



# 2013-2033

## Goudhurst Neighbourhood Plan Consultation Statement

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Cover – Photographs submitted for the NDP photography competition, <https://goudhurst-pc.gov.uk/photographic-competition/>

# Section 1 Purpose

## Our Vision:

*‘Our Parish in 2033 will be a vibrant neighbourhood, containing hilltop settlements that are safe, balanced communities, with sustainable housing standards, good local services, business opportunities, managed traffic and walkable roads – a neighbourhood that supports change and development yet remains quiet and unspoilt’*

This document outlines the overall process of community engagement which has supported the development of the Goudhurst Neighbourhood Development Plan (GNDP). The document sets out a chronology which ends with the formal Regulation 14 public consultation.

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 for the GNDP.

The legal basis for this Consultation Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations. This requires that a consultation statement should:

- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- explain how they were consulted;
- summarise the issues and concerns raised; and
- describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

Although the main focus of this document is to describe the feedback from the Regulation 14 consultation process, it also details how consultation has been managed during the development of our plan.

We have consulted with residents and the Borough throughout plan development and each of these consultations is documented. The output from consultation has been used to drive the overall direction of our plan and to set the vision and objectives. Our plan is community driven and has been developed by volunteers within the community. The policies contained in the GNDP result directly from consultation with the community and businesses within the Parish of Goudhurst. This work has been completed over the last three years. Details of the process can be found in Section 3.

Details of consultation during the development phase of the plan are all available on our NDP website and each of the activities provides a link to the detail. For the Regulation 14 consultation this document details:

- responses we have had from residents;
- responses from statutory consultees;
- a summary analysis of the comments received from all parties; and
- changes to the Neighbourhood Plan resulting from feedback.

*Our Parish occupies one of the most dramatic areas in the High Weald AONB and all three settlements are prominent on the skyline. Protecting this unique landscape is important to our communities and to our future generations*

*Goudhurst is one of many rural Parishes in the Borough of Tunbridge Wells*

## 1.1 Submitting Body

This document supports the Goudhurst Neighbourhood Plan, which is submitted by Goudhurst Parish Council, the qualifying body as defined by the Localism Act 2011.

### Designating the Neighbourhood Area

The community fully supported the designation of the Parish of Goudhurst as the Neighbourhood Area (the area covered by this plan) and Tunbridge Wells Borough Council (TWBC) approved our request on the 7<sup>th</sup> November 2016.

### Our Parish

Goudhurst Parish includes Goudhurst village, Kilndown and Curtisden Green and countryside in-between. The Parish is in West Kent and forms a part of the Borough of Tunbridge Wells lying to the east of Tunbridge Wells town, and has boundaries with the Parishes of Horsmonden, Cranbrook, Hawkhurst and Lamberhurst



Figure 1 Boroughs and District Councils in Kent

To the south there is a boundary with Ticehurst in East Sussex and Marden and Staplehurst to the north.

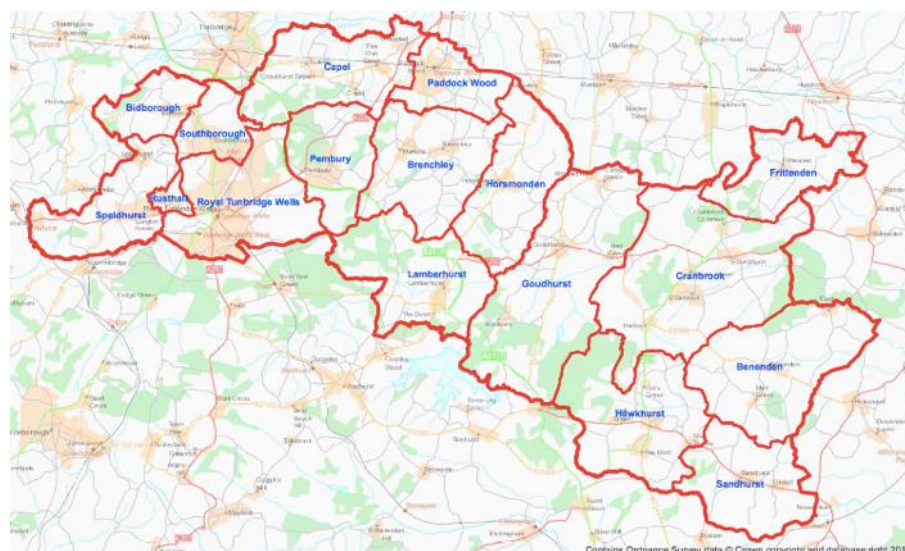


Figure 2 Parishes in Tunbridge Wells

The proposed Neighbourhood Area follows the boundary of the Parish of Goudhurst.



## The Parish of Goudhurst

This Plan applies to the Parish of Goudhurst in Kent. Goudhurst Parish covers 25 sq km (9.6 sq miles). Our Parish has a rich heritage and the natural environment has changed little over centuries. 90% of the Parish falls within the High Weald Area of Outstanding Natural Beauty (AONB), 20% of the Parish is ancient woodland and 19% of our buildings are listed.

Goudhurst Parish has three main hill top settlements with Goudhurst village being the largest. Goudhurst village contains 53% of the population with Kilndown (11%), Curtisden Green (9%) and the remainder (27%) being in the surrounding countryside.

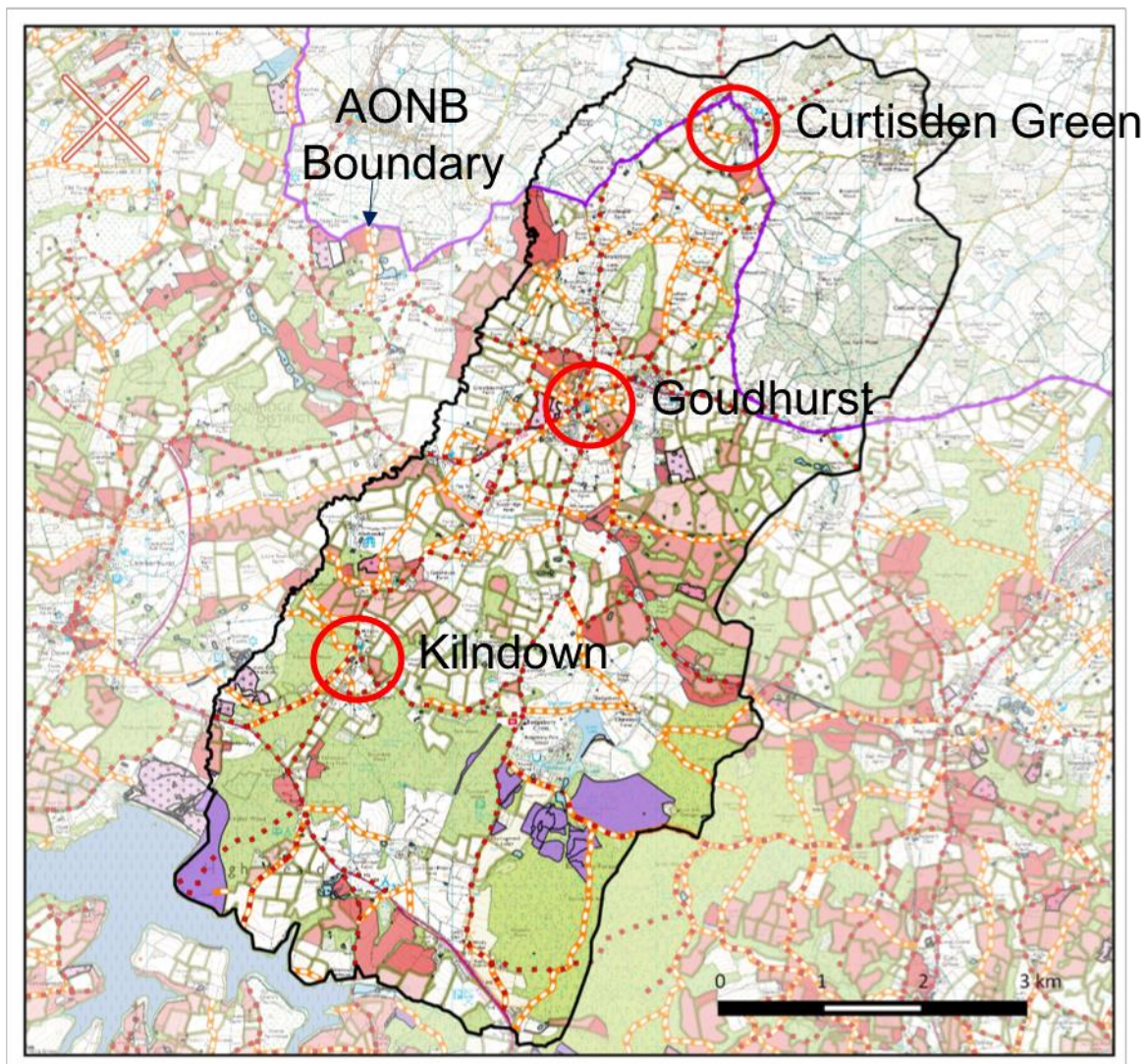
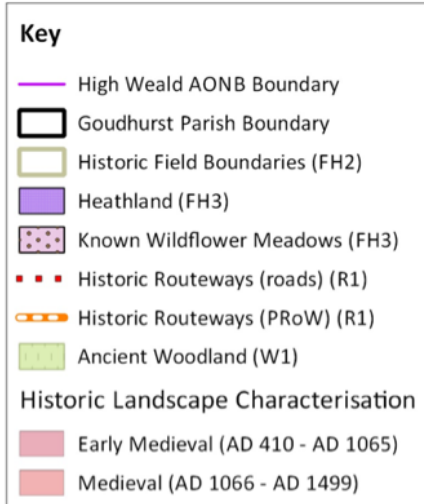


