

# Horsmonden Neighbourhood Plan 2022-2038



## PUBLIC CONSULTATION

Horsmonden Parish Council (the PC) has produced on previous consultations it has carried out with residents and parish councillors.

The government's Neighbourhood Planning regulations say that the PC - as the "qualifying body" producing the plan - must consult for six weeks with local people, businesses and other organisations to let people know what it contains and why so that they can give their views. This is called a "Regulation 14" consultation. The draft Horsmonden Neighbourhood Plan Regulation 14 consultation will run from Monday 13 September to Sunday 24 October 2021.

This leaflet is a summary of the draft plan where you can view the full document and comment on it.

The draft HNP proposes planning applications in the Neighbourhood. There is also an annex to the Neighbourhood Guidelines, to be used for the development options for the development (Bassetts Farm) in their draft Local

# Horsmonden Neighbourhood Plan

## Regulation 14 Draft



## 2022-2038

### Horsmonden Parish Council with the Neighbourhood Plan Steering Group

September 2021  
<http://horsmondennp.co.uk/>

# Horsmonden Neighbourhood Plan Consultation Statement

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## 1 Introduction

1.1 The Horsmonden Neighbourhood Plan (HNP) has been drawn up in line with the government’s neighbourhood planning regulations. These set out the requirement for consulting with the wider community, public bodies, landowners and the development industry to inform the production of the neighbourhood plan. This is so that they are:

- kept fully informed of what is proposed;
- are able to make their views known throughout the process;
- have opportunities to be actively involved in shaping the emerging neighbourhood plan;
- are made aware of how their views have informed the draft neighbourhood plan.

1.2 By doing this the ‘qualifying body’ Horsmonden Parish Council (HPC) is better placed to produce a plan that provides for sustainable development which benefits the local community whilst avoiding placing unrealistic pressures on the cost and deliverability of that development.

1.3 The HNP has now completed its formal pre-submission consultation. Prior to undertaking that consultation, HPC agreed that it had a complete draft – the parish council’s preferred approach. The pre-submission consultation lasted for six weeks from Monday 13<sup>th</sup> September to Sunday 24<sup>th</sup> October 2021.

## 2 Summary of Community Engagement

2.1 The focus of the Consultation Statement (CS) is on the 6 week pre-submission consultation (also called Regulation 14), however, it also includes a summary of previous engagement and consultation that has been undertaken including a summary of the main outcomes of such engagement and how this has informed the content of the plan. This demonstrates that there has been a rigorous programme of community and stakeholder engagement throughout the process of developing the HNP.

### Designation of Horsmonden Parish as a Neighbourhood Plan Area

2.2 Horsmonden Parish Council applied to Tunbridge Wells Borough Council for the designation of a neighbourhood area under The Neighbourhood Planning (General) Regulations 2012 in October 2017. The area proposed covers the whole of the parished area of Horsmonden and was the first step

for Horsmonden Parish Council in preparing a Neighbourhood Plan. The borough council approved the Neighbourhood Area on 24th November 2017. For further details see: <https://tunbridgewells.gov.uk/planning/planning-policy/neighbourhood-plans/horsmonden>.

## Village Visioning Event, April 2018 (Visioning Event)

2.3 Local interest groups, businesses and local residents discussed some of the key issues that are important to the village in a series of discussion groups titled: People and Places; This is a Special Place; Future Housing Growth; Learning from Other Places; Main Challenges; Streets Lanes and Roads and the Future [Vision]. Six visions were created and a preferred vision (set out below) has emerged. The top ten challenges for Horsmonden were:

1. Traffic
2. Sheltered and affordable housing
3. Non-school youth opportunities
4. Health services
5. Countryside protection
6. Housing growth
7. Schools and education
8. Employment space – working from home
9. Superfast broadband
10. Public transport

2.4 Vision:

“In 15 years’ time, Horsmonden will be a village that has retained its character, community spirit and rurality whilst embracing new technologies and economic opportunities. It will have diversified to have allowed improvements in transport, housing and leisure, to cater for all members of the community.”

## Summer Festival – Saturday 9<sup>th</sup> June 2018

2.5 The steering group were active at the festival with a stand on the Green to raise awareness about the plan and asked questions about the future of the village and how it could be shaped to grow sustainably.

## Website Launch – September 2018

2.6 A dedicated website was launched with links from the parish council website containing information and resources to assist and support the plan.

## Development Exhibition, Autumn 2018 (Exhibition)

2.7 The purpose was to make local interest groups, businesses and local residents of the HNP and changes on the horizon that could have. Far reaching effect on the village. People were asked to get involved. The exhibition panels can still be viewed on the website: <http://horsmondennp.co.uk/community-events/>.

## Household questionnaire, Winter 2018/19 (Questionnaire)

2.8 A survey was devised by the steering group based on the results of the previous consultation activities and sent to every household. There were 206 responses with 105 from female respondents (see results: <http://horsmondennp.co.uk/wp-content/uploads/2019/04/Questionnaire-results.pdf>). The majority of respondents (173) were in the 40-79 year age groups with 29 responses from 14-39 year olds. Themes included amenities, transport, facilities, services, housing, the environment, heritage and employment. These themes were used to develop working groups, the subsequent workshops and chapters of the HNP. Priorities over the next ten years were (in order of importance):

1. Road safety measures (80.4%)
2. Retaining and growing local shops and businesses (62.2%)
3. Services for older people (47.4%)
4. Facilities for young people (43.5%)
5. Additional pavements (40.2%)

## Evidence gathered by the steering and working groups 2019

2.9 Some volunteers preferred to join themed working group who were briefed and tasked to gather further quantitative and qualitative evidence to inform the emerging HNP policies. The chair of each working group attended the monthly steering group meetings. The working groups presented the results of their work at a series of themed workshops (see below).

## Themed community workshops that took place spring and summer 2019 (Workshops<sup>1</sup>),

2.10 Three themed workshops were held on Housing & Development, Community and Leisure; Landscape & Environment, Design and Style; Access & Movement, Business & Employment. Again, interest groups, businesses and residents took part and following a presentation of the results of the questionnaire and subsequent evidence gathering, undertook analyses of strengths, weaknesses, opportunities and threats by topic under each theme. Full reports of each workshop can be found at:

<http://horsmondennp.co.uk/worshop-reports/>. Key outcomes are summarised below:

- To meet the housing need in the parish by providing affordable housing for local families;
- Build smaller units to rebalance the supply of homes away from larger 4-5 bedroom homes;
- To build small or medium size developments;
- To ensure affordable homes remain affordable in perpetuity and to provide sheltered housing;
- Local Green Spaces proposed for designation, concerns over losing views in new developments, biodiversity and wildlife;
- Design codes to ensure attractive design in new developments and energy efficient housing;
- Concerns over parking, particularly providing adequate parking in new developments and for the new village hall;
- Localised traffic capacity and safety issues – particularly road and pedestrian safety in and to new developments;
- Developer contributions sought for public transport improvements;
- Provision for home working and live/work units;
- Address poor mobile phone and broadband coverage;
- Affordable housing for farmworkers;
- A business or enterprise hub and café utilising the existing village hall;

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<sup>1</sup> <http://horsmondennp.co.uk/worshop-reports/>



- As well as expansion of the school plans should include scope for the expansion of the kindergarten.

## Masterplanning and Design work undertaken by AECOM including the public workshop in Autumn 2019

2.11 The parish council and steering group were able to commission a free Technical Support Package<sup>2</sup> led by an urban design and landscape architecture team from AECOM to Masterplan the Bassetts Farm site (AL/HO3) and consider building and landscape design opportunities and threats and develop Design Guidelines. These were shared and discussed at an event with interest groups, businesses and residents held in October 2019, revised and published. The Design Guidance and Masterplan identified:

- New development should reflect the Local Character Analyses and existing architectural details;
- Streets should tend to be linear, permeable and any cul-de-sacs avoided or short;
- Pedestrian paths included in new developments integrated with existing pedestrian routes;
- Access to properties from the street;
- Existing trees and hedgerows integrated into new development;
- Spacing of development should reflect the rural character and allow for long distance views of the countryside. Trees and landscaping should be incorporated in the design;
- Materials used in proposed development are of high quality and reinforce local distinctiveness.
- The new medical centre is recommended to be accessible from the Goudhurst Road by a very short walk.

## Housing Needs Survey undertaken by Action for Communities in Rural Kent (ACRK), January 2020 (HN Survey)

2.12 The parish council and steering group were able to commission a Local Housing Needs Survey delivered to every household in the parish to ask households about their current and future housing needs. The aim was to

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<sup>2</sup> <https://neighbourhoodplanning.org/about/technical-support/>

understand overcrowding, unsuitable or housing cost pressures experienced by households in the parish. Of the 1075 surveys distributed 307 were completed representing a 29% response rate. The HN Survey revealed:

- High property prices and a predominance of privately-owned homes means that some local people are unable to afford a home in Horsmonden.
- The cheapest property for sale in the parish was a 2-bed apartment for £195,000. To afford to buy this home a deposit of approximately £41,250 would be required and an income of £66,786.
- To afford to rent privately an income of approximately £51,000 would be required to afford the cheapest 2 bed property found for £1,275 pcm.
- Overall, a need for up to 20 affordable homes was identified and a further 14 homes for older households of which two households required affordable housing (included in 20).

### Meetings with developers for the Brenchley Road (AL/AL/HO2) and Bassetts Farm (AL/HO3) sites.

2.13 To better understand the aspirations of the proposers / developers of these sites and to share the emerging policy intentions of the HNP, meetings were held in 2020 with Lambert and Foster (both sites), Persimmon (AL/HO3) and Rosconn (AL/HO2). Key issues discussed were access, size of dwellings, pavements, design, community facilities and open spaces.

## 3 HNP Pre-Submission (Regulation 14) Consultation

3.1 The pre-submission consultation for the draft HNP lasted for six weeks from Monday 13<sup>th</sup> September to Sunday 24<sup>th</sup> October 2021. There were 33 responses via an online survey form, 12 emails of which five had no comment to make. The Locality Roadmap (guidance on Neighbourhood Plans) suggests the following approach to dealing with the responses:

- details of people and organisations consulted about the proposed neighbourhood plan;
- details of how they were consulted;
- a summary of the main issues and concerns raised through the consultation process;



- descriptions of how these issues and concerns were considered and addressed in the proposed neighbourhood plan.

## People and organisations consulted

3.2 A summary leaflet was published and delivered to every house in the parish. The four page A5 leaflet included a brief summary of why and what is a neighbourhood plan, the vision and objectives with a brief description and a plan map with a key showing a 400m radius (approximately five minute walk from the village cross-roads), presence absence of pavements, proposed new locations for housing, the village hall, health centre, play areas, allotments and a community woodland / orchard. Residents were informed that they could view a full version of the HNP online at <http://horsondennp.co.uk/> and that the website explained how to submit comments online. Paper response forms and collection boxes for these were also made available at the Gun and Spit Roast Inn, Heath Stores, the Parish Office at the Village Hall and the Social Club. Details were also included of two consultation events –

- online 7.30pm to 9pm on 23<sup>rd</sup> September
- in person at Horsmonden Village Hall 2.30pm to 4pm on 16<sup>th</sup> October

3.3 An article was included in the parish newsletter, notifications published on the parish council website, on Facebook and an email notification sent to all the residents and stakeholders who had attended the previous events and workshops. They were sent a link to the website where the HNP and supporting documents including the Design Guidance could be found with a link from the home page to the online survey.

3.4 A list of statutory consultees, including neighbouring parishes and boroughs, was provided by TWBC and an email notification sent to them, as well as landowners and developers (notably Rosconn who are the developers for the Brenchley Road site and Persimmon for the Goudhurst Road site). A notice was published in the Wealden Advertiser which is delivered to every house in the parish (which has a much wider distribution within west Kent and neighbouring parts of East Sussex).

## Main issues and concerns raised and how responded to in the HNP

3.5 The survey asked for people to respond on the HNP vision, objectives and policies. The responses on the vision were:

## Those supporting the vision statement

● Strongly Support	5
● Support	16
● not sure	1
● do not support	3
● strongly do not supportstrong...	2



3.6 A full list of the online survey responses is set out in Appendix A HNP Pre-Submission Consultation Responses.

3.7 While there was a majority of respondents supporting the vision, quite a number felt that because of the number of new homes proposed by TWBC in the Submission Local Plan, that they couldn't support it wholeheartedly.

Comments on the vision included:

- It is a good vision
- I've lived here for 50 years and the vision for this village will ruin this village. We have already had our quota of houses.
- I broadly agree with the vision – but all developments need to be sensitively managed and staged.
- I, like many people who enjoy life in Horsmonden as it is, feel apprehensive about plans for rapid increase in the number of houses to be built.
- The Steering Group and many others have devoted considerable personal time to produce a well-considered and balanced Vision and set of objectives.
- I think the vision should include words to emphasise the Rural / Farming aspect of the settlement, and the importance to retain and consider this aspect in future developments of the village.

3.8 This tone, with variations, continued throughout the responses. It was therefore proposed to respond to these frequently raised concerns by publishing numbered FAQs (frequently asked questions) and referring the responses to these, or where a different but uncommon point was raised, a specific response was discussed and agreed. Here are some examples of the FAQs published in full in Appendix B HNP Reg 14 FAQs.

## Issues and concerns raised via Facebook or the website:

### **3.9 Why place the new Medical Centre so far from the village centre?**

- A TWBC's Draft LP puts the Medical Centre on Bassetts Farm (AL/HO3). HNP has indicated it should be at the closest point to the village centre on the site (650m) and accessible by pavement.

### **3.10 Why so many houses?**

- A TWBC's Draft LP requires Horsmonden to: 'Deliver approximately 240 to 320 new dwellings, of which 40% shall be affordable housing, on three sites allocated in this Local Plan in the plan period [2022 to 2038].

### **3.11 Why is the Hop Pickers Line within the limits to built development but not included in Site AL/HO3?**

- A The route of the line within the borough has already been safeguarded through a Safeguarding Railway Land policy and by refusing proposals that would compromise its use as a green infrastructure corridor.

### **3.12 How will the HNP provide the smaller, cheaper properties the community want?**

- A HNP Policy 6.1 Meeting housing need states: New housing developments will be supported where they:
- Provide an appropriate proportion of smaller homes (1, 2 and 3 bedrooms) in line with the latest available housing need data at parish or district level;
  - Provide, where applicable, affordable housing in a range of tenures including for social rent and shared ownership that meets the latest identified local need for single people, couples, families and older residents.

### **3.13 Where is everybody coming from [to fill the new homes]?**

- A All communities are being asked to contribute to meeting the housing needs of the borough assessed as 12,200 additional homes over the plan period to 2038.

### **3.14 How are our roads going to cope?**

- A HNP proposes a walkable village where development is ideally within 400m/5 minute walk of the village centre and to the west of the crossroads. For this reason HO1 and AL/HO2 are seen as more sustainable than AL/HO3.

## Questions from the Pre-Submission Regulation 14 Consultation

### **3.15 Why have three large housing sites been proposed in Horsmonden?**

A The housing sites have been proposed by TWBC in their PSLP. HPC was able to commission a Site Options Assessment from international civil engineering and planning consultants AECOM to see if alternative sites were suitable but they were unable to find alternatives. As a result HPC decided not to allocate sites in the HNP. The SOA also makes recommendations for making the sites more sustainable which have informed the policies in the HNP.

### **3.16 Why doesn't the HNP make provision for more parking at the village centre / close to the cross-roads?**

A Village centre parking was considered and is acknowledged as challenging. However, if the Brenchley Road site is developed, the HNP makes provision for additional parking for the village centre. Also see FAQs on parking at the village hall and centre.

### **3.17 Are new developments required to provide pavements to the village centre?**

A The HNP requires developers to demonstrate how they will provide pavement access to the village centre (see Policy 2.3 page 23 and extract from Manual for Streets) before they receive planning permission.

