

# **Southborough and High Brooms Neighbourhood Development Plan**



**2024 to 2038**

**Consultation Statement**

**May 2025**

**Prepared by the Southborough and High Brooms  
Neighbourhood Development Plan Steering Committee on  
behalf of Southborough Town Council**

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## 1 INTRODUCTION

- 1.1. The policies contained in the Southborough and High Brooms Neighbourhood Development Plan (SHBNDP) have been developed following extensive interaction and consultation with the local community.
- 1.2. This Consultation Statement sets out how the SHBNDP has been developed and contains, in accordance with Regulation 14 of Neighbourhood Development Planning (General) Regulations 2012 (as amended):
  - details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - details as to how they were consulted;
  - a summary of the main issues and concerns raised by the persons consulted; and
  - how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

### **The Southborough and High Brooms Neighbourhood Plan Steering Committee**

- 1.3. Southborough Town Council is the qualifying body officially responsible for preparing the Neighbourhood Plan. A Steering Committee, comprising local councillors and volunteers from the community, was set up to lead on the development of the SHBNDP with each member taking the lead on a particular topic. Additional support was provided by other members of the community during the course of the Plan.

- 1.4. Current membership of the Steering Committee:

Chair:	Nicholas Woollett (local resident)
Vice Chair:	Michael Dunn (local resident, Southborough Society representative)
Secretary:	Richard Stewart (Town Councillor)
Members:	Dianne Hill (Town Councillor)
	Ian Kinghorn (Town Councillor)
	Trevor Poile (Town Councillor)
	Ruth Chambers (local resident)
	Margaret Borland (local resident)
	Alison Eardley (Planning Consultant)

Gratitude is expressed to Brian Dury (former Town Councillor, former Chair of the Steering Committee) who first established the project and was a member of the Steering Committee until early 2024.

Also to previous committee members: Dariel Francis (former Town Councillor) and Holly Wheeler (local business owner), and to James Boot (Community Engagement Advisor).

## 2 SUMMARY OF ENGAGEMENT AND CONSULTATION ACTIVITIES, ISSUES AND OUTCOMES

2.1. A high-level summary of the steps involved in development the SHBNDP is shown in *Table 1*:

*Table 1: High level summary of the key milestones*

Date	Milestone	Key activities
2023	Launching the Plan	<ul style="list-style-type: none"> <li>Designating the neighbourhood area</li> <li>Setting up a Steering Committee</li> <li>Issuing community questionnaire</li> </ul>
2023 to 2024	Identifying Key themes Engagement and evidence gathering	<ul style="list-style-type: none"> <li>Visioning Event</li> <li>Community survey</li> <li>Working up the objectives for each of the key themes</li> <li>Engagement with local children and teenagers, businesses, residents groups etc.</li> <li>Commissioning Housing Needs Survey</li> <li>Developing Design Guidance</li> </ul>
2024 to 2025	Pre-Submission Draft Plan  Submission Plan  Examination  Referendum	<ul style="list-style-type: none"> <li>SEA/ HRA Screening of the emerging draft plan</li> <li>First round of formal consultation at Regulation 14</li> <li>Submitting documents to TWBC and Regulation 16 consultation</li> <li>Examination</li> <li>Plan 'made'</li> </ul>

2.2. The sections below describe, in fuller detail, the engagement and consultation process which took place during the Plan preparation. This is divided into four stages:

Stage I: Engaging on the key issues and opportunities for Southborough and High Brooms

Stage II: Preparing the Pre-Submission Version Neighbourhood Plan

Stage III: Consulting on the Pre-Submission Version Neighbourhood Plan

Stage IV: Finalising the Submission Neighbourhood Plan

## Stage I: Engaging on the key issues and opportunities for Southborough

- 2.3. Southborough Town Council (STC) embarked on the neighbourhood plan process in early 2023. An [application](#) and [accompanying map](#) were submitted in June 2023 to Tunbridge Wells Borough Council (TWBC), as the local planning authority, requesting to designate the Southborough and High Brooms Neighbourhood Area to align with the parish boundary. This was approved by TWBC on 11 August 2023.
- 2.4. A [Steering Committee](#) comprising local councillors and volunteers from the community was set up to oversee the process. Professional planning support was contracted using the Locality grant and a [Terms of Reference](#) was prepared for the Committee.
- 2.5. The project was officially launched at a Community Workshop held on 18 September 2023 at the Southborough Civic Centre. The Steering Committee Chair gave an [opening speech](#) about the neighbourhood plan, which was followed by a presentation about the parish including information about demographics, housing mix, environmental factors and other local features. The presentation outlined the neighbourhood plan process including the sorts of topics that could be explored. Attendees were then divided into small groups to discuss what they felt was working well in the neighbourhood area and what could be improved, as well as their ambitions for the future. Six tables were arranged with the following themes, and delegates could progress round the room providing their feedback using Post-it Sticky Notes:
- Transport
  - Local Heritage
  - Nature, Landscape, Environment & Climate
  - Housing
  - Employment, Businesses, & High Street
  - Community
- 2.6. The event was promoted extensively. An A5 flyer was posted to all households in the neighbourhood area, messages were posted on social media, posters were displayed in prominent locations around the area, information was on the Town Council website and articles were also placed in local print media.

### Promoting the Neighbourhood Plan launch event



- 2.7. Ideas stemming from the event were captured in a spreadsheet and a [report of the event](#) can be viewed on the SHBNDP website. In all, approximately 60 residents attended. E-mail addresses were collected to inform a mailing list for the neighbourhood plan project.

*Thank you Facebook post after the Launch Event*



- 2.8. The Launch Event was closely followed by a series of other information gathering events.
- 2.9. Residents were invited to attend an event at St Matt's Church in High Brooms, which took place on 25 October 2023. The event was promoted extensively; using the A5 flyers previously printed and delivered door to door. Larger A3 and A4 posters were placed in shops, and an A1 waterproof poster was prepared to display locally.

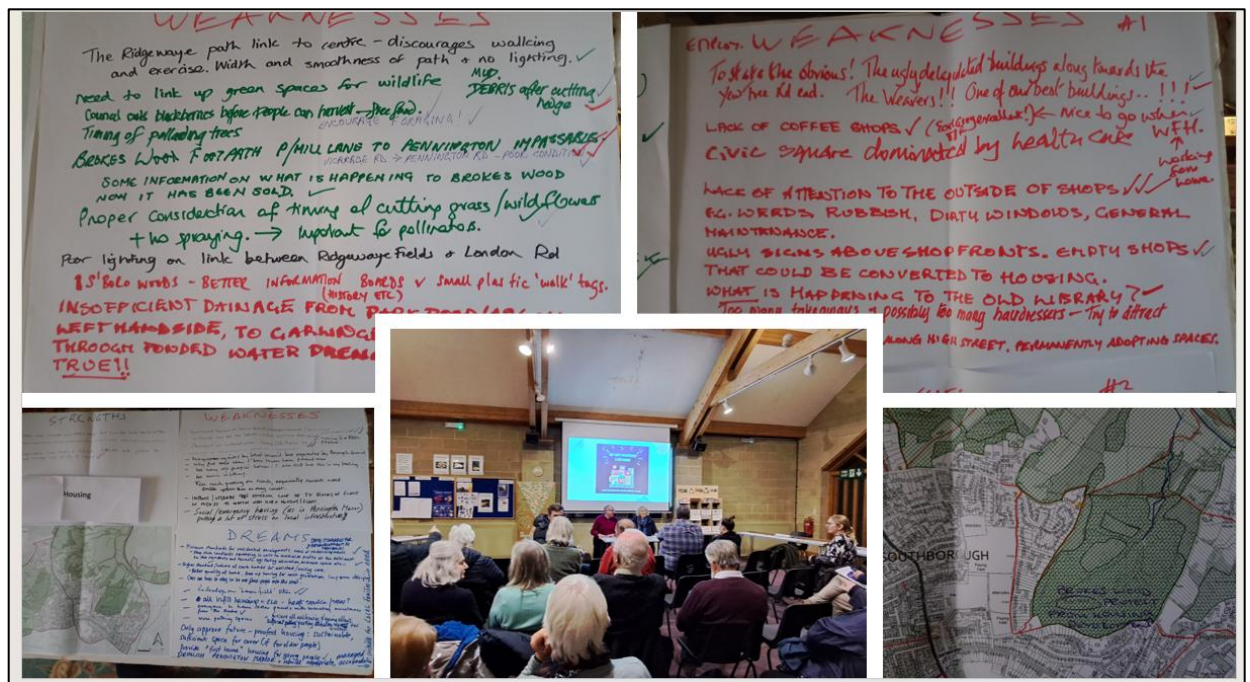
*Promotional material for the High Brooms event*





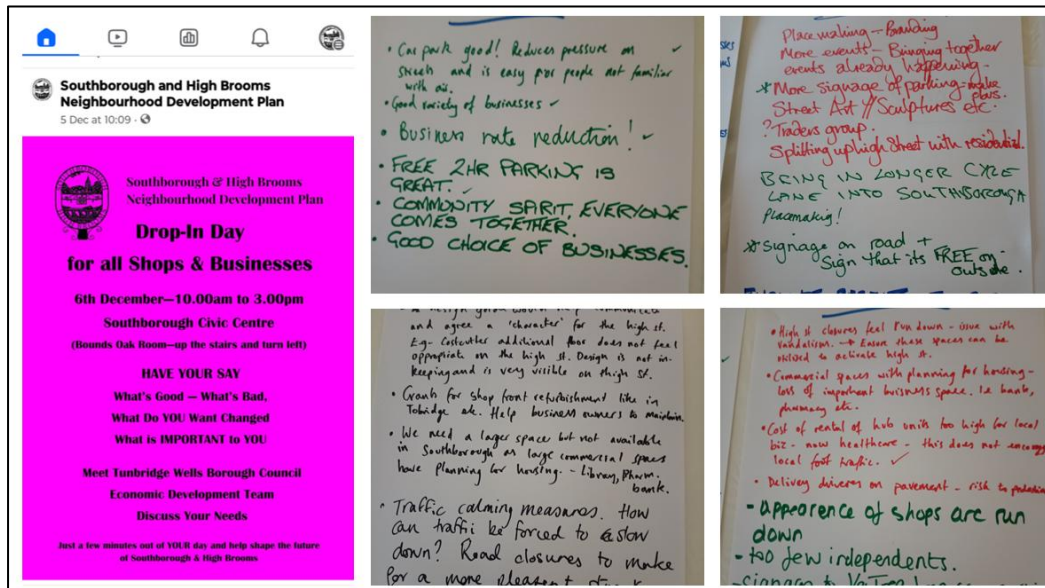
- 2.10. The event took a similar format to the launch event and information gathered was added to the overarching spreadsheet of feedback.
- 2.11. A third event took place on 14 November 2023 in the Parish Rooms at St Thomas Church, located in the north end of Southborough, promoted via posters and the fliers. As before, the theme tables were placed around the sides of the room enabling those attending space to write their feedback. Attendance was considered good with around 30 residents, giving a lively and positive atmosphere. The table session went very well and as before everyone wanted to keep contributing. All ideas were collated into the overarching spreadsheet.