Figure 3 The Parish of Goudhurst

# Section 2 Plan Consultation Activity

*The proposal to create a Neighbourhood Plan was unanimously supported at a public meeting attended by 238 residents*

*This plan was to be a community-led project delivered by residents*

*An overall steering group and five working groups were established to develop our evidence base and plan*

### Plan Development Process

The proposal to create a Neighbourhood Plan for Goudhurst Parish was outlined at a public meeting in Goudhurst Parish Hall on the 22nd September 2016 attended by 238 residents. The meeting was unanimous that such a plan would benefit the Parish and, following the meeting, our intention was formally registered and subsequently accepted by TWBC on the 7<sup>th</sup> November 2016.

### How were we organised?

On the 8<sup>th</sup> October 2016, at a second public meeting, a steering committee was created with Colin Willis elected by the group as chair and Craig Broom as secretary. The group was supported by Jim Boot and Michael Thornton as planning consultants.

The key objectives of the steering group<sup>1</sup> were to understand:

1. The housing need in Goudhurst
2. The criteria to be used when considering new sites for housing
3. Where new housing might be located
4. Design requirements for new developments and homes
5. What aspects of living in the Parish are important to residents
6. How we deliver sustainable development

The decision was taken to produce a community-led plan. Five working groups were tasked with building our evidence base and identifying issues, objectives and policy areas. The five working groups created were:



Terms of reference were produced for each group<sup>2</sup>.

### Community engagement

The key engagement steps were:

- 22<sup>nd</sup> September 2016 - 238 attended a meeting in the Parish Hall.
- 8<sup>th</sup> October 2016 - 85 people volunteered for working groups and steering
- 25<sup>th</sup> May 2017 - Update and Questionnaire launch >270 people attending
- End May 2017 - Questionnaire delivered to all households
- 15<sup>th</sup> June 2017 – Display at Village Fete
- August 2017 Summary of questionnaire results delivered to all households
- August 2017 - Exhibition of questionnaire results
- September-November 2017 - Four public workshops
- 24<sup>th</sup> November 2017 – Display at Christmas Fair
- 17<sup>th</sup> March 2018 - Meet the Village – public meeting
- 10<sup>th</sup> April 2018 - Photographic competition exhibition and awards

<sup>1</sup> <https://goudhurst-pc.gov.uk/neighbourhood-plan-process-and-governance/>

<sup>2</sup> <https://goudhurst-pc.gov.uk/neighbourhood-plan-process-and-governance/>

# Plan Consultation Activity

- 18<sup>th</sup> April 2018 – Workshop to establish options and alternatives
- 25<sup>th</sup> April 2018 - Sustainability/Site Assessment and Policy Writing
- 25<sup>th</sup> May 2018 - Public meeting to outline areas of policy development
- 13<sup>th</sup> June 2018 – Display at Village Fete
- 5<sup>th</sup> November 2018 - Draft Consultation Plan distributed to all residents
- 5<sup>th</sup> November 2018 - Regulation 14 Consultation begins
- 15<sup>th</sup> November - Draft Plan Consultation Parish Hall
- 21<sup>st</sup> November 2018 - Draft Plan Consultation Parish Hall
- 8<sup>th</sup> December 2018 Village Christmas Event
- 14<sup>th</sup> January 2019 Regulation 14 Consultation ends

There were regular updates in the Parish Magazine.

## Evidence Gathering Activities

### Questionnaire

A questionnaire<sup>3</sup> was launched on the 23<sup>rd</sup> May 2017 and ran until the 30<sup>th</sup> June 2017. It was open to all residents age 14 or above. Two paper copies of the questionnaire were delivered to each household. It was also available online. Over 1,200 responses were received, representing 47% of eligible respondents.

A separate questionnaire was delivered to local businesses and received 163 responses. A detailed results document was produced and is available from our website<sup>4</sup> and a summary document was delivered to all homes in the Parish<sup>5</sup>.

### Workshops

We held four public workshops to create a set of objectives (GNDP section 3) and explore options and proposals for the plan. The workshops were as follows:

- **Vision and Objectives<sup>6</sup>:** Creating both short and long-term visions for the Parish and setting the objectives of our Neighbourhood Plan
- **Housing and Design<sup>7</sup>:** Developing design policies, understanding the types of housing we need and site selection criteria
- **Traffic and Economy<sup>8</sup>:** Addressing the traffic issues raised in the questionnaire and tackling growth in our economy
- **Landscape and Community<sup>9</sup>:** Identifying the things we value, the facilities we use and our concerns around our overall quality of life

The analysis, objectives and proposals in this Neighbourhood Plan have drawn on a variety of data sources:

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<sup>3</sup> <https://goudhurst-pc.gov.uk/residents-questionnaire/>

<sup>4</sup> <https://goudhurst-pc.gov.uk/business-questionnaire/>

<sup>5</sup> [Questionnaire summary](#)

<sup>6</sup> [Vision & Objectives](#)

<sup>7</sup> [Housing & Design](#)

<sup>8</sup> [Traffic & Economy](#)

<sup>9</sup> [Landscape & Community](#)

*Our Questionnaire, completed by 47% of residents, gave a clear view of what was important in our community*

*Questionnaire responses and other evidence were used in public workshops to develop our vision and set objectives*

*A housing needs survey measured the need for housing*

*Volunteers created a strong evidence base collating information from multiple sources*

- Population, employment, housing, deprivation and car ownership was obtained largely from the Office of National Statistics and from a Parish profile provided by Action for Communities in Rural England (ACRE)
- Housing need was obtained from an independent Housing Needs Survey commissioned by the Parish Council and run by ACRE, the TWBC housing register, local estate agents, and public consultations
- Life in the village was obtained from the Goudhurst Village Appraisal (1967), the views of residents from our questionnaire responses, public consultations and workshops, and meetings with key service providers, including schools
- Our Landscape Assessment was developed by a volunteer team and with information from TWBC
- Flood risk was obtained from the Department of the Environment
- Geology, water and environmental assessments
- Goudhurst and Kilndown Conservation Area Appraisal 2006

More detailed information on this extensive evidence base, including Steering meeting agenda and minutes, reports on the village consultations and workshops, can be found in the Goudhurst Neighbourhood Plan supplementary documents on the website <https://goudhurst-pc.gov.uk/gouhurst-neighbourhood-plan-full-history/>.