### **3.18 Can affordable homes be protected from the Right to Buy?**

A There was an aspiration expressed in the Pre-Submission Regulation 14 Draft HNP that new social housing be retained as such in perpetuity. However, the parish council has been advised that doing so is outside the scope of planning policy. Planning policies cannot be used to override statutory legislation in respect of retaining affordable homes in perpetuity and right to buy.

### **3.19 Can the HNP phase building homes and new infrastructure?**

A In part because the housing allocations are from TWBC's SLP but also because of the way planning operates, it is generally not possible for NPs to phase development. For details of the proposed development see SLP Policies AL/AL/HO2 and AL/AL/HO3.

## Response from TWBC

3.20 A lengthy response was also received from TWBC. The letter and a schedule of how these were responded to in drafting the next iteration of the plan – the Submission Neighbourhood Plan – is set out in Appendix C TWBC Reg 14 Response. Here are some positive comments from their response:

“The Horsmonden Draft NDP is considered to be a well-produced document, and it is obvious from a review of the evidence base that a huge amount of work has gone into the assessment of sites, views, character, environment etc. TWBC Officers have been particularly impressed with the work and drafting of the policies and supporting text around the policies.”

“In general, the Draft NDP is supported, and TWBC is keen to assist and support the NDP group in the production of the Reg 15 version.”

3.21 Also, some clarification on the context of the relationship between the HNP and TWBC PSLP.

“At this time, as you are aware, the Development Plan comprises the TWBC Local Plan (2006), Core Strategy (2010), the Site Allocations Local Plan (2016) and Kent Minerals and Waste Local Plan 2013-30 (2020). The new Local Plan 2020-2038 was subject to Regulation 19 consultation which ran from 26 March to 4 June and is due for submission towards the end of October 2021.”

“For those NDPs that are already made at the time of adoption of the TWBC Local Plan, the NPPF is clear that, where policies in the NDP are in conflict with the policies in the Local Plan, these will be superseded by the Local Plan policies. An assessment will be made of all policies in made NDPs ahead of the adoption of the Local Plan as to whether the policies within these would be superseded by the policies in the Local Plan.”

3.22 Most of the points were focussed on improving the wording of policies including to make them more positive. However, advice was also received that some policy intentions had been challenged in recent Neighbourhood Plan Examinations such as Policy 3.6 Housing for Local Workers.

3.23 Also Policy 6.5 which aimed to limit availability of affordable housing to those with a local connection. There was criticism of equating 800m with a ten minutes' walk as walking speeds are different for different levels of mobility, so the wording has been changed to “approximately”. It was suggested that Furnace Pond could not be designated as a Local Green Space as part of it lay

outside the parish – although this is now proposed in the SLP – but it was decided to keep this in the revised Submission HNP (or at least the part that does lie in the parish).

3.24 A widely held aspiration set out in Policy 6.4 for new affordable homes to remain affordable in perpetuity was considered contrary to statutory legislation ‘Right to Buy’ and so has been removed although an explanation box has been included in the HNP Submission Plan.

3.25 Some policies were considered too prescriptive such as Policy 7.8 in relation to the High Weald AONB Management Plan and so the policy has been re-worded in line with that in the SLP. Where there was some divergence of views, a planning consultant Michael Thornton RTPI has been asked to advise the parish council. Ultimately the decision on which policies remain will lie with the examiner.

### Kent County Council Response

3.26 The letter received from KCC is included in full as Appendix D KCC HNP Reg 14 Response. Suggestions included:

- It is recommended that the Neighbourhood Plan supports the retention of these paths, and all PRoW in the parish, by including a specific policy supporting protection of PRoW where development is proposed and requiring their enhancement for the benefit of connectivity.
- KCC, whilst acknowledging and appreciating comments that the existing PRoW network is well maintained and available for walkers, suggests the Plan considers how new paths could be created to redress the 'lack of footpaths in South West of parish' (SWOT analysis, p. 64). Additionally, some existing Public Footpaths may be suitable to upgrade in status e.g. Public Footpath to Public Bridleway, to extend the public's access right to cyclists and horse riders. Applying both mechanisms could, for example, create a new cyclable route between the village and Sprivers that may prove a popular alternative to the car for existing residents, as well as future residents of the proposed developments around Horsmonden village.
- There may also be potential for a cycle route to Marden and the nearest railway station. Such routes will enhance local communities, deliver active travel and reduce use of local roads. The objectives and policies should recognise PRoW and support off-road cycling and horse riding as



a local leisure activity, for a positive contribution to the future of the parish.

- When SuDS are planned, it is important that there is consideration for the potential impact on the historic environment and any unavoidable damage is mitigated.

3.27 These suggestions have been incorporated into the revised Submission HNP.

## Developer responses

3.28 Two letters were sent by e-mail from Rosconn and Persimmon Homes which focussed particularly on their sites on SLP/AL/HO2 and SLP/AL/HO3. These are included in full in Appendices E (Persimmon) and F (Rosconn).

### *Persimmon*

3.29 Persimmon summarised their concerns as: As a key stakeholder in the future development of Horsmonden, we welcome the opportunity to engage and assist in the formulation of the HNP. Persimmon Homes supports the preparation of a Neighbourhood Plan for Horsmonden provided that it is in accordance with the strategic principle set out in the emerging Borough Local Plan, accords with the principles of the NPPF and plans positively for the sustainable growth of the Village. To this end we have highlighted that the following amendments need to be made to the Plan:

- amend the limit of built development shown on figure 2;
- amend the wording of Policy 7.2 concerning landscape and views;
- remove the requirement for ‘modern almshouses’ at Land east of Horsmonden.

3.30 In response, the map showing the limit to built development (based on an early proposal) has been revised to bring it in line with the SLP. The wording of Policy 7.2 concerning landscape and views has been revised. The proposal that some warden or sheltered housing – modern almshouses - be included in the largest development site Bassetts Farm has, as it is acknowledged that modern almshouses is quite a specific requirement, has been amended, although the proposal for warden or sheltered housing is retained.

### *Rosconn*

3.31 Rosconn Strategic Land sent a lengthy response including that they supported the vision statement. Their response included:

- They supported a speed reduction to 20mph along the Brenchley Road and will investigate with KCC the location of a safe crossing point.
- They didn't agree that the Manual for Streets specification for a 2m wide footway (pavement) along the Brenchley Road would be achievable although they were engaged in extensive pre-application work including with KCC Highways to 'develop a highways improvement scheme along Brenchley Road that conforms to Local Highway Authority's standards and meets the needs of the local community.'
- They were concerned that the Lifetime Homes Standard has been superseded.
- They wished for more flexibility on retaining hedgerows – for example where access might be provided – and felt that the proposed 50m buffer to ancient woodland duplicates other standards (Natural England 15m and SLP 25m) and should be removed.

3.32 The parish council have sought the advice of their planning advisor in relation to these policies and have amended them as advised.

## Appendices

- Appendix A HNP Regulation 14 Consultation Responses (all)
- Appendix B HNP Regulation 14 FAQs
- Appendix C TWBC response to Reg 14 with Comments
- Appendix D HNP KCC response to Reg 14
- Appendix E Persimmon Reg 14 response
- Appendix F Rosconn Reg 14 response

# Responses to Consultation on Draft Neighbourhood Plan Reg 14

## Those supporting the vision statement

● Strongly Support	5
● Support	16
● not sure	1
● do not support	3
● strongly do not supportstrong...	2



## Individual responses

<b>Record</b>	68	<b>Resident</b>	As a resident of Horsmonden	TN2 8JA
<b>Vision</b>				
<b>Organisation</b>	Resident for 40+ years married to a villager			
<b>Objectives</b>				
<b>Policies</b>				
<b>General</b>	Overall, there seems no logical reason to build any houses in the Village since hundreds are being built in Paddock Wood, Marden & Staplehurst which are connected to one thing lacking in Horsmonden, the railway line to London & dare I say the greater Ashford city that never materialised. Additionally, there is no prospect of reasonable local work places being developed so the extra bodies will have to travel by car - there being a paucity of public transport (have you tried to get to the county town by bus recently) - on roads that barely pass muster. Services will have to be completely re-thought. There would be little prospect of any developer building affordable housing, it just would not be on their economic planning: if they did, those houses would be just rabbit hutches & the next generation slums. There is no doubt that the ICE have got it right when they say that economically development should be in town & city centres not in the countryside. Some time soon the UK will need the good arable land for crops of some sort: ? will houses be knocked down to accommodate that requirement.			
<b>HNP response</b>	<i>Affordable housing is something that developers are legally obliged to provide. Currently they are required to provide 35% (Core Strategy 2016) but this will increase to 40% when the SLP is adopted. Also refer to FAQs on more general points.</i>			

<b>Record</b>	74	<b>Resident</b>	As a resident of Horsmonden	TN12 7BX
<b>Vision</b>	No			
<b>Organisation</b>	N/A			
<b>Objectives</b>	No			
<b>Policies</b>				
<b>General</b>	Page 67 Local Green Spaces - request to include the Community Garden (small strip of land opposite the village hall).Page 70 Important Views - request to consider an additional view for inclusion - View from field gate on footpath running east/west through our garden at Wrangling Green, across the farm fields southwards towards Horsmonden village and southeastwards across to Willard Place (view 5 in the draft).			
<b>HNP Response</b>	<i>The community garden is privately owned and following an assessment of its suitability we would have to consult with the owner and then include in the next draft of the plan. In terms of the view, an assessment will be undertaken and it will be considered for inclusion in the next draft of the plan.</i>			

<b>Record</b>	76	<b>Resident</b>	As a resident of Horsmonden	TN12 8NH
<b>Vision</b>	... retained character, community spirit and rurality” AND (rather than BUT).. embraced new tech.			
<b>Organisation</b>				
<b>Objectives</b>	3 - Business: to achieve this, attention needs to be given to the broadband infrastructure. 6 - Housing and development: strong emphasis needed on regenerating brownfield sites and improved environmental sustainability of new buildings			
<b>Policies</b>	Policy 2.1 Walkability is key to the village character: the Bassetts Farm site, other than the immediate north of Goudhurst Road, does not comply with this Policy 6.6 replacement dwellings: does this contradict the principle of brownfield taking precedent over greenfield? Policy 7.1 green space: the hop picker line should be added as a green space - the mature trees along it are extremely characterful within village boundary and should be part of the protected walk/bike route. Policy 7.2 views: the “fruit belt” views are extremely characterful. H03 Bassetts Farm proposals, other than the immediate north of Goudhurst Road, do not comply with this. The further up the hill the development spreads, the more impact on the long views from both directions.			
<b>General</b>	Many thanks to the team who put this together, a lot of hard research and work. Is there any scope to challenge the limit to built development shown in pink on figure 2? Site H03 Bassetts Farm breaches several of the policies (greenfield, views, orchard character) in particular at its northern extent where access back through the development creating a long walk to the village centre.			
<b>HNP Response</b>				
<b>Vision:</b>	Agree ‘and’ is more positive than but.			
<b>Business:</b>	Brownfield sites: see Policy 3.3 Conversion of farm buildings for business and Policy 6.2 windfall residential is already addressed. Environmental sustainability: This is addressed in the plan on page 54 Low carbon homes although there is no specific policy on this. This area is largely covered in Building Regulations and national policy.			
<b>Policies:</b>	Walkability: The HNP acknowledges that some parts of Bassetts Farm are at the outer limit of the 800m radius but the policy is still trying to maintain walkability through footways and pedestrian access from new development to the centre of the village. Policy 6.6 is not about previously developed land. Policy 7.1 Hop Picker Line – this is protected from development by the SLP. Policy 7.2 Important Views: The northern part of Bassetts Farm is proposed to be protected from development by the SLP and HNP Important Views 8, 9 and 15 (illustrated Fig 47 on page 70) do seek to protect the most important views. [Check numbering of views on Fig 47 and Fig 48 – check spelling of Swigs Hole Farm].			
<b>General and LBD:</b>	The LBD is set by TWBC in the SLP and not by the HNP.			

<b>Record</b>	79	<b>Resident</b>	As a resident of Horsmonden	TN12 8AL
<b>Vision</b>				
<b>Organisation</b>				
<b>Objectives</b>	Access & Movement objective: I agree with the objective to maintain a 'Walkable village' and reduce congestion caused by car travel and parking. However this vision needs to be built into any development plans. Unfortunately, all new developments that I've seen over the past 30 years have minimised room for off road parking resulting in an increased volume of unsustainable on-road parking. An example of this approach can be seen in Olivers close where houses only have room for 1 car (where realistically households would have more than 1). The recent planning applications for Bassetts farm have shown where an initial application was for 15+ houses and it's now at 22+ (where is everyone going to park?).Landscape & recreation objective: I agree with the objective to retain the agricultural heritage and retain views and I understand the need to support a greater numbers of houses. However, I can't see how this vision can be aligned with the plans to for building potentially hundreds of new houses in the village. I found it ironic that you used a photograph in a previous plan document used to promote the pleasant orchard views whereas the area of the photo is within the HO3 housing development area.			
<b>Policies</b>				
<b>General</b>	I agree with the objectives & policies outlined in the plan,. However, it is not clear how these can be enforced and if that is even possible with developers and local / regional authorities. For example house builders will always maximise profit to build as many houses on a site at the detriment to parking and garden provision. The need to improve additional amenities and services (i.e. health care / schooling) in line with house building always appears misaligned with the corresponding expansion of services always following much later. This will reduce the provision for villagers in the meantime. On a final small note regarding our immediate location. I note that the detailed plan shows a pavement outside our house (opposite Old station garage). At present there is no pavement outside our house and is often used by people to park. As a result, pedestrians have to walk in the road to move from the village centre towards Lamberts place. You may want to investigate this gap in access provision if further building is expected on the Bassetts farm site and behind.			