*Images from the event at Thomas Church, October 2023*



- 2.12. On 6 December 2023, a Business Drop-In event took place from 10.00 to 3.00pm in the Civic Centre. A mailing list of local businesses was developed, comprising around 75 entries and all were written to in advance of the event. In addition, some shops were members of the Southborough Street WhatsApp group and information was posted there too. The event was well-attended, including by a TWBC Economic Development Officer. Information gathered was added to the overarching feedback spreadsheet.

Example of information gathered at the Business Drop-in Event.



2.13. On the 9 December 2023, the Steering Committee had a presence at the Winter Fayre, with a stall promoting the neighbourhood plan project.

*The posters prepared for the Winter Fayre*



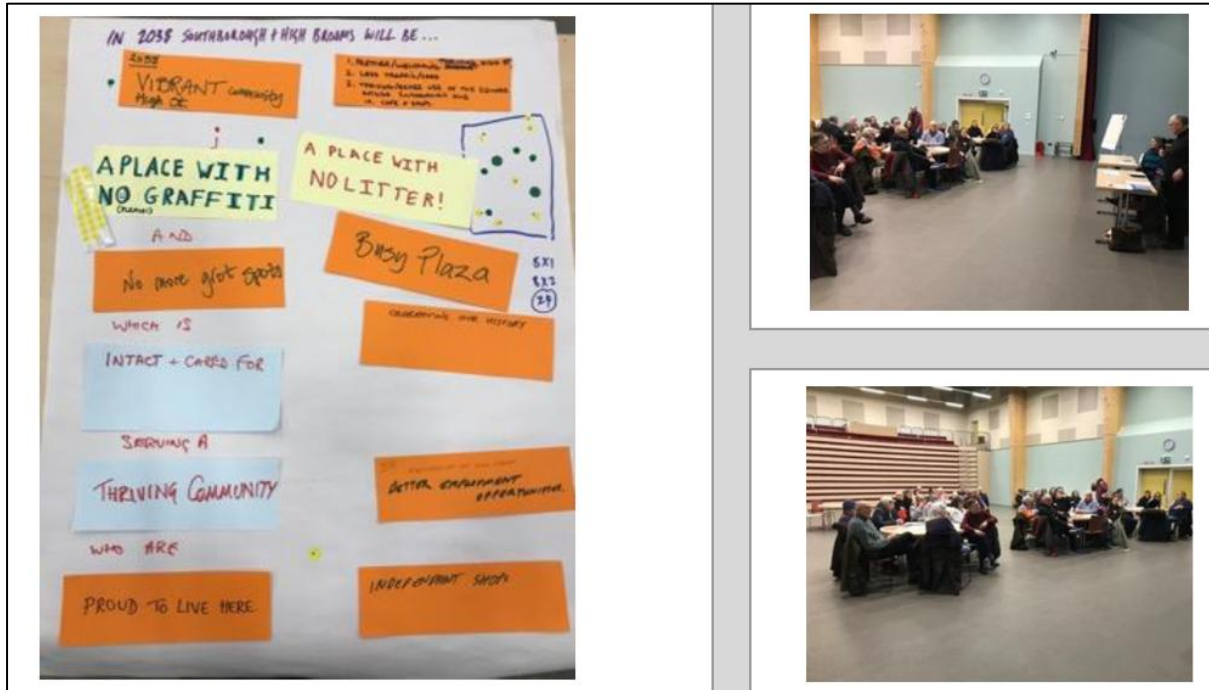
2.14. At this time, the initial website for the Neighbourhood Plan was set up, as a standalone page to the Town Council website. The URL of this page has since been amended and can now be found at: <https://www.shbndp.com/>. A [Facebook page](#) dedicated to the project had also been established.

2.15. The initial series of events and activities elicited just short of 800 comments and ideas, all of which were stored on the feedback spreadsheet, to be carefully considered by the Steering Group. A summary of key findings to date was put together, which was reported back to the community at a Visioning Workshop, which was held on the evening of 17 January 2024 at the



Civic Centre. Those attended this event were divided into groups and invited to write down key words and phrases to describe what they would like the area to be like in the future. Each group worked up their own vision for the area and once, ready, these were posted up for everyone to vote on. This would assist the Steering Committee in developing an overarching draft vision for the plan. The event was very well attended and a report of the [Visioning Workshop](#) can be found on the neighbourhood plan website.

#### *Images from the Visioning Workshop*









2.16. The results from the various event led the Steering Committee to identify initial themes for the Neighbourhood Plan, with each Steering Committee member taking responsibility for one or two areas:

- Transport
- Local Heritage
- Nature, Landscape, Views, Environment and Climate
- Housing
- Employment, Business, and the High Street
- Community & Well-being

### **Stage II: Preparing the Pre-Submission Version Neighbourhood Plan**

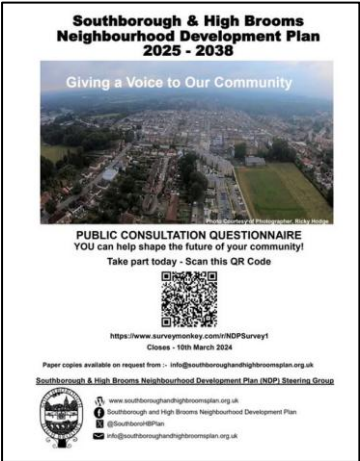
2.17. In parallel with the events, the Steering Committee had successfully applied to Locality for Technical Support to prepare both a Housing Needs Assessment and Design Guidance for the neighbourhood area. Consultants from AECOM led this work, in consultation with the Steering Committee. For the Design Guidance, the consultants visited the neighbourhood area and met with the Committee to discuss key issues and potential character areas. Information boards were developed, which were displayed at some of the initial events to gather community views.

Examples of the display boards prepared to consult on the emerging Design Guidance

Does this photo set a good example for the type of housing design we should be striving for in Southborough?		Does this photo set a good example for the type of housing design we should be striving for in Southborough?	
	<div>YES</div> <div>NO</div>		<div>YES</div> <div>NO</div>
<b>THINGS TO CONSIDER:</b> <ul style="list-style-type: none"><li>- Building appearance</li><li>- Materials and their relevance to the local area</li><li>- How buildings relate to one another and to the street or other public areas</li><li>- Building height and size</li><li>- Gardens</li><li>- Public space</li><li>- Boundary treatment (walls, hedges, paving etc.)</li><li>- Car parking</li><li>- General feel of the place</li><li>- How friendly it is for pedestrians and cyclists</li><li>- Sustainability (energy saving, efficient use of land, wildlife etc.)</li></ul>		<b>THINGS TO CONSIDER:</b> <ul style="list-style-type: none"><li>- Building appearance</li><li>- Materials and their relevance to the local area</li><li>- How buildings relate to one another and to the street or other public areas</li><li>- Building height and size</li><li>- Gardens</li><li>- Public space</li><li>- Boundary treatment (walls, hedges, paving etc.)</li><li>- Car parking</li><li>- General feel of the place</li><li>- How friendly it is for pedestrians and cyclists</li><li>- Sustainability (energy saving, efficient use of land, wildlife etc.)</li></ul>	
What I like about this design?	What I don't like about this design?	What I like about this design?	What I don't like about this design?
<div></div>	<div></div>	<div></div>	<div></div>
BOARD NO6	 	BOARD NO2	 

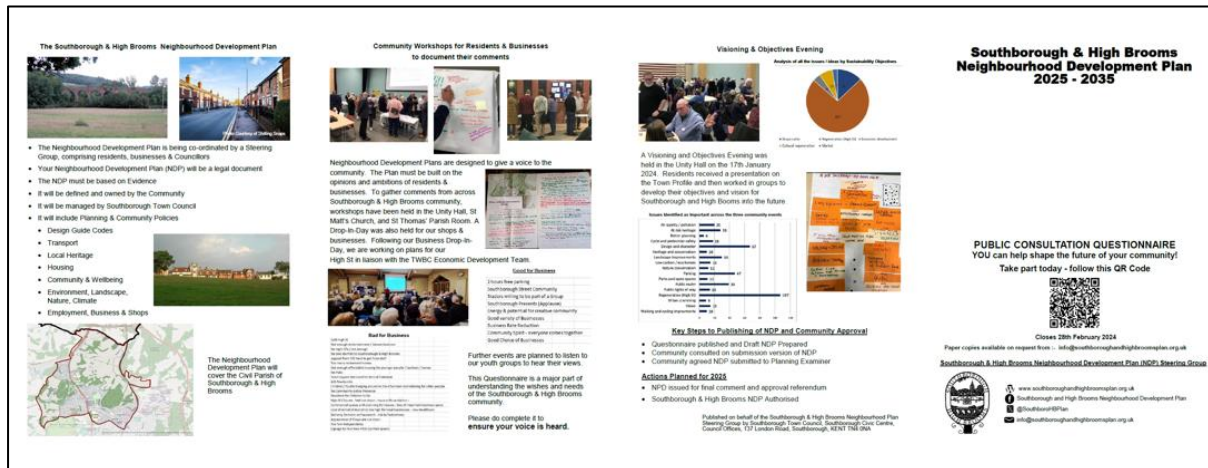
2.18. In February 2024, to assist in gathering additional evidence to underpin the emerging themes, a Community Questionnaire was published both in hard copy and online.

The Community Questionnaire



2.19. A flier was prepared and delivered to all households and placed in the Civic Centre and other local venues and outlets. All those on the mailing list were contacted and it was further promoted via the website and social media (WhatsApp, Nextdoor, X and Facebook). In total, 128 responses were received, and findings were distributed to the Steering Committee topic leads.

*Flyer prepared to promote the Community Questionnaire*



2.20. In parallel with the Community Questionnaire, a dedicated Business Questionnaire was set up. It was available to complete online and all those on the mailing list were contacted. Thirty responses were received.

2.21. Findings from the Questionnaire were carefully considered, and to help consolidate this, a Mapping Workshop was held on 25 March 2024 at the Civic Centre. Five tables were assigned specific themes and large maps were presented on each alongside some very specific questions. For instance, the Environment-themed table included questions around green space, biodiversity and viewpoints. The Transport-themed table included questions on issues such as areas to be improved for walking, areas to host cycle parking and so forth. Attendees spent time at each table, discussing the questions in groups, marking up the maps and applying Post-it Note comments. It was a successful evening and provided information for the Steering Committee to begin finalising the evidence base for the Plan and setting out proposed policies.

The Steering Committee spent the next months working to develop the informal draft neighbourhood plan. Work during this time included:

- 2.22. **Transport:** Bearing in mind feedback from the community, the group undertook local walkabouts and used maps to explore where improvements could be made to the walking, cycling and equestrian networks. Dialogue with TWBC officers assisted in terms of understanding the Borough Council approach to such issues, so that the neighbourhood plan policies in this area could add value.
- 2.23. **Local Heritage and character:** The Design Guidance was published in April 2024. The Steering Committee, with support from the Southborough Society, spent some time exploring potential non-designated heritage assets. Local knowledge combined with suggestions made via the Community Questionnaire and Mapping Workshop led to a long list of potential sites. Each was reviewed against TWBC's Local List criteria, and a short-list was agreed upon for inclusion in the SHBNBP.
- 2.24. **Nature, Landscape, Views, Environment and Climate:** Residents were asked for suggestions of green spaces that they felt were important to them. In parallel, the Steering Committee undertook a comprehensive audit of space across the area. Each member focussed on a

particular part of the neighbourhood area and undertook a walkabout to gather potential spaces to add to the long list. Each space was carefully considered against the NPPF criteria. Some were adequately protected from inappropriate development, for instance where they were covered by a designation such as Common Land or ancient woodland. Other spaces were not considered to be demonstrably special. A final list was drawn up for inclusion in the plan.