### 2.1 Photo Competition<sup>10</sup>

We ran a photo competition for 12 months from March 2017 to February 2018. This was open to all amateur photographers with 5 possible subject categories. Contributions were judged monthly. There were some 300 entries over the period.

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<sup>10</sup> <https://goudhurst-pc.gov.uk/photographic-competition/>



# Regulation 14 Pre-Submission Consultation



### PHOTOGRAPHY COMPETITION

Only two months left to enter this competition. It's open to amateur photographers of all ages, to capture the essence of the Parish of Goudhurst, Curtissden Green and Kilndown. The competition runs until 28<sup>th</sup> February 2018 so there is still time to submit your entries. We have had lots of wonderful photographs so far but it would be great to receive more entries for categories other than Landscape. As a reminder the categories are:

- Landscape
- Buildings
- Places Special to You
- Community
- Unique Things in the Parish
- Junior Competition for Under 16s

There are lots of fantastic prizes to be won with an Awards Ceremony being held on Monday 9<sup>th</sup> April, which will mark the beginning of a two week Exhibition of all the shortlisted entries and category winners.

Entries should be sent to:  
**photo@ndp.goudhurst.co.uk**

Further details and entry rules can be found on [www.ndp.goudhurst.co.uk](http://www.ndp.goudhurst.co.uk)



Find us on Facebook  
[www.facebook.com/GoudhurstPhotographicCompetition/](https://www.facebook.com/GoudhurstPhotographicCompetition/)

## Section 3 Regulation 14 Pre-Submission Consultation

The Neighbourhood Plan Steering Group finalised the Draft GNDP in October 2018 and it was approved for pre-submission consultation by Goudhurst Parish Council in their October meeting on October 8<sup>th</sup> 2018. The plan was printed and a paper delivery to every house in the Parish was begun on 25<sup>th</sup> October. The Plan was delivered in a printed envelope which:

- introduced the plan,
- outlined the feedback process and
- detailed public consultation sessions

The Regulation 14 Pre-Submission Consultation ran for a nine-week period from 12<sup>th</sup> November 2018 to 14<sup>th</sup> January 2019. To support the consultation a coordinated publicity campaign was undertaken in which:

- The plan was hand delivered to all homes in the Parish
- Our Facebook page was updated with details and links
- A notice and link to the plan was added to the Goudhurst Neighbourhood Plan website (<https://goudhurst-pc.gov.uk/goudhurst-neighbourhood-plan-full-history/>)

Envelope see appendix x



**Neighbourhood Plan**

**This is your copy of the Goudhurst Neighbourhood Plan**

With this delivery begins a formal six-week consultation with residents and other organisations. This is your chance to comment on the policies and objectives of this plan. The format for you to use is on page 72 of the plan.

All of the comments received will be collated, reviewed and published. The plan will be updated to reflect the comments made. It is this updated plan that will be submitted for inspection early in the New Year. There are also two drop in sessions in the Parish Hall on the 21st November 6.30-8.30pm and the 8th December 9-12.00.

The document is written so that you can 'skim' the plan by reading the comments (in green) in the left hand margin which summarise key points on each page. Section 5 (page 13) provides an overview of all of the planning policies in the document.

The focus for a Neighbourhood Plan is land-use policies to manage development and change. However, you have raised a number of issues and concerns that cannot be addressed with land use policies. The plan outlines an action plan with a series of community projects that will provide us with a base from which to tackle concerns and issues and improve life in our Parish.

Comments can be submitted by email or via the NDP web site  
[ndp.goudhurst.co.uk/planfeedback](http://ndp.goudhurst.co.uk/planfeedback)

**Figure 4 Envelope used for delivery**

# Regulation 14 Pre-Submission Consultation

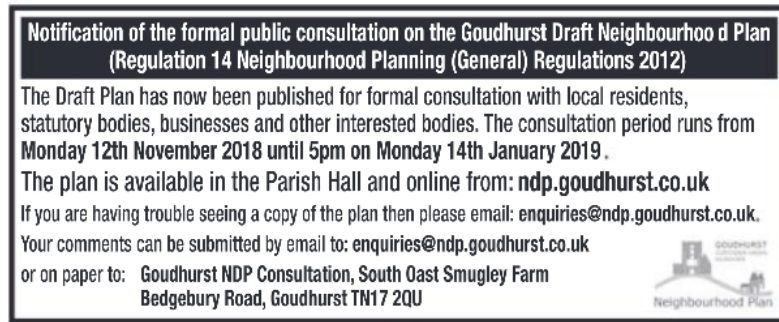


Figure 5 Advertisement placed in the Wealden Advertiser

- Notifications were sent to those residents who had wished to be informed of progress (523 email addresses)
- Notifications were sent to statutory and non-statutory consultees via email
- A public notice was put up on the noticeboards around the Parish and notification was placed in the Wealden Advertiser.

Consultation responses from statutory consultees are included in Appendix A and those from the wider public are detailed in Appendix B.

In general, statutory consultees raised no substantive issues. The main source of feedback was from TWBC.

The full list of statutory consultees we wrote to is as follows:

- Tunbridge Wells Borough Council
- Natural England
- Historic England
- Network Rail
- English Heritage
- Southern Water
- Homes and Communities
- National Trust
- Highways England
- Environment Agency
- British Gas
- Marine Management Organisation

We also wrote to a number of non-statutory consultees:

- Forestry Commission
- Hawkhurst PC
- Lamberhurst PC
- Staplehurst PC
- Marden PC
- Cranbrook PC
- Horsmonden PC

A copy of the email sent to the statutory bodies is shown in Appendix C.

# Section 4 Regulation 14 Responses

Responses from residents and other bodies were received either by email or submitted via a form on our website. The responses were generally centred around three themes: Traffic, Site Allocation and Green Spaces. The overall response to these areas is detailed below

Respondents to the Pre-Submission Consultation reflected a mixture of landowners and other stakeholders.

The schedule of comments and the respective responses made are shown in Section 7. As a result, the Submission GNDP has been appropriately amended.

## 4.1 Traffic

*Traffic is the number one issue in our Parish*

As you will have read in the Plan, the Parish Council and the NDP team are fully aware that traffic is the single most important concern in our community both in respect of the existing problems and issues and the adverse impact any future development might have.

We recognise the community would like to propose more radical actions to improve traffic through our Parish, but many proposals are outside the scope of a Neighbourhood Plan as set out in legislation.

Our goal remains to reduce the size and volume of vehicles and so create a safer environment for our residents. The policies in our plan can mitigate future impact from development within the Parish, but more significant change can only be delivered with wider community led initiatives in conjunction with the relevant highways authorities. The plan proposes a traffic project led by residents.

## 4.2 Site Allocation

*Has the plan really 'ducked' the issue of site allocation?*

The Parish Council considered a process of site selection and ultimately decided to defer site allocations to the Borough Council, thereby omitting them from the GNDP.

TWBC has issued two calls for sites which yielded 26 sites in Goudhurst Parish. Landowners interested in development have, therefore, had opportunities to put forward sites so there seemed little purpose in GPC issuing its own call for sites.

*A Parish call-for-sites running in parallel with the TWBC process could have caused much confusion*

It was considered that a Goudhurst call for sites might result in both duplicate and different sites coming forward creating confusion and making both the TWBC and Goudhurst processes difficult to manage.

The sites identified by TWBC were assessed against a set of criteria developed by the GNDP group. The criteria were intended to ensure that any discussion with the Borough was based upon gathered evidence. The assessment secured a local view about the potential for development of each site and allowed the team to discuss each site with TWBC. We concluded only limited development was possible in Goudhurst and our assessments agreed with those made by TWBC.