<b>HNP Response</b>			
<b>Access and movement objective:</b> <i>The HNP identifies that parking is already a challenging issue for the village particularly in the village centre. Refer on parking standards to TWBC SLP new parking standards. We will consider strengthening the wording of policy 2.6 to make increased provision of parking a requirement across all new sites.</i>			
<b>General:</b> <i>In terms of enforcement of objectives and policies, although objectives are more an expression of principles or aspirations for the future of the parish, the HNP policies, once made (adopted) will become part of the overall Development Plan for the district and will be used by TWBC to decide on future planning applications. In terms of the extent of pavement, this will be checked before the next version of the HNP. On the matter of additional amenities see SLP policies.</i>			

<b>Record</b>	80	<b>Resident</b>	As a resident of Horsmonden	TN12 8DZ
<b>Vision</b>	As a resident with children at the local school as well as working at the school, I have a query about the planned safe cycle route. The old railway line runs behind the school playing field. Is there anyway of utilising this to extend the planned cycle route as well as protecting/enhancing the local history of the 'hoppers' line?			
<b>Organisation</b>	Horsmonden Primary Academy			
<b>Objectives</b>				
<b>Policies</b>				
<b>General</b>				
<b>HNP Response</b>				
<i>As there is uncertainty over whether it is feasible to develop the Hop Pickers' line adjacent to the Bassetts Farm site as a walking and cycling route, instead the plan will be amended to provide a walking and cycling route along the western boundary of the site connecting to the school via Back Lane.</i>				

<b>Record</b>	82	<b>Resident</b>	As a resident of Horsmonden	TN12 8NE
<b>Vision</b>				
<b>Organisation</b>				
<b>Objectives</b>	<p>Access and Movement, Chapter 2: I agree that better and more pavements/footpaths is/will be required. I consider this essential. As a note/comment - I would not want to see traffic lights at the crossroads as I consider that this would clog up the village centre with vehicles, allowing for cars to pollute. -Housing and Development, Chapter 6:(i) Developers should be required to provide sufficient car parking spaces for new houses (families can require two cars, more once children start to drive; visitor parking should be allowed for too). That or sufficient public transport services are needed. I agree that new housing should be built sustainably (be "green"). (ii) I would like to see developers prevented from installing giant LPG gas cylinders underground (as per The Foundry and as the Gibbet Lane development is due to have). I don't agree that having too many of these LPG type tanks is good for the environment or our village.(iii) Developers should be required to fully assess wildlife, flora and fauna on developments sites prior to starting work, having carried out detailed surveys. They should be required address the proper care and relocation of wildlife and species where necessary and also provide the community with evidence of this. -Business and Employment, Chapter 3:(i) This will require sufficient car parking facilities or better public transport services to and from the village. I agree that we do not wish to see Horsmonden become a dormitory village. I hope KCC, having previously consulted on potentially reducing public transport services, will come on board and provide cleaner, greener, more reliable vehicles with a good service.(ii) It is vital that Horsmonden remains as a working agricultural/ farming community (so far as is possible in this age). However, I feel very strongly that this should not include intensive/factory farming which detracts from the rurality and nature of this farming community and, in reality, offers very little/virtually nil employment. I would not wish to see, for example, Fridays build a chicken 'farm'/factory here. -Community, Health and Leisure, Chapter 4: (i) I consider it vital that any new medical facilities are easily accessible to all, including those without transport. (ii) More is needed for young people/teenagers in this community - a Community Centre perhaps?-Landscape and Environment, Chapter 7:(i) I agree with the retention of accessible views. I note that an accessible (for all) view in the village itself (towards Brenchley, encompassing dramatic sunsets) was removed by the building of The Foundry. I also note that an accessible (for all) view towards Brenchley will be removed on completion of the Gibbet Lane development. I realise there is not real right to a view, but such views benefit the entire community and define the landscape of our village.(ii) It vital that Horsmonden remains as a working agricultural/ farming community (so far as possible in this age). However, I feel very strongly that this should not include intensive/factory farming which detracts from the rurality and nature of this farming community and, in reality, offers very little/virtually nil employment. I would not wish to see, for example, Fridays build a chicken 'farm'/factory here. (iii) I strongly agree that the night skies over Horsmonden should be protected from light pollution. Development must be sympathetic to this. This is also important to our wildlife.(iv) Developers should be required to fully assess wildlife, flora and fauna on developments sites prior to starting work, having carried out detailed surveys. They should be required address the proper care and relocation of wildlife and species where necessary and also provide the community with evidence of this.</p>			

<b>Policies</b>	
<b>General</b>	Generally, I can't stress enough the need for better public transport, especially to Paddock Wood which will receive new facilities in due course which Horsmonden villagers could benefit from.
<b>HNP Response</b>	<i>Car parking see previous comment. It is an aspiration in the plan to have low carbon homes in future (see page 54). We will investigate whether it is possible to require new homes to have Zero Carbon heating (no LPG). Flora and fauna (biodiversity) assessments for new developments are a requirement under current and emerging SLP policies. In terms of transport provision see Project 2.1 page 26 to provide a daily commuting service. For night skies, the Horsmonden Design Guidance sets out requirements for reducing light pollution in new developments and encourage existing homeowners to follow this as well. For medical facilities see Policy 4.1 New Medical Facilities which requires appropriate pedestrian access.</i>

<b>Record</b>	83	<b>Resident</b>	As a resident of Horsmonden	TN12 8LB
<b>Vision</b>	It is a good vision.			
<b>Organisation</b>				
<b>Objectives</b>	Objective 6 (Housing and Development) should express more on sustainability and carbon neutrality. It is referred to in the section about low carbon homes on page 54 but not made part of the objective nor is there a specific policy proposal relating to low carbon homes. e.g. How are new homes to be heated? Horsmonden is not on mains gas, at the moment the majority of homes use oil fired central heating systems and wood burning to heat homes. Even though higher standards are required by building regulations, surely the HNP could go above relying on the general building regulations and could actually specify a policy that that any new development must (or would be supported if it did) make use of lower carbon methods of heating such as ground source and air source heat pumps in order to future proof new housing for the government's clean energy proposals?			
<b>Policies</b>	See above			
<b>General</b>	Figure 33 on page 63 is hard to understand. The number of amenity titles on the left axis doesn't seem to match the number of bars on the chart so it's very hard to tell which are the popular amenities. Figure 33 is also not included on the list of figures on page 80. Notwithstanding that the HNP can't do much about public transport provision as it is outside the scope of a Neighbourhood Plan, section 2 refers a lot to the provision of better public transport links to Paddock Wood (for the mainline train station) there is little mention of services to Marden which also has a mainline station which distance-wise is no further than the Paddock Wood station and might be a more appropriate link for the new development at Bassetts Farm to take traffic out of the village to the east rather than through the already congested village centre. More attention also to better public transport links with Pembury, Tunbridge Wells and Tonbridge which are likely places of work, leisure and medical treatment for local residents.			
<b>HNP Response</b>	<i>See previous comment on low carbon homes. Agree Fig 33 and all charts will be checked and altered to increase legibility. It is acknowledged that Marden is a similar distance but lacks disabled access and Paddock Wood is also closer to London, the main destination for most rail users. If a commuter service to Paddock Wood is in place this would allow people to get to the other destinations by rail or bus.</i>			

<b>Record</b>	63	<b>Resident</b>	As a resident of Horsmonden	TN12 8LE
<b>Vision</b>	I've lived here for 50 years and the vision for this village will ruin this village. We have already had our quota of houses. The garage, the Forge, Boddingtons, Roe Roads, Willard Place, Manwarings, Morley Drive, and so on, and so on, etc.etc. Even where I live, the school and Orchard Way were orchards once upon a time. They were all built in the 60's. Newbies to this village don't realise how many houses have been built. Do they also realise that 49 houses are already being built in Gibbet Lane and another 20 at the front of bassetts farm off Goudhurst Road. When does this stop. My parents live on Bassetts Farm and they will be smack bang in the middle of this. To build anywhere in this village but especially on Bassetts Farm is criminal. All this village needs is a better surgery and parking (but definitely not on the village green). That's it. If any of these sites go ahead an accident at Horsmonden crossroads is going to happen! Do people realise that once the latest two developments happen you're talking about at least another 150 cars! I notice on all these plans no where does it mention about what is going on now. What is being built now!			
<b>Organisation</b>				
<b>Objectives</b>	Same as above.			
<b>Policies</b>	As above			
<b>General</b>	As above			
<b>HNP Response</b>	<i>The housing sites have been proposed by TWBC in their SLP. HPC was able to commission a Site Options Assessment from international civil engineering and planning consultants AECOM to see if alternative sites were suitable but they were unable to find alternatives. As a result HPC decided not to allocate sites in the HNP. The SOA also makes recommendations</i>			



for making the sites more sustainable which have informed the policies in the HNP. For housing numbers see FAQs.

<b>Record</b>	65	<b>Resident</b>	As a resident of Horsmonden	TN12 8ES
<b>Vision</b>	I broadly agree with the Vision - but all developments need to sensitively managed and Stage[d]. There has to be a clear focus on affordable housing for the young and we have to bear in mind that with a village of c. 2,400, any increase in numbers needs to be proportionate. The current plans for 350 houses and potentially 750-1000 new residents and potentially 500-700 new cars/vans is disproportionate and needs to be cut down to a more realistic number.			
<b>Organisation</b>	NA			
<b>Objectives</b>	Access and movement - this needs very careful thought as the village has become a major route to/from Cranbrook/Goudhurst in the morning and evening commutes to avoid the A262/A21. Between 7-8.30am and 5-630pm, there can quite often be 10-15 cars waiting in each direction to pass the more constricted areas, particularly in the village centre and on the Goudhurst Road near Old Station Garage/Boddingtons. The addition of 350+ houses, with over is highly likely to increase significantly the road traffic at the key pinch points. Unless the existing roads are widened with new pavements, there will also be considerable risk to pedestrians and cyclists which rightly are considered to be a key areas of concern in the Objective to ensure Horsmonden remains a "walkable village".			
<b>Policies</b>	NA			
<b>General</b>	1. I note that HO3 (Bassetts Farm) was rated a Green by the Site Assessment, although some concerns remain regarding access by vehicles and on foot to the rest of the village. The proposed development at Bassetts is wholly disproportionate with over 250 houses proposed in that area. The travel corridor to the village by car is extremely difficult as noted earlier in my response. There is very limited opportunity to provide access by foot as the road is so narrow. The development will destroy a wonderful area of orchards and through which a public footpath currently runs. Permission has already been granted for a small part of this site and I am sure that a limited number of additional houses in the old orchard closer to the road could be envisaged - but the traffic and pedestrian concerns need to be very carefully considered. The scale of the current plans are quite simply dangerous. 2. I note the work that has gone into logging the stunning footpaths and views around the village. It is absolutely right to protect as many of these views/vantage points in order that the "rural" nature of the village is retained for another generation. The view from Lewes Heath/HillTop across the AONB towards Goudhurst is one of the most extraordinary in the village, the footpath is increasingly well used and highly popular, as we see from our property, and we also benefit from the generosity of the current owner of Hazel Street Farm who allows villagers access to the paths around her orchards and vineyards - this area to the South of the village has increasingly become the "lungs" of the village used all year round and even in the winter as a toboggan run. This area looking out over Brick Kiln Lane, Share Farm, Trottenden Farm and hence up to Goudhurst must be preserved.			
<b>HNP Response</b>	<i><b>Vision:</b> For affordable housing for young people, see Housing Needs Survey 2020. For housing numbers see FAQs. <b>Objectives:</b> Generally, agree on pavements see Policy 2.3 page 23 and Manual for Streets. <b>General:</b> Statements are noted – see FAQs regarding sites and housing numbers. In terms of views 14 and 15 north from Hazel Street Farm aim to address the concerns. Also SLP and LBD keep development on Bassetts Farm to the lower slopes.</i>			

<b>Record</b>	67	<b>Resident</b>	As a resident of Horsmonden	TN128LA
<b>Vision</b>	I, like many people who enjoy life in Horsmonden as it is, feel apprehensive about plans for rapid increase in the number of houses to be built. This mainly concerns infrastructure, the ability of the village to support health, education and transport needs.			
<b>Organisation</b>				
<b>Objectives</b>	The objectives are excellent, the concern is their implementation. Who will be responsible, for example, for ensuring that pavements and roads are wide enough and safe for increased pedestrian and road traffic. At present the pavements are too narrow, or more often non existent, to allow for safe passage of wheel chairs and prams. In other words who will oversee the work of developers at every stage from planning to completion to make certain that the objectives of the neighbourhood plan are met.			

**Policies** Policy 2.1. You make the point that the new medical centre is further away from the village centre than you would like. I agree with this, particularly as it will entail a greater volume of traffic in general and people who currently walk to the surgery may require lifts. At every stage of planning for the 'walkable village' we need to bear in mind that age and health status determine the distance that can be walked. However, it is evident that the current location of the surgery is unsuitable for expansion of services. Policy 2.2. 2.3. 2.4. 2.5. and 2.6. I understand that many of these traffic issues depend on your ability to persuade KCC to take action. This must be done as we look into a future in which volume of traffic increases and HGVs get bigger. (I have concern about the access to the medical centre from the Goudhurst end. The road bridge is too narrow.) Policy 2.6. I note that you make no attempt to tackle the vexed problem of parking in the village centre where there have already been a number of accidents. I think that it must be, quite urgently. Policies under 3: I am in favour of supporting and promoting local business and employment, providing the housing, health and educational needs of workers can be met.6.4. I strongly support the plan to ensure that we have enough truly affordable houses for people at all stages of their lives.I would also like to see more properties to rent for people who cannot, or do not want to buy.

**General** I applaud you for the enormous amount of work and care which has gone into writing this document.

**HNP Response**

*The HNP policies will be used by TWBC when deciding planning applications in Horsmonden parish in future (once the HNP is made) and they will also be responsible for development control and potentially enforcement. Village centre parking was considered and is acknowledged as challenging. However, if the Brenchley Road site is developed, the HNP makes provision for additional parking for the village centre. Also see FAQs on parking at the village hall and centre and affordable housing.*

**Record** 94 **Resident** As a resident of Horsmonden TN12 8NE

**Vision** I note the inclusion of improved pavements needed at various places around the village. Would also recommend pavement improvements at the end of Maidstone Road where it meets the Sports Club. At the moment the pavement ends about 20 feet shy of the sports club / Tennis courts and is also on the opposite side of the road. So would possibly suggest a pedestrian crossing be included. Reason for suggesting is that cars entering the village have very little reaction time when coming around the bend of the tennis club to the main entrance of the sports club ..... plus are routinely travelling faster than 40mph

**Organisation**

**Objectives**

**Policies** I would like to understand why the 'limit to build development' line cuts my garden in half. Is it possible to get this altered so that it encloses the whole of the garden to Fairview on Maidstone Road. I know that my immediate neighbours feel the same.

**HNP Response**

*The HNP would support the suggestion for improved pavement approaching the sports club and tennis courts and a crossing point at a future date. The LBD is set by TWBC and so queries in that regard should be sent to them.*

**Record** 70 **Resident** As a resident of Horsmonden TN12 8LB

**Vision**

**Organisation**

**Objectives** Chapter 2 Access and Movement. I agree with the concept of a walkable village (Policy 2.1) but the lack of parking in the village centre, already critical, will only become more of an issue. Firstly there are residents who live too far to walk to the village, and then there are many within walking distance who have to use cars to go to work, perhaps dropping children at school and then stopping at the village store before continuing their journey. In addition there are non residents for whom the well known Heath Stores is a stopping off point for takeaway lunch and snacks as they pass through. These numbers will only increase as new properties are built. It's all very well making provision for parking spaces in the new developments, which of course are essential too, but I believe that village centre parking needs urgently addressing.

**Policies** Policy 2.1 - see above Policy 2.2 - traffic speeds. I am on the Speedwatch team and am therefore well aware of the excessive speeds of traffic passing through the village. I realise how difficult it is to make improvements here but I am strongly supportive of pedestrian crossing(s) with push-button lights or even a 20mph zone.