- 2.25. A similar exercise was undertaken to identify significant local views in the neighbourhood area. Feedback from the community was combined with the local knowledge of some members of the Steering Committee, who were keen walkers and knew the area and landscape well. Two members of the Steering Committee took both photographs and drone footage to support the discussion about which views should ultimately be included and the descriptions underpinning these.
- 2.26. **Housing:** Considering the Green Belt wrapping tightly around the settlement areas, and the emerging Local Plan, which was seeking to allocate sites locally, the Steering Committee took the decision not to allocate sites for housing. It was clear from the local engagement, however, that residents were keen to see the 'right sort of homes' being delivered locally. To that end, a Housing Needs Assessment for the neighbourhood area was developed and published in April 2024. This has underpinned policies in this part of the plan.
- 2.27. **Employment, Business, and the High Street:** The business survey revealed key issues facing this part of the community. Many of the issues were not necessarily land-use and planning related, and so have been considered as associated 'non-policy projects'. Others, for instance concerning car parking and access, have been addressed in the transport section of the plan. Many comments received during the engagement phase related to the high street and how this could be improved. The Steering Committee engaged with TWBC officers on this matter to consider potential routes forward, some of which are underpinned in policy. A further area of interest raised by the community was the desire to promote the arts sector more effectively. Meetings were held with local arts and creative sector organisations as well as with TWBC, to inform the policy in this area.
- 2.28. **Community & Well-being:** Much feedback had been gained from the community via the Questionnaire and Workshop event. A notable gap in the engagement was with younger people. Members of the Steering Committee engaged with the local schools to gather the view of younger children. In addition, they attended local cub and scout meetings and a local Youth Group at St Matt's Church. The information gathered was used to inform the policies in this part of the plan.
- 2.29. Additional engagement during this time took place at the Annual May Day Festival where a member of the Steering Committee gave an update on plan progress.
- 2.30. An informal draft neighbourhood plan was sent to TWBC in September 2024, who screened it to ascertain whether it was likely to have significant environmental impacts. Historic England, Natural England and the Environment Agency were consulted, and it was determined in November 2024 that the plan was unlikely to result in significant impacts.
- 2.31. The Pre-Submission Neighbourhood Plan was finalised in October 2024 and issued to the Town Council for approval. It was approved at their [meeting of 28 November 2024](#), and the Regulation 14 consultation commenced on 9 December 2024 for an eight-week period.

## Stage II: Consulting on the Pre-Submission Version Neighbourhood Plan

2.32. The Pre-Submission (Regulation 14) consultation took place between Monday 9 December 2024 and end January 2025. It was publicised in the following ways:

- The SHBNDP website was updated to include all the relevant documents.
- Hard copies of plan were made available, for instance at the library and via the Town Council office, to be viewed by individuals.
- A Feedback Survey was provided, both online and paper copy, allowing residents to provide their thoughts on the individual policies, the design guidance and any other aspects they wished to comment. Paper copies could be returned to various locations around the Parish.
- A promotional leaflet was prepared with links to the website and survey. This was distributed at locations around the neighbourhood area.

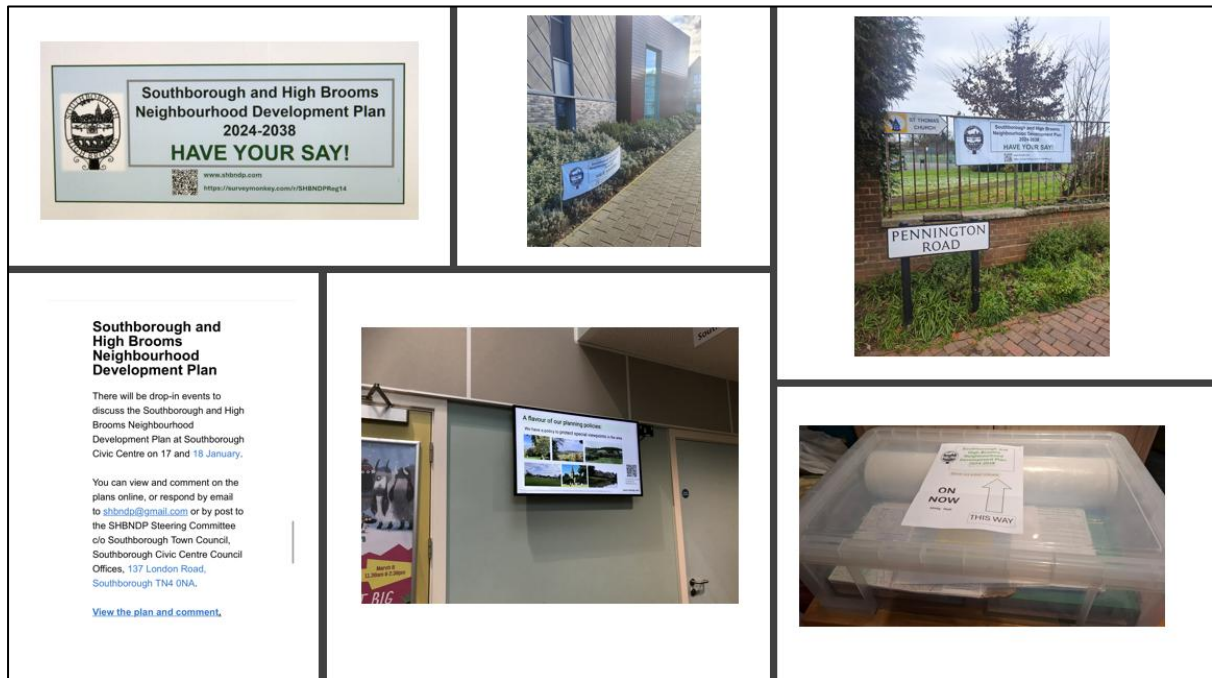
### *Promotional leaflet and extract from the feedback survey*

<p>Southborough and High Brooms Neighbourhood Plan Pre-Submission Draft Neighbourhood Plan Feedback Survey (Regulation 14 Consultation)</p> <p>Please complete and return by Friday 31 January 2025</p> <p>Residents of Southborough and High Brooms, together with other interested parties, are invited to comment on the Pre-Submission Version Southborough and High Brooms Neighbourhood Development Plan. This is a document that sets out a vision and objectives and a series of planning policies for our area for the coming years to 2038.</p> <p>Please read the full text of the Neighbourhood Development Plan and the policies and indicate how strongly, or otherwise, you agree with each one. You can view a copy of the Plan and supporting documents by visiting the Neighbourhood Plan: <a href="https://www.shbndp.com/">https://www.shbndp.com/</a></p> <p>Please tick the appropriate box to record your views on each policy and add any additional comments you wish to make. Please add a separate sheet if required.</p> <p>Please try to complete the whole survey, as your views are extremely important to us.</p> <p>1. To what extent do you agree with each of the 15 policies (please tick):</p> <table border="1"><thead><tr><th>Policy number</th><th>Strongly agree</th><th>Agree</th><th>Neutral</th><th>Disagree</th><th>Strongly disagree</th></tr></thead><tbody><tr><td>SHB1: Location of development</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB2: Meeting local housing needs</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB3: Character and design of development</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB4: Energy efficiency and design</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB5: Conserving heritage assets</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB6: Southborough High Street and other neighbourhood centres</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB7: Supporting the cultural and creative economy</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB8: Supporting flexible workspaces and opportunities for homeworking</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB9: Landscape and biodiversity</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB10: Local Green Spaces</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB11: Locally significant views</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB12: Dark skies</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB13: Improving walking, cycling and equestrian opportunities</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB14: Publicly accessible off-road car parking</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>SHB15: Improving opportunities for community and cultural facilities, sport and recreation</td><td></td><td></td><td></td><td></td><td></td></tr></tbody></table>						Policy number	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	SHB1: Location of development						SHB2: Meeting local housing needs						SHB3: Character and design of development						SHB4: Energy efficiency and design						SHB5: Conserving heritage assets						SHB6: Southborough High Street and other neighbourhood centres						SHB7: Supporting the cultural and creative economy						SHB8: Supporting flexible workspaces and opportunities for homeworking						SHB9: Landscape and biodiversity						SHB10: Local Green Spaces						SHB11: Locally significant views						SHB12: Dark skies						SHB13: Improving walking, cycling and equestrian opportunities						SHB14: Publicly accessible off-road car parking						SHB15: Improving opportunities for community and cultural facilities, sport and recreation						<p><b>Southborough and High Brooms Neighbourhood Development Plan 2024-2038</b> Regulation 14: Pre-submission Draft <b>Give us your views</b></p> <p>Southborough Town Council is preparing a Neighbourhood Plan for the parish covering Southborough, High Brooms and the rural areas. This document will set out planning policies to guide development in our area.</p> <p>We are now asking everyone for their formal views on the proposed Plan.</p> <p>This consultation will run for eight weeks, until the end of January 2025.</p> <p>We will be at some local events at Southborough Civic Centre for you to find out more:</p> <table border="1"><thead><tr><th>Saturday 14<sup>th</sup> December 2024, 10am-1pm</th><th>Friday 17<sup>th</sup> January 2025, 2-7pm</th><th>Saturday 18<sup>th</sup> January 2025, 10am-2pm</th></tr></thead><tbody><tr><td></td><td></td><td></td></tr></tbody></table> <p>To see the Plan documents go to: <a href="http://www.shbndp.com">www.shbndp.com</a></p> <p> Take part - scan this QR Code for survey form</p> <p>Paper copies of survey form available on request from: <a href="mailto:SHBNDP@gmail.com">SHBNDP@gmail.com</a></p> <p>Or follow this link for the survey form: <a href="https://www.surveymonkey.com/r/SHBNDPReg14">https://www.surveymonkey.com/r/SHBNDPReg14</a></p> <p>Email: <a href="mailto:SHBNDP@gmail.com">SHBNDP@gmail.com</a></p> <p><small>Published on behalf of the Southborough &amp; High Brooms Neighbourhood Plan Steering Group by Southborough Town Council, Southborough Civic Centre, Council Offices, 127 London Road, Southborough, Kent TN41 1JH.</small></p>						Saturday 14 <sup>th</sup> December 2024, 10am-1pm	Friday 17 <sup>th</sup> January 2025, 2-7pm	Saturday 18 <sup>th</sup> January 2025, 10am-2pm			
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- Banners were printed to promote the consultation and public events taking place.
- The television screen in the library was used to host a scrolling presentation about the neighbourhood plan and the key policies.
- An at-a-glance summary of the plan and policies was printed to hand out to people.