*The Parish council are not staffed to manage discussions with Landowners or deal with challenge on decision*

Given the close timing of the NDP and Local plan it was agreed that TWBC will allocate sites in their draft plan published in mid-2019. Had Goudhurst allocated sites in our plan:

- We would potentially damage the integrity of the TWBC process.
- Allocations, and more importantly rejections, are subject to challenge and GPC and the plan team do not have the process or resources to manage such challenges.
- Rejection of sites might cause speculative development prior to the TWBC plan being published and before GNDP policies could apply

We have considered publishing our assessments but, given the limited development proposed in Goudhurst and the broad agreement of the NDP and TWBC assessments, this would potentially prejudice the TWBC process.

### 4.3 Green Spaces

*There was both support and complaint about the allocation of Green Spaces in the plan*

A number of questions arose around the allocation of Green Spaces. There were complaints around specific Green Spaces allocated in the plan and there was also support for the same sites. A parallel document sets out the process and methodology used to assess and select Green Spaces.

The value of green space in shaping our community is recognized and greatly appreciated by residents. The nature of our countryside and the impact this has on the wellbeing of the community was identified at a very early stage in the Plan scoping process. Our questionnaire identified that the environment and our Green Spaces are important to over 90% of residents.

The sites identified for Local Green Space Designation in our plan were included following a documented methodology that follows the guidance in the NPPF. The process was completed jointly with TWBC. The initial list was provided by GPC to TWBC as part of their designation process in 2016. Additional sites were identified and added to the list during our workshops. All of the sites proposed were reviewed in two stages and some sites were discounted in both stages of the process. The overall process is published on our Website<sup>11</sup> and this answers the more detailed questions raised.

There were two specific comments made by landowners following the consultation and these are discussed in more detail.

The Regulation 14 consultation process of the draft plan gives everyone the opportunity to comment on the proposed list of green spaces in the Parish.

We recognise the concerns raised and support given during the consultation and these will be reviewed, along with a review of our overall process, when considering updates to our Neighbourhood Plan.

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<sup>11</sup> <https://goudhurst-pc.gov.uk/wp-content/uploads/2020/05/Green-Space-Designation-0.3.pdf>



## Comments and Areas of Potential Change

### Section 5 Comments and Areas of Potential Change

Below is a summary of the comments received, the areas to which they relate and our proposed action.

Policy Summary	Consultation Responses	Reasons for Change	Proposed Action
H1 Housing Mix	6, 27, 52, 53, T27	A number of comments raised questions around how the relative mix is defined	To clarify and simplify the policy to address the comments
H2 Tenure Mix	7, 26, 36, 45, T28	The levels of affordable housing in development has levels different from the NPPF and TWBC Core Strategy. Concerns were raised about the logistics of delivering small numbers of social rent houses in any development.	The objective of the policy is to ensure we see affordable housing delivered in smaller developments which historically have been more commonplace in our Parish. Our intention is for the higher TWBC and national targets to apply to larger developments if proposed. The plan will be updated to clarify.  Review the practicalities of delivering one or two social-rent affordable homes in any development.
H3 Allocating Affordable Housing	27, 37, T29	The allocation of affordable housing and the management of change where tenants wish to down or upsize was raised.	The questions raise interesting issues which should be considered within the scope of Project P1 - Access to Affordable Housing. No change to policy
H4 Rural Exception sites	9, T31, T9	There was concern a RES could override key policies in the plan. Suitable needs to be defined.	Review the concerns raised and clarify the position of RES sites within our plan and the NPPF.
H5 Replacement Dwellings	38, 52, T31	Questions were raised around the motivation for inclusion of this policy and whether it is needed in the plan.	Consider the rationale and intent for Policy H5
H6 Conversion of existing buildings	T32	Need to explain what a village amenity would be.	
B1 New business space	20, 21	There was concern expressed that the policy was over-supportive of business development.	Clarify the rationale for supporting new business space in the Parish.

## Comments and Areas of Potential Change

B2 Retention of business premises	19, 39, 44, T33	Comments suggesting tightening of rules around valuation and advertising of business premises. Also noted was an exemption of class A2 which is an error.	Review the policy to ensure it meets the needs of the community.
B3 Adaptation for live/ work		No comments recorded	
D1 Design Standards	T34	Recommendation that wording be left more open	
D2 Boundary Treatments	40	Comments noted that the policy does not address requirements for security etc.	Given the rural nature of our Parish, the intent of the policy is to have open fencing or hedging prioritised over close boarded alternatives. Review the policy and species to meet all needs including security of boundaries
D3 Climate Change		No comments recorded	
D4 Inside the Conservation Areas	T37	Incorrect details around permitted development rights	
D5 Outside conservation Areas	T37	Third element of the policy definition	
D6 Extensions	8, T37	There was a comment around historic approval of extensions that are not in-keeping with the main building. Feeling the detail is already defined in other policies.	The policy identifies the need for extensions to respect the original building. The plan cannot impact historic development and so no changes are planned to the policy.
T1 Parking in New Development	2, 4, 5, 13, 41, T39&9	Comments received show we need to clarify our position around the number of parking places required in new development.  Concerns over the use of different terms for bedrooms may be a concern also the definition of garages.	The requirement for parking spaces is for new development to have zero impact on public and on-street parking. This is most important in, and adjoining, the Goudhurst Conservation Area. The policy will be reviewed.
T2 Safe and Sustainable Transport	2, 4, 5, 42, 43, T40	Traffic concerns remain a constant across the Parish. The comments reflect issues and solutions that need to be addressed within Project P2. Project P2, although not a land-use policy, to be updated to reflect the opinions expressed by residents.	No Change to policy

## Comments and Areas of Potential Change

		Secondary schools are mentioned but the context is unclear.	
T3 Traffic Mitigation	49, T41	As above and a clearer definition of precisely what mitigations would be expected with costings.	No Change to policy
L1 Development within the AONB	16, 46, T10	Comments only	No Change to policy
L2 Development adjacent of the AONB	46, T9, T11	Changes in wording for clarification.	No Change to policy
L3 Retain the profile of our hilltop villages	46, T12	Changes in wording for clarification.	No Change to policy
L4 Conserve Landscape and Heritage Assets	T51	Changes in wording for clarification of the word unique.	
L5 Gap between Goudhurst LBDs'	T14, T52	Changes in wording for clarification.	
L6 Bio-diversity	T15, T53	Need to reflect national and local objectives and deliver net gain	
L7 Trees	33, T54	Question around the meaning of 'wholly exceptional' circumstances. Changes from must to should. Consider wording around replacement trees.	Clarify the position.
L8 Light Pollution	35, 48, T16,	Comments around preserving our dark skies. Take into consideration rights around lighting on a dwelling house. Reference to Policy EN8 needs to be reviewed as this will change in the new Local Plan. Consider the impact of large windows either in design on in this policy.	There were comments but these were supportive so no substantive changes are planned for this policy – although it has been redrafted to clarify the intention
L9 Green Spaces	11, 14, 15, 32, 33, 47, 50, 52, T20	There were questions from landowners and residents both objecting to and in support of the Green Spaces policy.	The Landscape team will review the comments received and revisit the methodology in light of those comments to ensure sites have been assessed in accordance with the NPPF guidelines. We will validate the outcome with TWBC and seek discussions with landowners who have commented.
L10 Views	T21	Changes in wording for clarification. Some of the views are from outside of the Parish.	
C1 Community Facilities & amenities	25	No changes proposed	

