

Pembury Regulation 16 Consultation Response Report

Response Number	Name/ Organisation	Which part of Plan does response refer to?	Response	Do you wish to attend examination hearing?	Would you like to be notified of the Council's decision regarding the outcome of the Paddock Wood Neighbourhood Plan?	Supporting Documents
1	Amanda Clinch	Transport and Movement	<p>As a resident of Romford Road I am writing in opposition to the above proposal. As you are well aware both Romford Road/Woodside Road & Kings Toll Road are used as rat runs by traffic when the A21 southbound becomes blocked at Kippings Cross Roundabout. What on earth will be achieved by diverting all this traffic on to just Romford Road? Romford Road is a much more densely populated road, is part of a national cycle route, has footpaths crisscrossing it, is the location for a dementia specific residential home, and is a pedestrian route for many in to the village. It also has accident black spots at 2 locations & is far too narrow for HGVs - indeed too narrow for 2 cars to pass in certain places.</p> <p>Please can you consider other solutions to your problems of traffic congestion on the A21 at Kippings Cross first. By perhaps installing traffic lights for use at peak times or by closing the second exit to Pembury Village (Bo Peep Corner) so genuine local traffic will come through the village, as we do anyway in peak hours. Making Kings Toll Road pedestrian access only is not a feasible solution - it merely relocates the problem to Romford Road. It puts a lot more traffic onto Romford Road which is already unsafe for both pedestrians & drivers at certain times of day with speeding traffic & volumes for which the rural lane is not designed. The safety of our children & pets is yet another concern.</p>	Did not say	Did not say	
2	Brenchley and Matfield Parish Council	Whole plan	Brenchley and Matfield Parish Council supports all the policies in this draft Plan.	No	Yes	
3	Environment Agency	General comments on the topics set out in the response's subheadings	<p>Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the environment. This document sets out the key environmental issues, within our remit, which should be considered.</p> <p>Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: https://neighbourhoodplanning.org/wp-content/uploads/Environment-Toolkit-20181220.pdf</p> <p>We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including</p> <ul style="list-style-type: none"> Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies (https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies), the South East River Basin Management Plan (https://www.gov.uk/government/publications/south-east-river-basin-management-plan/) Thames River Basin Management Plan (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/geth0910bswa-e-e.pdf) as appropriate. <p>The information below explains the key issues we would consider in reviewing your Plan. We aim to reduce flood risk, while protecting and enhancing the water environment.</p> <p>Flood risk <u>Development must be safe and should not increase the risk of flooding.</u></p> <p>Neighbourhood Plans should conform to national and local policies on flood risk: If a Neighbourhood Plan is proposing sites for development please check whether there are any areas of Flood Zones 2 or 3 within the proposed site allocations.</p> <p>You can view a site's flood zone on the Flood Map for Planning on our website:</p>	Did not say	Did not say	

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			<p>https://flood-map-for-planning.service.gov.uk/</p> <p>If the proposed allocation is located within Flood Zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG): http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/</p> <p>Here you can determine whether the flood risk vulnerability of the proposed development and the flood zone are compatible. In accordance with national planning policy the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk. This should be informed by the Environment Agency's floodmap for planning and the Local Planning Authority's Strategic Flood Risk Assessment (SFRA), if they have one. We recommend you contact the Local Planning Authority to discuss this requirement further.</p> <p>We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken.</p> <p>It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.</p> <p>We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at ksle@environment-agency.gov.uk for further details.</p> <p>In addition to the above you should also check with the Local Planning Authority's Neighbourhood Planning team with regards to other sources of flooding (such as surface water, groundwater, sewers and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). The Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.</p> <p>Climate Change Allowances The Local Authority's Strategic Flood Risk Assessment should indicate the extent of flood zones with likely climate change.</p> <p>On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances.</p> <p>Flood Defences Areas of your Neighbourhood Plan area, or proposed sites, may be given protection by a flood defence/alleviation scheme. Where this is the case the Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.</p> <p>Ecology <u>Proximity to watercourse / Ecology</u></p> <p>Main rivers can be viewed on the Environment Agency's map: https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc5_24433980cc333726a56386</p> <p>We normally require a buffer zone of 8 metres (fluvial) and 16 metres (tidal) between any new development and the top of the bank of the main river. The permanent retention of a continuous unobstructed area is an essential requirement for emergency access to the river for repairs to the bank and for future maintenance and/or improvement works. A buffer between new development and the river wall is also required to ensure no adverse loading which could impact the stability of the channel</p>			

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			<p>wall. This buffer zone will help provide more space for flood waters, provide improved habitat for local biodiversity and allows access for any maintenance requirements.</p> <p>Where development is proposed next to the river we recommend that it includes a green buffer strip alongside the watercourse. Where such a buffer strip does not currently exist, we normally seek that it is established. This is a key way in which we carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.</p> <p>The provision of green infrastructure, particularly along rivers, and the inclusion of sustainable drainage techniques can help reduce the risk of flooding. This can also provide recreational and wildlife benefits. Opportunities to incorporate biodiversity in the Plan will be encouraged. In accordance with national policy, any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it; delivering biodiversity net gain. We would not support development proposals if there was shown to be a likely detrimental impact on the water environment.</p> <p><u>Water Management and Groundwater Protection</u> Local level actions and decision making can help secure improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive (WFD). It seeks to:</p> <ul style="list-style-type: none"> • deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and • encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment. <p>Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the water environment. Local WFD catchment data can be obtained from: http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/</p> <p>Overall deterioration in water quality and promoting improvement in the ecological status of any water body. Actions to achieve this are listed in the Thames River Basin Management Plan (RBMP) and the South East River Basin Management Plan https://www.gov.uk/search?q=River Basin Management Plans</p> <p>Where appropriate, a WFD Assessment (http://planningguidance.communities.gov.uk/blog/guidance/water-supply-wastewater-and-water-quality/water-supply-wastewater-and-water-quality-considerations-for-planning-applications/) should assess any potential impacts on the watercourse and demonstrate that the required enhancements will be delivered. Any development that has the potential to cause deterioration in classification under WFD or that precludes the recommended actions from being delivered in the future is likely to be considered unacceptable to us.</p> <p><u>Groundwater Quality</u> <u>Development must not cause pollution to the water environment</u></p> <p><u>Aquifers and Source Protection Zones</u> Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance: https://www.gov.uk/government/collections/groundwater-protection</p> <p>To see if a proposed development is located within a Source Protection Zone, please use our online map: https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs</p> <p><u>Land Contamination</u></p>			

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			<p>You must consider land contamination when preparing your plan. Managing it during development is key to addressing past contamination and preventing further impacts during development.</p> <p>You can establish if a site may be contaminated in several ways. Your Local Authority may hold a register of sites it knows to be contaminated. A list of potentially contaminated sites can be accessed on the following link: https://www.claire.co.uk/useful-government-legislation-and-guidance-by-country/76-key-documents/198-doe-industry-profiles</p> <p>We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health. Further information can be accessed on the following links:</p> <ul style="list-style-type: none"> Guiding principles for the Land Contamination https://www.claire.co.uk/useful-government-legislation-and-guidance-by-country/192-guiding-principles-for-land-contamination-gplc Model Procedures for the Management of Land Contamination: https://webarchive.nationalarchives.gov.uk/20140328160926/http://cdn.environment-agency.gov.uk/scho0804bibr-e-e.pdf Approach to Groundwater Protection https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf <p>Water supply and foul drainage When allocating sites in you Plan, you will need to consider if the water supply and foul drainage infrastructure can accommodate the development. Your local water company can provide further information about water supply and sewerage capacity.</p> <p>Surface water drainage The inclusion of Sustainable Drainage Systems (SUDS) should always be a consideration within any development to reduce the risk of surface water flooding on and off site. The Lead Local Flood Authority, is the main contact for SUDS issues. However, we have interest in SUDS from a groundwater protection perspective and those area of critical drainage.</p> <p>The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to Controlled Waters.</p> <p>We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices. This can be found at: https://www.gov.uk/government/collections/groundwater-protection</p> <p>The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements: https://www.gov.uk/government/publications/groundwater-on-position-statements</p> <p>Infrastructure Delivery</p>			

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			<p>We would recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account if the Plan looks to fund local infrastructure.</p> <p><u>Environmental Permitting Regulations</u> To see if a proposed development requires an Environmental Permit under the Environment Permitting Regulations please refer to our website: https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit</p> <p>Under the Environmental Permitting (England and Wales) Regulations 2016, a flood risk activity permit (FRAP) may be required for work:</p> <ul style="list-style-type: none"> • in, over or under a main river; • within 8m of the bank of a main river, or 16m if it is a tidal main river; • within 8m of any flood defence structure or culvert on a main river, or 16m on a tidal main river. <p>Flood risk activities can be classified as: exclusions, exemptions, standard rules or bespoke. These are associated with the level of risk the proposed works may pose to people, property and the environment. Local Authorities should advise developers to refer to the flood risk activity permit section of gov.uk for further information.</p> <p>Please note This document is a response to a Neighbourhood Plan consultation and does not represent our final view in relation to any future planning application made in relation to any site. You should seek your own expert advice in relation to technical matters relevant to any planning application before submission.</p> <p>If you have any questions please contact the Kent and South London Sustainable Places team: kslplanning@environment-agency.gov.uk</p>			
4	Gordon Bennett	Transport and Movement	<p>I have only just become aware that the Pembury Neighbourhood Plan contains a proposal to make Kings Toll Road pedestrian and resident traffic only to alleviate some of the problem of through traffic avoiding the A21. I object to this proposal as it is only addressing one part of a complex problem which concerns Romford Rd, Bramble Reed Lane and Foxhall Lane to name but three lanes that are affected. Infact this proposal will only make matters much worse. A plan is needed to address the problem as a whole.</p> <p>Some reasons to object to the proposal for King's Toll Road becoming pedestrian are :</p> <p>Rat Run Traffic will be diverted along Romford Road & Foxhole Lane It does nothing to alleviate the rat run problems in Romford Road/Foxhall Lane which are at least as serious as those in King's Toll Road, and need to be given equal priority, rather than made worse. Romford Road/Foxhall Lane/Bramble Reed Lane are unsuitable for even more traffic because Parts are single track Several blind bends National Cycleway No.18 goes along the road Public Footpaths used by parties of hickers run along parts of the roads The Road is used by horse-riders, pedestrians and children(some children are on horseback accompanied by experienced adults) and lastly mothers with pushchairs. Excessive speeding in parts, e.g. near Alban's Lodge. Wish Hill is steep, narrow single track and has blind bends. Accident Black Spotsare at Wish Hill and Snipe Wood Bend footpath junction, near Easter Hill. Increased Dangers from Increased Traffic Density because of Traffic diverted from King's Toll Road</p> <p>More congested traffic would increase the danger to pedestrians, children, cyclists, walkers, horse-riders, and other drivers. both directly, and by the increased potholes which more traffic would cause. Accidents would increase, especially in parts where speeding traffic confronts a narrow single-track section of the road.</p>	Did not say	Did not say	

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			<p>Local air pollution would increase.</p> <p>Conclusion This plan is not a solution. It moves the problem around, but overall it results in a worse problem</p> <p>The Pembury Neighbourhood Plan needs amendment to 'explore opportunities to manage Woodside Road, Romford Road, and King's Toll Road to mitigate danger and damage from rat runs throughout the whole network, using appropriate traffic calming and management, to ensure no detriment to any part of this network.</p>			
5	Hugh Boorman	Allocations in the emerging Local Plan	<p>Please find enclosed my list of constructive criticism and reasons for objection to the contents of the local plan which I, with respect, find totally out of keeping and without any thought for the existing community and surrounding countryside. These are the proposed areas of concern.</p> <p>1, Map 87 Policy AL/PE1 Land Rear of High Street and West of Chalket Lane.</p> <p>2, Map 88 Policy AL/PE2 Land at Hubbies Farm and South of Hastings Road.</p> <p>3, Map 89 Policy AL/PE3 Land North of the A21, South and West of Hastings Road.</p> <p>4, Map 90 Policy AL/PE4 Land at Downingbury Farm, Maidstone Road.</p> <p>5, Map 91 Policy AL/PES Land at Sturgeons fronting Henwood Green Road.</p> <p>6, Map 92 Policy AL/PE6 Land at Tunbridge Wells Hospital and Adjacent to Tonbridge Road.</p> <p>7 Map 93 Policy AL/PE7 Land at Woodgate Corner.</p> <p>5, Map 91 Policy AL/PE 5 Land at Sturgeons fronting Henwood Green Road. Sadly this site is nearing completion and all of the of the concerns previously mentioned have appeared. This site is not for a rural village location. There is no area in which residents can enjoy any privacy, vehicle parking is very restricted and knowing the problems experienced with existing ageing draining taking that from Canterbury Road and the Main Road and above I cannot see that there can be any improvement if it is all draining down into the existing woodland drainage.</p> <p>2, Map 88 Policy AL/PE2 Land at Hubbies Farm and South of Hastings Road. There are many sound reasons why this development must be turned down immediately. Most of the reasons are very obvious.</p> <p>a, The main one the proposed development entrance and exit coming out onto the main road right opposite the only entrance and exit of Belfield Road.</p> <p>b, The two main Bus Stops are either side of that road and would cause absolute chaos and could be very dangerous.</p> <p>c, The impact of loss of rural vision would be a disaster for local residents .</p> <p>d, The impact on the existing parking on the Main Road would cause many problems. The existing Hairdressers and the entrance and exit to the Electricity Board workshop are opposite to the proposed development.</p> <p>e, Drainage of rain water would be an immense problem, at this moment in time it is absorbed by natural grass and fields where as when it is all concreted over there would be an immense problem of dispersing that water, causing huge problems on existing drainage down on the Main Road.</p> <p>f, The Public Footpath 239A runs right along the top of this site with magnificent views out to the North Downs and this would be gone forever should this proposed development take place. under no circumstances must it be allowed to happen.</p> <p>Map 89 Policy AL/PE 3 Land North of the A21, South and West of Hastings Road.</p> <p>There are again many reasons why this application should be rejected and they are as follows.</p>	Did not say	Did not say	