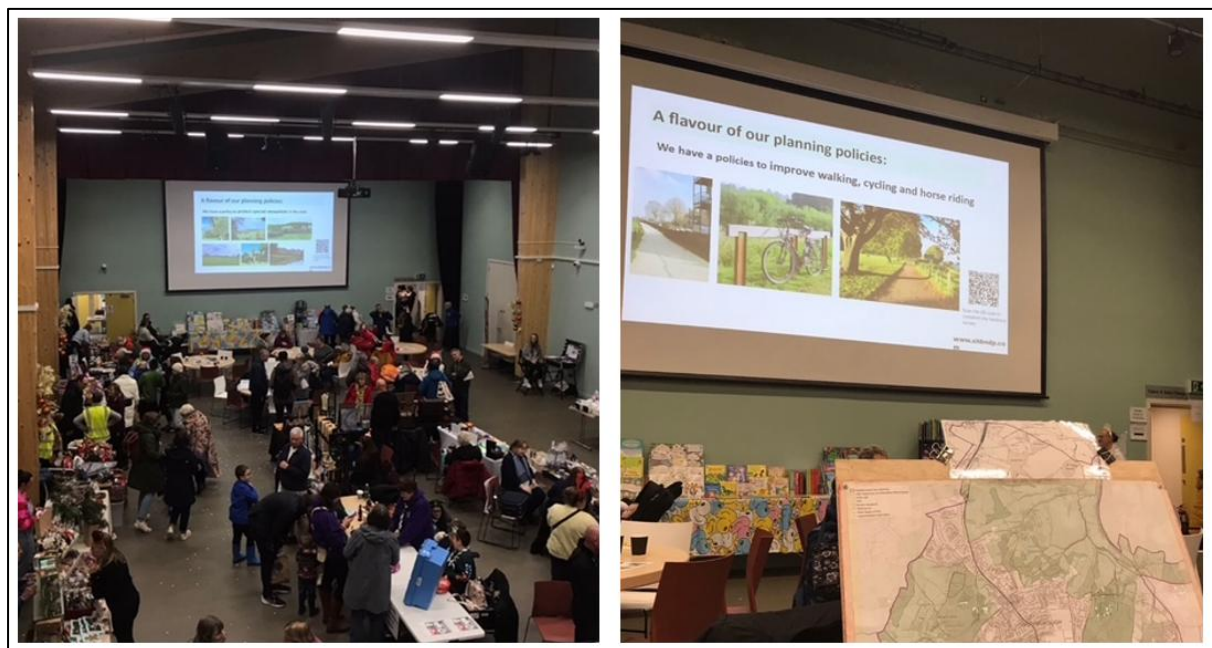


*Examples of the publicity material*



- Four public events were organised, hosted by the Steering Committee. The first, on the 7 December coincided with the Winter Fayre. The Committee had a stall with information about the plan, a map of the area and paper surveys to hand out. The presentation from the television screen was displayed on the overhead projector throughout the event.

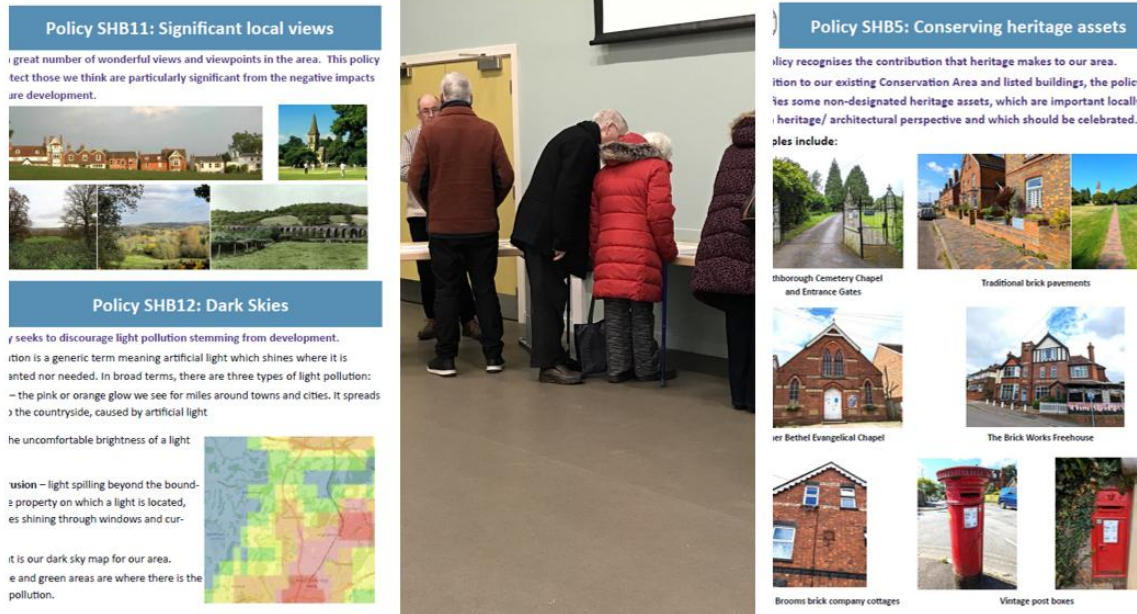
*Images from 7 December event*



- The Committee had a further presence at the Saturday Christmas Market on 14 December 2024. Two further events were held on 17 and 18 January 2024 at the Civic Centre. An

exhibition comprising maps and posters was set up. There was a scrolling presentation about neighbourhood planning generally and Committee members were on hand to answer questions.

### Posters and images from the January events



- An article on the SHBNDP was published in various local magazines and on the TWBC update pages. This included the Tunbridge Wells Local Magazine, which is delivered to all households.
- Social media updates were posted on local Facebook pages.

### Promotional articles



- An email (and later reminder emails) was sent to the SHBNDP residents mailing list, the local business mailing list and other interested parties.
  - Statutory consultees were written to directly, informed by a list of contacts provided by TWBC
  - The owners of the proposed Local Green Spaces and non-designated heritage assets were written to.
- 2.33. A list of the statutory consultees contacted is contained in Appendix A and responses were received from the following:
- Tunbridge Wells Borough Council (TWBC)
  - Kent County Council (KCC)
  - Network Rail
  - Creative Tunbridge Wells
  - Historic England
  - Hadlow Estate
  - British Horse Society
  - Environment Agency
  - Natural England
  - Southern Water
  - National Highways
  - Southborough Society
  - Town and Country Housing
  - Bethel Trust
  - Salomons Estate
  - TWBC Economic Development Manager
  - Owner of Camp Field, Birchwood Avenue
- 2.34. 57 responses were submitted by residents, largely via the feedback survey. In the paragraphs below, where support for policies is provided, this relates to those responding to the survey.
- 2.35. Representations received at the Pre-Submission Consultation were recorded by topic/policy and carefully considered by Steering Committee members. A summary of the comments and responses from the Steering Committee, are set out in Appendix B. Full copies of the responses are available on the neighbourhood plan website. The following paragraphs provide a summary, by topic area, of the comments received during this process and how these were integrated into the Submission Version SHBNDP.

- 2.36. **General comments:** Overall, the comments were very supportive of the Plan and its scope. Conformity references have been updated to align to the National Planning Policy Framework updated in December 2024. A section relating to minerals and waste has been added on the advice of KCC. Some minor, factual amendments were made to the 'About Southborough and High Brooms' section.
- 2.37. The SHBNDP has been reviewed to ensure that it meets accessibility requirements.
- 2.38. **Spatial Strategy and housing:** Policy SHB1 (Location of development) was supported by 91% of residents. It was amended to reflect comments from TWBC, mainly relating to terminology. An additional clause relating to flooding was added. Policy SHB2 (Meeting local housing needs) was supported by 88% of residents. The recommended mix of social rent compared to affordable home ownership was amended slightly following comments from TWBC and discussion by the Steering Committee. It was agreed that it would be prudent to align with the TWBC figures, which only differed slightly from those in the local Housing Needs Assessment. An additional sentence has been added to the policy in relation to restricting larger (in terms of number of bedrooms) homes.
- 2.39. **Character, heritage and design:** Policy SHB3 (Character and design of development) is underpinned by the Southborough and High Brooms Design Guidelines and Codes, which form an integral part of the SHBNDP. It was supported by 88% of residents. An action to update the Southborough Conservation Area Appraisal was noted. The policy itself has been amended slightly for clarity purposes and to ensure that development is both landscape- and heritage-led. Reference to the Healthy Streets approach is endorsed.
- 2.40. Policy SHB4 (Energy efficiency and design) was supported by 86% of residents. Reference to KCC's climate change risk and impact assessment has been included as well as the TWBC Climate Change Strategy. The policy has been amended to reflect a lower water usage requirement, as endorsed by South East Water and TWBC. Clauses relating to sustainable drainage has also been added. The policy remains largely as drafted.
- 2.41. Policy SHB5 (Conserving heritage assets) received 88% support from residents. The mapping was amended slightly for clarity purposes. Fifteen non-designated heritage assets have been identified. All owners were written to.
- 2.42. **Town Centre and key employment sites:** Policy SHB6 (Southborough High Street and other neighbourhood centres) received 90% support from residents. The policy was amended slightly to include reference to Sui Generis as a potential use class that would be supported in this area. In addition, it has been noted that parts of the policy would not be relevant where, for instance, there are permitted development rights.
- 2.43. Policy SHB7 (Supporting the cultural and creative economy) received 82% support from residents. Additional wording has been added to the supporting text because of the response from Creative Tunbridge Wells. The policy has been slightly amended to refer to non-residential development as opposed to all development proposals.
- 2.44. Policy SHB8 (Supporting flexible workspaces and opportunities for homeworking) received support from 78% of residents. A note has been added to take account of permitted developments, which would sit outside of this policy.

- 2.45. **Environment and Green Space:** Policy SHB9 (Landscape and biodiversity) was strongly supported with 94% of residents agreeing to its inclusion. Within the supporting text, reference to the tree hierarchy has been removed as it was misleading in terms of supporting some species not typical of the area. Beyond this, there were very few amendments.
- 2.46. Policy SHB10 (Local green space) received 94% support from residents. In total, 37 spaces of the original 38 spaces included in the Pre-Submission Plan are proposed for local green space designation, some of which coincide with those that had been proposed for inclusion in the TWBC emerging Local Plan. Each of the owners were written to, explaining the purpose of the designations and what it would mean for them. Specific responses were received from the following:
- **TWBC** supported the majority of the proposed local green spaces. They questioned LGS24 (Apple Orchard) and LGS25 (Boot Fair Field) due to their distance from the settlements in the neighbourhood area. In addition, they noted that the land used as a Boot Fair is done so under permitted development rights. This use could stop, and therefore, this reason for it being demonstrably special would no longer apply. The Steering Committee discussed this in the context of comments from owners, the Hadlow Estate (see below).
  - **The Hadlow Estate** objected to the inclusion of LGS24 and LGS25, citing that they were too remote from the settlement and not demonstrably special. The Steering Committee discussed this in depth and considered that neither space was too detached from the community. Both are within easy walking distance via public footpaths, although public access is not a requirement of the NPPF. For LGS25 (Boot Fair Field), it was considered that TWBC's comments about its usage, which was clarified by the response from the Hadlow Estate, did mean that it could be taken out of use as the venue for the Boot Fair. Therefore, it was felt prudent to remove this site from the plan. The Hadlow Estate response argued that LGS24 (Apple Orchard) was not demonstrably special. The Committee disagreed with this and undertook additional research into the area, which is a historic apple orchard and one of the few remaining in the neighbourhood area. The space has been retained with this additional information.
  - **Town and Country Housing** objected to the inclusion of LSG5 (Open space adjacent to TCHG flats and car park), LGS33 (Crundwell Road cluster), LGS36 (Broomhill Park/Kibbles Lane/Speldhurst Road cluster) and (LGS37: Grassy area, Lady's Gift Road). They suggested that these areas are ancillary and necessary to the properties they serve and should not be designated separately from the wider estate. They write that the additional designation and protection provided by this policy is unnecessary and imposes undue development control limitations that do not align with good planning practices. The Steering Committee discussed this in depth and determined that the spaces are integral to the estates and provide much-valued space for the residents living in those areas. For the reasons provided in the justification, these were felt very much to meet the requirements of local green space.