## Comments and Areas of Potential Change

C2 Accessibility	5, T23	Clarify questions around meaning 'pedestrian connectivity'.	
C3 Developer Contribution	T24	Concerns this is vague and needs further clarity	
C4 Assets of Value to the Community		No comments recorded	
C5 Broadband and Mobile infrastructure	22, 30, T25	Need to focus not just on electronic communications but also new dwelling connectivity to services.	
C6 Protecting & improving Public Rights of Way (PROW)	52	PROW are important in our community and we should take any opportunity to improve or extend our network.	Addition of new policy to address the requirement.
Preface		Replace section	Section replaced for next iteration to reflect successfully passing regulation 14.
Reading this document	T1	Incorrect emphasis on 'enforceable' rather than consideration.	'enforceable' changed to 'taken account of in determination'
Section 1 - Purpose	T2, T3, T4	Clarification of TWBC's activity in delivering a new Local Plan. Change of Cranbrook to Cranbrook and Sissinghurst. References to SEA and HRA missing from the list of documents.	Clarification of TWBC's activity in delivering a new local Plan. Change of Cranbrook to Cranbrook and Sissinghurst. Inclusion of SEA and HRA in the list of documents.
Section 2 – How we developed our plan	T5	Changes for clarification	Small word changes to simplify and clarify meaning
Section 3 – Goudhurst – A History		No changes	No Changes
Section 4 – Our Vision Goals and Objectives	T6, T7	Changes for clarification	Small word changes to simplify and clarify meaning
Section 5 - Our Policies	T8	Changes for clarification	Small word changes to simplify and clarify meaning
New Section – Delivering Sustainable Development		Although the plan is designed to support sustainable development as documented in the Basic Conditions Statement it was not explicitly identified within our plan.	New section summarising how our plan supports sustainable development
Section 6 – Landscape and Environment Policies	T9, T11-T19	Changes for clarification	Small word changes to simplify and clarify meaning
Section 7 – Community and Wellbeing Policies	T20-T24	Changes for clarification	Small word changes to simplify and clarify meaning



## Comments and Areas of Potential Change

Section 8 – Housing Policies	T25-T31	Changes for clarification	Small word changes to simplify and clarify meaning
Section 9 – Business and Employment Policies	T32	Changes for clarification	Small word changes to simplify and clarify meaning objectives
Section 10 – Design Policies	T33-T37	Changes for clarification	Small word changes to simplify and clarify meaning
Section 11 – Traffic and Transport Policies	T38-T42	Changes for clarification	Small word changes to simplify and clarify meaning
Section 12 – Selecting sites for development	1, 10, 18, 24, T41	There were concerns raised that we had not included our assessments of sites submitted to the TWBC calls-for-sites processes.	We need to clarify the position around sites and amend the link to the criteria which were published on our website. We need to review the decision to not publish the results of our assessments and discuss the options with TWBC. This section will be moved towards the beginning of the document along with the rationale.
Section 13 - Parish Action Plan	T42, T43		
Section 14 - Feedback	T45	Feedback form no longer needed in future versions	Remove section
Section 15 - Useful Definitions	T46	Glossary has the potential to confuse terms with NPF and other definitions	Remove section
General Comments	T47, T48	Accept comments and update accordingly	Update as appropriate.

## Section 6 Summary of Policy Changes

We can remove those policies that have no changes once we are settled.

Policy Summary	Rationale for Change	Original Text	Updated Text
H1 Housing mix	To clarify and simplify the policy	<ul style="list-style-type: none"> <li>- A minimum of 40% of dwellings to be 1- and 2-bed, with a balance of both</li> <li>- 20%-40% of dwellings to be 3-bed</li> <li>- A maximum of 15% of dwellings to be 4+-bed dwellings</li> </ul>	<ul style="list-style-type: none"> <li>- A minimum of 40% of dwellings to be a mixture of 1- and 2-bed*</li> <li>- A maximum of 15% of dwellings to be 4+-bed dwellings*</li> </ul> <p>Numbers to be rounded to the nearest whole number</p>
H2 Tenure Mix	To clarify the intention around the levels of affordable homes in the plan. Development in Goudhurst is historically on small sites. The intention is that all sites of 4 or more deliver affordable housing. We will defer to borough policies for larger developments	Proposals for development must reflect local housing need and 25% of all dwellings must be provided as affordable homes in all developments delivering 5 or more dwellings.	Proposals for development shall reflect local housing need and 25% of all dwellings must be provided as affordable homes in all developments delivering 4 to 8 dwellings.  Where affordable homes cannot be delivered on a specific site, the alternative of a developer contribution to allow development on alternative sites within the Parish may be considered.
H3 Allocating Affordable Housing	No changes proposed.		
H4 Rural Exception sites	Clarify the position around the policy, its obligations and its relationship with NPPF.	Proposals for the development of small-scale affordable housing schemes on Rural Exception Sites on the edge of one of the three settlements in the Parish where housing would not normally be permitted by other policies will in general, be supported.	Proposals for the development of affordable housing schemes on Rural Exception Sites will, in general, be supported.

## Summary of Policy Changes

H5 Replacement Dwellings	The scale of redevelopment of sites outside the limits to build has in many places introduced urban standards of site utilisation which is incompatible with our rural location. The intent is that development is of a scale compatible with the rural setting. We have simplified the policy to focus on this objective.	<p>The replacement of existing dwelling units should be permitted only where the existing building has established and continuing residential use rights and the current building is unstable or uneconomic to repair. All other policies set out in this plan will apply and in addition the following criteria must be met:</p> <ol style="list-style-type: none"> <li>1. the footprint of the replacement building does not exceed the total volume of the original building plus the additional volume that could be generated using the maximum limits imposed for extensions under permitted development;</li> <li>2. the location of the replacement building is situated to coincide in whole or part with the position of the original building unless an alternative location within the existing curtilage of the property would reduce the visual impact of the building from areas to which the public have access or facilitate the necessary realignment of a public highway.</li> </ol> <p>Such development may be subject to conditions.</p>	Outside the Limits of Built Development, the replacement of an existing dwelling by another dwelling within the same residential curtilage will be permitted where the scale, form, height, massing, including relationship with the site boundaries, of the replacement dwelling is compatible with its rural location and the surrounding form of development.
H6 Conversion of Existing Buildings	No changes proposed		

## Summary of Policy Changes

B1 New business space	Business is important to the future sustainability of our community. The text has been simplified removing provisions elsewhere in the plan.	The change of use to other employment, commercial or business uses, or the extension of buildings in employment, commercial or business uses will, in general be supported. Planning permission for new business space and tourism facilities will be considered in the following circumstances:  1. The change of use of a rural building to business or tourist use  2. A new building for business or tourist uses  3. A proportionate extension of an existing building for business or tourist use on a scale appropriate to the settlement or in the open countryside:  a) where associated with a farm diversification scheme or an existing employment site; or  b) otherwise, including on all isolated sites, only where the development can be shown to be making a positive contribution to its setting in the open countryside and to the purpose of designation of the High Weald Area of Outstanding Natural Beauty.	Planning permission for new business space and tourism facilities will be supported in the following circumstances:  1. Change of use of a rural building to business or tourist use,  2. A new building for business or tourist uses,  3. A proportionate extension to an existing building for business or tourist use that is on a scale appropriate to the settlement or the open countryside.
B2 Retention of business premises	Although not intended, the policy as stated exempts use class A2.	Planning applications that result in the loss of retail (Use Classes A1), services (Use Classes A3-A5), commercial	Planning applications that result in the loss of retail (Use Classes A1), services (Use Classes A2-A5), commercial
B3 Adapting Existing Buildings for Live/work	The policy wording was simplified removing provisions in the NPPF and covered by other policies in our plan	b) no significant and adverse impact arises to nearby residents or other sensitive land-uses from noise, fumes, odour or other nuisance associated with the work activity;	Provisions removed as they are covered by other policies.