**General**

**HNP Response**

*In regard of parking at the village centre (Heath Stores) please see FAQ 14. The suggestions in respect of pedestrian crossing and a 20 mph zone are reflected in the draft plan and policies but not explicitly so. HNP is unable to require speed limits on roads outside of new developments but have suggested "Developments proposals will be supported if demonstrably designed to minimise traffic speeds." In terms of a pedestrian crossing, while this is addressed in the text, consideration will be included for specifying pedestrian crossings in the policy 2.1 or 2.3.*

<b>Record</b>	88	<b>Resident</b>	As a resident of Horsmonden	TN12 8EU
<b>Vision</b>	No			
<b>Organisation</b>				
<b>Objectives</b>	No			
<b>Policies</b>	7.1 & 7.2 Local Green Spaces Please advise if it is possible to include the area which is designated as AONB along Brick Kiln Lane and which the High Weald Trail runs through as a local green space. This space could be included in the HNP in a similar light as the St Margaret's Churchyard, that is, "the area provides heritage beauty and tranquility and is demonstrably special, accommodating The High Weald trail. The landscape shapes the village of Horsmonden. Important View Please advise if it is possible to include the beautiful view along Brick Kiln Lane which opens out as you come from Goudhurst Road.			
<b>General</b>				
<b>HNP Response</b>	<i>The area mentioned will be assessed to see whether it can be added to the list of proposed LGS. However, the NP is unable to designate large tracts of land or land that is remote from the settlement (please also see FAQ Q9).</i>			

<b>Record</b>	93	<b>Resident</b>	As a resident of Horsmonden	TN12 8AS
<b>Vision</b>				
<b>Organisation</b>				
<b>Objectives</b>				
<b>Policies</b>	I do not support the proposed development HO3 (Bassetts Farm) for the following reasons:1) Policy 2.1 and 2.3, 2.4: The development does not have a safe pavement to walk along to the village and the road isn't wide enough to put one in.2) The Goudhurst road cannot support the increase in car numbers or parking or traffic.3) Policy 7.2: Both of the views from Bassetts Farm, from EE mobile area and towards Hazel Street Farm, are significant views and should not be lost.			
<b>General</b>				
<b>HNP Response</b>	<i>The HNP has to be in general conformity with the Strategic Policies in the TWBC Submission Local Plan and site allocations are strategic policies so the HNP cannot directly oppose the allocations. The policies 2.1, 2.3 and 2.4 are designed to make all new developments accessible by foot and hence sustainable.</i>			

<b>Record</b>	92	<b>Resident</b>	As a resident of Horsmonden	TN12 8DA
<b>Vision</b>	Happy with this			
<b>Organisation</b>				
<b>Objectives</b>	Happy with these			
<b>Policies</b>	Happy with these			
<b>General</b>	Why, on the map, do you not mark the footpaths/pavements on the Maidstone Rd beyond the new proposed school crossing. the pavements stop near the sports field and leave residents who live further on, in danger of the traffic.			
<b>HNP Response</b>	<i>It is correct that the pavement along the Maidstone Road stops just short of the vehicular access to the sports ground (although there is a small gap in the fence for pedestrian access opposite the end of the pavement). As the homes of the residents who live further along the Maidstone Road are already built, it is not possible for the HNP to have a policy to create a new pavement here (that would have to be linked to new development for example further north along the Maidstone Road). However, consideration will be given to including a project (to be championed by the parish council) to provide an extension to the existing pavement to the existing homes.</i>			

<b>Record</b>	91	<b>Resident</b>	As a resident of Horsmonden	TN12 8LA
<b>Vision</b>				
<b>Organisation</b>				

<b>Objectives</b>	2 Pavements. The study fig 3 is not currently accurate. There is only inadequate pavement on the north side of Goudhurst Road from Orchard Way to Lamberts Lane and no pavement on either side from Lamberts Lane to the proposed site of Bassetts Farm with no chance of any improvement .5 <b>All buildings housing or business should be future proofed using sustainable technology, materials and methods.</b> 6 Housing. Social housing of any description should not be available to any outside buyers, individual or local authority in perpetuity. 7 Landscape and environment. High sensitivity is allocated but does not seem to guarantee any protection. Ref Furnace Lane / Gibbet Lane.
<b>Policies</b>	2.7 Parking. TWBC Standards are unrealistic for future planning when in 2021 numbers of cars in many household already exceed their estimate.4.1 Medical facility. The suggested position will inevitably be accessed by car by many people adding even more traffic at what will become a very busy junction with a large housing development and a narrow village road. This junction is within 100 m of a blind bend. The suggested pedestrian crossing would have no pavements possible on either side of the Goudhurst Road.4.4 Village Hall. Suggestion that it should be 400 m from village centre, why does the same not apply to the medical centre ?6.3 Sheltered Housing. Needs to be close to the centre of the village, perhaps the existing village hall and find a business hub slightly further out, possibly a farm site?7.11 In the light of recent flooding in the village, permeable surfaces should be expected on all, but particularly sloping sites such as Bassetts Farm.
<b>General</b>	A lot of thought and effort by many people on our behalf.
Objectives: Housing allocations are housing allocations policy rather than land-use policy.	
<b>HNP Response</b>	
<u>Pavements</u> <i>It is acknowledged that the map Figure 2 needs to be amended to show the full extent of the absence of pavement along the Goudhurst Road on the north side opposite Lamberts Place. It is for the developer to demonstrate that they can achieve an adequate pavement in order for them to receive planning permission (once the HNP is made). There is however, a pavement from Orchard Way as far as the garage driveway and on the opposite wide of the road as far as Lambert's Place.</i>	
<u>Parking</u> <i>The Lamberhurst NP Examination shows how difficult it is to specify higher parking standards (more car provision). It is felt that the new TWBC SLP is a reasonable improvement over the existing KCC parking standards.</i>	
<u>Medical Centre</u> <i>See FAQ 1.</i>	
<u>Sheltered housing</u> <i>This is an interesting suggestion (utilising the existing village hall) which will be put to the parish council.</i>	
<u>Permeable surfaces</u> <i>Consideration will be given to amending policy 7.11 Flooding to include permeable surfaces in new developments.</i>	

<b>Record</b>	90	<b>Resident</b>	As a resident of Horsmonden	TN12 8BX
<b>Vision</b>	The Steering Group and many others have devoted considerable personal time to produce a well considered and balanced Vision and set of objectives.			
<b>Organisation</b>				
<b>Objectives</b>	2.0 - the objective to achieve a "walkable village" is critical to the Vision and the provision of sufficient pavements, calm traffic and parking space needs to be at the forefront of all planning decisions.5.0 <b>Preservation of the character of the village greatly depends on the design and appearance of all new buildings.</b>			
<b>Policies</b>	All of 2.x are critical to achieving the Vision.4.1 New medical facilities - this policy hints at it being optional for the PC by stating "in principle". I understand that the NHS may wish to move towards a larger centre covering more villages, but this decision needs to be synchronised with the granting of planning within Horsmonden especially for the larger sites. New facilities for Horsmonden are vital.7.2 It is not clear why some of the important views in Figure 17 are short and others longer. For example View 6 from Haymans Hill towards Maidstone Road stretches right across the Swiggs Hole valley and up towards Castle Hill. Similarly for View 7 Haymans Hill looking North which stretches for miles.			
<b>General</b>	I hope that once final the HNP can be delivered in all respects and not diluted as time passes by.			
<b>HNP Response</b>				
<i>Thank you for your comments on the new Medical Facilities which are noted. The requirement for these is addressed in more detail in the TWBC SLP site allocation policy AL/HO3. The comments on views policy 7.2 are also noted and the views will be reviewed to assess their scope.</i>				

<b>Record</b>	89	<b>Resident</b>	As a resident of Horsmonden	TN12 8LP
<b>Vision</b>	I think the vision should include words to emphasise the Rural / Farming aspect of the settlement, and the importance to retain and consider this aspect in future developments of the village.			
<b>Organisation</b>				

<b>Objectives</b>	
<b>Policies</b>	Policy 7.6 - Could a stronger word be used rather than "supported". Perhaps "Preserved"?
<b>General</b>	It is mentioned that if the Village Hall is relocated, the current site of the Village Hall could be considered as a Car Park. Perhaps this should be emphasised more in the narrative. If the School or Doctors surgery is relocated, there is nothing mentioned about what the "change of use" of these sites could be. Or put another way, the School site especially, should be suggested as open ground to include Skate Park and other amenities for youngsters. Spelling / lose characters - Page 6 extra "j" in 2nd paragraph. Page 63 chart label "Public green Spacesk" has unnecessary "k". Page 61, please change "Hop fields" to "Hop Gardens".
<b>HNP Response</b>	
<u>Vision</u>	<i>It is considered that the rural farming aspect is adequately referenced in the Vision with the word 'rurality'</i>
<u>Landscape and Recreation Objective</u>	<i>Will be amended to include 'horticultural'.</i>
<u>Policy 7.6 Retaining the best and most versatile and characteristic agricultural land</u>	<i>It is considered that retain is the most appropriate wording.</i>
<u>General</u>	<i>A range of options for the current village hall should a new hall be built (enterprise centre/hub or sheltered housing). The site reserved for school expansion will only have scope for temporary use (see SLP AL/HO3). Thank you for the spelling corrections and suggestion for Hop Gardens!</i>

<b>Record</b>	71	<b>Resident</b>	As a resident of Horsmonden	TN12 8AX
<b>Vision</b>				
<b>Organisation</b>				
<b>Objectives</b>				
<b>Policies</b>				
<b>General</b>	The loss of parking area on Bassetts Farm for Station Cottages' cars will cause a hazard for the exit onto Goudhurst Road. Exit from Bassetts Farm will increase with the new houses.			
<b>HNP Response</b>	<i>See HNP Policy 2.5 Public Parking and SLP Policy AL/HO3. The developer will be asked to increase the provision of public parking on AL/HO3.</i>			

<b>Record</b>	87	<b>Resident</b>	As a resident of Horsmonden	TN12 8LP
<b>Vision</b>				
<b>Organisation</b>				
<b>Objectives</b>				
<b>Policies</b>				
<b>General</b>	I'm deeply concerned on the impact on the village roads that the extra housing proposed will make. Already the lanes around the village are overwhelmed with vehicles and because of lack of parking, cars are parking on the roads making it dangerous for pedestrians as well as motorists. The impact regarding flood waters on our property if the proposed building on HO2 is agreed is worrying. I have mentioned this to Jane Marsh and have emailed her video and photography of the deluge of water running off Sprivers, onto our fields and surrounding our house during the heavy rainfall experienced a few months ago. I'm also concerned that Horsmonden will lose its character with the total of housing proposed. It was its character, open fields and beautiful countryside that appealed to us when we purchased our property. Sadly I'm worried that horsmonden like many other villages will become one big housing estate. The open fields will be gone which will be a travesty.			
<b>HNP Response</b>	<u>Impact on village roads</u> <i>See FAQ Q2, Q6, Q12.</i> <u>Surface water flooding</u> <i>See amended policy 7.11 Flooding</i>			

<b>Record</b>	86	<b>Resident</b>	As a resident of Horsmonden	TN12 8NH
<b>Vision</b>	The Vision is too bland to be meaningful. It suggests control in areas, such as technology, transport and housing, over which it has no influence. It is also highly unlikely to be achieved.			
<b>Organisation</b>				

<b>Objectives</b>	Objective, Walkable village, and 5, housing and development, are laudable but are invalidated from the outset by the proposal for development HO3, from which it will be impossible to walk to the village. Housing and development: Objective to redevelop previously developed land is invalidated by HO1, HO2 and HO3 - so what is the point of the objective? Business: The dormitory village concept is no longer relevant post-pandemic. The objective makes no reference to improved broadband provision for existing village properties, which is the single biggest obstacle to business and enterprise in the village. Landscape and environment: dark night skies. This objective will be compromised by the greenfield developments identified in the plan.
<b>Policies</b>	Policy 2:1 HO3 will not be in safe, walkable distance to the village. Policy 6.6: Policy should offer a wider scope for replacing existing buildings, as brownfield regeneration should be prioritised over greenfield development. Policy 7.1 The Hop Picker's line should be added as green space, especially if it is to be used as a walk/bike route. The mature trees along the line are crucial to the village character and should be protected. Policy 7:2 The views are critical to the village character. Bassetts Farm to Hazel Street Farm view - as identified as important in the plan, will be seriously compromised by HO3.
<b>General</b>	There are many of the laudable objectives in this plan but the extent and location of development proposed make it practically impossible for those aimed at retaining the village character to be achieved.
<b>HNP Response</b>	
<u>Objectives</u> <i>See FAQ Q13 regarding site allocations. Dormitory village – some employment cannot be carried out easily from home or homes are too small so it is considered that retaining employment sites (policy 3.1) will continue to be important, albeit acknowledging that home working is increasing. Dark night skies – will apply to new developments.</i>	
<u>Policies</u> <i>Walkable village Policy 2.1 - It is acknowledged that the majority of SLP AL/HO3 is outside 400m (approximately 5 minute walk) and the eastern part of the site is outside 800m (approximately 10 minute walk) of the village centre. The HNP policy 2.1 aims to encourage future development to be within 400 metres. AL/HO3 is proposed by TWBC not the HNP. Policy 7.2 Views including Bassetts Farm to Hazel Street Farm – the policy encourages developers to minimise the disruption for this view.</i>	
<u>General</u> <i>See FAQ Q13.</i>	

<b>Record</b>	85	<b>Resident</b>	As a resident of Horsmonden	TN12 8AG
<b>Vision</b>	Generally fine with this as high level statement. Important to focus on the rurality part			
<b>Organisation</b>				
<b>Objectives</b>	Again mostly fine. As to the housing development objective, and the objective of providing smaller dwellings in particular, though I do see a conflict. I appreciate there is some local feeling in favour of smaller housing; but my view is that in the long run that will mean overall denser population of the parish - which in turn creates all the traffic and other problems and conflicts directly with the vision of 'rurality'.			
<b>Policies</b>	I am supportive of 3.2, 3.4, 4.2 , and 5.1 in particular. Policy 6.1 however concerns me. In addition to the general comment above (ie that smaller units means - in the long run - denser population), specifically the big problem with HO3 is the single point of vehicular access at Bassetts Cottages. Likewise siting the medical centre and village hall (Policies 4.1 and 4,4) increases traffic through that chokepoint significantly. I would prefer the limit of built development at HO3 (which I realise isn't negotiable) was managed in a way that generates less traffic. Policy 7.1 - surprised the view at northwards from the public paths GR708410 ie over Haymans Hill are is not included. Any reason for this ? Policy 7.11 - the Parish Council will be aware of the significant flooding at Olivers Court this summer. Building the whole Bassetts Farm hillside clearly could, unless managed very carefully, very readily increase the peak pressure on the stream catchment. Important that the developers are pressed to make special engineering provision for this.			
<b>General</b>	My overarching comment is the the traffic management through a single access to what is very nearly a new small village in its own right at the HO3 site just isn't satisfactory; and while the 'walkable village' concept is well meaning, it will I think prove to have been a platitude. Apart from pressuring TWBC to reduce the 165 home target, leaving the village hall and medical centre where they are today would help mitigate this problem.			
<b>HNP Response</b>				
<i>Thank you for your supportive response. As you acknowledge the scale and location of development is outside the scope of the NP (see FAQ Q 13). The HNP also discusses locating a combined pavilion and village hall at the Sports Ground as a possible site particularly if any of the SLP allocations shouldn't go ahead. Your suggestion for including the view northwards from the public paths GR708410 ie over Haymans Hill will be assessed for inclusion in the revised draft plan.</i>				

<b>Record</b>	84	<b>Resident</b>	As a resident of Horsmonden	TN12 8DN
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<b>Vision</b>
<b>Organisation</b>
<b>Objectives</b> agree need for new community, health and leisure facilities. We suggest these are co Located (eg village hall combined with new sports facilities on Maidstone road) to achieve economies of scale eg one car park. Maidstone road has existing pavement plus a footpath via primary school, which helps children's access as well. Housing and development. Dispute we need stated number of dwellings, fewer would be preferable. House buildout needs to be scheduled across full period of plan, with infrastructure improvements aligned with schedule. The proposed sites need pedestrian access in line with AECOM review findings.
<b>Policies</b> Policy 2.3 and 2.4 strongly support adequate pavements with adequate width. Policy 4.4 supported but take opportunity for combining village hall with new sports facilities at sports ground (which is more closely located to majority of housing in village as well) within easy safe access of the school. Policy 6.1 seems at odds with surveys that follow and plans vastly exceed housing needs and wishes of village residents eg 70% of village wanted same level of house building or less, 77% wanted small scale developments. Only 1.9% wanted a large estate of 50+ houses Policy 6.3 is very important.
<b>General</b> Strongly support the production of an HNP agreed by the village residents. We would like to see it contain an implementation schedule which shows a phased house build approach over next 15 years, with supporting infrastructure aligned to this schedule.
<b>HNP Response</b>
<i>In part because the housing allocations are from TWBC's SLP but also because of the way planning operates, it is generally not possible for NPs to phase development. For details of the proposed development see SLP Policies AL/HO2 and AL/HO3.</i>

<b>Record</b> 72	<b>Resident</b> As a resident of Horsmonden	TN12 8BX
<b>Vision</b>	Its to much far to many houses	
<b>Organisation</b>		
<b>Objectives</b>	The village has not got the infrastructure for this many houses, especially on Basstts Farm site	
<b>Policies</b>	Not to be bullied by Tunbridge Wells Council and government.	
<b>General</b>		
<b>HNP Response</b>		
<i>See FAQ Q13 and Q19.</i>		

<b>Record</b> 73	<b>Resident</b> Other	BN27 2AX
<b>Vision</b>		
<b>Organisation</b>	Senior Planning Policy Officer, Planning Policy, Wealden District Council	
<b>Objectives</b>		
<b>Policies</b>		
<b>General</b>	Thank you for inviting Wealden District Council to participate in the Regulation 14 consultation on the draft Horsmonden Neighbourhood Plan. We have reviewed the Regulation 14 Neighbourhood Plan and have no comments to make.	