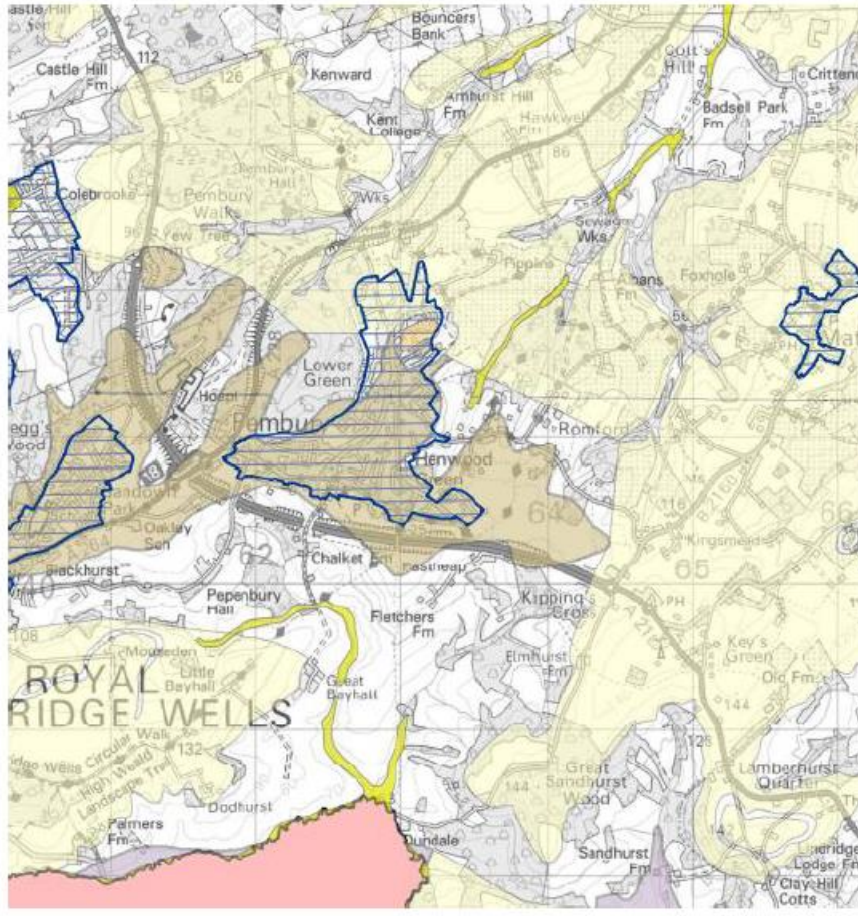
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			<p>a, The loss of Rural Vision and Beauty which must not be destroyed and the loss to those living in the properties opposite the field and woodland would be indescribable.</p> <p>b, The very fact that views would be overcome with houses would be appalling..</p> <p>c, Public Footpath WT237 runs down the right hand side of the proposed development onto the main road and this path along with Policy AL/PE2 has large views of the North Downs.</p> <p>d, The Hedge that runs nearly the length of this property has a preservation order attached to it.</p> <p>e, There is a copse of mixed trees that are growing down partway in the middle of the main field and yet they are not shown on the map which leaves them very vulnerable to removal.</p> <p>f, There is already a large amount of vehicle parking on the side of the road and up on the grass verge. What would you do with those, because, the other side of the road would be impossible.</p> <p>The very movement in and out of the site will create a problem for the existing road and the local inhabitants movement of traffic. Totally out of keeping with the local structure.</p> <p>6, Map 92 Policy 92 AL/PE 6 Land for Development at Pembury Hospital, No objection providing that no unnecessary damage is done to local woodland and as much effort as possible is made to preserve its rural location.</p> <p>1, Map 87 Policy AL/PE 1 Land for Development at Rear of High Street and West of Cornford Lane.</p> <p>There are many reasons why this proposed development should be objected to in the most energetic and serious manner .</p> <p>a, The very thought of proposing to increase the amount of traffic coming out onto the main road or entering the lane to the proposed development site would be horrendous and cause immense problems on what is already a busy main road.</p> <p>b, The flow of traffic would also be affected by traffic parking at the Paper Shop.</p> <p>c, There is also a major problem area where the proposed development has access onto Chalket Lane with the movement of traffic in and out of Camden Court Old Peoples Dwelling, in the Summer there is a constant flow of traffic in and out of the Cricket Ground with 1st and 2nd team Cricket. being played, youth training in the mornings plus Spectators.</p> <p>d, The problem of increased traffic coming out onto the main road opposite the traffic coming up the village green does ,nt bare thinking about.</p> <p>e, The loss of Rural Vision out towards the South Downs would be seriously affected.</p> <p>Map 88 Policy AL/PE 2 Land at Hubbies Farm and South of Hastings Road.</p> <p>There are many reasons why this proposed development must be rejected and they are as follows.</p> <p>g, Where would the access and exit to and from this site be. To place it at the Bo- Peep end would, create a massif traffic problem with traffic coming in and out of the A21, Sandhurst Avenue, Hastings Road and Henwood Green Road.</p> <p>h, The volume of additional traffic would cause immense problems. This proposed development must not proceed.</p> <p>Map 90 Policy AL/PE4 Land at Downingbury Farm, Maidstone Road.</p> <p>This proposal is again on another site which would cause immense problems and would result in the destruction of an area that has been Green Belt since time began.</p> <p>a, We are given to understand unless things have changed that the main that the traffic from the proposed housing development would make exit and access up past Gimble Way and Church Road ?. I cannot believe that any one could possibly even think of that and they obviously have no local knowledge.</p> <p>b, The proposed development would destroy for ever the rural views that can be seen from Public Footpath WT218 which runs adjacent the Orchard to meet up with WT217B.</p> <p>c, What would the proposed development occupiers do to prevent Footpath Walkers viewing their dwellings, erect six foot high panel fencing.</p> <p>d, The viewing from rural areas, as far away as Kent College would be gone for ever.</p>			

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			<p>e, The drainage from that site would cause immense problems with natural drainage being grassland being replaced by concrete and causing immense problems on the lower end of the site especially.</p> <p>f. Under no circumstance must any access be allowed down onto the Maidstone Road.</p> <p>This proposal must not take place under any circumstances and would contribute to the rural destruction of Pembury.</p> <p>Map 90 Policy AL/PE 4</p> <p>The second part of this proposed development is that of a light industrial unit bordering the premises of the Hospice Unit.</p> <p>a, I rather think that this proposal may be an unnecessary infringement on the quiet surroundings that the Hospice requires for its patients and a restriction on any further extension of that site.</p> <p>b, It would destroy the rural nature of its location and the noise created by the movement of additional vehicles in and out of the proposed site would be detrimental to the intended quietness of the Hospice and its Patients.</p>			
6	Historic England	General	<p>We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you to previous comments if relevant submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</p>	Did not say	Yes	
7	Kent County Council	Chapters 2, 3, 5, 6, 8, 9, 10, 15	<p>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. The County Council appreciates the opportunity to comment on the Neighbourhood Plan and is generally in support of the policies laid out within the document.</p> <p><u>2. About Pembury</u></p> <p><u>Public Rights of Way (PRoW):</u> The County Council considers that the Neighbourhood Plan could go further in recognising the value of connections between local communities. Off-road improvements, such as those shown in Figures 9.2 and 9.3, will enhance access around Pembury, the parish's principal settlement; however, improvements should also be considered to connect with local settlements and to larger communities such as Matfield, Paddock Wood and as far as Tonbridge. The Neighbourhood Plan also recognises that access to nearby settlements is a 'challenge' (paragraph 2.13). Working jointly with neighbouring parish councils will therefore benefit Pembury residents by providing better access opportunities. Moreover, working actively with neighbouring councils who similarly can secure funding, and then pooling resources, should increase the likelihood of delivering such improvements.</p> <p><u>3. Vision and Objectives</u></p> <p><u>PRoW:</u> The Neighbourhood Plan's Vision and Objectives allow considerable opportunity for maintaining and enhancing the local PRoW network and therefore make a significant contribution in delivering the Neighbourhood Plan's overall aims. The Neighbourhood Plan proposes a positive role for PRoW to help shape the parish in the years ahead, such as ensuring (together with the adoption of the Tunbridge Wells Borough Council Local Plan) new development connects to and enhances the local PRoW network (paragraph 4.3, bullet 7); identifying where improvements can be made to support sustainable active travel routes (Figures 9.2 and 9.3); and with a series of Non-Policy Actions (Section 13).</p> <p>KCC notes that the Neighbourhood Plan recognises the need for the local community to work with various partners to achieve the Neighbourhood Plan's ambitions, including the County and Borough Council. The County Council strongly encourages partnership working between Pembury Parish Council and KCC regarding changes around the PRoW network, and would encourage the Neighbourhood Plan to specifically state this. This will ensure consistency both with standards around the county PRoW network and the various applicable statutory procedures, such as when upgrading the status of a Public Footpath to Public Bridleway to establish public access rights for cyclists and horse riders. It will also ensure consistent advice and working can be delivered to neighbouring councils.</p> <p><u>5. Housing</u></p>	Did not say	Yes	See appendix A (KCC Drainage and Planning Policy – a Local Flood Risk Management Strategy Document)

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			<p><i>Policy P5: Sewerage and Drainage Infrastructure</i> Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, recognises that consideration is not given to brownfield development sites in Policy P5. It is advised that the Parish Council reviews the KCC Drainage and Planning Policy document (Appendix A), particularly Policy 2, which gives guidance on acceptable run off rates to use for brownfield development and to therefore reflect these requirements within the Neighbourhood Plan.</p> <p>It is also recommended that reference is made to the County Council's pre-application service, and the Neighbourhood Plan includes encouragement for it to be used alongside that of the water authority, as per page 33 of the document.</p> <p><u>6. Character, Heritage and Design</u></p> <p><i>Policy P6: Conserving Heritage Assets</i> Heritage Conservation: In respect of point A, the correct name for the record of heritage assets is the Historic Environment Record (HER) and the link should go to www.kent.gov.uk/HER. The Heritage Gateway is a portal that presents data from the Kent HER. The County Council is pleased that this paragraph reflects that not all heritage assets are identified in paragraph 6.30 and remain to be identified.</p> <p>In respect of point C, where development proposals have the potential to impact on archaeological remains, KCC advises that a full archaeological desk-based assessment and potentially archaeological fieldwork is needed, rather than just a Heritage Statement. The assessments should be carried out by fully qualified specialists and it is recommended that this is included within the policy.</p> <p><u>8. Environment and Green Space</u></p> <p><i>Biodiversity opportunity areas within Pembury</i></p> <p><u>Biodiversity</u>: The County Council recognises that the Neighbourhood Plan refers to the Biodiversity Opportunity Area (BOA) boundaries. KCC would highlight that, following the production of the Local Nature Recovery Strategy, BOAs may no longer exist. This is because they may be absorbed into the Local Nature Recovery Strategies and the BOAs could be made obsolete. It is therefore recommended that the Parish Council replaces this reference to include the Local Nature Recovery Strategy.</p> <p><u>9. Transport and Movement</u></p> <p><u>Highways and Transportation</u>: The County Council, as Local Highway Authority, is pleased to note that the policies in the Neighbourhood Plan accord with those in the Tunbridge Wells submitted Local Plan and support active travel, which is a key policy for KCC.</p> <p><u>PRoW</u>: As a general statement, the County Council is keen to ensure its interests are represented with respect to its statutory duty to protect and improve PRoW in the county. 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) and the Framing Kent's Future strategy (2022-2026). KCC intends for people to enjoy, amongst others, a high quality of life with opportunities for an active and healthy lifestyle, improved environments for people and wildlife, and the availability of sustainable transport choices.</p> <p>KCC notes that PRoW is the generic term for Public Footpaths, Public Bridleways, Restricted Byways, and Byways Open to All Traffic. The value of the PRoW network is in providing the means to realise many objectives of this Plan and much more. For example, the PRoW network can enhance community connectivity and cohesion; improve local environments by reducing local traffic congestion and improving air quality; support personal health and well-being of individuals and groups; and support local economies, whether in providing passing trade such as with a cafe, or larger supply businesses as with cycle or equestrian users. PRoW should therefore be given positive regard in this Plan.</p>			