## Summary of Policy Changes

		c) there is no net loss of any dwellings;	
D1 Design Standards (now D1 Design Considerations)	Additional provisions have been added to this policy to reflect changes in other policies where text has been simplified. On pre-inspection the advice was also to amend the title from Design Standards to Design Considerations.		<p>l) where required, proposals should be accompanied by an integral landscaping scheme (for both soft and hard landscaping) to enhance the natural and local environment/AONB.</p> <p>m) where development is in an exposed or elevated site then the design should minimise the impact on the nightscape of light pollution whether from internal or external light sources.</p> <p>n) Supporting outstanding or innovative design.</p>
D2 Boundary Treatments	Comments were to include species that can act as security boundaries. On review the policy has been simplified and the detail reflected in the policy intent.	<p>Hedges will be preferred over fencing. Outside the settlements hedges make the most appropriate boundary and native species of planting, such as a traditional mixed hedge of hawthorn, field maple, beech, and hornbeam should be used and may include trees such as oak, cherry or ash.</p> <p>Within the settlements other traditional urban hedges (privet, box etc.) or shrubs such as escallonia, viburnum, and elaeagnus may be grown as attractive garden boundary hedges</p>	New development should include the use of appropriate boundary treatments of hedges of native species

## Summary of Policy Changes

		Intrusive fences and ornate gates with imposing pillars are to be avoided. If fencing is to be used then post and rail or low wooden fencing and green hedging should be used. High or close-board fencing in frontages will also be discouraged in favour of softer treatments.	
D3 Climate Change	Removal of provisions linking new development with existing buildings. The benefit of such a provision is hard to quantify and difficult to dimension or deliver and so will be removed	4. link the provision of low and zero carbon energy infrastructure in new developments to existing buildings;	Provision removed.
D6 Extensions	Change to the overall intent to encompass requirement 4 which is removed.	Extensions to buildings must:  4. ensure that the cumulative effect of such extensions, viewed from the surrounding area, is acceptable; and	Extensions to buildings – whether individually or cumulatively – must:
T1 Parking in New Development	This clarifies our objective around parking places required in new development which is to ensure development has zero impact on public and on-street parking in Goudhurst Village	Proposals for new homes in the Parish must provide for one off-street parking space for each bedroom.	Proposals for new homes in or adjoining the Goudhurst conservation area must provide for one off-street parking space within the development site for each bedroom.
T2 Policy T2 Safe Access and Sustainable Transport	No changes proposed		

## Summary of Policy Changes

T3 Traffic Mitigation	Clarification of objectives	..... impact can be mitigated by means of developer contributions to measures agreed with the Parish Council (in consultation with residents) and the highways authority.	..... Impact can be mitigated.  Mitigation <b>can be secured by design</b> , developer contributions or other measures agreed with the Parish Council <b>the Borough Council and the Highways Authority</b> .
L1 Development within the AONB	Policy has been clarified to include future changes in the HWAONB management plan.	Proposals for development in the AONB will be permitted only where they satisfy the objectives of the High Weald Area of Outstanding Natural Beauty Management Plan.	Proposals for development in the AONB should, where appropriate, make a positive contribution to the objectives of the High Weald Area of Outstanding Natural Beauty Management Plan and any subsequent updates thereto.
L2 Development adjacent of the AONB	Change from ‘damage’ to ‘harm’	Where development is proposed outside of the AONB it must not <b>damage</b> or detract from the environment, character and landscape setting of the AONB.	Where development is proposed outside of the AONB it must not <b>harm</b> or detract from the environment, character and landscape setting of the AONB.
L3 Retain the profile of our hilltop villages	Change from ‘alter’ to ‘harm’	Development must not <b>alter</b> the profiles of the three hilltop settlements (Goudhurst, Kilindown and Curtidsen Green), as seen from the surrounding countryside.	Development must <b>preserve and enhance</b> the profiles of the three hilltop settlements (Goudhurst, Kilindown and Curtidsen Green), as seen from the surrounding countryside.
L4 Conserve Landscape and Heritage Assets	Removal of the word unique	Development must conserve the <b>unique</b> historic landscape of the Parish and the settings of its heritage assets.	Development must conserve the historic landscape of the Parish and the settings of its heritage assets.
L5 Retention of the gap between Goudhurst LBDs	Strengthen wording	Proposals will <b>be supported</b> that maintain the separate identity and character of the two Goudhurst settlements and prevent their coalescence or the erosion of the undeveloped gaps.	Development proposals must maintain the separate identity and character of the two Goudhurst settlements and avoid their coalescence or the erosion of the undeveloped gap.

## Summary of Policy Changes

L6 Biodiversity	Strengthen the policy in line with the NPPF.	Development that would result in a loss of biodiversity will, in general, not be permitted. Where loss is unavoidable proposals may be considered to:  1. mitigate that loss; or 2. compensate for that loss, resulting, where possible, in a net enhancement to biodiversity within the Parish	All development must contribute to a net gain in biodiversity. Development that would result in a loss of biodiversity will only be considered where proposals:  1. mitigate that loss; or, where that is not possible, 2. compensate for that loss
L7 Trees	The overall language of the policy has been simplified. More detail has been provided on the intent of the policy. Requirements for replacement is now addressed within D1 Design Considerations	Proposals <b>must</b> retain ancient woodland, ancient trees or veteran trees of arboricultural and amenity value and development that damages or results in the loss of the above will not be permitted unless there are wholly exceptional circumstances. Proposals must be accompanied by a tree survey that establishes the health and longevity of any affected trees. <b>Where it is agreed that it is impossible to retain a tree a replacement of similar species must be planted.</b>	Development that undermines the future health of, or results in the loss of ancient woodland, protected trees and veteran trees will not be permitted. Proposals shall be accompanied by a tree survey that establishes the health and expected longevity of any affected trees.
L8 Light Pollution	The landscape in Goudhurst means that houses are often built on exposed or elevated sites making this a complex area. The policy and intent have been updated to better reflect the overall objective	Policy L8 Light Pollution  Approval is required for all external lighting schemes including temporary lighting and lighting of sports facilities. All lighting should be minimized in power and duration and designed to minimize light spill. All relevant development requires the approval of all external lighting with a lighting plan to minimize impact. Proposals will be refused, unless it can be shown as beneficial to the community, essential and must have regard	Policy L8 Protection of the rural landscape at night ('nightscape')  All proposals for alterations, extensions and new development will be considered in terms of the appearance of lighting and reflectivity in the 'nightscape', with particular attention paid to the position and proportions of windows and other glazed areas. Inappropriate glazing leading to an incongruous appearance in the



## Summary of Policy Changes

		to current guidelines established for the High Weald AONB and TWBC policy EN8	<p>setting of the historic rural nightscape should be avoided.</p> <p>New development schemes should be supported by a proportionate external lighting scheme (excluding those on an existing dwelling house) including temporary lighting and lighting of sports facilities. The impact of all external lighting should be minimized in terms of direction, power, colour and duration. A lighting plan submitted with the proposal should set out how this is to be achieved.</p> <p>All lighting should be designed to minimize light spill.</p> <p>All proposals for external lighting should demonstrate an essential purpose to the occupier or beneficial impact to the community and have regard to current policies and guidelines of the High Weald AONB and TWBC.</p>
L9 Green Spaces	The policy has been simplified. The section has also been updated the document to reflect the overall methodology used to review the list of green spaces. The requirement for larger developments to provide new Local Green Spaces has been removed from this policy as	<p>Policy L9 Green Spaces</p> <p>Development that results in the loss or degradation of Green Spaces will be considered only in <b>wholly</b> exceptional circumstances. Larger developments should be designed to provide new <b>green amenity spaces, reflecting and extending the existing network of</b></p>	<p>Policy L9 Local Green Spaces</p> <p>Development that results in the loss or degradation of Local Green Spaces will be rejected unless there are exceptional circumstances.</p>