<b>Record</b> 77	<b>Resident</b> Other	CW1 6GJ
<b>Vision</b>		
<b>Organisation</b>	Operations Delivery, Consultations Team, Natural England	
<b>Objectives</b>		
<b>Policies</b>		
<b>General</b>	Dear Sir / Madam,Horsmonden Neighbourhood Plan – Regulation 14. Thank you for your consultation on the above dated 15 September 2021. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved,enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee inneighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on the draft Horsmonden Neighbourhood Plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan. For any further consultations on your plan, please contact:consultations@naturalengland.org.uk	

<b>Record</b>	81	<b>Resident</b>	Other	TN12 8JU
<b>Vision</b>	Perhaps add "to promote and enhance the mental and spiritual well-being of all members of the community"			
<b>Organisation</b>	The Parish Church, St. Margaret's.			
<b>Objectives</b>	The above ("to promote and enhance the mental and spiritual well-being of all members of the community") could be added to objective 4.			
<b>Policies</b>				
<b>General</b>	<p>St. Margaret's Church response to Neighbourhood Plan consultation (relating mainly to Chapter 4) It is noted that although St. Margaret's Church is mentioned several times and a photo is included, very little is said about the contribution of its people to the community life of the village or of possible community use of the church building, although it is probably the largest indoor space in the village (with seating for 200+), and a notable historical and architectural asset. Together with the churchyard it offers a place of sanctuary, peace and restoration for the mental and spiritual well-being of residents and visitors. The Parochial Church Council is very aware that the building is under-used by the community and so has plans to re-develop it to add kitchen and toilet facilities in a small extension and to make the space within the church suitable for a wider range of activities. TWBC is currently being consulted on these plans and their response is awaited. (Although within the Churchyard [local green space 8, pages 65-67], the extension will not impact on view 19 [pages 70-71]). The PCC is keen to open up the church building to wider community use, to attract more residents and visitors to appreciate this beautiful Grade 1 listed building and its peaceful and scenic churchyard. Although some 1 ½ miles south of the village centre, it is linked by a fairly direct Public Footpath and there is more dedicated parking space than for most of the other community buildings in the parish. Its beautiful and tranquil setting would be a positive advantage for some activities. With the re-development planned, it will be a suitable venue for concerts, art and craft exhibitions, theatrical productions, some sports and for other community and group activities. (Chapter 4) The redevelopment plans include providing 2 toilets and kitchen facilities, new heating and lighting with the aim of reducing the church's carbon footprint. The church has recently installed fibre broadband for broadcasting services and providing access to the internet and VOIP calling. Essential repair work is also planned to preserve the building for posterity. As well as work on the building, the churchyard is being developed to enhance wildlife diversity and as a habitat for rare species. (cf. page 48 and chapter 7). The church and churchyard have particular historic connections with both the Austen family and the Willard family (Simon Willard, the founder of Concord, Massachusetts) and have the potential to attract more tourist visitors to the village, which will benefit the local pub and shop. However publicity and road and footpath signage to the church should be improved to encourage and direct visitors to the church. (cf. chapter 2).</p>			
<b>HNP Response</b>				
<i>Vision: The HNP supports the suggestion in regard to mental health and spirituality and will consider adding it either to the vision or community infrastructure objective.</i>				

# Horsmonden Neighbourhood Plan Frequently Asked Questions (FAQs)

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## Questions via Facebook or the website

Q1. Why place the new Medical Centre so far from the village centre?

A. TWBC's Draft LP puts the Medical Centre on Bassetts Farm (HO3). HNP has indicated it should be at the closest point to the village centre on the site (650m) and accessible by pavement.

Q2. Why so many houses?

A. TWBC's Draft LP requires Horsmonden to: 'Deliver approximately 240 to 320 new dwellings, of which 40% shall be affordable housing, on three sites allocated in this Local Plan in the plan period [2022 to 2038].

Q2. Why is the Hop Pickers Line within the limits to built development but not included in Site HO3?

A. The route of the line within the borough has already been safeguarded through a Safeguarding Railway Land policy and by refusing proposals that would compromise its use as a green infrastructure corridor.

Q4. How will the HNP provide the smaller, cheaper properties the community want?

A. **HNP Policy 6.1 Meeting housing need states:** New housing developments will be supported where they:

- Provide an appropriate proportion of smaller homes (1, 2 and 3 bedrooms) in line with the latest available housing need data at parish or district level;
- Provide, where applicable, affordable housing in a range of tenures including for social rent and shared ownership that meets the latest identified local need for single people, couples, families and older residents.

Q5. Where is everybody coming from [to fill the new homes]?

A. All communities are being asked to contribute to meeting the housing needs of the borough assessed as 12,200 additional homes over the plan period to 2038.

Q6. How are our roads going to cope?

A. HNP proposes a walkable village where development is ideally within 400m/5 minute walk of the village centre and to the west of the crossroads. For this reason HO1 and HO2 are seen as more sustainable than HO3.

Q7. What is being built now?

A. Site HO1 Furnace Lane has been approved to provide 49 dwellings including 35% affordable housing and involving creation of access ... and natural area for play.

A. Application 15/503340 Bassetts Farm has approval for 20 homes but is considered part of a draft allocation for up to 165 dwellings plus community use (medical centre, allotments and community orchard/woodland).

Questions arising at the meeting on 23<sup>rd</sup> September 2021

Q8. Was consideration given to a pedestrian crossing at the village cross roads?

A. Previously in discussions with KCC (the Highways Authority), they have said that the village cross roads wouldn't be suitable for a pedestrian crossing, which has to be a certain distance from a cross-roads (25m) and parking, hence the suggestion for it to be further down the Brenchley Road. The borough council has a 'near miss' register which could be incorporated in the next version of the plan.

Q9. Why isn't the area of the village within the High Weald AONB included in the list of Local Green Spaces?

A. The HNP isn't permitted to designate large tracts of land as Local Green Space. The guidance on this generally regards the maximum area as 20 hectares (50 acres). However, the HNP has two policies regarding the AONB:

- Policy 7.8 Development within the AONB: Proposals for development in the AONB will be permitted only where they meet the objectives of the High Weald AONB Management Plan.
- Policy 7.9 Development adjacent to the AONB: Where development is proposed outside of the AONB it must not damage or detract from the environment, character and landscape setting of the AONB.

Q10. It appears that some development is outside the Limits to Built Development?

A. The developed area of the Bassetts Farm site (HO3) proposed by TWBC's draft LP would be within the new limits to built development but with the northern part of the site – outside the new limits to built development - retained as amenity land: allotments, play area and community orchard/woodland. There is also a small area of land adjacent to the school which is reserved for a future school expansion, should numbers at the school grow to the point where it would be required in the future.

Q11. Would it be possible to develop the Hop Pickers Line as far as Paddock Land as a walking and cycling route

A. While the route of the Hop Pickers Line within the Bassetts Farm site is protected from development and is proposed as a walking and cycling route to the school, it is outside the scope of the HNP to protect the route of the line outside of the parish boundary. TWBC's draft LP does have a policy that protects the route from further encroachment from development should sufficient funding be found at a later date to wholly or partially restore the route of the line for walking and cycling.

Q12. Has adequate parking been considered at the proposed village hall site on the Brenchley Road site (HO2) to avoid parking and congestion along the Brenchley Road?

A. The developer has said that there would be sufficient parking including for deliveries at the proposed village hall site. There are policies on public parking (2.6) and new parking in new developments (2.7) within the draft HNP.

#### Questions arising from the Pre-Submission Regulation 14 Consultation

Q13. Why have three large housing sites been proposed in Horsmonden?

A. The housing sites have been proposed by TWBC in their PSLP. HPC was able to commission a Site Options Assessment from international civil engineering and planning consultants AECOM to see if alternative sites were suitable but they were unable to find alternatives. As a result HPC decided not to allocate sites in the HNP. The SOA also makes recommendations for making the sites more sustainable which have informed the policies in the HNP.

Q14. Why doesn't the HNP make provision for more parking at the village centre / close to the cross-roads?

A. Village centre parking was considered and is acknowledged as challenging. However, if the Brenchley Road site is developed, the HNP makes provision for additional parking for the village centre. Also see FAQs on parking at the village hall and centre.

Q15. Are new developments required to provide pavements to the village centre?

A. The HNP requires developers to demonstrate how they will provide pavement access to the village centre (see Policy 2.3 page 23 and extract from Manual for Streets) before they receive planning permission.

Q16. Why, on the map, do you not mark the footpaths/pavements on the Maidstone Rd beyond the new proposed school crossing to the sports ground?

A. The pavement that runs along the western side of the Maidstone will be shown on an amended map in the next revision of the plan.

Q17. Why, on the map, do you mark a pavement along the south side of the Goudhurst Road adjacent to the new Bassetts Farm site where only a very limited footway (no curb) exists?

A. The map will be amended to clarify the presence / absence of pavements.

Q18. Can affordable homes be protected from the Right to Buy?

A. There was an aspiration expressed in the Pre-Submission Regulation 14 Draft HNP that new social housing be retained as such in perpetuity. However, the parish council has been advised that doing so is outside the scope of planning policy. Planning policies cannot be used to override statutory legislation in respect of retaining affordable homes in perpetuity and right to buy.

Q19. Can the HNP phase building homes and new infrastructure?

In part because the housing allocations are from TWBC's SLP but also because of the way planning operates, it is generally not possible for NPs to phase development. For details of

the proposed development see SLP Policies AL/HO2 and AL/HO3.



Mr J Boot  
**BY EMAIL ONLY**

**Our Reference:** N/A

**Date:** 22 October 2021

Dear Mr Boot,

**Tunbridge Wells Borough Council (TWBC) response to Reg 14 edition of the Draft Horsmonden Neighbourhood Development Plan (NDP)**

Thank you for the invitation to TWBC to provide comments on the above.

I have set out general comments first, followed by more detailed comments on the NDP.

I am very keen that the detailed comments are not read as criticisms: rather, they are suggestions as to how policies, which are (in the main) supported, could potentially be strengthened.

It is also considered most appropriate that the wording and drafting most closely reflects that produced through the neighbourhood planning process, and therefore even if the TWBC approach may be to draft wording slightly differently, comment has only been made if it is felt it is of tangible benefit. For that reason, the absence of comment on particular pages or policies should not be interpreted as not being supportive (or as being critical).

**General comments:**

Relationship between NDP and adopted/emerging Development Plan

TWBC supports and takes an active role in advising and supporting the neighbourhood planning process by sharing evidence and information and ensuring that any emerging NDPs are both in general conformity with the strategic policies of the Development Plan and consistent with national policy.

At this time, as you are aware, the Development Plan comprises the TWBC Local Plan (2006), Core Strategy (2010), the Site Allocations Local Plan (2016) and Kent Minerals and Waste Local Plan 2013-30 (2020). The new Local Plan 2020-2038 was subject to Regulation 19 consultation which ran from 26 March to 4 June and is due for submission towards the end of October 2021.

For those NDPs that are already made at the time of adoption of the TWBC Local Plan, the NPPF is clear that, where policies in the NDP are in conflict with the policies in the Local Plan, these will be superseded by the Local Plan policies. An assessment will be made of all policies in made NDPs ahead of the adoption of the Local Plan as to whether the policies within these would be superseded by the policies in the Local Plan.

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With this in mind, the comments provided on the NDP below therefore reflect this: we have sought to suggest ways that the policies/supporting text could be amended to “future proof” the NDP if the PSLP is adopted after the NDP is “made”.

The Horsmonden Draft NDP is considered to be a well-produced document, and it is obvious from a review of the evidence base that a huge amount of work has gone into the assessment of sites, views, character, environment etc. TWBC Officers have been particularly impressed with the work and drafting of the policies and supporting text around the policies.

In general, the Draft NDP is supported, and TWBC is keen to assist and support the NDP group in the production of the Reg 15 version.

Formatting/terminology comments

<ul style="list-style-type: none"> <li>Paragraph numbering throughout the entirety of the document would be useful to aid withreferencing</li> </ul>	Noted
<ul style="list-style-type: none"> <li>Consistency of text layout - sometimes it is broken in to two columns (like an article), othertimes the text stretches over the whole page. Can make reading it complicated when it comes to the two columns, as not sure whether to read down or move across.</li> </ul>	Noted
<ul style="list-style-type: none"> <li>The NP needs to meet accessibility requirements under Public Sector Bodies (Websites andMobile Applications) (No. 2) Accessibility Regulations 2018. See attached TWBC Gospel Of Online Documents (GOOD) for further guidance.</li> </ul>	Follow up with graphic designer
<ul style="list-style-type: none"> <li>Reference to TWBC site allocations/polices – please use ‘PSLP’ version for policynumbering/site name as opposed to Draft LP.</li> </ul>	Change to SLP
<ul style="list-style-type: none"> <li>It is recommended that the text seeks to avoid terms such as “our NDP”. It is appreciated that the NDP will ultimately be subject to referendum, and therefore can be considered to berepresentative of the residents of the parish, but it is considered more appropriate that such references are removed because when the plan is ‘made’ it becomes part of the borough’s development plan and a TWBC document.</li> </ul>	Two amendments made
<ul style="list-style-type: none"> <li>Graphs and charts – overall they are quite clear, but some could benefit from percentages/unit of measure for clearer analysis, for instance Figure 14, page 30.</li> </ul>	Graphs and charts are to be amended.
<ul style="list-style-type: none"> <li>SWOT analysis – currently Figures, might be more suitable as tables. This would require a‘list of tables’ section alongside the list of figures. It might be worth considering whether these SWOT tables would be better placed as an appendix.</li> </ul>	Swots to be summarised in document and moved to Consultation Statement.
<ul style="list-style-type: none"> <li>The policy and project boxes should be of a distinctively different colour to differentiate them</li> </ul>	Change made.