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			<p>KCC recognises that the Neighbourhood Plan does not refer to the KCC ROWIP, a statutory strategic document, and would strongly recommend that reference is made variously within the Neighbourhood Plan. This will assist successful partnership working, deliver improvements to the PRoW network in the town, and help avoid loss of access to funding opportunities.</p> <p><i>Policy P13: Improving walking, cycling and equestrian opportunities</i></p> <p><u>PRoW</u>: The County Council welcomes Policy P13, however, would encourage point E to refer to PRoW in general rather than bridleways specifically. By stating that existing PRoW must be retained, the Neighbourhood Plan will support KCC's statutory duty and it would not exclude future enhancements if new Public Footpaths were to be proposed.</p> <p>The Neighbourhood Plan has recognised that future funding is necessary to deliver access projects (paragraph 9.4); however, KCC considers that the detailing where funding may be sourced is vague. Funds collected from future development would typically be used to deliver priority projects across the Borough listed within an Infrastructure Delivery Plan (IDP). The Parish Council is encouraged to promote local access improvements, such as those shown in Figures 9.2 and 9.3, and to compile an on-going list of other schemes across the parish. These could be included in an expanded Item 11 within Section 13, so that they are considered for delivery as part of a future IDP.</p> <p>The compilation of an on-going list of access schemes by the Parish Council will allow residents to continually suggest additions to a projects list and KCC would recommend that this is kept under constant review. Sharing this list routinely thereafter with Tunbridge Wells Borough Council and the County Council will, in the event development comes forward, greatly assist in understanding the needs of the communities when allocating funding and priority. Having a list of potential projects readily available will therefore allow the Parish Council to readily seize opportunities and deliver for the benefit of local communities.</p> <p>KCC would suggest the following additional possible schemes:</p> <ul style="list-style-type: none"> • Upgrade of status to Public Bridleway of the Public Footpath from Pembury village, over the A21 along Chalket Lane to the parish boundary, where it meets Tunbridge Wells Public Bridleway WB43 - this would establish a largely off-road cycling route between Pembury and Tunbridge Wells; • Upgrade of status to Public Bridleway of Public Footpath WT231 that is recorded on the village's western settlement boundary and proposed in part to be improved for horse riders (Figure 9.2, point B). Were the path upgraded from the High Street close to its junction with the A228 through to the northern point of Church Road, it would connect to an existing bridge carrying Public Bridleway users over the A228, so enabling access to the quieter lanes and Public Bridleways north of the A228; • Improving the crossing of the A228 close to Hawkwell Farm to better connect Public Bridleway WT248 with Public Footpath WT208 would be valuable for walkers seeking access to the northern part of the parish and beyond; • The Parish Council could actively create a volunteer group focusing on managing aspects of the local PRoW network, thereby providing opportunities for social interaction, physical activity, a positive public profile, and more. The Neighbourhood Plan already proposes undertaking an audit of footpaths in the parish (it would be expected the audit extends to Public Bridleways also) but a local volunteer group might wish to undertake a programme of minor works, such as surfacing of paths. If this possibly has local support, the Parish Council is encouraged to discuss with the County Council how to develop a group and programme. <ul style="list-style-type: none"> • <u>10. Community Facilities</u> • <i>Policy P15: Improving Opportunities for Community and Cultural Facilities, Sport and Recreation</i> • <u>Sport and Recreation</u>: In respect of paragraph 10.3, the County Council would advise the consideration of the following guidance ‘Make Space for Us - Women In Sport’ for the provision of facilities aimed at teenagers. 			

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			<ul style="list-style-type: none"> The County Council would also highlight that potential funding and support for the provision of improved and additional sports pitches is available via Kent FA, by contacting Adrian Ainsley¹. <u>General Comments:</u> <p><u>Minerals and Waste:</u> The County Council, as Minerals and Waste Planning Authority, can confirm that the area of the Neighbourhood Plan is coincident with safeguarded land-won mineral deposits. These are the superficial sand and gravel deposits (River Terrace and Sub- Alluvial River Terrace deposits), although these are marginal in their occurrence. The more significant mineral deposit is the solid crustal unites of the sandstone (Ardingly and Tunbridge Wells Sand Formation) units that are present. These sandstones are extensive, massive geological units that occur across the Tunbridge Wells Borough area, and have historically been used for construction block production. The supply of this material now largely occurs from quarries in East Sussex; KCC notes that extraction in Kent has ceased in recent times.</p> <p>These safeguarded mineral deposits are shown on the extract from the Tunbridge Wells Borough Council Mineral Safeguarding Area Proposals Map of the Kent Minerals and Waste Local Plan (LMWLP) (2013-2030) (Early Partial Review) (2020) below:</p>			

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			 <p> River Terrace Deposits Sub - Alluvial River Terrace Deposits Sandstone - Ardingly Sandstone Sandstone - Tunbridge Wells Sand Formation </p> <p>The Neighbourhood Plan acknowledges that the Development Plan for the area includes the KMWLP. As the Neighbourhood Plan does not propose any development sites that would require Mineral Assessments, KCC has no management capacity safeguarding objections.</p> <p>The County Council notes that there are no substantive waste management or minerals handling and processing safeguarded infrastructure in the area of the Neighbourhood Plan.</p> <p><u>15. Glossary</u></p> <p>PRoW: The County Council welcomes the various references to 'Rights of Way' and recommends that the Neighbourhood Plan's Glossary includes a definition, in order for all readers have the same understanding. KCC would advise the definition used in Section 9 of this response.</p>			

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			<p>It is also recommended that the Neighbourhood Plan's Glossary is revised to include a definition of active travel. This will ensure that the various references are consistently interpreted and that designers of future developments and Tunbridge Wells Borough Council give it due weight in preparing and determining future planning applications. The County Council would encourage the definition used in the KCC Active Travel Strategy.</p> <p>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.</p>			
8	Linda McCarthy	Transport and Movement	<p>I live in Romford Road.</p> <p>Many years ago the residents of Cornford Lane tried to close the lane to the rat run. Mr Saunders was the then chairman of the Council, it was successfully thrown out. My comment at the time was 'we would all like to live on a private road.'</p> <p>If Kings Toll Road is closed to every one other than residents, walkers etc all that will happen is doubling the traffic towards the top of Wish Hill and Foxhole Lane. It just brings more misery to those who live and use the further parts of the Lane. The real problem are the two roundabouts at Kipping's Cross until this is resolved 'the rat runs 'will continue. Someone was very successful in sorting out the problems on the North Farm Estate, have they any better ideas other than traffic lights, reducing the lanes to one,</p> <p>I personally think that the roundabout at the BP garage is not correct.</p>	Did not say	Did not say	
9	MRPP obo Tesco Stores Limited	Policies P1 and P13	<p>We act on behalf of Tesco Stores Limited, who wish to provide their general support for the proposed Policy P1 of the Pembury NDP which declares support for the proposed 'location of development' as identified in the Local Plan and generally supports the southern extension to Pembury's "limits to built development area". Tesco are also supportive of the principle of the proposed footpath/cycle way/bridal way link from Pembury Road to Chalket Lane. We note that the routes are currently 'indicative' and conclude that this is sensible because they will need to be aligned in the context of the proposed development on the Tesco site and housing to the east. Further details will also need to be agreed relating to alignment, surfacing, lighting and legal status, together with how implementation needs to tie in with development proposals that come forward on the Woodsgate Corner site whether as part of the Borough Council's Local Plan proposal or other development arising from the existing retail use of the site.</p>	Yes	Yes	
10	National Highways	Policies P3 and P5, drainage, movement and transport	<p>We have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will be concerned with plans and/or proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of the Pembury Neighbourhood Development Plan, our focus will be on any potential impact to the in the vicinity of A21 as well as the A21 junction with the A228 in the vicinity of Pembury.</p> <p>Reference is made to our Regulation 14 Consultation and subsequent comments that were submitted on the 19 July 2022. In this context, our comments with regards to the Pembury Neighbourhood Development Plan Regulation 16 consultation are as follows:</p> <ul style="list-style-type: none"> • Site Allocations <p>Pembury Parish Council is located within the Tunbridge Wells Borough Council area, consequently the Neighbourhood Plan must be consistent with the policies set out within the Tunbridge Wells Local Plan. The emerging Local Plan is also material to our considerations. The current Submitted Local Plan categorises Pembury within the retail hierarchy as a 'village settlement', providing day-to-day facilities primarily to its residents. In terms of the proposed strategy (1 April 2021) Pembury is to:</p> <ul style="list-style-type: none"> • Deliver approximately 389-417 new dwellings (54 already have planning permission), through allocations. • Deliver supporting infrastructure improvements, including highways, cycleways, education, health, recreation, allotments, and community learning. 	Did not say	Yes	

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			<p>In assessing the Pembury Neighbourhood Development Plan, it is determined that no additional sites for residential or business/employment development have been allocated relative to the current or emerging local plans. Specific reference is made to Pembury Neighbourhood Plan 2020-2038, Basic Conditions Statement (November 2022) - Policy P2: Meeting Local Housing Needs states that: “Whilst the PNP does not seek to allocate housing sites, it does seek to influence the sort of housing delivered.” Eight site allocations within the Parish of Pembury are set ge Wells Local Plan and reference to these allocations are made in Appendix 1 of the Neighbourhood Plan.</p> <ul style="list-style-type: none"> • Policy P5: The Sewage and Drainage Infrastructure policy outlines that there is a problem with drainage in the southern end of the village, due the combined sewer system in the area. <p>It is noted that paragraph 6.21 – “<i>Clearly flooding is a problem, and the quantum of development anticipated in the SLP will need to be carefully planned</i>”. The A21 is mentioned within this context and various options are proposed. It is however noted that funding is required to resolve this as highlighted under section - <i>Pursue separation of the foul sewer network: This is a longer-term strategy that would require significant funding and partnership working between the key agencies (Kent County Council, Southern Water, National Highways, TWBC and the Parish Council).</i></p> <ul style="list-style-type: none"> • Drainage: We note the stated requirement for developers to consult National Highways has been included in paragraph 6.21 - Natural flood management and the use of Sustainable Drainage Systems. We would be content to discuss a wholly separate drainage solution taking water from one side of A21 to the other and away. But any drainage must not be connected to the SRN drainage, nor carry any risk to the safety, reliability, and operation of the SRN. <p><i>“In addition, developers of sites within the vicinity of the strategic route network are required to liaise with National Highways at the earliest opportunity with regards drainage matters. In accordance with national policy contained in Department for Transport Circular 2/13, no surface water from sites may drain onto the strategic route network nor any connections made to the associated drainage system.”</i></p> <p>ACTION: It should be noted that in accordance with New National Policy in Department for Transport Circular 01/2022, - Paragraph 59 - To ensure the integrity of the highway drainage systems, no new connections into those systems from third party development and proposed drainage schemes will be accepted. Where there is already an existing informal or formal connection into the highway drainage system from a proposed development site, the right for a connection may be allowed to continue provided that the flow, rate and quality of the discharge into the highway drainage system remains unaltered or results in a betterment. The company may require a drainage management and maintenance agreement to be entered into to secure this requirement in perpetuity.</p> <p>4) Walking & Cycling route: In principle, we welcome improvements to walking and cycling routes in the area and request that we are consulted on any proposals near the A21 at the earliest opportunity to ensure that the safe and efficient operation of the SRN for all users is not adversely affected. This is of particular importance as identified in paragraph 9.2 – “ <i>However, the presence of the A228 and the A21 impact significantly on Pembury. This is particularly notable at peak times or when there have been accidents and delays on the strategic route network, causing traffic to divert through the village and along the more rural roads,</i>” we should be read in conjunction with paragraph 9.7 that highlights the following two main areas of concern:</p> <ul style="list-style-type: none"> • Redirecting HGVs away from rural lanes – a dialogue with Kent County Council and National Highways would help to consider ways to re-route vehicles, for instance by altering Satnav guidance provided to private companies. • Problems associated with rat-running, where Pembury routes are used by drivers to avoid congestion on the A21. <p>ACTION: Continual engagement with National Highways to discuss aspirations to improve walking and cycling close to the A21 as well as to limit the use of rural lanes.</p> <p>5. Character, Heritage and Design</p>			

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			<p>With reference to Policy P3: Character and Design of development, paragraph 6.8. The 12 principles that the Pembury Design Codes, principle 5 – “<i>Prioritise a well-connected green system, creating and connecting green spaces and corridors and promote alternative forms of transportation. Establish a 40m green buffer band parallel to the A21 in order to mitigate visual impact to and from the AONB.</i>”</p> <p>ACTION: A minimum of 40m landscape buffer must be maintained along the A21 for National Highways to be able to carry out its roles/responsibilities, including maintenance and/or improvement covered by our Permitted Development Rights as a Strategic Highway Authority. National Highways we will work with all promoters of sites adjoining the A21 to agree suitable green/landscaping to avoid any undue fettering within the buffer band.</p> <p>6. Department for Transport Circular 2/13 has been updated to that of Department for Transport Circular 01/2022 that was published Friday 23rd December 2022.</p> <p>ACTION: Reference to the new circular will need to be made.</p> <p>The Climate Change Committee's 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up. Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of PAS2080 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption. These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.</p> <p>Conclusion</p> <p>As you will note from the above, we have No Objections to the draft Neighbourhood Plan, but have a few comments to bear in mind as the Plan progresses. Please do continue to consult us as the Plan progresses so that we can remain aware of, and comment as required on its contents. Should you have any queries regarding our response, please contact us via planningse@nationalhighways.co.uk.</p>			
11	Natural England	General	Natural England does not have any specific comments on the Pembury Neighbourhood Plan.	No	Did not say	
12	Southern Water	General	<p>Thank you for your email below inviting Southern Water to comment on the Pembury Neighbourhood Development Plan. I confirm we have reviewed the Plan with interest and have no comments to make at this submission stage.</p> <p>We look forward to being kept informed of the Plan's progress.</p>	Did not say	Yes	
13	Stantec obo Obsidian Strategic Asset Management	Housing provision, transport and highways, local green spaces	<p>We act on behalf of Obsidian Strategic Asset Management Limited ('our client') and have been instructed to submit representations to Pembury Parish Council's (PPC's) Pre-Submission Pembury Neighbourhood Development Plan (Regulation 16) Consultation ('the Draft Neighbourhood Plan').</p> <p>This representation supports the Draft Neighbourhood Plan strategy and in particular the recognition of the allocation of land at Hubbles Farm and South of Hasting Road, Pembury ('the Site') for residential development in accordance with Policy AL/PE2 of Tunbridge Wells Borough Council's Submission Local Plan. However, we seek to make some further, hopefully helpful, minor comments to the draft policy document to ensure it is fully effective and justified.</p> <p>Representations</p> <p><u>Housing Provision</u></p> <p>To ensure an appropriate housing mix is achieved, Policy P2 requires that other than in development designed to meet an identified specialist housing need, the mix of housing sizes, types, tenures, and affordability in proposed development should assist in meeting needs identified in the most recently available Pembury Local Housing Needs Assessment.</p> <p>Whilst we support this in principle, we welcome the reflection that this should be pursued “<i>in so far as is reasonably practicable and subject to viability</i>”. The increasing pressures on development to fund infrastructure and evolving policies and guidance on affordable housing requires flexibility and pragmatism, otherwise developments may not come forward in the event they are unable to practically and viably meet the standards out at Policy P2.</p>	Yes	Yes	