## Summary of Policy Changes

	inappropriate and included in policy D1.	<b>accessible green space running through the Parish.</b>	
L10 Views	Small changes to wording	Development <b>must</b> not cause any loss or diminution of important views into and out of the settlements from any area to which the public has access.	Development <b>should</b> conserve important views into, out of, and between the settlements from any area to which the public has access.
C1 Community Facilities & amenities	Clarification on what is being protected	Development proposals that will result in the total, or partial, loss of an asset or amenity that is of value to our community will not be supported.	Developments that incorporate proposals for improved or additional facilities within the Parish will, in general, be supported.
C2 Accessibility	No changes proposed	....within the Parish for all sectors of society will be supported.	....within the Parish <b>for everyone, regardless of their age, ability or disability</b> , will be supported.
C3 Developer Contribution	The position on developer contribution is clarified.	Where a developer contribution is appropriate the Parish Council, in consultation with residents and taking account of projects in this plan, will identify requirements and the developer should either: 1. provide, or contribute to, the identified requirements on site; or 2. fund, or directly deliver, off site facilities within the Parish.	The Parish Council will maintain a list of costed and documented projects that may be fully or partly funded by developer contributions (Section 106 agreements), where justified, arising from development. Such contributions to be used to: 1. provide, or contribute to, the identified facilities on site; or 2. fund, or directly deliver, off-site facilities within the Parish.
C4 Assets of Value to the Community	Title change and addition of a usage clause.		C4 Assets of Value Within the Community

## Summary of Policy Changes

		total or partial loss of an asset or amenity	.... total or partial loss of an <b>actively (or recently) used</b> asset or amenity
C5 Broadband and Mobile infrastructure	No changes proposed but provision for new housing included in design considerations.		
C6 Protecting & improving Public Rights of Way	Addition of new policy.		New development should protect and, where possible, enhance the existing PROW network and its setting.  Where associated public footpaths or bridleways are proposed to be re-routed or realigned, they should be designed as part of the landscaped wildlife corridors, rather than being routed along estate roads as part of highway improvements.

## Submitted Responses

### Section 7 Submitted Responses

Below are the responses submitted through the process

#	Comment/Concern	Change Comment	Steering Comment
1.	<p>I have just received the Copy of The Neighbourhood Plan which I think is well presented and well thought out., and I realize how much time and effort is required to produce this document.</p> <p>The Comment I would like to make is on the positioning of any new Residential Development.</p> <p>The biggest problem for All Residents locally is the vast amount of traffic using the Lanes, and it will only get worse. It would seem sensible to me that any new Development in Goudhurst should be located where people can walk to the village. This alleviates traffic movement and pollution and will help the local Amenities...i.e. Shops, Schools, Pubs and the Church.</p>	<p>I am a long standing Resident of Curtisden Green and I do not think that this Hamlet is the right place for any new Development as Bethany School produce huge amounts of traffic on narrow lanes which include Coaches and Mini Buses and it will progressively get worse as the School is now opening their facilities to the Public.</p> <p>This is not a case of "Not in my Back Yard" ... But just common sense!!</p> <p>I hope these comments will be taken into consideration when finalizing the New Residential Sites.</p>	<p>Although the NDP does not list or allocate sites for development, the focus for the plan is to support sustainable development across the Parish as set out in the NPPF paragraphs 78 (supporting growth in villages with services) and 79 (avoiding development of isolated homes).</p> <p>Traffic concerns are answered in section 4.1</p>
2.	<p>I have received the draft plan and may I say that I consider it to be an excellent professional document. However, there is one point I would make, concerning traffic in Goudhurst (section 11.1 and 13P2):</p> <p>You note that the major problem is the excessive amount of traffic on the High Street, particular the HGVs. However, the measures you propose</p>	<p>A by-pass for the village, along the old railway line from Hope Mill past Smugleys Farm and cutting across farm land to rejoin the A262 near to the Peacock. The track is still there and is not built over, except at Risebridge. The return to the main</p>	<p>Our overall comment on traffic can be found in section 4.1.</p> <p>We would not dismiss any proposals and we believe that change can be delivered through community led initiatives (Project P2) where, as a community, we identify and pursue <b>all</b> options (including those you suggest) in conjunction with GPC and the relevant highways authorities.</p>

## Submitted Responses

	(downgrading the A262 to a B road etc.), whilst welcome, are not going to solve the problem in the longer term. I think you should at least discuss more radical alternatives:	road could go along several different paths.  Dividing the A262 into two one-way stretches through the village – the existing road going from East to West and the eastward traffic being diverted along North Road – Lovers Lane – Chequers Road to rejoin the main road at the Chequers. There are several other possibilities for the route.  If these are to be dismissed, I think you should say why. Otherwise, I fear that the village may face complete gridlock in a few years' time.	
3.	<p>Thank you for your excellent document but I am a little confused.</p> <p>I assume that the work of the steering group will end with the adoption of the NDP and that after that implementation of the plan will be entirely in the hands of the Parish Council?</p> <p>The planning authority will continue to be Tunbridge Wells Borough Council and they will be expected to follow the planning policy outlined in the Goudhurst NDP?</p> <p>Will this mean that the Parish Council will remain, as now, only able to advise and recommend on planning proposals and that the final decision on all planning proposals will remain with TWBC?</p>		<p>Broadly correct but the basis for future decisions will be very different.</p> <p>Once the consultation period is complete, the plan will be updated to reflect residents' comments. It then has two stages to complete: First it goes forward to examination where the planning inspectorate will review the plan to ensure it meets the legal requirements of an NDP and does not contradict national or local policies. Once acceptable to the examiner it will be put to a local referendum. If it passes that then the Steering group will disband and GPC take on future responsibility for the plan. At this point it is legally enforceable and the policies in the plan take primacy in planning decisions.</p> <p>GPC have their planning committee who, as now, have a view of all planning proposals. However, once the plan is in place support/objections for any proposal will be based upon a set</p>



## Submitted Responses

	<p>I am sorry to take up your time but I really only look for a “yes” or “no” answer.</p> <p>Many thanks for your prompt reply – I am sorry to have disrupted your Sunday evening.</p>		<p>of Goudhurst focused policies contained in the plan rather than opinions.</p> <p>Full approval of all planning remains the responsibility of the TWBC planning committee which is made up of borough councillors. This group normally takes the recommendation of the planning officers. Once the plan is approved, the officers will need to give Goudhurst policies primacy when making decisions. This does not provide any guarantees but to go against plan policies would require justification.</p> <p>So, you are correct in saying the overall process flow remains the same. However, the rules governing future decisions will no longer be the broad TWBC policies focused on the needs of the town but rather a set of policies that reflect the needs of our local community.</p>
4.	<p>By far the most significant is the traffic problem – there are obviously lots of possible solutions – like changing the A262 to a B road, banning the trucks completely, building a bypass and traffic control to name a few.</p> <p>It is abundantly clear that when there is traffic control, the traffic flows more smoothly – I live in Church Cottage and twice traffic control has been used because of scaffolding on the side of my house – the first time for two weeks and it worked – ask the Start and Eagle if you doubt me</p> <p>I suggest we have a vote on traffic control as a short to medium term fix while the other solutions continue to be debated</p>		<p>Our overall comment on traffic can be found in section 4.1.</p> <p>The plan identifies a community project (P2) which proposes the creation of a group to identify and action a plan to address the current traffic problems identified in the questionnaire. Your suggestions (one of which has already been actioned by the Parish Council) are practical and would be capable of action by the proposed project group.</p>

## Submitted Responses

	It is surely better than doing absolutely nothing which appears to have been the case for the 11 years I've lived in Goudhurst		
5.	<p>Thank you for seeking my comments on this plan. Only two fairly obvious points to emphasise:</p> <p>1. Any extra housing must be accompanied by sufficient infrastructure to support the extra people. ie, roads, schools, medical care, shops, etc</p> <p>2. You absolutely MUST stop large vehicles passing through the village, and also prohibit parking on the pavements along toe road below the church. The traffic there needs to flow</p>		<p>We would agree that additional housing should be accompanied by supporting infrastructure. The Parish historically has seen small developments which add to demand but have never represented a step change in need but that may change in the future. Policy C1 and C3 looks to developers to support investment in the community.</p> <p>There are mechanisms such as the Community Infrastructure Levy (CIL) which are used to capture funds for infrastructure investment. TWBC have no plans to introduce a CIL.</p> <p>Our general response to traffic (section 4.1).</p> <p>Our plan cannot unfortunately unilaterally ban larger vehicles as the road remains an 'A' road and so is open to all. As an 'A' road GPC is also limited in the changes that can be made independently of Highways. Project P2 is intended to explore all of the options and alternatives in order to relieve congestion and improve road safety.</p>
6.	It's a small point, perhaps, but the numbers in the housing mix do not add up. Assuming 40% is a maximum for 3 bed and the stated maximum for 4+ is 15%, then the balance (of 1 and 2 bed ) has to be a minimum of 45%.		The numbers are not fixed percentages and so were never intended to add up to 100%. Our objective is to increase the number of smaller homes and we set minimum and maximum figures and overall targets. The plan will be updated to clarify this.
7.	Policy H2 requires a minimum of 25% homes in a development to be affordable. TWBC already have a higher figure as does the NPPF – why are we so low?		In Goudhurst the landscape and other constraints mean we rarely see larger developments in the Parish and so, under TWBC and NPPF targets, we would not see any affordable housing delivered in the Parish.