- Detailed comments, broken down by section of the plan:

Page/Para	Policy Details	Proposed Change	
<b>Contents Page</b>			
p3	List of chapters within thePlan	To include paragraph/chapter numbering for easeof reference	Difficult to change. Check with graphic designer.
<b>Glossary</b>			

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p4	TWBC are referred to as the local authority	Refer to as Local Planning Authority	Changed
p4	Reference to Draft LP	Any reference to the Draft LP should be in relation to the Regulation 18 version. The Regulation 19 Pre-Submission Local Plan (PSLP) should be referred to in all other instances.	Changed. Clarify whether we should be referencing the Submission Local Plan (SLP or PSLP)
<b>Introduction</b>			

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<b>Page/Para</b>	<b>Policy Details</b>	<b>Proposed Change</b>	
Paras 1-2	Introductory paragraphs about the designated area	Ensure tense is correct – “is” to “was” the first step for Horsmonden PC in preparing a Neighbourhood Plan	Done
Paras 1-2	First reference to Tunbridge Wells Borough Council	Insert (TWBC) after	Done
Introduction, p5	Introductory paragraphs and background information	Perhaps more background information could be provided in this section – for instance the role of an NDP and the process behind it, and the scope of an NDP for enabling residents to shape their own neighbourhood	Will be added.
<b>Chapter 1 Overall Strategy</b>			
2 <sup>nd</sup> para	Horsmonden Parish Council), the tier of government in the UK closest to the grass-roots, has its own Sustainable Development Policy which states:	Remove bracket and reword sentence to read better, for example “Horsmonden Parish Council, the first tier of local government,”	Done
First two sub-sections	Sustainable Development and The Role of Neighbourhood plans	Perhaps these sections would fit better in the introduction. This would provide a good opportunity for setting the planning scene and could contain the first reference to TWBC Local Plan.	Done
Para 4 of Neighbourhood Planning subsection.	The Localism Act 2011 made provision for neighbourhood plans to have the same weight in planning decisions as the Local Plan for the area covered by the NP (i.e. Horsmonden Parish).	It could be worth adding when 'made' they form part of the LPA's statutory development plan for the borough.	Done
Introduction to Horsmonden NDP, 1 <sup>st</sup> para	The plan making process	Include reference to the various stages of the plan making process (Reg 14 and Reg 16 submissions), The Neighbourhood Plan is tested against what are known as the Basic Conditions as set down in legislation. It will be against	Done

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		these criteria that the independent examination will focus.	
Summary of community engagement, 1 <sup>st</sup> para	Activities listed earliest to latest	In chronological order	Checked – they are
Text within summary of community engagement subsection	Reference to PSLP Sites HO1, HO2 and HO3	For clarification, we suggest that you introduce these at the same time and set out that they are policies from TWBC's PSLP, and that all references to the sites contain brackets to set out the PSLP allocations for clarity. Full policy number should be given, AL/HO1 etc Correct address for Policy AL/HO3 should be used (and also for other allocation policies): AL/HO3 refers to Land to the east of Horsmonden (and in other parts of the plan where applicable where Bassetts Farm is referred to). It is noted that the Plan acknowledges that HO1 has planning approval, but it may be worth adding the following	Done

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Page/Para	Policy Details	Proposed Change	
		details: 18/01976 approval for 49 dwellings, granted 26 March 2021	
Horsmonden Parish Profile	References to 'district'	should be 'borough'	Changed for whole document
Horsmonden Parish Profile	Reference to 2021 Census data	Update if new data becomes available.	We might be lucky
The vision	"It will have diversified to allow improvements in transport..."	Use of diversified – perhaps refer to the fact that new development will deliver some of these improvements	Review with PC and HNP SG
Housing and Development paragraph	Reference is made to the number of sites as 225-305.	Update to reflect PSLP figures of 240 – 320 dwellings. (note: the HO3 allocation now includes the previously approved scheme, Land at BassettsFarm)	Done
A challenging planning landscape	References to the TWBC Local Plan preparation	Needs to be updated to refer to the TWBC PSLP Reg 19 consultation and subsequent submission of the Local Plan to the planning inspectorate, and any further updates as relevant.	Done
A challenging planning landscape	Final para: 'TWBC housing policy for Horsmonden is identified as a strategic policy'	Clarification is required – it is presumed that this refers to PSTR/HO1 and not any of the Development Management policies in Section 6 of the PSLP	Noted and amended to reflect this.
Figure 2 Illustrative map of main issues and options	LBD boundary	The NDP LBD boundary at the eastern end of Horsmonden (intersecting HO3) is different to the TWBC LBD (as shown in the PSLP).	Noted and will be amended for Reg 15 version.
<b>Chapter 2 Access and Movement</b>			
Figure 2 Map	New Medical Centre	Presumably this is an indicative location within allocation AL/HO3. Key to map should state this	Noted and will be amended for Reg 15 version.
Figure 2 Map	AONB	The 'green triangles' on the map don't correspond clearly with the key	Noted and will be amended for Reg 15 version.

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Figure 2 Map	Area indicating policy AL/HO3	Site allocation area does not correspond to the site area shown in the TWBC PSLP, Map 62	Noted and will be amended for Reg 15 version.
First sentence, p14	'...our HNP'	Remove 'our', for reasons explained above	Amended
Box: Planning summary, p14	Currently phrased a bit negatively (opening lines)	It is the perfect opportunity for the HNP to sell itself and what it can offer in terms of policies to achieve good access and movement, for example "Although there are some limitations...HNP can provide policies to address access and movement in the village, in line with the borough council's Transport Policies."	Thank you, a useful suggestion.

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Page/Para	Policy Details	Proposed Change	
Pavement Study, p15	Suggests widening of pavements for social distancing; also referenceto physical distancing in next para	May be preferable (and will be more likely to stand the test of time) to refer to problems that arise from narrow pavements, for example difficult when using a child's buggy/holding a child's hand	Thank you a useful amendment.
Bottom paragraph on left side of p16	"this chapter reviews...the empirical evidence"	Perhaps have this sentence nearer the top, as the evidence has already been presented above.	Moved to beginning of chapter.
Policy 2.3 and Policy 2.4	Adequate pavements and safe pedestrian crossing	The text of both policies is the same, and so we suggest deletion of one policy to avoid repetition.	2.4 deleted.
Policy 2.1	Policy Box: refers to development proposals for new housing	This policy could be relevant for all types of development, not just for housing. Subsequent policies refer more generically to 'development proposals'	Amended.
Project 2.1, p26	Project to deliver daily commuter bus service to station	Note: policy should refer to 'commuter' bus not 'commuting' bus Have the costings been calculated and agreed? This would inform the viability of the service referred to in the project box	Amended. Costs to be sought.
Policy 2.3	Adequate pavements	What is meant by adequate?  The term 'development proposals' this won't apply to all types of application	Amended to 'in line with the Manual for Streets'
Policy 2.4	Policy wording	Does this policy duplicate that of 2.3? Can they be combined for clarity?	For discussion.
Policy 2.5	School crossing patrol to be funded by new development contribution over a minimum of 5 years	It is noted that developer contributions from individual developments must be reasonably related in scale and kind.	Deborah to supply follow up comments. HNP to get costs of providing a school crossing patrol.
Policy 2.6	Policy wording	Can this policy be combined for clarity and succinctness?	The policies are for a slightly different scenario (2.6 village centre and 2.7 all developments) so would probably be left as they are.



Policy 2.7	New Parking	These standards reflect those for a Zone B area in TWBC's emerging standards; Horsmonden is located within Zone C and is therefore subject to slightly higher proposed standards. This consequently requires correction, or alternatively, justification for proposing a lower standard.	Amended to the higher proposed standards 2.5 for 4+ house.
<b>Chapter 3 Business and Employment</b>			
Para 1, p29	Horsmonden Village website quote	Suggest that it would read better to include the website text and then refer to the Horsmonden village website	Amended.
Planning summary, p29	TWBC policies	Refer to TWBC PSLP ED policies specifically on retention of employment land (Policy ED 2).	Added as footnote.
Figure 14- Business questionnaire response, p30	Presentational	The chart should include percentages/unit	Will redo chart to show %
Policy 3.1, p30	Wording amendment	Remove 'fully' from 'unless fully justified'.	Amended
Policy 3.2 p31	Simplify policy wording	Remove 'demonstrably' to simplify. Are there any particular development proposals or circumstances in mind?	Amended – don't believe this references a specific site.
Policy 3.3, p31	Policy wording	Reference to light industrial use being Use Class E should be B1(c).	Amended

Page/Para	Policy Details	Proposed Change	
		<p>It is worth considering whether the policy could be more similar in approach to PSLP Policies ED 4 Farm Diversification and particularly ED 5 Rural conversion in the Limits to Built Development, which refers to supporting conversion of existing rural buildings and supports them being converted to business uses. It is important to ensure that the policies are not conflicting.</p> <p>It may also be helpful to consider the Permitted Development Rights (PDR) in place, set out at paragraph 6.473 in the PSLP.</p>	<p><b>Michael Thornton to advise.</b> In the narrative we could include some text stating that we will be supporting the SLP policy and explain this in the Consultation Statement.</p>
Policy 3.4, p32	Clarity required	The Policy could be made clearer on what is envisaged. For instance, size and scale of development, and what constitutes a retail outlet.	<b>Michael Thornton to advise.</b>
Policy 3.5	Combining policies 3.2 and 3.5	We would suggest combining 3.2 and 3.5 together. They are also very general and permissive, and we would suggest adding a caveat: <i>'... will be supported, <u>subject to compliance with other relevant policies in this Plan and with national policy.</u></i>	Text amended and combining the two will be addressed in Reg 15 plan.
Policy 3.6	Housing for Local workers – clarity required	<p>Query the last sentence as it could be difficult to enforce.</p> <p>The policy could be clearer on its expectation and who it is referring to (ie rural workers). There should be evidence to back this up.</p> <p>PSLP Policy H3 includes details of local connection test for affordable housing</p> <p>The independent examiner for Lamberhurst stated that <i>My conclusion is that a specific, parish based, local connection allocation policy does not fall within the definition of a policy for the use and development of land, but is rather proposing a housing allocation policy. As such I will be recommending the policy can be deleted although the supporting text can refer to the Borough Council's housing allocation</i></p>	Policy 3.6 has been deleted although some supporting text has been retained to encourage developers / TWBC to make provision for key workers and local employees.

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		<p><i>policy.</i></p> <p>Also, unclear if this policy refers to market and/or affordable housing</p>	
<b>Chapter 4 Community Health and Leisure</b>		'Chapter 4 Community Infrastructure' might be a more appropriate name (see 4.1 below)	Would this help Horsmonden win more infrastructure levy?
First priority, p35	New medical facility at Bassetts Farm	Add policy number and correct title for allocation (see comments above)	Added.
Health paragraph, p36	Allocation numbers	Refer to PSLP figures of 225-305 dwellings	Amended to 240 to 320.
Policy 4.1	Clarity on village	Specify the village 'of Horsmonden' The policy refers to financial contributions, and so is essentially an infrastructure policy, thus justifies changing chapter name so it fits better within this section.	Amended.
Policy 4.2	Allotments – clarity required	Specify larger developments. Justification for the need for new allotments needed.	<b>Do you mean to state AL/HO3?</b>

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Page/Para	Policy Details	Proposed Change	
		Reference to 10 min walking (and every walking reference in the plan) to be deleted due to differentiation in walking pace.	This approach is widely used (Tenterden Design Codes) and so we propose to explain it in the text.
Policy 4.2	Wording below policy box	Add policy number and correct title for allocation (see comments above)	Added.
Policy 4.3	Thresholds	Larger developments should be 50+ ?. 'Very' large developments remove the 'very'. Where did these thresholds come from?	From PSLP Policy OSSR2 although the wording very large developments isn't used. Will amend 'very'.
Policy 4.3	Reference to 'SportsGround'	Clarify required about the location/facility being referred to.	Also include a footnote clarifying Horsmonden Sports Ground and the PSLP LGS reference number 136.
Policy 4.4	Walking distance	May not be necessary to include due to differentiation in walking speeds or add "approximately" before.	Added approximately.
<b>Chapter 5 Design and Style</b>			
Design principles in general	Widely supported	The use of AECOM and the character analysis group to inform design principles is very positive. This is good urban design, to analyse and then design at every level based on this analysis.	I'll pass on your comments to their team.
Legibility of policy	Structure	The policy is a bit confusing as it reads more like a report than a policy chapter. A lot of the information provided would probably be better within a supporting document, perhaps as a summary report of the baseline information? It may help to review it from the point of view of a developer or homeowner and how it can actually be used as a tool.	We'll have a look at re-arranging / editing the chapter into a more logical order.

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Supporting text within the chapter		The supporting text should really explain each of the policies more succinctly. The text should be at the beginning, with the supporting text underneath relating to each of the policies. Then as part of the supporting text, I think it would be more user friendly to pick out those headline elements of character that summarise what is locally distinctive to the Borough, based on the findings.	
Design guidelines	Use of questions to make more engaging and provide a tool for developers/homeowners to use	They could pose these as questions, such as do the boundary treatments reflect the local pattern of hedging/chestnut fencing/picket fencing? As the design guidelines have been developed, it would work best to keep it fairly short, summarise, and then signpost to the guidelines as they have done. The High Weald colour study could also be signposted.	There are questions included in the design guide.
Point two	Height/form layout	Suggest adding in scale, external appearance, and density to strengthen the wording/approach	Thank you, useful suggestions.
Point three	Quality materials	Could add 'and local where possible' to 'good quality materials' and perhaps use this as the opportunity to mention the High Weald Colour Guide. Would it be better to give more strength to the design guidelines in the first sentence 'expected to demonstrably apply' the Horsmonden Design Guidelines, or something like that?	Thank you, useful suggestions.
Point six	High Weald AONB Design Guide	The policy may need further explanation... do they mean 'where appropriate', as in, those parts of the parish within and adjacent to the AONB?	Surely just because the village lies just outside the AONB boundary the design and character is very much in keeping.

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Page/Para	Policy Details	Proposed Change	
N/A	Impact on residential amenity	There is no mention of impact on the residential amenity of existing neighbouring properties in this policy.	Good point. Added to policy. Michael Thornton to have a look at SLP EN1 Section 6 and advise.
<b>Chapter 6 Housing and Development</b>		Why is it called housing and development when the chapter is just referring to housing...should it be 'housing development'?	Good point. I'll put it to the SG & PC
Introduction: First para	Allocation numbers	Refer to PSLP figures of 225-305 dwellings	Amended.
Para before policy box: Policy 6.1	Reference to 'exception sites'	Clarification required: additional sites in addition to Policies AL/HO1, 2 & 3, or 'rural exception sites' for specific local connection housing needs? Or sites that aren't allocated?	
Policy 6.1	Formatting	Numbering is wrong, and the first sentence doesn't need a 1 in front of it. Point 2, should be at borough level.	
Policy 6.1	Affordable housing definition	The affordable housing definition in the NPPF is much wider than that which is set out in the policy and it should reflect the latest national policy. Policy H3 PSLP sets out minimum affordable housing requirements. This policy does not provide any indication of thresholds for the delivery of affordable housing. Suggest that rather than saying 'where applicable', for clarity the TWBC PSLP Policy H3 should be referred to.  The preamble to policy 6.1 refers to 'exception sites' – this should be defined: does this refer to 'windfall sites' or 'rural exception' sites?	The text 'where applicable' has been replaced with 'in line with PSLP Policy H3'
Policy 6.2	Windfall residential development. The term 'infill'	Not sure why infilling is for developments of 1-5 in the policy when reference is made to small windfalls between 1-10 in the supporting text. Further clarity required on why infill is 1-5 and why it doesn't come under windfall development.	Refer to Michael Thornton

Policy 6.4	Enforcing the policy	It is outside the scope of planning policy. Planning policies cannot be used to override statutory legislation in respect of retaining affordable homes in perpetuity and right to buy. New affordable homes can only be retained in perpetuity if they are built on a rural exception site i.e., outside the limits to built (LBD) development. If they are secured on a site within the LBD we can secure first lets for local people, and by agreement with the Registered Provider, we can advertise them for local people for the re lets but this cannot be bound by planning law 'in perpetuity'. Affordable housing built in the rural areas can only have an exemption from the right to acquire if it is a 'Designated Protected Area' under the Housing, Right to Enfranchise Act 2009. The Right to Buy is a statutory instrument that Council tenants have. The Council do not have stock in this Borough and therefore it is the Right to Acquire that RP tenants have that is applicable for us.	Noted. This policy will be replaced with text explaining how this is outside the scope of planning policy.
Policy 6.5	Enforcing the policy	It is outside the scope of planning policy. Planning policies cannot be used to set out how/who can access affordable housing. This is the role of the Council's Housing Allocations Policy. TWBC can	Noted. This policy will be replaced with text explaining how this is outside the scope of planning policy.