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			<p>The addition of First Homes as an affordable housing requirement is also significant. Government notes that:</p> <ul style="list-style-type: none"> • must be discounted by a minimum of 30% against the market value; • are sold to a person or persons meeting the First Homes eligibility criteria; • on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and, • after the discount has been applied, the first sale must be at a price no higher than £250,000. <p>First Homes by their definition are unlikely to be larger 3-4+ bed homes and should account for at least 25% of all affordable housing units delivered through planning obligations. This may therefore have a bearing on dwelling size mix advocated in Policy P2 and Figure 5.1.</p> <p>Whilst we also appreciate the ambitions of Policy P2 to support proposals that enable an uplift to the discount provided in the First Homes element of the development (to assist single occupants on median and lower quartile income), we do not consider there is sufficient evidence to support a discount aspiration 'of 50%' without it affecting the viability and deliverability of schemes for developers. We consider that Part A iii should be revised to remove reference to 'of 50%', to better align with the government guidance, as this could hold significant implications for viability.</p> <p><u>Transport and Highways</u></p> <p>The pre-text to Policy P13 cites accidents and delays on the strategic route network as a significant challenge, causing traffic to divert through the village and along the more rural roads. The policy outlines that Hastings Road and the High Street are affected in this way and reductions in volume and speed of motor traffic along this route, which is heavily used by pedestrians and cyclists must be encouraged.</p> <p>Policy P13 also highlights that feedback from the Community Survey and local workshops revealed a particular concern about accessibility and safety through the village centre, where cycle lanes are limited and often filled with parked cars. Clearly, the safety and functionality of Hastings Road and the High Street is integral to the Site, given that it is proposed that access into it will be taken from here. It is positive that discussions have already taken place with DHA Transport, Pembury Parish Council and Kent County Council (KCC) Highways Team in support of 'downgrading' the speed of the road, as part of a traffic calming scheme, so as to address these issues and to improve its safety.</p> <p>Accordingly, whilst we support the broad principles outlined within Policy P13, we consider that the policy could be further refined to better reflect the most up-to-date discussions on the matters and could include more specific reference to the downgrading of the speed limit on the High Street and Hastings Road to improve safety and facilitate a better cycling and walking environment.</p> <p>Local Green Spaces</p> <p>Policy P9 designates Local Green Spaces within Pembury that are demonstrably special to the local community. We support the allocation of such spaces and their continued protection within the Neighbourhood Plan.</p> <p>As a point of clarification, Policy P9 refers to Local Green Spaces listed in para 8.18 – this should read 8.20. In accordance with the requirements of TWBC Submission Plan Policy AL/PE2, the layout and design of the emerging proposals for the Site includes no built development located south of the existing Pembury Cemetery, as this land is safeguarded for future cemetery expansion as indicated on the site layout plan of the Submission Plan.</p> <p>This space could therefore be allocated as new Local Green Space, which will allow for the space to be utilised by the public in the period prior to the area being required for cemetery expansion as well as afterwards.</p>			

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			<p>Summary and Conclusions</p> <p>Overall, we are supportive of Pembury Parish Council's Neighbourhood Plan and welcome their aspirations to address housing need in accordance with Tunbridge Wells Borough Council's Submitted Draft Local Plan.</p> <p>We trust that these representations will be considered and look forward to receiving details of the Examination.</p> <p>In the meantime, should you require any additional information please do not hesitate to contact Dan Melling eme Warriner at this office.</p>			
14	Countryside Partnerships	Whole Plan	<p><u>Policy P1 – Location of Development</u> As it was the case in the Pre-Submission Version Document for consultation at Regulation 14, the Submission Version continues to support the sites allocated for development in Pembury in the Tunbridge Wells Local Plan. We continue to fully support this approach. We are aware of the Inspector's response (November 2022) on the Tunbridge Wells Submission Local Plan and the Council's response (December 2022). The issues raised by the Inspector in particular relate to the new settlement in Tudeley and the wider strategy for Paddock Wood. No specific concerns have been raised for sites that are allocated in Pembury. Whilst the Tunbridge Wells Local Plan process is likely to be delayed given the amount of additional work that needs to be undertaken to address the Inspector's concerns, allocated sites for Pembury would continue to strongly contribute towards the needed housing in the Borough up to 2038. An extensive amount of work and Green Belt assessment have been undertaken by the Borough Council to justify the release of sites from the Green Belt within Pembury. One of these sites is allocation AL/PE3, which is a suitable site that is deliverable and which will also contribute to sustainable development objectives and will maintain the 5 year housing land supply.</p> <p><u>Policy P2 – Meeting Local Housing Needs</u> The approach to deliver a good mix of dwelling sizes as part of development is supported in principle. However, as raised in our previous submission (a copy of which attached and we would kindly request for it to be given regard to as part of the current Submission Version consultation), we remain concerned about the particular mix being sought in the policy. We request that our previous submissions (dated 18 July 2022 and copy attached) on this matter are taken into consideration for the purposes of the Submission Version consultation. We reiterate the need to recognise that a more flexible approach towards the housing mix provision better meets the changing needs of the community as opposed to emphasising the need to deliver smaller sized houses. It is also important to ensure that the housing needs assessments across the Borough is updated to respond to the needs. In line with the Government's policy, we welcome the introduction of and requirement for First Homes, which the development of Site AL/PE3 would deliver as part of the affordable housing units.</p> <p><u>Policy P3 – Character of Development</u> We kindly request for our previous representations (dated 18 July 2022 and copy attached) to be taken into account on this policy.</p> <p><u>Policy P5 – Sewerage and Drainage Infrastructure</u> We kindly request for our previous representations (dated 18 July 2022 and copy attached) to be taken into account on this policy.</p> <p><u>Policy P10 – Managing the Environmental Impact of Development</u> We kindly request for our previous representations (dated 18 July 2022 and copy attached) to be taken into account on this policy.</p> <p><u>Policy P11 – Protection of Locally Significant Views</u></p>	Yes	Yes	See Countryside Partnerships Regulation 14 representation on page 30

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			<p>We kindly request for our previous representations (dated 18 July 2022 and copy attached) to be taken into account on this policy.</p> <p><u>Policy P13 – Improving Walking, Cycling and Equestrian Opportunities</u> The need for new developments to ensure safe and improved pedestrian and/or cycle links with the existing sustainable means of network is recognised and fully supported. This is particularly relevant for the allocation of Site AL/PE3, which would deliver a continuous east-west cycle route that will connect with National Cycle Route 18 on the High Street. As a result of the development of this site, there would also be opportunities to provide a cycle route link from the southern edge of the settlement of Pembury, running south over the A21 to link with the east side of Royal Tunbridge Wells at Hawkenbury.</p>			
15	Countryside Partnerships	Basic Conditions Statement	<p><u>Table 2.2: Assessment of how each policy in the Pembury Neighbourhood Plan conforms to the NPPF</u></p> <p><u>Policy P1: Location of Development</u> As per our previous submission on the Regulation 14 consultation, dated 18 July 2022 and a copy of which is enclosed, we support the approach in the Pembury Neighbourhood Plan (PNP) in carefully allocating sites that synchronise with the Submission Local Plan (SLP) and that respect the protection of the High Weald Area of Outstanding Natural Beauty and Green Belt. The allocated sites have been based on an extensive and robust evidence to ensure that they are in the most appropriate places to ensure that the objectives of sustainable development are met and the character of the countryside and national designations are protected and enhanced.</p> <p>Draft site allocation AL/PE3 in the SLP (Policy AL/PE3) is for residential development providing approximately 80 dwellings, of which 40% to be affordable housing. The allocation of this site for residential development is fully supported by Countryside Partnerships who have full land control (supported by the landowner) and are seeking to deliver housing at the earliest opportunity in the plan period.</p> <p>Countryside Partnerships recognises that it is critical that housing is delivered particularly in the early stages of the Local Plan period before the strategic sites. This site is readily available and within the control of a national house builder with a track-record of delivery within the borough and covenant for the construction of high-quality dwellings. In light of this, through the necessary technical and layout design work that respond to the allocation policy criteria and working closely and collaboratively with the Parish Council and Borough Council, this allocation will be delivered if it is agreed that the SLP is sound.</p> <p>Draft Site Allocation AL/PE3, therefore, represents a genuine deliverable opportunity for quality housing development consistent with the wider objectives of the PNP, SLP and NPPF.</p> <p>An appropriate end date both for the PNP and SLP is at least 2038, allowing sufficient guidance for development across this plan period. This date will allow the SLP to take a long-term view and provide greater certainty on a framework within which further reviews can take place and how larger strategic sites will be delivered. Through the allocation of site AL/PE3, there will be an opportunity to develop suitable land that will assist in meeting the housing need (both market and affordable) in the Parish in the short term in a sustainable manner whilst ensuring that there is an approximate mix of housing.</p> <p>Therefore, the allocation of AL/PE3 is supported as it represents a sustainable location with sustainable development benefits and it contributes to meeting the housing need.</p> <p><u>Policy P2 – Meeting Local Housing Needs</u> The approach to deliver a good mix of dwelling sizes as part of development is supported in principle. However, as raised in our previous submission on the Regulation 14 consultation, dated 18 July 2022 and a copy of which is enclosed, we remain concerned about the particular mix being sought in the policy.</p> <p>We request that our previous submissions (dated 18 July 2022 and copy attached) on this matter are taken into consideration for the purposes of the Submission Version consultation. We reiterate the need to recognise that a more flexible approach towards the housing mix provision better meets the changing needs of the community as opposed to emphasising the need</p>	Yes	Yes	

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			<p>to deliver smaller sized houses. It is also important to ensure that the housing needs assessments across the Borough is updated to respond to the needs. This is particularly relevant for the provision of family housing in all tenures following the pandemic. Most of the housing needs assessments by Local Authorities pre-date the pandemic which has led to a noticeable shift in working culture, emphasising the need for homes that enable working from home that should be recognised in the mix standards set by planning policies.</p> <p>The National Planning Policy request Local Authorities to accommodate needs having regard to provision of new and flexible working practices as opposed to purely anticipated accommodation needs during policy drafting. This should be given material weight in order to allow scope for flexibility in the housing mix delivery.</p>			
16	South East Coast Ambulance Service NHS Foundation Trust	Housing and infrastructure	<p>Following the merger of Surrey, Sussex and Kent NHS Ambulance Services in 2006, SECamb now operates Emergency 999 and NHS 111 Clinical Assessment Service (CAS) across Surrey, Sussex, Kent and North East Hampshire. Having inherited an estate of largely physically, functionally and economically obsolete ambulance stations, SECamb is implementing its more flexible and efficient “Make Ready” operational model – a network of hubs across the region with specialist teams to “make ready” (maintain, deep clean and stock) emergency vehicles and to which crews centrally report to collect a “made ready” vehicle on shift commencement. This ensures the more efficient turnaround of vehicles by specialist teams rather than leaving vehicle preparation to ambulance crews at multiple small traditional ambulance stations.</p> <p>The “Make Ready Centres” (MRCs)/hubs are then surrounded by “spokes” of small ambulance community response posts (ACRPs) across each Make Ready operating unit area. ACRPs provide community-based welfare facilities for crews that are active on shift – often co-located with other blue light or public sector facilities. ACRPs are small flexible facilities which can be relocated and increased/decreased in number as patient demand varies over time. More information on Make Ready is available at this link: https://www.secamb.nhs.uk/what-we-do/about-us/make-ready/ Our first Make Ready Centre was opened in Paddock Wood in 2011.</p> <p>The proposals within the Pembury Neighbourhood Development Plan, together with other new housing development across the South East will put pressure on existing MRC capacity meaning that further strategically located MRCs may well be required going forward. In the medium term the existing Paddock Wood MRC (which serves Pembury), will need to be replaced with a larger facility – and even larger as a result of the 400 plus new homes proposed in the Neighbourhood Development Plan. 400 plus new residential units will generate increased demand on SECamb with the likely need for additional strategically located ACRPs as well as greater MRC capacity. We believe that this emergency service infrastructure requirement should be reflected in the Neighbourhood Development Plan with a view to appropriate developer contributions in due course.</p>	No	Yes	
17	Justin Cumberlege	Section 9	<p>There is a failure to consider and require safe cycle ways from north to south of the village or other routes - for example from Woodsgate Corner, along Woodhill Park, through the recreation ground and along the Ridgeway to get to the school. Cycle ways should be designed away from traffic and safe for a competent 12 year old to cycle. Currently the plan shows very limited, very short and interrupted cycle way at the south of the village only. However it is proposed to develop the green belt at the north of the village where car congestion is already bad because of the school so cycling should be encouraged. There is no provision for parking cycles in the village centre or health centre.</p>	Yes	Yes	
18	Anna Hawkins on behalf of The British Horse Society	Policies 1 and 15	<p>Policy 1 - we (The British Horse Society) remain concerned about the proposed development site PE4 as Church Road is a currently used access road to the bridleway bridge. Stronger assurances must be made that there will be provision for equestrians in terms of access in all the proposed development sites.</p> <p>The bridleway network around Pembury is disjointed and does not function as a safe off-road network. There is an opportunity to improve this by collaboration and consultation between ourselves and developers and policy makers.</p> <p>Policy 15 - we remain concerned that there is a lack of provision of a British Horse Society approved equestrian centre where children and adults can learn to ride.</p>	Yes	Yes	
19	Elizabeth Wilkins	Movement and transport (Kings Toll Road)	<p>What mitigations would be placed to stop traffic from diverting from Kings Roll Road down to Wish Hill where blind bends and single track lanes on a steep hill consistently cause a danger? Would this solve the problem of Kings Toll Road but create a more dangerous issue on Wish Hill? This situation is already dangerous and residents regularly divert 3 miles to drive</p>	Yes	Yes	