- **The Owner of LGS28 Camp Field, Birchwood Avenue** objected to the designation of this field for the following reasons:
  - i. The National Planning Policy Framework (December 2024) Chapter 8 - Promoting Healthy and Safe Communities sets out in Paragraph 07 (c) the local green space designations should only be used where the green space is local in character and is not an extension tract of land. This area of land is approximately 20 acres and therefore is extensive and considerably larger than other areas identified as suitable local green spaces.
  - ii. This land is used for Agriculture and has been subject of subsidies and therefore will be kept in an Agricultural use.
  - iii. At the moment the land is being used for grazing. With crop rotation, this area must be used again for Arable use, i.e. the growing of wheat, barley etc for example where of course this would be totally unsuitable for informal recreational use including walking. There is a public footpath at the edge of the field but there is no public access on the land itself.

The Steering Committee discussed this at length. It was concluded that the site was considered to be demonstrably special locally for the reasons cited in the justification for the space. Some additional wording has been added to that justification for clarity. The designation would not convey access to the space, and this is not a requirement of the NPPF.

- 2.47. Policy SHB11 (Locally significant views) was supported by 96% of residents and Policy SHB12 (Dark skies) by 82% of residents.
- 2.48. **Transport and Movement:** Policy SHB13 (Improving walking, cycling and equestrian opportunities received 92% support from residents. Reference to the Air Quality Management Area has been removed as this is no longer in place. Commentary around the work being undertaken by TWBC on improving opportunities for active travel have been included, including progress on the projects noted in Tables 3 and 4. The maps have been amended to make them clearer to read. Policy SHB14 (Publicly accessible off-road car parking) was supported by 84% of residents and remains largely as drafted.
- 2.49. **Community facilities:** Policy SHB15 (Improving opportunities for community and cultural facilities, sport and recreation) received 96% support from residents, reflecting its importance locally.

#### **Stage IV: Finalising the Submission Neighbourhood Plan**

- 2.50. Following the changes made to the SHBNDP because of the Regulation 14 consultation, the Submission Version plan was formally submitted to TWBC who, once satisfied that the correct set of documents have been received, will undertake the Regulation 16 consultation. The document will then proceed to Examination and, assuming a favourable outcome, to referendum.

### **3 CONCLUSION**

- 3.1. The Steering Committee has undertaken a very thorough engagement programme in order to develop the Southborough and High Brooms Neighbourhood Plan. It has set out a comprehensive vision and objectives and guiding principles for the neighbourhood area. In developing the policies to achieve the vision and objectives, the Group has actively engaged with a wide range of stakeholders and the Plan has evolved accordingly.
- 3.2. Feedback from the Regulation 14 consultation has enabled the Plan to be shaped into its final version, to submit to TWBC.
- 3.3. This report fulfils the requirements for the Consultation Statement, set out in Regulation 15(2) of the Neighbourhood Development Planning (General) Regulations 2012 (as amended).
- 3.4. Gratitude is extended to everybody who has contributed to the Plan's development, either as a valued member of the Steering Committee or as someone who has taken the time to contribute their views and opinions. This has been invaluable in helping to shape the scope and content of the Southborough and High Brooms Neighbourhood Plan.

## APPENDIX A: LIST OF THOSE CONSULTED AT REGULATION 14 (PRE-SUBMISSION STAGE)

In addition to residents, the following statutory organisations were contacted by the Town Council:

<b>Statutory Consultees</b>
Tunbridge Wells Borough Council
Tonbridge and Malling Borough Council
Kent County Council
East Sussex County Council
The Coal Authority (not relevant)
Homes England
Natural England
Environment Agency
Historic England
Network Rail
National Highways
Marine Management Organisation
Southeast Water
Southern Water
Gas supplier
Electric (UK Power Networks)
British Telecom
National Grid
NHS West Kent CCG
<b>Adjoining Parish councils:</b>
Bidborough
Speldhurst
Rusthall
Capel

### Local Green Spaces:

Site	Name of Owner
<b>Blackthorn Avenue</b>	Local resident living adjacent to the site
<b>Blackthorn Avenue Dog Park</b>	TWBC / Town and Country Housing Group
<b>Blackthorn Avenue right</b>	TWBC / Town and Country Housing Group
<b>Corner of Blackthorn Avenue and Juniper Close</b>	TWBC / Town and Country Housing Group

<b>Open space adjacent to TCHG flats and car park</b>	TWBC / Town and Country Housing Group
<b>Blackthorn Avenue entrance space</b>	TWBC / Town and Country Housing Group
<b>Frank Weare Recreation Ground</b>	Southborough Town Council
<b>High Brooms Rest Garden</b>	Southborough Town Council
<b>Barnett's Wood Allotments</b>	TWBC
<b>The Piggery</b>	Southborough Town Council
<b>Wheelers Field</b>	Southborough Town Council
<b>Petanque Ground</b>	Southborough Town Council
<b>Southfields Park Skinners School Football Rugby Grounds</b>	Skinners School
<b>Corner near to the library</b>	Kent County Council
<b>Redwood Sequoia Grove</b>	Southborough Town Council
<b>Ridgeway Allotments</b>	Southborough Town Council
<b>Southborough Hockey Pitch</b>	Southborough Town Council
<b>Ridgeway, Southborough Recreation Grounds</b>	Southborough Town Council
<b>Yew Tree Allotments</b>	Southborough Town Council
<b>Pennington Place off Pennington Road</b>	Kent County Council
<b>Valley View</b>	Kent County Council
<b>Garlinge Road</b>	Kent County Council
<b>Pennington Recreation Ground</b>	Southborough Town Council
<b>Apple Orchard</b>	Hadlow Estate
<b>Boot Fair Field</b>	Hadlow Estate
<b>Harland Way tree strip</b>	Kent County Council
<b>The Crescent, Darnley Drive</b>	Kent County Council
<b>Camp Field</b>	Alan Madgwick
<b>Doctor's Meadow</b>	Southborough Society
<b>Woodland Area, near Holden Pond</b>	Southborough Town Council
<b>Holden Pond</b>	Southborough Town Council
<b>Crundwell Road Recreation Ground</b>	Southborough Town Council
<b>Crundwell Road cluster</b>	KCC / Town and Country Housing Group
<b>Sir David's Park green space</b>	Kent County Council
<b>Green spaces at Keel Gardens</b>	TWBC
<b>Broomhill Park/Kibbles Lane/ Speldhurst Road cluster</b>	Town and Country housing Group
<b>Neighbourhood Green, Lady's Gift Road</b>	Town and Country housing Group
<b>David Saloman's Estate (gardens)</b>	Markerstudy Group

The owners of the proposed non-designated heritage assets were also written to.



## **APPENDIX B: SUMMARY OF COMMENTS RECEIVED AT PRE-SUBMISSION REGULATION 14 CONSULTATION AND RESPONSE FROM THE STEERING COMMITTEE**

Responses were received from:

1. Tunbridge Wells Borough Council
2. Kent County Council
3. Network Rail
4. Creative Tunbridge Wells
5. Historic England
6. Hadlow Estate
7. British Horse Society
8. Environment Agency
9. Natural England
10. Southern Water
11. National Highways
12. Southborough Society
13. Town and Country Housing
14. Bethel Trust
15. Resident (Alan Wolfe)
16. Resident (Chris Jones)
17. Resident (Sophie Chatfield)
18. TWBC (Economic Development Manager)
19. SurveyMonkey responses
20. Owner of Camp Field, Birchwood Avenue

The table overleaf provides a summary of the comments received, where the Ref. column aligns with the numbering of respondents as shown above.

Spelling errors in actual responses have not been corrected.

Full copies of the responses have been sent to TWBC directly.

R ef	Who ?	Page/para/ policy	Comments/ Proposed change	SG response
1.	1	General References to Southboro ugh	Be clear on whether these references refer to the town of Southborough or the whole Southborough Town Council area.	Amended to make clear that this relates to the neighbourhood area.
2.	1	References to LBD	Be clear on whether this is the adopted LBD or as proposed in the emerging Local Plan.	Noted.
3.	1	Ref to NPPF	The NPPF 2024 was published in December after this NDP consultation started. References to the NPPF will need to be updated along with the paragraph numbers. References to specific NPPF paragraphs should reference which NPPF version they apply to in case the paragraph numbers change in future updates to the framework. For example, the NPPF paragraph references beneath the policy boxes or in paragraph 8.7 should reference the NPPF version.	Updated to 2024.
4.	1	1.3 Reference to status of SHBNDP	Set out that the NDP and the policies within it will form part of the development plan for the borough once the NDP is 'made'.	Amended.
5.	1	1.10 KCC Waste and Minerals	Suggested additions in relation to an update on the Kent Minerals and Waste Local Plan: The Development Plan also comprises The Kent Minerals and Waste Local Plan (KMWLP) 2013-2030 (adopted 2016, modified in 2020, since subject to further review and currently subject to examination, the main modifications to the KMWLP having been subject to a public consultation in October/November 2024)	Amended.
6.	1	1.15: TWBC LP Policy for Southboro ugh	Be clear on whether these references refer to the town of Southborough or the whole Southborough Town Council area.	Noted.

R ef	Who ?	Page/para/ policy	Comments/ Proposed change	SG response
7.	1	1.15	It is suggested that this has a caveat added that the TWBC new Local Plan is subject to main modifications and public consultation in due course and therefore the policy could be amended.	Noted.
8.	1	Foreword	It would be better to refer to this as the Tunbridge Wells Borough Local Plan	Noted
9.	1	1.18	This is still referred to as the High Weald AONB Management Plan (not the High Weald National Landscape Management Plan).	Updated.
10.	5	General	We welcome the production of this neighbourhood plan, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time.	Noted.
11.	7	General	<p>We welcome the mention of horse riders within the current plan, thank you. However, your plan does not go far enough to enable real, tangible change for the better.</p> <p>The most recent figures from KCC indicate that <b>18% of the public rights of way network is available to horse riders and 6% is available to carriage drivers</b>. When was the last time you saw a horse and rider on Southborough Common or on a road in the High Brooms area? They are simply pushed out.</p> <p>Horse riders in the Southborough and High Brooms area currently have nowhere to ride out except on the roads (see KCC's ROW map below, green and blue indicate equestrian access on a bridleway or restricted byway).</p>	<p>Policy SHB13 does support the creation of new bridleways / upgrade of existing ones. We have set some of these out on the associated map. The NDP itself is not the mechanism to create bridleways. The TC would welcome further discussion.</p>
12.	8	Flooding	Recommend including a policy on flood risk – see letter for reasons	<p>Added into the Spatial Strategy section.</p> <p>Added flooding as a clause into SHB1 in terms of areas most susceptible to flooding and in the context of grey belt areas in particular.</p>

R ef	Who ?	Page/para/ policy	Comments/ Proposed change	SG response
				Made note of existence of streams that are too small to be picked up by the EA maps.
13.	9	General	No specific comments.	Noted.
14.	11	General	No objection.	Noted.
15.	12	General	Firstly, may I say that the quality and level of detail in the document is impressive and all those involved in its evolution and production should be congratulated. Comments about publicising the Plan.	Noted.
16.	15	General	<p>Since this plan was initially proposed we have had a change of Government. The new Labour Government is proposing to ride rough shot over local planning. One headline stated, war is being declared on NIMBYs with sweeping planning reforms.</p> <p>My question is will this Development Plan be of any use? My fear is the laws regarding planning will be changed to allow the Labour Government to achieve their plan to build 1.5 million new homes by 2029, some possibly in our area, regardless of any Neighbourhood Development Plan.</p>	Noted. The NDP is the opportunity for the community to influence planning locally.
17.	17	Query	I've read these plans. Where are the 42 new dwellings going to be? Please clarify.	This relates to strategic allocations and not the content of the SHBNDP. The former allotment site (SO/1) has been built out. SO/3 has not yet built out.
18.	2	2.1	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	Noted – see also TWBC comment on this. Text amended to reflect.