Page/Para	Policy Details	Proposed Change	
		use the S106 Agreement to prioritise affordable housing to be allocated to households with a strong local connection to the Parish, (3 years residence not 5) or through employment. However, they must also qualify for affordable housing i.e. be in Housing Need as per our Allocations Policy.	Noted. This policy will be replaced with text explaining how this is outside the scope of planning policy.
Policy 6.6	Replacement Dwellings	Does this apply to buildings anywhere? See TWBCPSLP H10 Policy – replacement of existing dwellings outside the LBD. This approach should be reflected in the NP.	Michael Thornton to advise.
<b>Chapter 7 Landscape and Environment</b>			
Introduction box, p60	Local context	This statistics for the NCA apply to a wide geographical area and seeing as one of the purposes of a NDP is to reflect local circumstances it would be more useful if figures were provided for the Parish rather than the NCA as a whole.	These are provided in the following paragraphs.
Furnace Pond reference, p60	Wildlife status	It is a Local Wildlife Site not a Local Nature Reserve.	LNR reference replaced with LWS.
Furnace Pond in Local Green Space table, p65	Designation of site	The site cannot be designated as it falls outside of parish boundary.	Part of the site falls within the parish boundary. The intention is to retain this part of the site in the list of proposed LGS.
p64, Local Green Spaces	“Local Green Spaces were accessible, well-used and maintained and safe”	Wording needs to clarify that this relates to the proposals considered.	Additional text to clarify.

p65 Table	Clarity on table	The table needs a title. The table is unclear in parts. For example, Fromandez Drive is neither proposed by TWBC or in the HNP, although there is counter argument column which implies the site should in fact be designated. It is perhaps more appropriate to rename the final column "HNP comments" and review the group's comment for each. The "TWBC 'comment on criterion'" column also does not accurately reflect the comments in TWBC's latest Local Green Space Assessment document – direct quotes suggested. It is noted that the HNP is proposing additional sites not assessed by TWBC; however, it should be noted that site AS_39 (Green Space in Bassetts Farm) in TWBC's Local Plan is also proposed for designation but has not been assessed in the HNP.	Table title has been added. The TWBC column has been deleted. Reference is made to TWBC's PLSP assessment. The Heath Village Green is to be coloured / listed separately. <b>Should we add in the Bassetts Farm site?</b>
Figures 43 and 44,p66-67		It is noted that the boundary for site 1 (Furnace Ponds) is slightly different to those proposed by TWBC	Will be referred to GIS mapper.
Figure 45 - Important Views table, p68	Important views description	Rather than just describe the view it would be helpful to have set out what is important about or in the view e.g., is the foreground or the distant view, is a feature or combination of features, enclosed/open etc.	As explained this text was from the original workshop. However, Figure 48 List of views to be protected by policy 7.2 could be amended to include 'what is important about or in the view' as you suggest.
Policy 7.2 Protecting important views	Policy wording	Refer to the map in the policy	Text amended to reference Figs 47 and 48.
Policy 7.3 Biodiversity	Policy wording	The policy could be strengthened, for instance including reference to the Defra Biodiversity Metric through a biodiversity gain plan. See TWBC PSLP Policy EN 9 Biodiversity Net Gain.	The supporting text has been amended as suggested.

Page/Para	Policy Details	Proposed Change	
Policy 7.4: Trees and hedgerows & Policy 7.5: Development adjacent to Ancient Woodland	Policy wording	There is no absolute impediment to the loss of protected trees or hedgerows, but they should be avoided if at all possible.  It is recommended to combine the two tree policies together, as they both refer to ancient woodland and veteran trees but are separated in the document. In Policy 7.4 would suggest the wording is more generic to include important trees (not just veteran and ancient).	This has been amended.  This has been amended.
Policy 7.7	Policy wording	Whilst it is acknowledged that some lighting doesn't require planning permission, it may be useful to refer to lighting standards, including the Institute of Lighting Professionals (ILP) Guidance Note GN01: The Reduction of Obtrusive Light. See TWBC PSLP EN 8 Outdoor Lighting and Dark Skies for more details.	
Policy 7.8 Development within the AONB	Policy wording	Too prescriptive and goes beyond the NPPF - development should contribute to AONB MP Objectives. PSLP Policy EN 19 The High Weald Area of Outstanding Natural Beauty states that proposals "should demonstrate a positive contribution to the objectives of the AONB Management Plan". We suggest a similar approach is used for Policy 7.8.	Amended as suggested.
Policy 7.9	Policy wording	How is damage defined, this term isn't normally used in respect of the AONB.	Michael Thornton to advise.

### Concluding comments

I trust the above is of assistance. It may be pertinent to schedule a meeting for mid/late November to go through any queries raised by the above comments, including redrafting of any policy wording where appropriate, and to discuss the next steps for the NDP.

Please do not hesitate to contact me in the meantime if you wish to discuss this in further detail.

Yours sincerely,



**Stephen Baughen**  
Head of Planning

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## Growth and Communities

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### BY EMAIL ONLY

9 November 2021

Dear Sir / Madam,

### Re: Horsmonden Neighbourhood Plan - Regulation 14 Consultation

Thank you for consulting Kent County Council (KCC) on the Horsmonden Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

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

### Chapter 1 Overall Strategy Chapter

#### Objectives

##### *Landscape and recreation*

Heritage Conservation: The County Council recommends that given the rich heritage in the area, the Neighbourhood Plan should include a specific section on heritage, to avoid relevant text being disjointed through the Plan. This could present the history of the parish and review the range and quality of the surviving heritage assets. This would in turn make it easier to relate this heritage to the themes that are developed later in the Neighbourhood Plan. Additional information could be provided on the history of iron-working in Horsmonden; including the site at Horsmonden Furnace, the designed landscapes at Sprivers, Rectory Park and Scotney Castle, the range of agricultural buildings in the parish, the moated sites including the scheduled monument at Share Farm and the historic farmsteads (there are at least 48).

There are many aspects of Horsmonden's landscape that are not agricultural in origin (e.g. natural woodlands, streams and gills) and yet form key elements in the parish's

landscape. The County Council therefore supports the following objective but would recommend the following amendment: “to retain the distinctive agricultural heritage of the parish, protect views, enhance biodiversity, protect ancient woodland and green spaces and retain dark night skies”.

#### **Chapter 4 Community, health and leisure**

Public Health: The County Council is supportive of the aspirations set out in the Neighbourhood Plan which promote a walkable community with safety of pedestrians being a priority, the addition of places to grow food through allotments and providing play facilities for children and younger people.

The Neighbourhood Plan has a number of objectives and policies that support improvements to the health and wellbeing of residents in the area. To expand the evidence base, KCC recommends using data from the [Kent Joint Strategic Needs Assessment](#) (JSNA) and other sources of public health data from the [Public Health Outcomes Framework](#) (PHOF), including ward level data. In addition, reference to how Neighbourhood Plan policies support the [Kent Health and Wellbeing Strategy](#) would be welcomed.

#### **Chapter 6 Housing and development**

Public Rights of Way (PRoW): It is noted the Neighbourhood Plan does not seek to allocate future housing development sites, but that the emerging Tunbridge Wells Local Plan looks to allocate three sites around Horsmonden village. Sites HO1 and HO2 will not affect existing recorded PRoW. Site HO3, on the eastern side of the village, is crossed by part of Restricted Byway WT340A with Public Footpath WT341 running along its northern boundary. KCC will work with the Borough Council to protect these paths when detailed plans come forward for the site. However, it is recommended that the Neighbourhood Plan supports the retention of these paths, and all PRoW in the parish, by including a specific policy supporting protection of PRoW where development is proposed and requiring their enhancement for the benefit of connectivity.

Heritage Conservation: For new development in the countryside, it is desirable that it is in keeping with the character of existing settlement. It should be noted that development between villages and hamlets and among farm buildings would, in many places, be consistent with the historic character of those areas. Historic England (with KCC and the Kent Downs AONB team) has published guidance on historic farmsteads in Kent<sup>1</sup> that considers how rural development proposals can be assessed for whether they are consistent with the existing character of the countryside.

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<sup>1</sup> <http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance>

## **Chapter 7 Landscape and environment**

Public Rights of Way: As a general statement, KCC is keen to ensure its interests are represented with respect to its statutory duty to protect and improve PRoW in the County. KCC is committed to working in partnership with local and neighbouring authorities, councils and others to achieve the aims contained within the KCC Rights of Way Improvement Plan (ROWIP). KCC intends for people to enjoy a high quality of life with opportunities for an active and healthy lifestyle, with improved environments for people and wildlife, and the availability of sustainable transport choices.

PRoW is the generic term for Public Footpaths, Public Bridleways, Restricted Byways, and Byways Open to All Traffic. The PRoW network is often considered a recreational network of paths; however, it can also provide means for people to access services and workplaces.

The value of PRoW routes is well recognised in the Plan, but KCC recommends that the Plan could have further positive regard to the network in its objectives and policies for PRoW. The network should be referenced within 'Access and movement' Objective (p. 10), the 'Landscape and recreation' Objective (p. 11), and Access and Movement policies (2.1 - 2.8).

A PRoW network useable on foot, bicycle and horse, will positively contribute to the National Planning Policy Framework (NPPF) aim for 'healthy, inclusive and safe places' and 'for the provision of shared space and community facilities', as noted in the Planning Summary (p. 34).

Presently, the parish PRoW network is entirely made up of Public Footpaths and three unconnected Restricted Byways. There are no Public Bridleways and therefore, no meaningful network for cyclists or horse riders.

KCC, whilst acknowledging and appreciating comments that the existing PRoW network is well maintained and available for walkers, suggests the Plan considers how new paths could be created to redress the 'lack of footpaths in South West of parish' (SWOT analysis, p. 64). Additionally, some existing Public Footpaths may be suitable to upgrade in status e.g. Public Footpath to Public Bridleway, to extend the public's access right to cyclists and horse riders. Applying both mechanisms could, for example, create a new cyclable route between the village and Sprivers that may prove a popular alternative to the car for existing residents, as well as future residents of the proposed developments around Horsmonden village.

Working in partnerships with neighbouring parish councils and landowners could help to establish new off-road routes to Brenchley and Goudhurst, the two nearest sizeable settlements. There may also be potential for a cycle route to Marden and the nearest railway station. Such routes will enhance local communities, deliver active travel and reduce use of local roads. The objectives and policies should recognise PRoW and support off-road cycling and horse riding as a local leisure activity, for a positive contribution to the future of the parish.

KCC recommends that the Plan encourages opportunities for off-road access enhancements which could be delivered around the parish when funding becomes available.

KCC would welcome working closely the Parish Council to achieve its aims to enhance the local PRow network and to realise these ambitions for the benefit of residents and visitors.

Heritage Conservation: The introductory section of this chapter provides a good review of the quality of the landscape. It should be noted, however, that there is potential for the discovery of archaeological sites from earlier periods than the medieval period. Although Horsmonden was unlikely to have been extensively settled in earlier periods, the lack of such sites in the parish is also due to a lack of investigation.

The text rightly identifies the Tunbridge Wells Borough Council Landscape Character Assessment 2017 as a key information resource for consideration of landscape issues but should also refer to the Historic Landscape characterisation for the Borough, and specifically that for Horsmonden<sup>2</sup>. The characterisation is designed to help developers, planners, decision-makers and the public assess the historic importance of Horsmonden's landscape and its component elements.

#### *Policy 7.11 Flooding*

Heritage Conservation: Sustainable Drainage Schemes (SuDS) may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations.

When SuDS are planned, it is important that there is consideration for the potential impact on the historic environment and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. KCC has recently produced advice for SUDS and the historic environment (Appendix 1). It provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets.

#### **Additional comments:**

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, notes that much of the Plan's area is coincident with the safeguarded Tunbridge Wells Sand Formation (Sandstone) (a landwon mineral). The Neighbourhood Plan should acknowledge the existence of a safeguarded mineral in the area.

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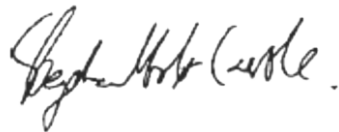
<sup>2</sup> [https://tunbridgewells.gov.uk/data/assets/pdf\\_file/0008/387665/i-HLC\\_Horsmonden.pdf](https://tunbridgewells.gov.uk/data/assets/pdf_file/0008/387665/i-HLC_Horsmonden.pdf)



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

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Stephanie Holt-Castle'.

**Stephanie Holt-Castle**  
Director for Growth and Communities

Enc.

Appendix 1: Sustainable Urban Drainage Systems and the historic environment



**Persimmon**

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Horsmonden Neighbourhood Planning Group  
The Parish Office,  
Horsmonden Village Hall,  
Back Lane,  
Horsmonden,  
Tonbridge  
TN12 8LH

20 October 2021

Dear Sir/Madam,

**Land to the East of Horsmonden  
Horsmonden Neighbourhood Plan Consultation Response**

Thank you for the opportunity to inform the formulation of the Horsmonden Neighbourhood Plan (HNP). This letter forms the formal response of Persimmon Homes South East to the ongoing Regulation 14 Consultation.

As one of the largest housebuilders in the UK, Persimmon has traditionally been very active within Kent, and has a number of land interests within Horsmonden and the wider Borough of Tunbridge Wells and is therefore a key stakeholder in the area. The Company has a keen interest in ensuring the HNP provides opportunities for the sustainable growth of Horsmonden.

This representation follows previous discussions with the Horsmonden Neighbourhood Plan Group, as well as the Company's ongoing participation in the formation of the emerging Tunbridge Wells Local Plan.

**Neighbourhood Planning**

The National Planning Policy Framework (NPPF, 2021) sets out that neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.

Paragraph 11 of NPPF sets out that plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied

locally. Paragraph 13 further sets out that neighbourhoods should develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development and plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.

This is further reinforced at paragraph 29 of NPPF which sets out that the ambitions of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area and must be in general conformity with the strategic policies of the Local Plan. It is also stated that Neighbourhood Plans should not promote less development than set out in the Local Plan, nor undermine the strategic policies of the Local Plan.

The Company encourages the formulation of a Neighbourhood Plan which fully conforms with the strategic needs of the wider local area and the strategic policies of the Local Plan. The HNP should not be abused as a tool to frustrate sustainable development.

#### **Emerging Tunbridge Wells Local Plan**

Tunbridge Wells is currently in the process of preparing a new Local Plan, which has recently been subject to a regulation 19 consultation period. It is understood that the new Local Plan is about to be submitted to the Secretary of State for examination. Once adopted, the Local Plan will determine the scale and distribution of development in the Borough.

Under strategic policy PSTR/HO 1 the emerging Local Plan allocates three sites within Horsmonden to deliver 240-320 new dwellings in order to meet local needs and aspirations. Policy Reference AL/HO3 allocates approximately 115-165 dwellings of these proposed new dwellings to Land to the East Horsmonden. Persimmon Homes is actively promoting this site through the emerging Local Plan process.

#### **Land at Bassetts Farm**

As noted above the Company has interests in Horsmonden:

##### **a) Land to the East of Horsmonden**

Persimmon Homes is in control of the Land East of Horsmonden. The Site is located in a sustainable location on the north eastern edge of Horsmonden, within walking distance of the village's services and facilities. The Site extends to approximately 14.7ha and comprises two distinct areas an orchard area to the north and a paddock area to the south-west.

**b) Bassetts Farm**

Outline Planning Permission has been granted for development of up to 30 no. residential dwellings on land immediately to the north of Goudhurst Road, east of the village (under reference TW/15/505340/OUT). Reserved Matters Consent is expected to be received imminently. The consented land is owned and controlled by Persimmon Homes.

Both parcels of land are covered by an emerging allocation in the draft Borough Local Plan under Policy Reference AL/HO3 'Land East of Horsmonden' (discussed above).

It is envisaged that delivery of the consented land and the proposed allocated site could be coordinated to deliver a well-designed sustainable extension to the village. In this regard the Company has some concerns on aspects of the HNP which may frustrate the delivery of the Land East of Horsmonden, contrary to the strategic requirements of the emerging Borough Local Plan. These concerns are set out below.

**Limits to Built Development**

Figure 2 of the HNP is an illustrative map which shows the main issues and options for Horsmonden, including limits to built development. As is shown on Figure 2, the limit to built development would prohibit dwellings being built on a large proportion of the eastern section of the site allocated under Policy HO 3 of the emerging Borough Local Plan.