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			through Pembury Village due to the cars coming down Wish Hill during rush hour, preventing residents from coming up the hill to get home.			
20	Mark Clinch	Movement and Transport (Kings Toll Road)	I object. This ridiculous proposal will further adversely affect the appalling risk to life on Romford Road caused by traffic avoiding the Kippings Cross roundabout. Stop tinkering and address the real problem - inadequate capacity beyond Kippings Cross.	No	Yes	
21	Ruth Alston on behalf of the A21 Rat Run Group	Policy 13 and Section 13	<p>On behalf of the A21 Rat Run Group (Pembury & Matfield), I write to register our formal response to the submission version of the Pembury Neighbourhood Plan.</p> <p>POLICY P13 SECTION 9.7</p> <p>Bullet 3. Redirecting HGVs away from rural lanes The Group also recommends the use of traffic signs warning that the rural lanes are not wide enough for HGVs, as well as traffic calming measures such as width restrictions at entry points to rural lanes.</p> <p>Bullet 4. Problems with Rat Running See the attached Pembury Rat Run Group's Report A21 Rat Run: Summary Briefing.</p> <p>SECTION 13 NON POLICY ACTIONS</p> <p>8 Enhancing biodiversity The Rat Run Group suggests replanting the damaged KCC-owned verge along Romford Road near Alban's Lodge, with the appropriate vegetation that used to be there recently. This would restore lost pollinator habitat, and improve biodiversity. It would also act as traffic calming on this part of the rat run, and help to lessen the number of accidents on Wish Hill. The Rat Run Group has been offered volunteer help with this by the Kent High Weald Project.</p> <p>12 Rat-running through Pembury, especially when traffic problems on the strategic routes It is unsound to propose to manage Kings Toll Road with respect to through motor traffic so it is for residents, cyclists, equestrians and pedestrians only. This is not a solution as several local rural lanes also have equally severe rat running problems from A21 congestion. It moves the problem around, but overall it will result in worse problems. There would be increased overall detriment from this increased traffic density in Romford Road.</p> <p>Romford Road will become more hazardous as the traffic rerouted from King's Toll Road, will:</p> <ul style="list-style-type: none"> • Result in more congestion, especially during rush hours • Increase the danger to cyclists, walkers, horse-riders, and other drivers, both directly, and by the increased potholes which more traffic would cause. • Increase accidents, especially in those parts where speeding traffic confronts a narrow single-track section of the road. • Increase local air pollution • Increase the danger to young children living locally. <p>To divert traffic from King's Toll Road is simply to push the A21 rat running problem entirely onto Romford Road, which is totally unsuitable for acting as the A21 By-Pass. It has single track stretches of carriageway, 11 feet wide, three accident Black Spots, a twisty steep hill with several blind bends, a National Cycleway along the whole road, the long-distance High Weald Landscape Trail which goes along part of the actual road, and junctions with several other Public Footpaths, one of which also goes along the actual road. It also has horse-riders from King's Toll Road.</p> <p>The Group recommends that all the rat run lanes are treated in a holistic and strategic manner, in accordance with the intervention principles of nil detriment so that no rat run site here is damaged by intervention on another adjacent rat run site.</p>	Yes	Yes	See A21 Rat Run Summary Briefing on page 36

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			<p>The traffic calming and management measures suggested in the Group's A21 Rat Run Summary Briefing (attached supporting document) should be implemented along all the affected rat run lanes equitably and include:</p> <ul style="list-style-type: none">• Width restriction at entry points to the rat run network to make HGV access difficult.• Appropriate vegetation at the sides of the lanes to retain the tarmac width, and prevent speeding.• Local Signs to deter HGVs• A21 signs 'Local Traffic only' as used elsewhere on the A21 and A2• Consideration of the Quiet Lanes recommended by CPRE and already used by KCC in other AONB areas, such as Sevenoaks.												
22	Graham Land and Development	Policies P1, P2, P3, P4, P5, P6, P8, P10, P13, and P15	<p>These representations are submitted by Graham Land and Development in response to the Pembury Neighbourhood Development Plan Regulation 16 Consultation.</p> <p>Graham Land and Development is a family run healthcare business which owns and operates 9 nursing homes and care facilities in Surrey and Kent, including the existing 76 suite care home at Cornford House in Pembury which falls within the Pembury Neighbourhood Plan Area.</p> <p>Graham Land and Development is fully supportive of the key land use and design principles outlined within the Submission Version of the Neighbourhood Plan (SVNP), including the proposed extension of the Limits to Built Development to incorporate their existing care home site and other sites allocation in the Tunbridge Wells Submission Local Plan (TWSLP). In accordance with an extant planning consent granted in September 2018, Graham Land and Development is committed to implementing a sensitive scheme for the development of under-utilised land to the north of the existing care home to provide a new a 68-suite integrated retirement community, including the provision of a community day care centre. This scheme will deliver significant benefits for the local community, meeting a recognised need for older person's care accommodation, freeing up local family housing, creating jobs within the community and delivering environmental and footpath improvements.</p> <p>In this context, the following comments are made in respect of the Submission Version of the Neighbourhood Plan (NP):</p> <table><tr><th>Policy/Paragraph</th><th>Nature of Representation</th><th>Justification</th></tr><tr><td>Paragraph 4.2</td><td>Support with comments</td><td><p>At paragraph 4.2 the SVNP refers to the site allocations for Pembury as proposed within the TWSLP. These allocations are then listed in Appendix A of the SVNP and the extent of the Limits to Built Development is identified on the various maps within the Plan as being extended to include the proposed site allocations.</p><p>Graham Land and Development fully supports the extension of the Limits to Built Development to Pembury to ensure consistency with the TWSLP. However, for clarity, it is recommended that the list of site allocations in the TWSLP is also included within the main body of the SVNP.</p></td></tr><tr><td>P1 – Location of Development</td><td>Support with comments</td><td><p>The text at paragraph 4.3 notes that the SVNP does not allocate sites for housing on the basis that housing supply is being addressed through the strategic site allocations in the TWSLP. However, to provide greater certainty to developers, and to ensure consistency with the TWSLP, it is recommended that the wording of Policy P1 be amended to confirm that the SVNP is supportive of development on the sites identified in the TWSLP. The following revision is proposed:</p></td></tr></table>	Policy/Paragraph	Nature of Representation	Justification	Paragraph 4.2	Support with comments	<p>At paragraph 4.2 the SVNP refers to the site allocations for Pembury as proposed within the TWSLP. These allocations are then listed in Appendix A of the SVNP and the extent of the Limits to Built Development is identified on the various maps within the Plan as being extended to include the proposed site allocations.</p> <p>Graham Land and Development fully supports the extension of the Limits to Built Development to Pembury to ensure consistency with the TWSLP. However, for clarity, it is recommended that the list of site allocations in the TWSLP is also included within the main body of the SVNP.</p>	P1 – Location of Development	Support with comments	<p>The text at paragraph 4.3 notes that the SVNP does not allocate sites for housing on the basis that housing supply is being addressed through the strategic site allocations in the TWSLP. However, to provide greater certainty to developers, and to ensure consistency with the TWSLP, it is recommended that the wording of Policy P1 be amended to confirm that the SVNP is supportive of development on the sites identified in the TWSLP. The following revision is proposed:</p>	Yes	Yes	
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					"Development in the neighbourhood area, including on sites allocated within the Tunbridge Wells Local Plan, will be supported within the extended Limits to Built Development as defined in Figure 4.1..."			
			Policy P2: Meeting Local Housing Needs - Support	Support with comments	Graham Land and Development strongly supports the SVNPP objective to meet a range of local housing needs, including specialist housing options for older people. Although the wording of the policy does not preclude sites coming forward for specialist housing needs, it would be helpful for the supporting text at paragraph 5.12 to list those sites which are being promoted to address these needs. This includes the following sites as identified in the TWSLP: Policy AL/PE 6 Woodsgate Corner, Pembury Policy AL/PE 7 Land at Cornford Court, Cornford Lane Policy AL/PE 8 Owlsnest, Tonbridge Road			
			Policy P3 - Character of Development	Support with comments	The general design principles set out in Part A of the policy are supported. However, it is recommended that requirement to reflect the 'hotch-potch' of architectural variety in the locality be removed. This reference is confusing, as it is not clear which style should be followed and, by definition, this suggests a confused design approach. For clarity, and to promote high quality design, the following revision to the wording of the policy is proposed: The scale, character, and siting of the proposal should respect the landscape and its features, valued views into and out of the settlement, the local streetscape and heritage assets. It should respond positively to the reflect the 'hotch-potch' of architectural variety found locally, using materials that are in keeping with those used in existing buildings in the immediate locality... The design principles set out in Part B of the policy are sound and provide a robust basis against which schemes can be appraised.			
			Policy P4: Energy Efficiency and Design	Support				
			Policy P5 – Sewerage and Drainage Infrastructure	Support				
			Policy P6 – Conserving Heritage Assets	Comment	The general approach towards the protection of non-designated heritage assets is noted. However, to accord with paragraph 203 of the Framework, the policy might be amended to confirm whether a different approach is to be taken in considering proposals relating to non-designated heritage assets relative to those involving designated heritage assets.			

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			Policy P8 – Green and Blue Infrastructure and Delivery Biodiversity Net Gain	Support				
			Policy P10 – Managing the Environmental Impact of Development	Comment	Under Section B (ix) development proposals are required to incorporate open space that is accessible to the general public. This is not always appropriate, for example, in the context of a care environment where the safety of residents needs to be secured. The words ‘where appropriate’ should therefore be added before the text at B(ix).			
			Policy P13 – Improving Walking, Cycling and Equestrian Opportunities	Support with comments	<p>The objective of Policy 13 to encourage enhanced footpath and cycleway connections is fully supported.</p> <p>In promoting its new development at Cornford Court, and in response to on-going dialogue with the Parish Council, Graham Land and Development have identified an opportunity to provide a new footpath link adjacent to the northern and eastern site boundaries of their land to facilitate access between the village centre/Tesco and housing to the east (both existing and proposed). This potential route might reasonably be included within Figures 9.2 and 9.3.</p>			
			Policy P15 – Improving Opportunities for Community and Cultural Facilities	Comment	The reference in Policy P15 to ‘paragraph 10.2’ should be amended to ‘paragraph 10.3’ to be consistent with the text that precedes it.			
23	Mr Sean McQuillan	Housing Development	<p>"Site PE4 I understand the rationale behind identifying sites PE 1 to 3 for development. In Part 3 of the PNP section 3.2 Neighbourhood Plan Objectives, development at site PE4 contravenes the intentions of Objectives 3 and 4.</p> <p>The impact of development at this location outweighs the benefit of adding the proposed 25 houses to the overall housing stock. Development in to the Green Belt at this northern location of the village must be avoided. Building on site PE4 does not meet the requirements of POLICY P1: LOCATION OF DEVELOPMENT part B.</p> <p>With reference to Section 6 of the PNP, CHARACTER, HERITAGE, AND DESIGN, section 6.8, development would result in the loss of assets that are rightfully identified as valuable in Principle 1."</p>			Yes	Yes	
24	Anne and Geoff Wallace	Movement and transport (Kings Toll Road)	<p>Reasons to object to King's Toll Road becoming pedestrian Rat run traffic will be diverted along Romford Road. The rat run problems in Romford Road are at least as serious as those in King's Toll Road, and need to be given equal priority, rather than made worse.</p> <p>Why Romford Road is unsuitable for even more traffic</p> <ul style="list-style-type: none"> • Parts are single track 11 feet wide • Several blind bends • National Cycleway no.18 goes along the whole road • Public Footpaths along parts of the road • Used by horse-riders and walkers accessing footpaths and permissive bridleways • Excessive speeding in parts, e.g. near Alban's Lodge • Wish Hill is steep, narrow, and has blind bends. 			No	Yes	

