamlets are serviced in the same way. Accessing the village centre internally is tricky for some of the population because of the spread of the hamlets, and this also makes access outside of the village more difficult for some. Our walking audit evidence indicates that, for a resident aged 80 or over, the Co-op (approximately 1,045 metres from the village centre) is at or beyond a reasonable round trip on foot.

It is also evident that the high-tier classifications ignore the critical role that local fields play in maintaining separate identities. Forcing high growth targets into East Peckham and Hale Street actively support coalescence. This directly violates local character protections and contradicts TMBCs stated spatial objective to preserve the distinct, rural identities of detached settlements.

**Modifications Necessary to Make the Plan Sound**

To resolve this unsoundness prior to Submission to the Secretary of State, the following modifications are requested:

1. Update and correct factually incorrect information, including bus services and downgrade the Tiers: re-categorise East Peckham from Tier 3 to Tier 4 (or lower), and Hale Street to Tier 5 (Other Rural Settlements/Hamlets) to accurately reflect their physical constraints, infrastructure limits and detached hamlet status.
2. Review Housing Allocations: consecutively reduce or remove the unsustainable, flood-vulnerable proposed strategic allocations EP1 and EP2.
3. Incorporate Infrastructure Triggers: amend the Spatial Strategy text to ensure no settlement can be targeted for higher-density infill until documented water supply and wastewater network capacities are legally proven and delivered.