R ef	Who ?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>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.</p> <p>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.</p>	
19.	16	2.27	<p>Just a brief note. In para 2.27 you state:</p> <p>Salomons hosts the Canterbury Christchurch University Institute of Applied Psychology.</p> <p>This is no longer true. It moved to Meadow Road in Tunbridge Wells.</p>	Amended text – remove final sentence.
20.	2	Vision	<p>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.</p> <p>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</p>	Noted.

R ef	Who ?	Page/para/ policy	Comments/ Proposed change	SG response
			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.	
21.	1	4.3 bullet 3: Brownfield register	Note that TWBC updates the Brownfield Register on an annual basis. It might be helpful to include the general Brownfield Register webpage link to that so that the link remains up to date, rather than a link to the 2023-24 Brownfield Register (which has since been replaced by the 2024-25 Brownfield Register). This should also be changed in Section 16 – list of evidence/other documents.	Amended link. Added to evidence document.
22.	1	Fig 3 LBD	Clarify whether this is the LBD proposed by the emerging Borough Local Plan or the current adopted LBD.	It is the proposed LBD – map amended accordingly.
23.	1	Policy SHB1 B.iii	To assist the reader, it would be helpful if the successor policy in the Submission Local Plan (SLP) is referenced.	Noted – amended and added in the successor policy number.
24.	1	Para 5.5 and Policy SHB2 criterion A)ii and iii Affordable housing mix	Tenure mix for affordable housing is proposed as 50/50 split between affordable home ownership and social rent. This conflicts with TWBC’s SLP policy which proposes 60% social rent and 40% affordable home ownership. We would recommend a meeting with TWBC officers to discuss this difference in policy.	SG discussed and decided to mirror the TWBC mix.
25.	1	Policy SHB2 A	Sizes of market housing The Housing Needs Assessment has compelling evidence on affordability, (particularly paragraphs 1.9 – 1.14), that mean that the NDP may want to put more emphasis on the size of market and affordable housing. Of note is that the current median house price in the neighbourhood area is £425,000. The lower quartile price, which is a good proxy for entry level housing, is £325,000. Whilst this is slightly less than for Tunbridge Wells as a whole, with average household income in the neighbourhood area being £56,150 in	Added into supporting text regarding the need for dialogue with housing officer and keeping this element of the policy under review.

R ef	Who ?	Page/para/ policy	Comments/ Proposed change	SG response
			<p>2020, and the lower quartile income per person being £20,835, affordability of housing is a problem for local people.</p> <p>The HNA found that local households on average incomes are unable to afford even entry level homes and the median house price would require an income of 94% above the current average.</p> <p>To assist with affordability, it is suggested that the number of large (i.e. 4+ bed) dwellings in new developments, is restricted to a low percentage of the overall site total, perhaps up to 5% of overall dwelling numbers. Para 1.32 of the Housing Needs Study notes that if the NDP are seeking to improve housing affordability then more 1 – 3 bed homes should be provided. Smaller 1 and 2 bed homes should also be designed to be accessible and adaptable to help meet the growing need for older persons housing.</p> <p>Size of AH: Affordable and social rented housing should assist in meeting the needs of local people on the housing register and the sizes be determined by the numbers of households waiting. In general, affordable, and social rented housing should provide a mix of smaller one bed and family, three bed plus accommodation but up to date housing statistics should always be obtained from the TWBC affordable housing officer. However, being too prescriptive in terms of the sizes of housing, particularly market housing, runs a risk of housing sites not coming forward. Any policy on the size of housing units in should therefore be kept under review.</p>	
26.	1	SHB2 C	<p>The commuted sum part of this policy criterion should be separate to the physical integration.</p> <p>The commuted sums part also needs strengthening and should refer to the ‘exceptional circumstances’ paragraph in the SLP Policy H3 and any future government guidance and testing on viability.</p>	<p>Separated into a new clause.</p> <p>Made reference to SLP Policy H3 (Exceptional circumstances).</p>



R ef	Who ?	Page/para/ policy	Comments/ Proposed change	SG response
27.	1	AHB2 A iv	First Homes are no longer being promoted as an affordable housing tenure. Policy should refer to the NPPF definition Annex 2 - <i>'Other affordable routes to home ownership... includes low-cost homes for sale (at a price equivalent to at least 20% below local market level)'</i> .	FH is still promoted NPPF p.18, hence reference retained.
28.	13	SHB2 H	Regarding SHB 2 Housing, we disagree with point (iii), which suggests a specific need for affordable housing within the Parish. We believe that the Local Plan Policy adequately addresses this need, and the focus should be on providing homes for rent, as this is the most acute need, rather than prioritising home ownership.	See previous comment on this matter.
29.	1	5.6 Exception sites	Southborough is not a designated parish in <a href="#">The Housing (Right to acquire or enfranchise) (Designated Rural Areas in the Southeast) Order 1997</a> and would be too large population wise to be designated. This means that whilst rural exception sites can be developed, there is a risk of losing the housing through tenants exercising their Right to Acquire or through mutual exchange. These rights can only be restricted through the parish being listed as a 'designated protected area'. It is therefore suggested that the reference to exception sites is removed.	Removed the paragraph.
30.	1	SHB3	This all looks very good but the policy wording itself could do with a little bit more of a framework to bring out the local distinctiveness in the guidelines.	Noted. It was felt that the policy should not try to repeat the Design Guidance and that it was sufficient to reference it. The Design Guidance forms an integral part of the neighbourhood plan.
31.	1	SHB3 A	Suggest adding 'to' after 'responds' in the first sentence, and 'appearance' to the list in the third sentence.	Added in.

R ef	Who ?	Page/para/ policy	Comments/ Proposed change	SG response
32.	1	SHB3 B	Applicants may need more direction to understand the direction of 'as appropriate to their scale, nature and location'. It may be worth including a table showing which guidance relates to which character area/use class/size of development.	The text should be considered in relation to which character area the proposal is located within and take account of the type of development and its size, to determine how each clause might apply.
33.	1	SHB3 Bi	This provides a good reason to review the conservation area appraisal, which could be done in partnership with the Borough Council.	TC to progress an update to the CA Appraisal with TWBC.
34.	1	SHB Biv	There should be a link to the guidance supporting this. Streets for a Healthy Life?	Added in hyperlink.
35.	1	SHB3 B vi	How will 'unacceptable' be defined?	The wording has been amended to significant.
36.	1	SHB3 General	The policy works well in conjunction with the design guidelines but it also needs to stand on its own, hence the points above.	See previous comments.
37.	1	SHB4	<p>Further evidence that may be useful - KCC produce a <a href="#">climate change risk and impact assessment for Kent</a>, which highlights key projections for future Kent and Medway climate and findings on the impacts of these projections.</p> <p>Reference could be made to EV charge point provision or the future proofing of houses to allow for their installation.</p> <p>Urban greening could be considered through the use of green walls, roofs or bin storage sheds.</p> <p>Sustainable urban drainage (SuDS) could be referenced to help mitigate impact of surface water run-off and consequent discharges into the sewerage system.</p>	<p>Added into text.</p> <p>This is covered in building regs. Added as a clause.</p> <p>Added as a clause and cross-referenced to the SLP – see also Southern Water comment.</p>

R ef	Who ?	Page/para/ policy	Comments/ Proposed change	SG response
38.	1	6.16	Note that TWBC consulted on a borough-wide <a href="#">Climate Change Strategy</a> in summer 2024, which is due for adoption in early/mid-2025. This strategy sets out the Borough's approach to achieving net zero.	Added in.
39.	1	SHB4 B	Reference to reduced embodied carbon through the use of sustainable building materials could be added to policy criterion B) ii or vi.  Reference could be made under policy criterion B) v. to the use of smart water butts as an adaptation measure to reuse water, whilst also reducing demand on the sewerage system during periods of high rainfall / extreme weather events.	Added in.  Added in.
40.	10	SHB4	Southern Water supports grey water recycling technologies and as explained further below, we would encourage additional content on sustainable urban drainage solutions (SuDS) as part of design considerations. Whilst we also support policies in favour of water efficiency, <b>please could amendments be made to the plan to help its readers understand that Southern Water is not the statutory water supplier to Southborough and High Brooms?</b> For example, paragraph 6.19 of the draft Plan refers to Southern Water's business plan but nowhere else does it state the statutory water supplier for Southborough and High Brooms.  Also, should this additional information be of help to you, for policy including water efficiency targets you will need to refer to: <ul style="list-style-type: none"> <li>• The Tunbridge Wells Local Plan policy on water efficiency – which for the submission draft of the evolving local plan (the SLP) is policy EN24.</li> <li>• The Building Regulations optional standard for water efficiency in water stressed areas – that policy EN24 of the SLP will base its target of 110 litres per person per day target on.</li> </ul>	The bit in bold has been clarified in the supporting text.  South East Water is the water supplier.  Included wording on suds.

R ef	Who ?	Page/para/ policy	Comments/ Proposed change	SG response
			Several policies in the SLP refer to SuDS (in particular EN26) but should you wish to encourage sustainable development that considers all impacts of climate change within the neighbourhood development plan, we suggest adding the following to part B of policy SHB4: <b><i>Give priority to the use of sustainable urban drainage systems (SuDS) unless there is clear evidence that this would be inappropriate.</i></b>	
41.	1	SHB5 B	It would be helpful if non-designated heritage assets 14 and 15 were named as brick pavements rather than just pavements to better relate to the supporting text and figures 6 and 7.	Amended to include the word 'brick'.
42.	14	Bethel	There are a number of issues that are specific to the building that we would like to make you aware of. Your entry describes the Bethel as a public building. Its original use was as a church but the last worshipping community ceased using the building over 20 years ago. However the Bethel trust's charitable status contains a number of very restrictive covenants which mean the buildings only permitted use is for religious services and the proclamation of the gospel. The buildings public use is therefore severely limited by these covenants and it cannot let as a hall for public use. The current use as a food larder was a temporary response to the growth in extreme food poverty during the covid crisis and strictly speaking falls outside of the permitted use of the building. The trustees are currently in consultation with the Charities Commission about the future of the trust and the building as there is no likelihood of religious worship resuming in the building.	Changed to Former Church (Asset Type) in Appendix B.
43.	1	7.1	It would be helpful to include the context for the Economic Needs Study 2016. It could just state that it was prepared as evidence for the Borough Local Plan.	Noted- added in.
44.	1	7.8	This paragraph could be deleted as it does not follow on from any mention of neighbourhood centres and is covered under paragraph 7.15	Deleted.