Whilst we recognise the HNP aspirations for tight settlement boundaries and to protect the character and setting of Horsmonden, we are concerned that the settlement boundaries shown within Figure 2 will severely limit the quantum of development that can be accommodated on the allocated land. Given the existing on site constraints at Land at East of Horsmonden, it is unrealistic to think that approximately 115 – 165 dwellings can be provided within the boundaries set out within Figure 2 of HNP

In summary Figure 2 as currently drafted conflicts with the emerging Tunbridge Wells Local Plan in particular, the strategic requirements set out Policy PSTR/HO 1, Policy AL/HO3 and Policy Map 26)..

It is our view that settlement boundaries will ultimately have to be drawn around the housing allocations identified within the emerging LP creating synergy between the two documents. This is supported by Paragraph 29 of the NPPF, which states that Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.

We would encourage the Neighbourhood Plan Group to align the preparation of the HNP with works undertaken by Tunbridge Wells Borough Council, including aligning the settlement boundaries identified within Figure 11 of the Limits to Built Development Topic Paper for Pre-Submission Local Plan (February, 2021) and Inset Map 26 under Policy PSTR/HO 1.

#### **Protecting Important Views**

Land East of Horsmonden is not subject to any national landscape value designation, but is located to the north and east of The High Weald AONB. We fully recognise the value that the HNP puts upon protecting important views into the village. Any development that Persimmon Homes propose to be situated on the Land East of Horsmonden will be sensitively designed from a visual and landscape perspective.

Persimmon have appointed JBA as our landscape architects to review the landscape character of Horsmonden and prepare a Landscape and Visual Impact Assessment (LVIA) which examines the important views into the village and our Site.

Following the findings of the initial LVIA, and a landscape led iterative process, the layout is being prepared to ensure:

- development has been reduced on the north eastern upper slopes;
- retaining open space across the whole of the upper northern slopes; and
- allowing space within the developed area for tree lined main street, following the contours of the land, and space for large species trees which will break up rooflines on the slopes as they mature.

Figure 47 of the HNP identifies sensitive views that are from the PRoW along the edge of the AONB, however the development, as set out above would reflect the characteristics of the existing settlement that follows the slopes of the tributary valley. At present, Policy 7.2 'Protecting Important Views' has the potential to significantly impact upon the deliverability of development at Land East of Horsmonden. More clarity is needed on the wording of Policy 7.2, in that protecting important views should not mean to the exclusion of development, but to ensure well considered landscape led development.

### **Almshouses**

Policy text on page 56 of the HNP refers to the need for 'modern almshouses' at the emerging Land East of Horsmonden (H03) allocation. Further, the HNP does not demonstrate a need for specialist accommodation to support the needs of older people.

Whilst Persimmon Homes recognises the value of providing accommodation that is suitable to the older population of Horsmonden, we do not consider it necessary for this need to be met through the provision of 'modern almshouses'. Persimmon Homes consider that this need can be met through the provision of 1 bed and 2 bed flats and apartments. There is no requirement in national policy for the provision of 'almshouses' to meet the needs of older people.

As part of the proposed development at Bassetts Farm, and in accordance with emerging Local Plan Policy H3 we are proposing that 40% of the overall provision of housing be affordable (approx.48 units). In conjunction with ongoing discussions with Tunbridge Wells Borough Council an appropriate tenure mix will be proposed that meets needs of local residents and the wider community of Horsmonden. This will include a number smaller units such as 1 bed flats and 2 bed houses, allowing older residents to affordably downsize and remain within the Parish.

### **Conclusions**

As a key stakeholder in the future development of Horsmonden, we welcome the opportunity to engage and assist in the formulation of the HNP. Persimmon Homes supports the preparation of a Neighbourhood Plan for Horsmonden provided that it is in accordance with the strategic principle set out in the emerging Borough Local Plan, accords with the principles of the NPPF and plans positively

for the sustainable growth of the Village. To this end we have highlighted that the following amendments need to be made to the Plan:

- amend the limit of built development shown on figure 2;
- amend the wording of Policy 7.2 concerning landscape and views;
- remove the requirement for 'modern almshouses' at Land east of Hosemonden.

I hope that the above information is useful. I can confirm that Persimmon Homes would like to appear at the Examination for the HNP.

Yours sincerely

Calvin Coxsidge  
Development Planner  
**Persimmon Homes South East**

# Horsmonden Neighbourhood Plan 2022-2038



# CONSULTATION RESPONSE FORM

## Regulation 14: Draft Horsmonden Neighbourhood Plan Consultation

The full draft HNP is available to read and download at: [www.HorsmondenNP.co.uk](http://www.HorsmondenNP.co.uk). You can complete your response to the draft Horsmonden Neighbourhood Plan (HNP): online, download and print a MS Word document or a pdf form from our website. If you have downloaded this as a Word document, please complete it and return, as an attachment to [hnp.invites@gmail.com](mailto:hnp.invites@gmail.com)

All the forms allow you to comment on the vision, objectives, a policy or policies and make general comments. All questions with an asterisk must be completed for your form to be valid. Paper response forms should be taken to one of the following collection boxes at the Gun and Spit Roast Inn, Heath Stores, the Parish Office at the Village Hall and the Social Club. The draft HNP Regulation 14 consultation will run from Monday 13 September to Sunday 24 October 2021.

By submitting this form you consent to the processing of your personal data in accordance with the Horsmonden Parish Council Privacy Notice overleaf (also at [http://www.horsmonden-pc.gov.uk/Sites/2695/\\_UserFiles/Files/Horsmonden%20Parish%20Council%20Privacy%20Notice%20Accessible.pdf](http://www.horsmonden-pc.gov.uk/Sites/2695/_UserFiles/Files/Horsmonden%20Parish%20Council%20Privacy%20Notice%20Accessible.pdf)).

### 1. Please provide your full name \*

First name: John

Surname: Breese

### 2. In what capacity are you making your comment? \*

As a resident of Horsmonden

Other

### 3. If a resident, please provide your house name or number and your street address \*

### 4. If an organisation, please state the reason for your involvement and the name of any organisation you represent \*

Rosconn Strategic Land – Promoter of Land at Brenchley Road, allocated under HO2 of the Local Plan  
Address: Rosconn House, 1 Grove Road, Stratford-upon-Avon, Warwickshire, CV37 6PE

### 5. Postcode \*

CV37 6PE

### 6. Email address \*

[john@rosconngroup.com](mailto:john@rosconngroup.com)

### 7. Do you support the vision statement (Please tick one box only)?

- |                                     |                  |
|-------------------------------------|------------------|
| <input type="checkbox"/>            | Strongly Support |
| <input type="checkbox"/>            | Not sure         |
| <input type="checkbox"/>            | Do not support   |
| <input type="checkbox"/>            | Strongly do not  |
| <input checked="" type="checkbox"/> | Support          |



# COMMENTS

8. Do you have any comments or suggestions on the Vision? -Boxes will expand to fit your typing.

9. Do you have any comments or suggestions on the Objectives? (When referring to an Objective/s please quote the Objective number)

10. Do you have any comments or suggestions on the Policies? (When referring to a policy/s please quote the policy number)

Rosconn Strategic Land (RSL) welcome the opportunity to comment on the draft Horsmonden Neighbourhood Plan (HNDP). RSL represent the owners of land at Brenchley Road that is proposed to be allocated for residential development within the draft Tunbridge Wells Borough Local Plan under Policy (HO2). We have prepared the following comments and suggestions in respect to the draft Policies for consideration of the HNDP team.

**Policy 2.2: Minimising traffic speeds**

RSL acknowledge the concern about traffic volumes and speeds which has emerged out of the consultation and evidence base undertaken by the HNDP. We would suggest for clarity that a distinction could be made between the two areas of concern that have emerged, the first ambition that within larger new developments speeds are minimised and the second concern related to reducing the speeds of vehicles running through the existing road network. A split approach could take the form of two policies which support the use of traffic calming measures, one for new development and one on identified existing roads. It may be more appropriate to identify the speed reduction on existing roads as a Project, as opposed to Policy. KCC will be the ultimate arbitrator for such schemes and clearly identified proposals of support for speed reduction on roads such as Brenchley Road or within the village centre would clearly guide the Highways Authority as to the communities’ goals. RSL are supportive of a speed reduction along Brenchley Road to 20mph and will investigate this with our highway engineers and KCC along with the identified desire for a crossing point as part of this process.

**Policy 2.3: Adequate pavements & Policy 2.4 Safe pedestrian routes**

RSL recognise and support the aspiration for new development to be connected to the services and facilities available in the village by safe and effective pedestrian routes. Indeed, in respect of Land South of Brenchley Road, Horsmonden the emerging Local Plan already contains a requirement for the Site to “provide a pedestrian access from the Site along Brenchley Road to link with the existing footway network.” The technical work undertaken to date as well as discussions with Kent County Council (KCC) as the Local Highway Authority demonstrate there is adequate land within the public highway to deliver such a link.

In terms of the width of any footway along Brenchley Road we acknowledge the advice provided in Manual for Streets (MfS) as quoted within Policy 2.3’s supporting text that the minimum general width of footways should be 2m. However, MfS is general guidance and its standards will not necessarily be achievable, or desirable, in all cases. Manual for Streets 2 (MfS2), for instance, recognises that:

“Many villages have existed for centuries are likely to have an historic centre with a street pattern that is unlikely to conform to a standardised highway layout but which it is desirable to conserve in the interests of maintaining the character of the area. Carriageways are often narrow, and footways may be narrow or non-existent and as a result speeds can be low.”

Elsewhere MfS2 states:

“The majority of rural roads follow old pathways and boundaries and do not conform to present guidance on highway standards. Indeed, an attempt to do so could be to the detriment of local character and lead to intrusion into our most outstanding landscapes.”

“There are often concerns over the urbanising effect and visual intrusion of unsympathetic highway features such as traffic signs, road markings, street furniture and excessive carriageway width. These can be in conflict with local place functions.”

Horsmonden is a pleasant rural village nearby the High Weald Area of Outstanding Natural Beauty. The character and visual amenity of such a location depends on, amongst other things, the relative informality of its street patterns. Many of the existing footways within the village are materially below the recognised MfS standard and hence there is a need, as set out within MfS2, to avoid over-engineered highway solutions as these can appear obtrusive and detrimental to local character.

As such we would recommend that Policies 2.3 and 2.4 are suitably qualified to recognise that standard highway solutions will not be possible, or desirable, in every instance due to the informality of existing street layouts within the village and local character considerations. This approach would be in the spirit of MfS.

Notwithstanding the above, we have engaged in extensive pre-application work along with engagement with KCC and will continue to develop a highway improvement scheme along Brenchley Road that conforms to the Local Highway Authority’s standards and meets the needs of the local community.

#### **Policy 4.2: Allotments**

The Policy wording states that land should be set aside for allotments in ‘larger developments’, although the supporting text identifies that the only site currently proposed large enough to accommodate this is Bassetts Farm. ‘Larger Developments’ is then defined in Policy 4.3 as 50-99+ homes whilst 100+ home schemes are referred to as ‘Very Large Developments’.

As such, RSL would suggest Policy 4.2 is amended for the purposes of clarity and consistency and the Policy either makes direct reference to the provision of allotments in Bassetts Farm, or the policy replaces ‘larger developments’ with ‘very large developments (100+)’.

#### **Policy 4.4: New village hall**

Policy AL/HO 2 of the draft Tunbridge Wells Local Plan sets out that the Land south of Brenchley Road and west of Fromandez Drive is allocated for residential development and a replacement village hall. This preferred area within the eastern section of the allocation is marked out within the supporting Plan contained in the Policy. The emerging Local Plan does not allocate any other area as being suitable for a replacement village hall.

As stated in our response to Policy 2.3 and 2.4 RSL are confident a safe pedestrian footpath can be delivered to connect into existing footways within the public highway and that we are intending to bring forward land as part of the development proposals for a village hall along with a proportionate contribution to fund the construction. RSL is concerned that a Policy which takes a blanket approach to where the village hall is located may fail the test of general conformity with the Local Plan, as criterion (6) of HO 2 identifies for provision of a village hall on land indicated on the policy site layout plan. If the village hall is located in another location, it could bring about conflict with the Local Plans strategic policies such as the protection of open countryside. As such, RSL would suggest the Policy is amended to identify the intended location of the new village hall as per the Local Plan.

#### **Policy 5.1: Design of new development**

RSL would note that Lifetime Homes is no longer a recognised standard in planning although is something synonymously used with what is known as Building Regulation Approved Document M4(2). This standard which provides enhanced accessibility and adoptable dwellings is already incorporated into the emerging Local Plan which under Policy H6 sets a target for all new housing to be built to M4(2). This approach is in line with the National Planning Policy Guidance which advises that local planning authorities in adopting new policies should only reference M4(2) and M4(3) when providing enhanced accessibility or adaptable and not important additional information requirements. Such standards can only be required through the Local Plan process with reference to viability. As such this requirement should be reviewed to ensure it has regard for national policies and advice as per Basic Condition (a).

#### **Policy 7.4: Trees and hedgerows**

RSL do not have any objection in principle to this Policy but note that provides no flexibility in respect to protected hedgerows. RSL are currently carrying out ecological and arboricultural surveys to assess the existing trees and hedgerows to ensure they are protected before, during and after development along with confirming whether the hedgerow is classified as protected. A creation of small gap in the existing hedgerow would be required to provide a suitable pedestrian and vehicular access into the site, as such the policy should be amended to provide some flexibility for development affecting hedgerow. This approach is inline with the Local Plan which under criteria (8) of the HO 2 sets out that regarding shall be given to the existing hedgerow on-site.

#### **Policy 7.10: Development adjacent to Ancient Woodland**

RSL are supportive of the principle of protecting Ancient Woodland and ensuring new development provides a sufficient buffer so as not to damage or detract from it. We do however object to the Policy in its current form.

The 50m buffer distance has been taken from the precautionary principle set out in the Woodland Trust guidance 'Planners Manual for Ancient Woodland, 2019', however significantly not all the guidance is reflected within the Policy. The supporting text around this 50m makes clear there is no 'one size fits all' and that 50m is a precautionary principle unless the applicant can demonstrate very clearly how a smaller buffer would suffice. It is noteworthy that a 50m buffer to Ancient Woodland was rejected as an amendment by the House of Lords to the current Environment Bill.

The Draft Local Plan Policy EN 13 (Ancient Woodland and Veteran Trees) already sets out stringent policy criteria for the protection of Ancient Woodland including the use of an adequate buffer, whilst the supporting text in paragraph 6.170 makes reference to a precautionary buffer of 25m from the edge of woodland in the absence of site surveys and detailed assessments. The use of a 25m buffer is already in excess of that which is set out by the relevant statutory agency Natural England which in its Standing Advice 2018 which refers to a minimum 15m buffer zone (or 15 times larger than the stem diameter of a veteran tree or 5m from the edge of its canopy).

We would restate RSL are committed to taking a landscape and ecological-led approach to safeguarding the ancient woodland adjacent to the site. We are currently in the process of carry out a wide range of detailed ecological studies to inform the early design and masterplan of the site, whatever buffer is ultimately recommended from the results of these studies will be used.

As such, RSL consider that this policy should be deleted to ensure the Plan confirms with Basic Condition (e), as the Policy duplicates other standards which are already set out by statutory agencies such as Natural England and the Tunbridge Wells Local Plan.

11. Do you have any general comments about the HNP? (Page references would be helpful but aren't essential)

**Thank you for taking part in the consultation**

**What happens to your responses?**

*Horsmonden Parish Council is the data controller of your personal data for the purposes of applicable data protection legislation in relation to Neighbourhood Plan making. We collect names, addresses and other contact details. However, when publishing the representations received during this consultation, we will only publish the name of the individual respondent or the organisation that they represent. All other personal information will be omitted or redacted – this includes the contact details and signatures of individuals.*

**What will we do with your data?**

*All personal information will be processed in accordance with the Parish Council's Data Protection Policies which are detailed on its website or can be obtained from the Clerk. A summary of all representations received will be made public when the plan is submitted to Tunbridge Wells Borough Council for examination. **This may include verbatim comments received. Full contact details of private individuals will not be published publicly.***