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			<ul style="list-style-type: none"> • Accident Black Spots at Wish Hill and Snipe Wood Bend footpath junction, near Easter Hill. <p>Increased Dangers from Increased Traffic Density because of Traffic diverted from King's Toll Road</p> <ul style="list-style-type: none"> • More congested traffic would increase the danger to cyclists and drivers by the increased number of potholes which more traffic would cause • Accidents would increase, especially in parts where speeding traffic confronts a narrow single-track section of the road. • Local air pollution would increase • Increased danger to young children living locally • Much mention is made in the local plan of the value of the local footpath network. Many of these paths and two permissive bridleways are regularly accessed from Romford Road and any additional increase in traffic would worsen the potential danger to walkers and riders <p>Conclusion This plan is not a solution. It moves the problem around, but overall it results in a worse problem</p> <p>Recommendation We recommend that Pembury's Neighbourhood Plan is amended to 'explore opportunities to manage better Woodside Road, Romford Road, and King's Toll Road to mitigate danger and damage from rat running throughout the whole network, using appropriate traffic calming and management, to ensure no detriment to any part of this network.</p>			
25	Chris Metcalfe	9.4	<p>In relation to section 9.4 - 'Areas where improvements to the current network can be made', there would seem to me to be a clear opportunity now that the A21 work has been completed, to provide a quality cycling link from the North side of the village, through Church Road, over the bypass and up Old Church Road and Pembury Walks to meet with the existing A21 cycle path (for clarity, I have highlighted this in yellow on the attached map).</p> <p>This would connect the North side of the village with existing off road cycling routes to both Tunbridge Wells and Tonbridge. This would also provide opportunities with connecting the North and South sides of Pembury (as well as connections to the National Cycle network route 18 via Romford Road) where the current plan only discusses connections between East and West of the village.</p>	Yes	Yes	See map on page 34
26	Chris and Kathy Wallwork	Policy P10 p55 and Policy P13 9.4 p64	<p>Policy P10: Greater emphasis on insisting that natural features such as hedgerows are retained and a firm hand used when inspecting the designated sites during development is essential to prevent further loss of these natural features. Hedgerows designated to be retained in the Sturgeons development were grubbed out at the start of the works there, leading to loss of habitat, nature pathways and natural attractiveness/amenity. It appears that nothing was done about this by the authorities.</p> <p>Policy P13: J needs clarifying: Cycle path needs to be between the footpath and the area used for car parking. A successful arrangement has been achieved around Kew Gardens on Kew Road (albeit with double yellow lines to prevent parking), using bollards to prevent parking and driving in the cycle lane. Screenshot attached showing the arrangement along Kew Road.</p>	Yes	Yes	See image on page 35
27 (late received 7 th Feb)	Sarah Clarke	Transport and movement	<p>It is accepted that the Neighbourhood Plan cannot address the Local Plan, proposed housing development within the Parish, the lack of additional facilities and the impact on the existing infrastructure, including highways.</p> <p>The Plan encourages the future residents to be proud of their village, the environment and its position as a rural adjunct to Tunbridge Wells. In the plan it is proposed that Kings Toll Road, leading from Romford Road to the B 2160 should be pedestrianised with access only for residents, to alleviate the "rat run" problems. Apart from the fact that this would need to be policed, traffic would then be diverted onto Wish Hill from Romford Road, Bramble Reed Lane and Foxhole Lane leading to the dangerous junction with Crittenden Road in Matfield.</p> <p>This linked with the proposals for the reduction in the access from the B 2160 at Kippings Cross may make this a worthy project, but this cannot be realised in isolation to a full and proper discussion on the problems of the A 21, both for Pembury and the surrounding areas.</p>	Did not say	Did not say	
28	TWBC		Thank you for the invitation for TWBC to provide comments on the Pembury Neighbourhood Plan..	Yes	Yes	See table of officer comments

Response Number	Name/ Organisation	Which part of Plan does response refer to?	Response	Do you wish to attend examination hearing?	Would you like to be notified of the Council's decision regarding the outcome of the Paddock Wood Neighbourhood Plan?	Supporting Documents
			<p>I am very keen that the detailed comments presented below are not read as criticisms: rather, they are suggestions as to how policies, which are (in the main) supported, could potentially be strengthened.</p> <p>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).</p> <p>General comments:</p> <p><u>Relationship between a NDP and the adopted/emerging Development Plan</u></p> <p>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.</p> <p>At this time, as you are aware, the Development Plan comprises saved policies in the TWBC Local Plan (2006), the Core Strategy (2010), the Site Allocations Local Plan (2016) and the Kent Minerals and Waste Local Plan 2013-30, updated to a period 2023-2038 (2021).</p> <p>The emerging Local Plan 2020-2038 was subject to a Regulation 19 consultation which ran from 26 March to 4 June 2021, and was submitted to the Planning Inspectorate on 1 November 2021. An Examination in Public (EiP) took place between March and July 2022. The Inspector's initial findings were received in November 2022, and the Council is required to consider the issues raised and the suggested ways forward. The Council's initial response was sent to the Inspector on 22 December 2022, and confirmed that at this time it is not possible to put a timeframe on determining the most appropriate approach to the issues raised by the Inspector's initial findings which will need to be underpinned by a clear understanding of and the requisite appraisal of options. The Council confirms that it remains committed to have an adopted Local Plan in place as soon as practicable and continues to work towards this end.</p> <p>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.</p> <p>The Pembury 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.</p> <p><u>The TWBC detailed comments, are broken down by section of the plan, and presented in a table. They are attached to this letter.</u></p> <p>Concluding comments</p> <p>I trust the above is of assistance. It may be pertinent to schedule a meeting 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.</p>			beneath this table

TWBC Officer Comments

Policy/Page number	Policy Details	Comments	Proposed changes
General			

All of the plan	Accessibility requirements	The plan meets all accessibility requirements.	No changes proposed.
All of the plan	Map e.g Figure 4.1 and others in the NDP	These show existing and proposed Limits to Built Development – this should be clearly identified as the TWBC adopted/proposed Plan	Consider amending, for clarity.
1. Introduction			
Page 2, 4 th para	Forward	4 th para refers to ‘last September’	Add year for clarity
Para 1.5	Introduction	Refers to need to have regard to the NPPF	Suggest regard is also had to current NPPF consultation.
Para 1.7	National Planning Policy	Part about NPPF	Suggest an additional sentence about current NPPF consultation.
Para 1.9 and 1.10	New TWBC Local Plan	Paras 1.9 and 1.10 need reviewing/updating given that TWBC received the initial findings of the EiP Inspector in November 2022	Review and update.
Para 1.9		Refers to LDS adoption date for TWBC Local Plan Jan 2023	Note: the LDS is due to be comprehensively updated – when a date for this is confirmed the LPA will inform the examiner
Para 1.11		States ‘ <i>The proposed strategy (at 1 April 2021) for Pembury is to:</i> ’	Note: the TWBC SLP was submitted to the Planning Inspectorate on 1 November 2021
1.15	Community Engagement – Table	2023 is identified for both examination and referendum – it’s possible the referendum may end up early 2024 depending on the examination/timescales for organising referendum	Consider amending date to 2023-2024
2. About Pembury			
		No comments.	
3. A Vision for Pembury			
		No comments.	
4. Spatial Strategy			
Policy P1 Location of development	Criterion (A) Development in the neighbourhood area will be supported within the Limits to Built Development as defined in Figure 4.1. Development proposals on brownfield land will be particularly supported, subject to compliance with other policies in this plan.		Clarification required if this is referring to the adopted LBD boundary, or the proposed SLP LBD boundary See note at end relating to the progress of the TWBC Local Plan. The examiner will be provided with any further updates during the independent examination process.
Policy P1 Location of development	Criterion (B) refers to LBD		Clarification required if this is referring to the adopted LBD boundary, or the proposed SLP LBD boundary See note at end relating to the progress of the TWBC Local Plan. The examiner will be provided with any further updates during the independent examination process.
Policy P1 Location of development	Criteria included within (B)	It is unclear whether development should meet some or all of the criteria listed under B. If all criteria are to be met, this would preclude all development proposals	Clarity needs to be provided by inserting ‘or’ after each individual criterion
5. Housing			
Para 5.6	Typo	“numbers of....”	Amend to number of.....
Para 5.11	Typo	“155 to 156....”	Amend to 155 to 166.....

6. Character, Heritage, and Design			
Page 25 Para 6.8.	The 12 principles that the Pembury Design Codes seek to enable are as follows. New development should: Includes (point 5) Establish a 40m green buffer band parallel to the A21 in order to mitigate visual impact to and from the AONB.	The approach in the TWBC policies is to add in 'approximately'	<i>Adding in approximately</i> would be better way of expressing this policy as policies should not be unnecessarily rigid
Page 28, Policy P3, Criterion B.IV		It is noted that, within point B.IV, that space for off-road parking and cycle parking for residents, visitors and services vehicles is to be in accordance with the SLP parking standards, which is supported. However, the Council notes that the standards set out within the SLP are yet to be adopted.	None.
Policy P3 (C)	Requirement for lower density development at rural boundary		Will this affect delivery of allocated policies in the TWBC SLP, all of which include a rural boundary
Policy P4 Energy Efficiency and Design	Criterion A	Consider switching emphasis to carbon emission reduction instead of energy to encourage transition away from fossil fuels	
Policy P4 Energy Efficiency and Design	Criterion vi	Instead of the phrase 'a combination of', this criterion should prioritise energy demand reduction over energy consumption to encourage to fabric first approach. Reference to the energy hierarchy would be helpful.	
Policy P4 Energy Efficiency and Design	Criterion beginning "Where development cannot achieve..."	Consider whether this criterion is necessary. Criterion B already includes the caveat "as appropriate to scale, nature and location". We should expect very high standards in all development as we move towards the Government's Future Homes Standard which will be introduced in 2025.	
Policy P5: Sewage and Drainage Infrastructure	B: has a requirement for "rigorous analysis".	The plan should clearly set out what is meant by this/what the plan expects developers to do.	
Policy P6 Conserving Heritage Assets	(A) Refers to 14 buildings/structures set out in para 6.30/mapped on Fig 6.2		These buildings/structures are the Parish Council's own list of NDHAs, following an audit. It would be helpful to know if there were any selection criteria for the audit, as the PPG gives greater weight to that process; but otherwise the PPG also the LPA the ability to give weight to those identified in NDPs.
7. Employment in Pembury			
Para 7.6		Reference to turnover in Euros	To be replaced by a '£' sign
Para 7.3		Final sentence doesn't read right - needs addressing	
8. Environment and Green Space			
Pages 48-50; Policy P9: Local Green Spaces		<p>TWBC supports the approach of NDP in seeking to designate sites proposed for LGS in the SLP given that the SLP is yet to be adopted.</p> <p>As per the Council's Reg.14 comments, it is noted that TWBC and Pembury NDP Group agree on the sites proposed in the SLP: sites 186, 187, 188, 189, AS_4, AS_9, AS_13 (i.e., Pembury sites 1, 2, 3, 4, 5, 6, 7). The Pembury NDP seeks to</p>	None.

		<p>propose additional sites (i.e., Pembury sites 8, 9, 10, 11, 12, 13, 14), 5 of which TWBC has assessed and considered to not have met the designation criteria. Sites 8, 12, and 13 are assessed as one site in the SLP; the TWBC LGS Assessment states that the site is already sufficiently protected. Site 9 was not considered suitable for designation as it is considered to be an incidental green space with similar characteristics with many local sites not proposed for designation and therefore not 'demonstrably special'. Site 10 (which is a smaller area within the SLP) was not considered suitable as it was also considered to be already sufficiently protected. Pembury NDP sites 11 and 14 have not been assessed previously by TWBC.</p> <p>The Council notes that supporting justification for the proposed LGS sites in the Pembury NDP are provided in Appendix D of the NDP.</p>	
Page 57 Policy P11:	<p>Policy requires that 'Proposals for development should be supported by a landscape/visual impact assessment which clearly demonstrates the potential impacts that such a proposal would have on significant views where relevant and how these impacts will be mitigated.'</p>		<p>It is noted that supporting text at para 8.37 recognises the conflict with VPs 2 and 3 and proposed allocations in the TWBC SLP:</p> <p>V2 appears to be situated on PE2 and clearly looks across where development will be provided by the SLP. However the description in Appendix E acknowledges this and the limitations of what might be retained:</p> <p><i>"The field directly in front of the footpath is included as a site allocation in the SLP. Whilst views may not be wholly safeguarded, glimpses of the panorama should be, where possible, retained. This could include from the existing footpath and also from the cycle paths to be incorporated as part of the proposal".</i></p> <p>For VP 3 the description appears to assume that that development will not interfere with the view which is unlikely to be the case:</p> <p>"The view is taken from the top right corner (north-east) of the field allocated as part of Site AL/PE4. It is this corner that is likely to remain undeveloped due to the proximity to ancient woodland and the topography of the site. From this high spot, views are afforded north towards Matfield and the North Downs beyond. At the junction with the ancient coach road, the footpath here would have historically presented travellers with a view over the village, announcing their impending arrival".</p> <p>Whilst consideration of these views within the design is appropriate and the layout may be able to retain elements of these views the policy goes further than this and requires that the views are "safeguarded" which is higher bar which the proposed development is unlikely to reach:</p> <p><i>"POLICY P11: PROTECTION OF LOCALLY SIGNIFICANT VIEWS The Plan identifies nine locally significant views in paragraph 8.33 and in Figure 8.5, with descriptions in Appendix E. As appropriate to their scale and nature, development proposals within the shaded arcs of the various views as shown on Figure 8.5 should be designed in a way that safeguards the locally significant view or views concerned. Proposals for development should be supported by a landscape/visual impact assessment which clearly demonstrates the potential impacts that such a proposal would have on significant views where relevant and how these impacts will be mitigated".</i></p> <p>Whilst the limitations are in part recognised the view descriptions, supporting text and policy are considered to lack clarity for view points 2 and 3 and what might be expected</p>

			<p>from a development and are at present in conflict with the proposed allocations in that if treated as a “safeguarded” view this would significantly restrict development.</p> <p>In addition views 2 and 3 and will inevitably change if these applications proceed as both Parish and Borough policy would require a 40m landscape buffer of trees in the area where these views are located.</p> <p>There is no difficulty if the policy seeks these views to be noted and retained where possible acknowledging that the proposed development will significantly alter the available views in these locations but as the policy is currently framed and the views currently described there is a conflict between the allocations PE2 and PE3 in the SLP and Policy P11/Views 2 and 3 in the neighbourhood Plan.</p>
9. Transport and Movement			
			No comments
10. Community Facilities			
Policy P15		Policy P15 – the wording at criteria ‘C’ doesn’t seem right and should be considered and checked with Sport England to ensure consistency with their policy approach.	
Infrastructure Improvements and Provision	Para 12.3	Reference to strategic policy for Pembury, PSTR/PE1	Add text to clarify that this is as per the emerging TWBC Local Plan.
Glossary	Limits to Built Development	Reference to TWBC proposed LBDs	It should be noted that the TWBC Local Plan remains at examination and that there is potential for LBDs to change through the modifications process if the Inspector considers this necessary.
Appendix B: Design Guidance and Codes			
2.2.3, page 18	Edge Lanes, point no.3.	It is not quite clear what sort of access this refers to – pedestrians? Is this safe? The plan drawing doesn’t quite fit the Romford Road example as it appears there is an internal road parallel with the main road.	
3.3 Design guidance for codes	General coding/guidance.	It looks like the only thing that is actually coded are the street typologies. It would be difficult to code anything else unless it’s specific to a site, however, we would say these are more guidelines than codes.	
Page 70	Reference to the High Weald AONB Guidance	For ease to assist users of the document, this could be hyperlinked.	