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45.	1	7.10	At the end of the paragraph add in: <i>TWBC defines this as a Neighbourhood Centre (known as North Southborough).</i>	Added in the bold text.
46.	1	7.11	Not sure if the last bit is required from this bullet point: <i>'Supporting residential uses at first floor level and above (where this is accessible and adaptable to changing needs) provided there is no adverse impact on the highway'.</i>	Removed the bit in bold.
47.	1	SHB6 Use classes	Appropriate town centre Sui Generis uses (e.g. pubs, music venues, theatres) could also be mentioned and could complement the cultural and creative ambitions of Policy SHB7.	Added in.
48.	1	SHB6 C	This policy criterion is very restrictive when compared to the SLP policy and the national approach, and taking into account permitted development rights. This should be carefully considered and it may be helpful to add in some wording around permitted development rights.	Added in 'notwithstanding permitted development rights'.
49.	1	7.19	Further explanation of what Creative Tunbridge Wells (CTW) is could be included. CTW is a strategic partnership including TWBC, KCC, Applause Rural Touring, Royal Tunbridge Wells Together (BID) and The Forum which have recently prepared a Creative Economy Strategy for Tunbridge Wells borough. CTW has formed a Southborough Working Group including representation from STC to explore opportunities for future cultural and creative activity in the neighbourhood area.	Included in the para.
50.	1	7.20	The reference to Knot Work should be amended to <b>Knot Works</b> and the text about Applause should be amended as follows: In addition, Applause Rural Touring is based at the Civic Centre. Applause Rural Touring is a cultural charitable organisation with Arts Council England (ACE) National Portfolio status (NPO). Applause collaborates with people across Kent, Sussex, Essex and the wider south east to create opportunities for creative experiences in their local	Amended to 'Works'.  Retained as is, so as not to date the plan.

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			communities. Applause has trialled a year-long pilot family theatre programme at the Civic Centre and has recommendations for future activity.	
51.	1	7.21	The Cultural Planning Toolkit (Creative Estuary/Kent County Council) should also be referred to.	Added in.
52.	1	7.22	Suggest changing 'KCC recommends' to 'the Cultural Planning Toolkit recommends...' Suggest amending the reference to 'proposed proposals' (also in Criterion A of Policy SHB7).	Amended. Wording revisited
53.	1	SHB7 A	See the comment above on amending the 'proposed proposals' wording.  Is the requirement to produce and engage on a Cultural Wellbeing Action Plan appropriate for all development proposals in the town centre? For instance, should this be required for householder applications in the town centre boundary?	See above.  Cross-referenced into the projects list as a project for the TC and other partners.
54.	4	SHB7 and text	Creative Tunbridge Wells welcomes the inclusion of Policy SHB7 and the statement in para 7.17 regarding support for the creative and arts sector in Southborough and High Brooms. It is helpful to see the reference to the Kent Cultural Strategy in paragraph 7.18 and the Tunbridge Wells Creative Economy Strategy in paragraph 7.19, both of which are key strategic documents for the creative sector. Please could a further explanation of what the Creative Tunbridge Wells (CTW) partnership is be included within the text in paragraph 7.19, as follows: <i>Creative Tunbridge Wells (CTW) is a strategic partnership including TWBC, KCC, Applause Rural Touring, Royal Tunbridge Wells Together (BID) and The Tunbridge Wells Forum which has recently prepared a Creative Economy Strategy for Tunbridge Wells borough. CTW has formed a Southborough Working Group including representation from STC to explore opportunities for future cultural and creative activity within the Neighbourhood Plan area.</i> In paragraph 7.20 please alter the reference to Applause Rural Touring to the following:	Added the two terms into the Glossary plus weblinks.

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			<p><i>In addition, Applause Rural Touring is based in the Civic Centre. Applause is a cultural charitable organisation with Arts Council England National Portfolio status. Applause collaborates with people across Kent, Sussex, Essex, and the wider region to create opportunities for creative experiences in their local communities. Applause has trialed a year-long pilot family theatre programme at the Civic Centre and is seeking to work with STC on recommendations for future activity.</i></p> <p>Creative Tunbridge Wells supports the statement in paragraph 7.21 that there is scope to further utilise the Civic Centre space for community activities, including the arts. Could the following be added after the word 'arts'...</p> <p><i>working with the local sector specialists and in consultation with existing cultural sector bodies including Creative Tunbridge Wells.</i></p> <p>The reference to the <i>Kent Cultural Toolkit</i> in paragraph 7.21 should refer to the <i>Cultural Planning Toolkit (commissioned by Creative Estuary and Kent County Council)</i>.</p> <p>Creative Tunbridge Wells supports the bullet points included below paragraph 7.21 setting out local priorities.</p> <p>In paragraph 7.22. the reference to '<i>KCC recommends....</i>' should be changed to the <i>Cultural Planning Toolkit recommends.....</i></p> <p>Creative Tunbridge Wells supports the criteria in Policy SHB7 B including the provision of affordable workshop/studio space.</p> <p>Creative Tunbridge Wells also supports Policy SHB8 and the aim to support flexible workspaces and opportunities for homeworking. The CTW partnership is also seeking to support the wider creative sector including the many freelancers and SMEs working in the borough and therefore recognises the need for appropriate workspaces.</p>	
55.	1	SHB8	It would be worth making reference to permitted development rights for home extensions/outbuildings in supporting text. (i.e. such proposals may not always require full planning permission).	Added in.
56.	1	SHB Ai	'within the town' should be clarified, does this mean within the defined town centre, or the town as a whole (i.e. the LBD), or the whole area of the Town Council?	Amended to neighbourhood area.



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57.	1	Fig 10	<p>Some species are contrary to the proceeding text being not native and some are highly unsuitable. There also seems to be some confusion on whether these are recommendations for street planting or rural areas, but the list fits neither and should be removed or revised.</p> <p>Individual comments on species:</p> <p>Laurel – this is a not street tree and is invasive in native woodlands causing loss of wildlife and ground flora.</p> <p>Pinus Nigra – a non-native suitable for parklands but why not the native pine – is this meant to be Pinus Sylvestris?</p> <p>English Elm – Only disease resistant varieties should be planted and only in small numbers</p> <p>Lawson and Leyland Cypress - non-native suitable for parklands and not streets or woodlands</p> <p>Lilac – not suitable and non-native</p>	Removed the diagram.
58.	1	8,27	The paragraph refers to Figure 9 as showing the proposed LGS designations, when it should refer to Figure 12 (Figure 9 is the town centre boundary and neighbourhood centres map)	
59.	2	SHB9	<p>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.</p> <p>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.</p>	See previous comments on inclusion of SuDS wording.

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60.	1	SHB10 LGS	<p>TWBC supports the majority of the proposed LGS designations being pursued through the NDP but questions whether LGS24 and LGS25 are demonstrably special due to their considerable distance away from the settlements in the neighbourhood area.</p> <p>Additionally, the Boot Fair at LGS25 is listed as reason for it being demonstrably special. The land is used as a Boot Fair under permitted development rights. This use could stop, and therefore, this reason for it being demonstrably special would no longer apply.</p> <p>Additionally, the list of proposed LGS designations notes where they are also proposed for designation in the SLP but misses a few off:</p> <p>LGS11 – this is essentially AS_83 in the SLP (albeit mapped slightly differently)</p> <p>LGS17 and LGS19 – together with LGS18 these form 238 in the SLP</p>	<p>Noted. The Group consider that both spaces are close to the community. In light of the comments about permitted development rights, space LGS25 has been removed.</p> <p>The group are minded to retain LGS24 (with additional justification) as its role as a historic orchard is much valued. Additional justification has been added to the Appendix for this space.</p>
61.	6	SHB 10 LGS	<p>LGS24: Apple Orchard LGS25: Boot Fair Field</p> <p>The estate is opposed to these sites being allocated as LGS as they do not meet the criteria for designation as laid out in the National Planning Policy Framework.</p> <p>See letter for reasoning.</p>	<p>LGS25: As above, it was agreed to remove LGS25 in the context of the community use coming to an end in 2027.</p> <p>LGS24: this has been retained and the justification added to.</p>
62.	10	SHB10	<p>We suggest adding the following wording to policy SHB10 to indicate how Local Green Space will be protected:</p> <p><i>The areas listed below (and identified in maps..) are designated Local Green Space where inappropriate new development will not be allowed except in very special circumstances:</i></p>	<p>Noted but this is already in the NPPF, hence no need to repeat in the policy.</p>

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63.	13	SHB10	<p>Referring to policy SHB10, we object to the inclusion of the following TCHG land areas as Local Green Spaces:</p> <ul style="list-style-type: none"> <li>- LSG5: Open space adjacent to TCHG flats and car park</li> <li>- LGS33: Crundwell Road cluster</li> <li>- LGS36: Broomhill Park/Kibbles Lane/Speldhurst Road cluster</li> <li>- LGS37: Grassy area, Lady's Gift Road</li> </ul> <p>These areas are ancillary and necessary to the properties they serve and should not be designated separately from the wider estate. We believe that the additional designation and protection provided by this policy is unnecessary and imposes undue development control limitations that do not align with good planning practices</p>	The Steering Committee discussed this and agreed that the spaces are integral to the design of the estates. It is for this reason that they are demonstrably special to the community, who use them for recreational purposes. The spaces have been retained in the Submission Version.
64.	20	SHB10	<p>Object to inclusion of Camp Field.</p> <ol style="list-style-type: none"> <li>1. The National Planning Policy Framework (December 2024) Chapter 8 - Promoting Healthy and Safe Communities sets out in Paragraph 07( c) the local green space designations should only be used where the green space is local in character and is not an extension tract of land. This area of land is approximately 20 acres and therefore is extensive and considerably larger than other areas you have identified as suitable local green spaces.</li> <li>2. This land is used for Agriculture and has been subject of subsidies and therefore will be kept in an Agricultural use.</li> <li>3. At the moment the land is being used for grazing. With crop rotation, this area must be used again for Arable use, i.e. the growing of wheat, barley etc for example where of course this would be totally unsuitable for informal recreational use including walking. There is a public footpath at the edge of the field but there is no public access on the land itself.</li> </ol>	This was discussed by the Committee who considered that LGS designation does not require a space to be accessible to the public. It does not convey access rights either. The space is valued locally for the reasons provided. It has been retained in the Submission Version.
65.	1	9.1	Note that Local Transport Plan 5 – Striking the Balance was adopted by KCC in December 2024.	Noted.
66.	1	9.2	The A26 AQMA was revoked in 2024.	Deleted.

