



Growth and Communities

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BY EMAIL ONLY

31 January 2025

Dear Sir/Madam,

Re: Southborough and High Brooms Neighbourhood Development Plan (2024 – 2038) – Pre-Submission Regulation 14 Consultation

Thank you for consulting Kent County Council (hereafter referred to as the ‘County Council’) on the Southborough and High Brooms Neighbourhood Development Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the document.

Chapter 2: About Southborough and High Brooms

Historical Context – Ch 2.10.

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, confirms that within the plan area, there are significant safeguarded land-won minerals, mainly a suite of sandstones that have low to no current demand. These minerals are, in all probability, now only suitable for historic building/structure restoration and building purposes. The ‘growth’ identified by the Neighbourhood Plan aligns with the emerging [Tunbridge Wells Borough \(TWBC\) Local Plan](#) and the County Council has commented on the allocations in terms of mineral safeguarding. Therefore, any development that comes forward in the future would need to accord with the emerging Local Plan. Any mineral safeguarding considerations would have to be addressed, as required by the adopted [Kent Minerals and Waste Local Plan 2013-30 \[Adopted Early Partial Review 2020\]](#) policy DM 7.

The County Council welcomes the acknowledgement of the adopted [Kent Minerals and Waste Local Plan 2013-30](#) [Adopted Early Partial Review 2020] within the Neighbourhood Plan.

Chapter 3: A Vision for Southborough and High Brooms

Public Rights of Way (PRoW): As a general statement, the County Council is keen to ensure its interests are represented with respect to its statutory duty to protect and improve PRoW in the county. It should be noted that PRoW is the generic term for Public Footpaths, Public Bridleways, Restricted Byways, and Byways Open to All Traffic. The County Council is committed to working in partnership with local and neighbouring authorities, councils, and others to achieve the aims contained within the County Council [Rights of Way Improvement Plan](#) (ROWIP) and the County Council ['Framing Kent's Future'](#) strategy for 2022 - 2026. The County Council intends for people to enjoy, amongst others, a high quality of life with opportunities for an active and healthy lifestyle, improved environments for people and wildlife, and the availability of sustainable transport choices.

The Neighbourhood Plan's underlying Vision (page 17) and Objectives (page 18), allow opportunities for maintaining and enhancing the local PRoW network, which will make a significant contribution in delivering the Plan's overall aims and much more. For example, the PRoW network can boost community connectivity and cohesion, enhance local environments by alleviating traffic congestion and improving air quality. Furthermore, the PRoW network can promote personal health and well-being for individuals and groups, and stimulate local economies by attracting passing trade, such as cafes, or supporting larger supply businesses, like those catering to cyclists. PRoW should, therefore, be given positive regard in this and all development plans.

Chapter 8: Environment and Green Space

Policy SHB9: Landscape and Biodiversity

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, acknowledges that there are 'parent' policies in place such as the [KCC Drainage and Planning Policy](#), the emerging [TWBC Local Plan](#) and national guidelines. However, the proposed Neighbourhood Plan lacks adequate consideration of surface water, SuDS and related flood risks. The County Council would recommend that the Neighbourhood Plan considers incorporating SuDS into the requirements or, at the very least, refers to the relevant local and national governing requirements.

Furthermore, the County Council recommends that Southborough Town Council may wish to consider adding additional wording to Policy SHB9 to strengthen it with regards to the requirement for new development to not contribute to flood risk via the inclusion of SuDS. The County Council does acknowledge that SuDS are considered in the [associated design code documentation](#).

Chapter 9: Transport and Movement

Policy SHB13: Improving walking, cycling and equestrian opportunities

Highways and Transportation: The County Council, as Local Highways Authority for Kent, support the vision and objectives relating to transport which seek to encourage active travel, infrastructure for electric cars and improved bus services.

PRoW: The County Council, as the PRoW and Access Service for Kent, welcomes the suggestions in Policy SHB13 and references to the ROWIP. The Neighbourhood Plan includes some specific mentions of PRoW; however, the County Council recommends enhancing the recognition of the PRoW network by adding the term to the Neighbourhood Plan's glossary. This would help raise its profile and highlight the benefits that an improved PRoW network could bring to the residents of Southborough and High Brooms.

Paragraph 9.14

The County Council welcomes the suggestions within the Plan to enhance the PRoW network by upgrading certain paths to bridleways. It is recommended that Southborough Town Council identifies paths to upgrade and includes these in the Neighbourhood Plan's list of Non-Policy Actions to evidence demand when TWBC is preparing its Infrastructure Development Plan or, should the County Council be seeking to improve access in the parish.

The County Council recommends the list of Non-Policy Actions should be able to be added to by residents and kept under constant review to ensure its relevance. The list of projects could include upgrading footpaths through the common to the bridleway and removing steps from the Bridleway which would not only improve accessibility for walkers but also equestrian and cycle use (page 66, Table 3: Potential walking improvements, point 3). Also, there is scope to upgrade footpaths around Brokes Wood or to the north of the Parish to provide possible connections to the A21 NMU (non-motorised users) route.

In seeking to improve the walking, cycling and equestrian opportunities as suggested above, the Service strongly encourages Southborough Town Council to work with the County Council to ensure consistency with standards around the county's PRoW network and the various applicable statutory procedures. This is in accordance with Objective 3 (page 18) and paragraphs 9.11 to 9.14 (pages 65-70). The County Council would also support improving signage for walking routes and destinations where these use existing PRoW (pages 40-43).

In reference to [Appendix A. Design Guidelines and Codes](#), Figure 31 (page 25) shows the PRoW and Highways Network. The key references Public Footpath (PRoW), however, there is no distinction between PRoW status, and so it incorrectly shows the Public Bridleway and Restricted Byway as Public Footpath. The County Council recommends that the key should be revised to refer solely to PRoW, without distinguishing between different statuses. Additionally, Bridleways and Restricted Byways should be included, and the map should be amended appropriately (there are no Byways Open to All Traffic within the Southborough and High Brooms area). Furthermore, AM01 Promoting Active Travel (Page 66) refers to Figure 32; this should be figure 31.

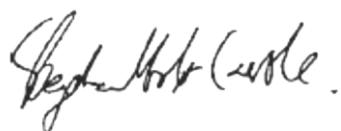
Chapter 12: Infrastructure Improvements and Provision

Waste Management: The County Council, as Waste Disposal Authority, has a Statutory Duty to provide Household Waste Recycling Centres (HWRCs) and Waste Transfer Stations (WTS) with sufficient capacity to accept arisings from across the county. Tunbridge Wells Borough Council (TWBC) is the Waste Collection Authority for this area with responsibility for kerbside collection.

The County Council notes that Tunbridge Wells (North Farm) HWRC and WTS are reaching capacity. Mitigation at this site or provision for a new site to provide the required capacity is likely to be needed to deliver the growth proposed in the Local and Neighbourhood Plan. Whilst the Southborough and High Brooms Neighbourhood Plan does not allocate sites for housing, it sets out parameters to support TWBC proposed growth strategy. The County Council has responded to the Local Plan and welcomes the inclusion of waste in the types of infrastructure to be delivered.

The County Council would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,



Stephanie Holt-Castle
Director – Growth and Communities