Supporting Documents

Response 14 DHA obo Countryside Partnership's Regulation 14 Representation

We write on behalf of our client, Countryside Partnerships (UK) Ltd (hereafter 'Countryside'), regarding the draft Pembury Neighbourhood Plan (PNP). The Pembury Neighbourhood Plan 2020-2038 Pre-Submission version is currently out for public consultation. The pre-submission draft plan has been published for public consultation for a period of six weeks and is due to close on 18 July 2022.

Our client has land interests in the site known as 'Land North of the A21, South and West of Hastings Road' which is proposed to be allocated for residential development in the emerging Tunbridge Wells Local Plan, under policy AL/PE3. The emerging Tunbridge Wells Local Plan is currently undergoing Examination by the Planning Inspectorate. Draft policy P1 of the PNP supports development of sites where they are allocated in the Tunbridge Wells Local Plan (or its successor). The PNP does not allocate any further sites for development than those allocated in the Submission Local Plan (SLP).

It is our client's intention to bring forward development proposals for a high-quality residential development comprising approximately 80 dwellings (including 40% affordable) as per draft policy AL/PE3. The proposals will include significant internal green space and ecological enhancements as well as a walking and cycling route with pedestrian access off Hastings Road and flowing through the site before joining up with existing Public Rights of Way and a National Cycle Route.

Our client supports the principle of bringing forward a Neighbourhood Plan and recognises the benefit such Plans bring to the local community and welcomes this opportunity to express their views and provide suggestions where they would be helpful.

Policy P1: Spatial Strategy

Section 4 of the PNP sets out the approach to the location of development within the Parish. It is noted that the PNP does not allocate any sites of its own for housing however it does set out a series of parameters to support the emerging Tunbridge Wells Local Plan's growth strategy. This includes providing new dwellings in the period to 2038 on sites in accordance with the Borough's Submission Local Plan (SLP). The SLP allocates eight sites for new housing within the Parish, including AL/PE3, which are critical to the wider Borough's strategic objectives for meeting objectively assessed housing needs. As such, Countryside is strongly supportive of this approach.

Policy P2: Meeting Local Housing Needs

Countryside has no objection to the principle of a policy seeking a good mix of dwelling sizes. However, we have concerns about the particular mix being sought in the policy.

The NPPF (2021) states that the size, type, and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including but not limited to families with children, older people etc. (paragraph 62). Policy P2 seeks to ensure that there is a range of general housing that is designed to be capable of meeting the specific housing needs of the Parish. The policy provides an indicative preference for smaller two- and three- bed housing (55-65% of all dwellings). The justification for this is that the Parish has fewer smaller dwellings available and this would provide an opportunity for first time buyers and people wishing to downsize.

However, it is important to recognise that there is a need for a mix of all property sizes. Whilst there is a need for smaller properties for first time buyers and older people wanting to downsize, there are numerous larger family houses currently being occupied by older people who have no current wish to move out of their family house and downsize. Whilst creating opportunities to enable such people to downsize is important, many older people are perfectly happy living in their existing accommodation and have little desire to move.

It is therefore important that there are plenty of opportunities for those wanting to move from smaller 1- and 2-bed houses (e.g. those starting a family) to larger properties to be able to do so. This in turn will then help free up smaller properties for first time buyers and downsizers as well.

Whilst paragraph 5.4 of the plan refers to a Local Housing Needs Assessment "contained in the Evidence Base", no such assessment appears on the Evidence Base pages on the Neighbourhood Plan website. It is not clear how the figures in the policy have been derived.

A Parish Profile is provided, and it is clear from this that the overall (i.e. market + affordable) proportion of 1-bed units sought by P2 (15-25%) is substantially higher than that currently found in the village (12%) and the wider South East (also 12%).

It is acknowledged that the proportion is higher in Tunbridge Wells (15%), though even this is at the very lowest end of the range currently sought, despite being in a more urban location with a large town centre and excellent transport links where both larger apartment blocks and 1-bed properties are more likely to be found. As 1-bed properties are generally only found in apartment blocks, and usually as part of a wider mix, the policy is therefore essentially seeking more than one quarter (and more likely one third or more) of all new properties in Pembury to be apartments, which is at odds with the character of the village.

Such apartment blocks are also more likely to be appropriate in more central locations, rather than on the edges of the village, where houses rather than flats are more likely to be attractive to the market, and indeed occupiers.

We would also comment that in our experience many Registered Providers find there is less demand for 1-bed units, with the more flexible 2-bed and 3-bed units preferred.

In relation to affordable housing unit sizes, it is also worth noting the average wait times for different size properties as set out in TWBC's Housing Needs Assessment Topic Paper for the Pre-Submission Local Plan (Table 3 on p15). This notes that, as of January 2021, the average waiting time for a household on the Housing Register waiting for a 3-bedroom house to become available was 36 months, and 26 months for a 2-bed house. This compares with average wait times of 12-18 months for a 1-bed apartment., clearly illustrating that there is a higher unmet demand for 2- and 3-bed affordable units compared with 1-bedroom units.

Furthermore, the percentage of 2-bed market units sought by the policy appears very high. The difficulty with a "one size fits all" policy such as draft Policy P2 is that it fails to take account of the fact that different sites will have different characteristics and different markets. For example, a brownfield site on the High Street is likely to be most suitable for a 1-bed and 2-bed apartment scheme, where some occupiers may prefer a relatively central location with good access to facilities and public transport. One would not expect to see a 4-bed house on such a site as it would not be attractive to the market.

Conversely, a site on the edge of the village is more likely to be suitable for 3-bed and 4- bed family housing, where apartment blocks may be out of character with the surroundings. The need for 3-bed and 4-bed homes should not be under-estimated. Many people in smaller homes struggle to find suitable larger houses to upsize to when their needs change because so much of the existing larger housing stock continues to be occupied by people who originally moved in with their families but who have since left home.

Indeed, the Housing Needs Study 2018 being relied upon by TWBC for its emerging Local Plan states:

"...analysis suggests that on the basis of household aspirations (likes), the highest demand is for 3 and 4-plus bedroom houses. While demand, expectation and current stock profile are fairly evenly matched for 3-bedroom houses, fewer households expect to achieve a 4-bedroom house than would choose one."

Arc4 TWBC Housing Needs Study 2018, paragraph 5.14

In a Hearing Statement to the Housing Mix session of the ongoing Tunbridge Wells Local Plan Examination, TWBC has also made reference to the Strategic Housing Market Assessment (which is three years older than the Housing Needs Study) noting that:

*"While [SHMA recommendations] points to a higher proportion of smaller homes (i.e. less bedrooms) than the Housing Needs Study, the SHMA consultants explain this in terms of a need to deliver more smaller family housing for younger households. It also goes on to say: 'In applying policies on housing mix to individual development sites, **the SHMA recommends that regard should be had to the nature of the development site and character of the area, and to up-to date evidence of need as well as the existing mix and turnover of properties at the local level.**'"*

Examination Document TWLP/027: Matter 8 Issue 1 Hearing Statement by TWBC, paragraph 6 (our emphasis)

This backs up the flexible approach we have suggested above

Ultimately, developers are generally very good at providing the right types of housing for the right sites, knowing what the market requires there. This can change over time, and will vary significantly between sites. Developers are very happy to provide smaller units where these are attractive to the market – as has widely been the case in the recent years.

In summary, we strongly recommend that rather than setting out a prescriptive mix, the policy should be reworded to require a mix of housing unit sizes taking into account the characteristics of the site and up-to-date evidence, in line with the approach taken in Policy H1 of the Tunbridge Wells Submission Local Plan.

Policy P3: Character of Development

The NPPF (2021) places a strong emphasis on the creation of high quality, beautiful, and sustainable buildings and places which is fundamental to the planning and development process (paragraph 126). In particular, neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development. Policy P3 seeks to encourage development proposals within the Parish to comply with the highest design standards, adhere to the High Weald AONB Housing Design Guide and provides specific Design Guidance and Codes. In principle Countryside have no objection to the need to reflect local distinctiveness in new developments.

It is however important that policy does not dictate design too specifically. It is agreed that the requirement in part B.ii of the policy for the 'reduction/consolidation of road signs and other street furniture' generally does make for better designed places. However, it is necessary to recognise that this may not always be in the developer's control. For example, road signs may be necessary to ensure highway safety (in accordance with Traffic Signs and General Directions 2016) and certain street furniture may be necessary to prevent access for motorised vehicles in some locations. Such considerations will normally be dictated by the local Highway Authority (Kent County Council).

Part B.viii of the policy requires the provision of high-quality boundary treatment including the retention and enhancement of established trees and hedgerows, or the replacement of these if not possible. This part of the policy appears to be similar to part B.iii, which requires soft landscaping and other boundary treatment to provide active frontages in developments, which should preserve and sensitively incorporate existing natural features such as trees and hedgerows within the site, with the aim of delivering a net environmental benefit. It is suggested that these two requirements be consolidated into one to ensure there is no unnecessary repetition of policy.

Part C of the policy encourages the siting of lower density development at the rural boundary of the site in order to provide a gradual transition from the built form to open countryside. It is suggested that the wording of this should be more nuanced than currently presented. For example, draft allocation AL/PE3 as well as others, are bounded by the A21 dual carriageway which is not representative of a typical rural boundary or the open countryside. It may not be

reasonable or practical to apply this principle in this case which would deliver lower density development than necessary. In turn this would be an inefficient use of land and serve to place greater pressure on more sensitive Green Belt and AONB sites in the future. The density of development should be appropriate to the particular site and the policy wording should be revisited to allow for this flexibility. For example, the policy could be reworded as follows:

*Where development sites abut open countryside, development on the rural boundary edge should mitigate any detrimental visual impacts on the countryside. This should be achieved through the siting of lower density development at the rural boundary of the site, **where necessary and appropriate** in order to provide a gradual transition from the built form to open countryside, or by other means such as through a layout that clearly minimises the visual impact of any larger buildings on both the open countryside and existing village-scape.*

Policy P4: Energy Efficiency and Design

Policy P4 seeks to ensure that development meets the highest environmental standards in terms of construction, material, and energy use. This policy and its aims are aligned with those of Countryside and are supported. However, this policy appears to duplicate the general requirements of policies EN2 and EN3 of the emerging Tunbridge Wells Local Plan. Again, the NPPF makes it clear that plans should avoid unnecessary duplication of policies that apply to a particular area (paragraph 16). It is suggested that this policy, as currently worded, is not necessary in addition to existing national and local policies and should therefore be deleted.

Policy P5: Sewage and Drainage Infrastructure

Policy P5 seeks to ensure that development proposals fully consider the natural environment in Pembury to adequately manage drainage and sewerage. Part B of the policy states that planning proposals will not be supported unless it can be shown by ‘rigorous analysis’ that there is sufficient capacity in the local sewerage system and that any new connections will not increase the risk of system back up/flooding or cause any adverse impact to the neighbourhood area environment.

Countryside object to this part of the policy which is negatively worded and contrary to the NPPF (2021), which states that plans should be prepared positively (paragraph 16). Furthermore, responsibility for this does not fall on to developers and in fact lies outside of the planning system. Whilst all developers will of course liaise with the water companies regarding capacity, water companies have a statutory duty to provide the infrastructure required to support development and any upgrades needed are dealt with through the Infrastructure Charge. It is suggested that this part of the policy should be deleted.

Policy P6: Conserving Heritage Assets

Policy P6 seeks to recognise the important contribution that heritage assets make the local character and distinctiveness of Pembury. While Countryside has no objection to the principles sought in this policy, it does not particularly add anything new to existing national and local policy. Again, the NPPF makes it clear that plans should avoid unnecessary duplication of policies that apply to a particular area (paragraph 16). Therefore, it is suggested that this policy as currently worded should be deleted.

Policy P8: Green and Blue Infrastructure and Delivering Biodiversity Net Gain

Policy P8 seeks to ensure that the multiple benefits of Pembury’s green and blue spaces are recognised and enhanced. Again, while Countryside does not have any particular objection to this policy, parts A-C do not add anything new compared to the emerging Tunbridge Wells Local Plan. Indeed, the requirement for developments to provide a net gain in biodiversity will soon become statutory requirement as set out by the Environment Act 2021. Again, the NPPF makes it clear that plans should avoid unnecessary duplication of policies that apply to a particular area (paragraph 16). Therefore, it is suggested that

parts A-C of this policy as currently worded are deleted.

Policy P10: Managing the Environmental Impact of Development

Policy P8 seeks to ensure that development proposals have considered how they can enhance the natural environment including the features of it that are particularly distinctive to Pembury and that development proposals contribute to the provision of adequate open space. Countryside is supportive of the aims of this policy, however there are objections to the detailed wording of some parts.