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67.	1	9.4	This paragraph could include a reference to the role of active travel in reducing carbon emissions and that it can also help to support local businesses.	Added in.
68.	1	9.9	The aspirations align with Policy STR6 in the Submission Local Plan for Tunbridge Wells which prioritises active travel and then public transport. Following the engagement on the Better Streets project, a decision has been taken to focus on a series of enhancement measures that were supported by local residents which would make the area safer for those walking, wheeling and cycling.	Noted.  Amended text to reflect this in conversation with the TWBC officers.
69.	1	9.10	TWBC has been awarded further funding to explore opportunities to improve walking routes within Southborough and High Brooms as identified in the KCWIP Southborough Walking Zone.	Noted.
70.		9.11	This paragraph references Figure 15 as illustrating the local walking opportunities findings from the Mapping Workshops and Community Survey. Figure 15 is 'Principles of the '20 minute' neighbourhood (source: TCPA)' should instead reference 'Figure 16: Public Rights of Way and potential improvements'.	Corrected the Figure numbering.
71.	1	Table 3	Ref 4 does not explain which recreation ground it is referring to. Ref 7: Access to High Brooms Station has been addressed to some extent in the Better Streets project and will be considered further within the funded Southborough Walking Zone project (commencing January 2025).	Ref 4: should be Ridgeway Fields – amended. Ref 7: Made ref. to this in the table.
72.	1	9.13	Note the Barnett's Wood Route is included in TWBC's LCWIP Phase 1.	Added in ref to this.
73.	1	Table 4	Ref 9: The A26 Cycle Route is a priority for TWBC and is included in the Borough Council's LCWIP Phase 2 document.	Made ref. to this.
74.	1	Fig 16	This map is referenced in Policy SHB13 but does not relate well to the policy, instead it relates more to the supporting text and the 20-minute neighbourhood aspiration. For instance, the public transport network is mentioned in criterion A, before the figure	Added in a plainer map showing the PROW, transport nodes.

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			<p>reference, but is not mapped. In contrast, features such as the (now revoked AQMA) and 20-minute walk zones are not mentioned in the policy but are mapped in the figure.</p> <p>Additionally, whilst the aspiration for 20-minute neighbourhoods is fully supported, it is unclear what benefit the red circles bring to the map. The policy is about improving the walking, cycling and equestrian network, and not other aspects of 20-minute neighbourhoods, such as the location of services. It could be seen as active travel improvements outside of the circles (and where there is likely to be greater car dependency) as not necessary, which brings the question of why were those areas chosen and why is the northern end of Southborough excluded?</p> <p>Finally, there are a couple of improvements which should be made to the map key. The green line on the map is not in the key and it is not clear what this represents. What the numbers mean should also be added to the key as it is not obvious what they represent to someone who just reads the policy and then looks at the map without going through the supporting text.</p>	<p>Checked the key to Fig. 16. Plus added additional 'walkable circle' to cover the north-west part, which could reach North Southborough Neighbourhood Centre.</p>
75.	1	SHB13 A	This criterion should refer to safe pedestrian and cycle routes	Amended as suggested.
76.	2	SHB13	<p>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.</p> <p>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, <b>the County Council recommends enhancing the recognition of the PRoW network by adding the term to the Neighbourhood Plan's glossary.</b> 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.</p>	<p>Added into the Glossary as suggested.</p>

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77.	3	SHB13	Network Rail supports Policy SHB13: Improving walking, cycling and equestrian opportunities. The draft Policy sets out opportunities to link pedestrian and cycle networks with public transport, including the rail station. <b>High Brooms station has covered cycle parking for c32 bicycles and rail users should be encouraged to utilise this facility through the provision of safe cycle routes linking new development with the station.</b> This would also meet the requirements of Network Rail's first and last mile policy to encourage the use of active travel when accessing the rail network.	Noted.
78.	18	SHB13	I have had a quick look at the Transport section and it is great that it is supporting walking and cycling.	Noted.
79.	2	9.14	<p>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.</p> <p>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.</p> <p>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</p>	<p>Added in that the TC/ community could work with KCC to identify which ones (BHS).</p> <p>Noted. Added in the bridleway upgrading to the list. TC to maintain a 'live' list of community priorities for this purpose. Added this to point 3 of the Table.</p> <p>Noted.</p>

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			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).	
80.	1	9.19	The policy is about the provision of off-road parking, especially around high visitor use areas such as the High Street and High Brooms railway station. This paragraph at the beginning of the justification, whilst partially relevant as some residents will use these spaces as the primary parking place, sets the context of residents needing vehicles for journeys outside of their neighbourhoods.	Retained the para.
81.	1	SHB14	TWBC notes that there is some contradiction between the ambition of this policy to create additional parking spaces and the ambition to enhance, and create additional, cycling and walking infrastructure in Policy SHB13.	Noted but see para 9.19.
82.	1	10.4	Note that the TWBC IDP is a working document and is being updated and will be consulted upon through the Local Plan Main Modifications consultation.	Clarified this in the text.
83.	1	SHB15 A and B	<p>It would be helpful to add in reference to what types of facilities for teenagers as it is a bit vague to just state 'facilities for teenagers'.</p> <p>Criterion B could be deleted and incorporated into criterion A to include <b>new</b> and upgraded play areas for children.</p> <p>Would also suggest putting the wording from criterion B into the supporting text to the policy and changing '<i>in accordance with</i>' to <b>having regard to</b> the Tunbridge Wells Local Plan/Open space Study standards and adding in (<b>or any subsequent guidance</b>) (the use of 'having regard to' is something the Inspector mentioned on a number of occasions at the Tunbridge Wells Local Plan examination hearings (when making reference to</p>	<p>Additional wording has been added.</p> <p>Agreed to merge B into A.</p> <p>Amended to reflect.</p>



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			guidance/supporting documents) and proposed modifications to the Local Plan will reflect this).	
84.	1	SHB15	Sport England take a keen interest on such criteria based policies about the loss of any sports facilities/space and the SLP policy OSSR1 meets with their requirements. It would be worth referring back to the criteria within this policy and also consulting with Sport England on the proposed approach.	We have consulted Sport England.
85.	1	12.1	CIL: TWBC does not currently have CIL. If the Government proceed with implementing the Infrastructure Levy from the Levelling Up and Regeneration Act 2023, TWBC will consider and action as necessary.	Amended.
86.	2	Chapter 12	<p>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.</p> <p>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.</p>	Noted.
87.	1	Policies Map	What are the purple triangles? Please check the map key to ensure it lists all items on the policies map.	These are the views. Amended key to make

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			Please submit the shapefiles prepared to produce these maps alongside the Regulation 15 submission of the NDP to the Borough Council (or following preparation of the referendum version of the Plan). Once the plan is made and if the shapefiles are provided, TWBC could host an interactive map displaying the spatial policies.	clearer that these display as triangles on the map. Noted.
88.	1	Design Guide	<p>i. This is very welcome and it is good to see the stakeholder engagement outcomes set out in the beginning. The wish to avoid 'out of context brickwork' is good to see.</p> <p>ii. Fig 16: Just a suggestion, but the photo of Runcie Court for Salomons Estate obviously isn't the house itself so it may be misleading?</p> <p>iii. Fig 19: If there is a house with vertical sliding sash windows intact, it would be preferable to show that instead of this house. Otherwise, picking up on the local distinctiveness in, for instance, the brickwork detailing and cartouches is supported.</p> <p>iv. P.39: There are likely to be more opportunities than those listed. For example, what about better enclosure in the built form of the junction of Yew Tree Green Road and London Road, which includes the former library site owned by KCC? Are there any buildings or spaces at risk which could be identified as opportunities, such as the old Water Margin restaurant? The threats section should give examples of the 'retrospective' applications.</p> <p>v. P.42: General Design 7: The word 'redevelopment' should be removed as it could imply demolition and rebuild. Conserving buildings should also be mentioned as well as just features. The TWBC farmstead guidance could be referenced.</p> <p>vi. P.48: Why should front dormers be avoided? There are plenty of Victorian houses with them. They can be suitable provided they are mainly gable-ended rather than box or even hipped dormers. This page should be more specific with the materials. For instance, should the colour of the red brick be light coloured to mimic the stonework? Natural slate roof? Decorative chimney stacks? 'Natural clay tiles' rather than clay pantiles. Roughcast was not</p>	<p>The Guidelines have been produced externally. Simple changes have been made. Any further changes would need to be funded via the Technical Support and this would be pursued as necessary post-Examination. Amendments to be made at that time:</p> <p>i. Retain photo as is.</p> <p>ii. IK can source a photo showing this to replace current Fig 19.</p> <p>iii. Leave as is.</p> <p>iv. Amend as suggested 'Conversion'. Kent Farmsteads Guidance is relevant but could be referenced later in the document.</p> <p>v. Add 'large' or 'over dominant' to the front of that sentence. The photos</p>

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			<p>traditionally white, but rather natural (so the colour of the aggregate). Presumably a white coloured finish is more desirable?</p> <p>vii. LBO4: The image provided is not a traditional shop front and the proportions in the illustrations are not traditional. For example, see the figure in the supporting text of Policy EN 6 in the TWBC Submission Local Plan, where the supporting text also references the Victorian shop fronts on Silverdale Road.</p> <p>viii. LBO4 shopfronts: The reference to article 4 directions is missing the 4. First bullet point – there are a few reasons why the shop fronts cannot be retained. For example, there are quite a few good conversion examples on Camden Road where the glazing is covered with opaque film.</p> <p>ix. AM02 on plot parking 3rd bullet: There are other ways of defining defensible space in addition to hedgerows, such as those noted in the boundary treatments section.</p> <p>x. Checklist: The checklist needs to refer to the different categories (LB01, LB02 etc.) in the design guide. It all needs to be gathered together for ease of reference for the applicant and decision maker. Could it also be modified to use as a RAG assessment?</p>	<p>illustrate the materials better than adding in additional description. Remove ‘pan’ from pantiles.</p> <p>vi. Replace diagrams with the diagram from the TWBC EN6 (Fig 7) but retain the wording in the boxes, where not included in the Fig 7.</p> <p>vii. P. 52 – second column add in the ‘4’. Noted.</p> <p>viii. Add ‘or similar’ (see boundary treatment section).</p> <p>ix. Retain as is.</p> <p>x. Retain as is.</p>
89.	19	Design Guidelines	Amend p. 44 table Wildlife and Biodiversity to apply to all CAs.	Amended.
90.	2	General	<ul style="list-style-type: none"> <li>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.</li> </ul>	<p>Amended the key to be PROW.</p> <p>The NDP itself shows the different types of PROW.</p> <p>Amended.</p>

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91.	1	HNA	<ul style="list-style-type: none"> <li>Income needed to afford to rent says £50,000 / £84,000 to buy - These figures should be clarified on what size dwelling they apply to and if the income figures are per annum.</li> <li>1.13: First Homes are not supported in the new NPPF and therefore the discussion on discount should be around NPPF low-cost home ownership definition in NPPF.</li> <li>1.14: Affordability of affordable rented housing and social renting for singles and couples - This would benefit from defining what is meant by two 'lower earners'. Also, would the 'lower earners' require subsidy through benefits to afford?</li> <li>1.20 -1.22 As per the comment made under section 5 of the NDP, TWBC advises a meeting to discuss the difference in Local Plan and Neighbourhood Plan policy on affordable housing tenure mix.</li> <li>1.30: The report suggests that there is an over supply of two beds but much of this is in the older market housing stock. There is likely a need for good quality, energy efficient two bed housing in both market and affordable sectors.</li> <li>1.41: specialise housing for older people - It is unclear whether this relates to all specialist affordable housing rather than just older persons specialist housing.</li> </ul> <p>If it is just older people and those with disabilities, then the SLP has a policy and the NDP can therefore just state it will meet the shortfall. However, the SLP does not have a section on all specialist housing (e.g. those with learning disabilities). It is suggested that shortfalls in specialist housing is informed by KCC studies of need, including for extra care housing. This should be reflected in Policy SHB2.</p>	The HNA was prepared externally via the Locality funding. It should be read in conjunction with TWBC HNA.