Part B.vii of the policy requires open space to be incorporated into developments that is in usable parcels of land and ‘not fragmented’. It is unclear what is meant by this in practice. It is accepted that open space strategy for a site should be well designed and usable but it may be appropriate, especially on larger sites, for there to be more than one area of open space, which could potentially be interpreted as ‘fragmented’. There are many examples of older and contemporary developments successfully incorporating multiple areas of open space as opposed to a single larger one. Indeed, on some sites there are opportunities to provide open space benefits in areas of ecological or flooding constraints. It is suggested that the phrase “and not fragmented” should be deleted from the wording of this criterion so that it instead reads “in usable parcels of land”.

Part B.viii of the policy states that open space should be safe, easily accessible and “not severed by any physical barrier”. Similarly, the wording of this appears to be more restrictive and open to interpretation than is necessary, perhaps inadvertently. Public open spaces should be safe and easily accessible but it is not clear what is meant by a physical barrier. It is not uncommon for open spaces to be subdivided at times by landscape features such as lines of trees or hedgerows, acting to some extent as physical barriers.

Similarly, play areas are sometimes surrounded by fencing or other physical barriers to ensure safe use and accessibility, for example, to prevent accompanied young children from wondering too far and to ensure segregation of potentially hostile dogs.

In reality, whether such a barrier is unacceptable or not will depend on the specific characteristics and design of the open space, and indeed any barriers themselves. It is suggested that “safe and easily accessible” is sufficient to achieve the objectives of the policy and the reference to physical barriers should be deleted. If a reference must be retained, then at the very least it should refer to “unnecessary or inappropriate physical barriers”.

Policy P11: Protection of Locally Significant Views

Policy P11 sets out a series of views in and across the Parish that have been identified as being important to safeguard. The policy seeks to safeguard the views from inappropriate development. View V3 ‘View from WT233/W237 from ancient woodland looking north- east towards Matfield’ is a view contained within draft allocation AL/PE3 and there are similar important views identified at other allocated sites. Supporting paragraphs 8.35 and 8.37 sensibly recognise and accept that development of the allocated sites is likely to have a significant effect on these views and that developers should seek to incorporate glimpses of views within the proposals and that proposal should be accompanied by a landscape and visual impact assessment.

The principle of policy P11 to safeguard community-derived important views is welcomed by Countryside, subject to the retention of the supporting paragraphs referred to above, which recognise some views will inevitably be compromised where development has already been allocated in the emerging Tunbridge Wells Local Plan.

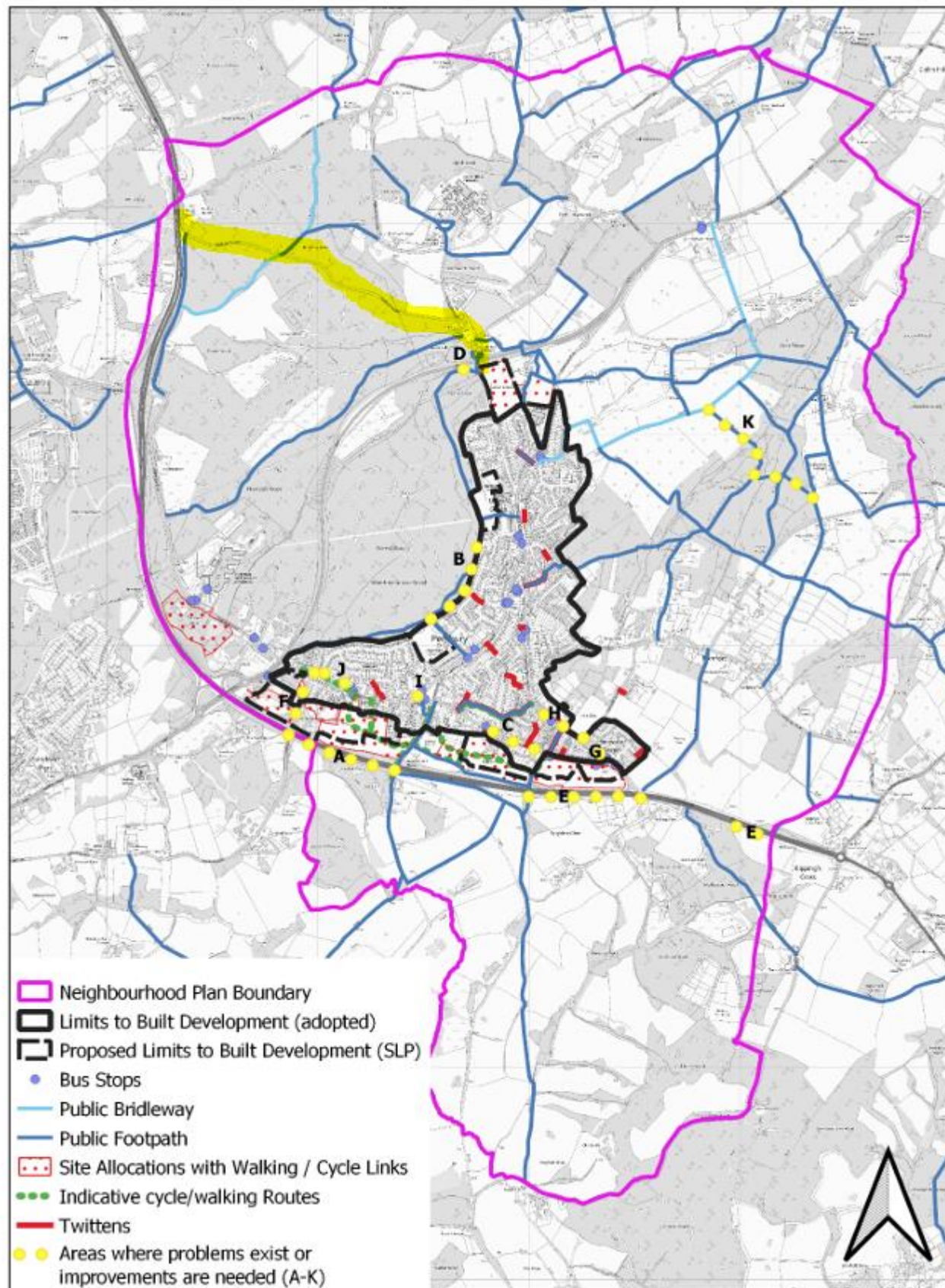
We would however comment that whilst view V3 is described as “V3: View from FP WT233/ WT237 from ancient woodland looking north-east towards Matfield”, in reality there are no views from within the woodland itself, only when you have emerged from it! “View from higher ground” or similar might be a more accurate description.

Summary

In its current form, Countryside, who has an interest in the emerging Tunbridge Wells Local Plan allocated site AL/PE3, are generally supportive of the draft Pembury Neighbourhood Plan which seeks to support development on sites allocated by the Local Plan in order to help deliver Borough’s strategic housing needs.

However, Countryside also has a number of comments and suggestions, which are intended to be constructive, regarding individual policies within the draft Plan that require reconsideration.

Going forward, we would be grateful if our general comments and concerns relating to the draft policies proposed in the emerging Pembury Neighbourhood Plan are taken on board when preparing the next draft of the plan. If you would like to discuss any of the above, we would be very happy to do so.





Response 21 Ruth Alston obo A21 Rat Run Group

A 21 Rat Run: Summary Briefing

for Meeting on 16 September 2022, chaired by Greg Clark in Pembury

This briefing is on behalf of the 75 or so members of the A21 Rat Run Group (Pembury and Matfield), which I, Ruth Alston, help to co-ordinate.

Please see the Map at the end for the Rat Run routes used.

1.Core Problem



Congestion at A21 Kipping's Cross southbound

Severe congestion at Kipping's Cross causes Rat Run traffic along Woodside Rd., Romford Rd., King's Toll Lane, Foxhole Lane, and Sophurst Lane. These 6 miles of rural lanes are narrow – typically the tarmac is about 11 feet wide or less. But since the heavy Rat Run traffic they have, in places, been made wider by substantial erosion of their green verges, which are mostly owned by KCC. An area of about 18 cricket pitches has been eroded in this way. Verge erosion makes the increased traffic go faster, and attracts large lorries. The result is that all these lanes have become very dangerous.

Accidents, near misses, and stuck lorries are now frequent.



*Eroded KCC Verge on
A21 Rat Run lane (Spring
2021 in lockdown)_*

*Lorry on Footpath
on Rat Run lane*



Hard surfacing has recently been put over parts of these eroded verges, possibly by a private initiative. In places the road width has been almost doubled in this way. This has hugely increased traffic speeds, attracted even larger vehicles, and made these lanes very much more dangerous. Extremely dangerous now is the Matfield end of Romford Road which is sunken, steep, single track, and twisty; Matfield-bound traffic now approaches it at very much higher speeds. A local father of two youngsters had his car written off here in this way.

Accident outside the care home in Romford Road Dec.2021

The nearby blind corner with Woodside Road is very dangerous, and made worse by poor drainage.

2. What's Special About These Lanes? Why do They Matter?

2.1. Our many walkers, cyclists and horse-riders are now endangered by increased and speeding traffic. The area contributes to healthy lifestyles and recreation. Romford Rd. itself has Public Footpaths *along* it, one being the long distance High Weald Landscape Trail; these Public Footpaths connect with a rich network of other Public Footpaths. Romford Rd. itself is also a designated long distance Cycle Route, National Cycleway 18, from Tunbridge Wells to Canterbury via Tenterden, officially described as 'all tiny, single-track tree-lined roads.'

Horse Riders use Romford Road, and King's Toll Road, where there is a stables. One of the most dangerous stretches of road has two footpaths crossing it, and a footpath *along* it.

2.2. The area is part of the High Weald Area of Outstanding Natural Beauty and the Metropolitan Green Belt, so it requires high levels of protection.

2.3. The green verges owned by KCC make a substantial contribution to pollinator habitat for our bees. KCC's 'Plan Bee' is committed to managing its green verges to maximise pollination, especially important in this area of fruit farms. They are an important part of protecting our whole biodiversity, and wild flowers on which we depend for much of our food. The drainage ditches have also been destroyed in many places, which worsens the problem.

3. What do We Want?

We want a substantial reduction in the through traffic bypassing the congestion at Kipping's Cross roundabout on the A21. Keeping A21 through traffic on the A21 is crucial. The damage which has already been done to green verges needs to be put right. We want a holistic solution which works well for *all the* affected roads.

4. How Can We Achieve This?

4.1 Submission to A21 Capacity Review On the advice of National Highways, we urge KCC and our MP to make a strong evidence-based case to the Department of Transport on the problems and accidents caused by the A21 congestion at Kipping's Cross, so that these problems will be prioritised when the A21 Capacity Review starts in 2025–2030.

Meanwhile, we need some solutions now.

Traffic solutions are for the experts in traffic management. We welcome their effective solutions. We laypeople suggest, as a starting point, consideration of the following ideas. All are relatively low cost.

An offer of some funding from the Group is available to contribute to an effective solution. Kent High Weald Project have also offered volunteer help – see 4.2.2 below.

4.2 Barriers

Experience elsewhere shows that this is the most effective method. Width restrictions need to be wide enough for emergency vehicles, delivery vans, normal farm vehicles, and the smaller lorries which use the units at Alban's farm. They need to be narrow enough to stop the giant HGVs which would get stuck, and narrow enough to slow down and deter other through traffic.

4.2.1 Built Barriers need to be robust: Two possible examples are:



Across the entrance to affected lanes near a street light, or solar powered etc. Actual width needs to be agreed.



Sturdy posts at both sides of the lane. Slows traffic and protects vegetation. Could work well on twisty Matfield end of Romford Road and Woodside Road.

4.2.2 Natural Barriers

Restoring the lanes to their tarmac width by re-instating the verges with appropriate vegetation will allow the verges to resume their former role of slowing the traffic down to a much safer speed, and so deterring through traffic. Kent High Weald Project have offered volunteer help with this project, and it would certainly make good publicity all round in also being good for the environment. Protection would be needed while the appropriate vegetation re-establishes, but then it will largely look after itself. A low cost and effective deterrent to speeding traffic.

4.3 Signage

4.3.1 A21 signs. The northbound A21 Bo-Peep junction at Pembury [TQ 637 402] has been signed 'Local Traffic' for many years. But the new sign on the southbound carriageway [TQ 633 403] says 'Pembury.' We would like these signs harmonised so that both say 'Local Traffic.' Such signs are used on the A2 in Bexley and Kidbrooke, in the newer green livery.



4.3.2 Informative and deterrent signs are needed e.g. A sign similar to the one at the Pembury entrance to Cornford Lane, warning of the width of vehicle allowed, of the width restriction, and saying clearly 'Except for Access' so that necessary local vehicles can enter.

4.3.3 It would be a kindness to warn HGVs with '**Unsuitable for HGVs**' signs that they will get stuck in our lanes, probably on one of the many sharp bends. Such signs would save the lorry drivers and other users much misery and chaos. Some of the lorry drivers do get very distressed.

5. A slip lane for Matfield has been suggested. Its effectiveness would depend on the proportion of traffic which turns off for Matfield here. Traffic counts will tell us. The length of the slip lane would also have a bearing on its effectiveness.

The A21 Rat Run Group (Pembury and Matfield) looks forward to working with our MP, National Highways, Kent Highways, our County Councillors, our Parish Councillors, and Officers to find a robust solution to the traffic dangers faced here by recreational users, countryside lovers, and residents.

Map of the Rural Lanes Affected is overleaf

A21 Rat Run Rural Routes in Pembury and Matfield



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