## Submitted Responses

			The objective of the policy is to ensure we see affordable housing delivered in smaller developments. Our intention is for the higher TWBC and national targets to apply to larger developments if they are proposed. The plan will be updated to clarify this.
8.	<p>May we thank you all very much for a splendidly produced publication.</p> <p>Read from cover to cover and carefully considered, the main concern is with</p> <p>Design Policy. 10.7 D6 Re planning permission.</p> <p>Quote ' design must complement main building.'</p> <p>Extensions in keeping with existing building. Using tile hanging, weatherboard etc.</p> <p>How did the extension to Stone Cottage, Church Road obtain planning permission?</p> <p>The size and design and materials used are <i>totally</i> out of keeping with the cottage.</p> <p>The 'oversized packing case' which has been built goes against everything stated in the NDP. Surely some design more suitable to the previously attractive old property could have been chosen. From the NDP can we expect more sympathetic additions ?</p> <p>Disappointing that it is too late for this one , we fear.</p> <p>How fortunate we are to live in hilltop villages!</p>		<p>The plan is setting policies that will apply to future development activity. Our policy on extensions was developed in response to similar concerns raised in the community during our workshops and evidence gathering about existing extensions in the Parish. The objective of the policy is not to prevent innovation or creativity, but to support development which reflects the sense of space and character that residents regard as important, as your comments indicate.</p>

## Submitted Responses

9.	With regard to any proposed Rural Exception Site does policy H4 mean that an RES site proposal would overturn all other policies.		Policy H4 does not overturn other policies in the plan. A Rural Exception Site may be permitted on sites where other housing would not normally be permitted. It does not mean that a RES can override other policies in the plan.
10.	<p>Section 12 provided an opportunity to allow local residents to have a say about the Call for Sites. By ‘swerving’ the issue, the Qualifying Body has prevented others, outside the Committee, from influencing the draft plan.</p> <p>The questions this raises include:-</p> <p>Why has the Committee not issued a Call for Sites?</p> <p>What assessment criteria were used? The reference to 35 Link to Criteria does not work.</p> <p>Why will the site review and analysis by ‘the team’ not be used?</p> <p>Why were the results of the reviews shared with TWBC but not the residents of the Parish?</p> <p>What is meant by ‘general agreement on all sites’ following discussions with TWBC?</p>		Our overall response to site assessment and allocation can be found in section 4.2.
11.	Letter From Bethany – See section 8.2.	<p>Remove Section 6.12 entirely or provide substantiating evidence and reasoning for the selection of privately-owned land as green spaces.</p> <p>The plan has no legal basis (Bethany)</p>	<p>The overall position on Green Space allocation is set out in section 4.3. There is concern in the comments that Green Space designation conveys rights to others. We can confirm that designation does not alter any rights with respect to any site.</p> <p>The plan has been developed in accordance with the legislation (Localism Act 2011 and the NPPF 2012/2018) and once made has legal force.</p>

## Submitted Responses

		<p>GPC are not involved in planning which is the responsibility of TWBC (Bethany)</p> <p>The plan was written by amateurs and has no validity (Bethany)</p>	<p>All planning applications in the Parish are adjudged by GPC at the start of the planning process. The NDP provides GPC with a structure with which to measure planning applications.</p> <p>The plan was indeed written by residents of the Parish and this meets the objective of the Localism Act 2011. Through our process we have had input from planning professionals and we have been working closely with TWBC and IPE to ensure our plan complies with the requirement of the NPPF.</p>
12.	<p>I assume that these working groups will be set up by the Parish Council. Are the members to be recruited from the existing councillors or is it envisaged that other local residents will be recruited? If the latter, then I wonder whether there are sufficient public-spirited people who will volunteer to serve.</p> <p>Also, I can foresee that the existing Trustees of the Parish Hall might well resent an outside body telling them how to manage their affairs. Similarly, the Social Club has an active and enthusiastic committee, Do they want another committee overseeing them? I am not sure that ReadyCall or the Church either want to be told how to run their organisations.</p> <p>But perhaps these organisations have already been consulted.</p>		<p>All of the organisations mentioned in the plan were consulted before the plan was published.</p> <p>The plan itself was community-led written by volunteers with support from consultants.</p> <p>The objective is to have the community provide the leadership for these future projects. The Parish Council has a key role in the process but they already have a full agenda.</p> <p>It is important that if the community want to see change then we need to mobilise support across the Parish.</p>

## Submitted Responses

13.	<p>Is insistence on one off-street parking space for each bedroom in new developments realistic? I do not think that it would be practical for, say, small three-bed roomed semi-detached or terraced housing on limited in-fill sites,</p> <p>Also you suggest that this requirement will reduce the pressure on existing off-street parking in the village by providing additional parking. This means that residents on new developments will be providing free parking for people living elsewhere. I am sure that that would be resented.</p>		<p>The intention of the policy is to protect public parking in the centre of Goudhurst recognizing that Goudhurst Village is potentially the only location capable of supporting sustainable development. The objective of the policy is to ensure that the public parking, that is so important to the economic viability of the Parish, is not filled by residents whose own parking needs have not been met by developments.</p> <p>The intent of the policy is to have flexibility around parking spaces so that we can preserve our commercial centre.</p> <p>This objective is clearly not well articulated and we will review the policy in light of comments.</p>
14.	<p>Letter from Bloomfields see section <b>Error!</b></p> <p><b>Reference source not found.</b></p>		<p>The overall position on Green Space allocation is set out in section 4.3.</p> <p>The option for allocating Green Spaces was introduced by the National Planning Framework in 2012. Site 102 was added to our list of Green Spaces to re-enforce its importance to the community.</p>
15.	<p>Dear Mr Willis</p> <p>I write to you in my capacity as a private resident of Curtisden Green since 1989. I read with interest the consultation draft document of the Goudhurst, Curtisden Green and Kilndown Neighbourhood Plan.</p> <p>I support the vast majority of what is in the plan and clearly you and your team have spent many hours putting this together. When this plan was first mooted, I did volunteer my services and as I have heard nothing since, I can only assume that it was deemed that there was not a gap for my skills set.</p>		<p>The overall position on Green Space allocation is set out in section 4.3.</p>



## Submitted Responses

	<p>Clearly a great deal of thought has been put into the creation of this substantial document.</p> <p>However, I was more than a little surprised to see three suggested green space areas for Curtisden Green.</p> <p>I fully support the inclusion of AS3 on Page 24 of the NDP consultation document as that is actually the plot of land that is Curtisden Green and as far as I'm aware is a publicly owned area.</p> <p>The request for the retention of green spaces within the parish in the original questionnaire implied to me that this was a request to preserve existing publicly owned and publicly accessed green spaces.</p> <p>The two additional green spaces namely AS1 and AS2 are privately owned and should not be publicly accessed without explicit permission. I therefore wish to lodge my objection to the inclusion of both of these fields into the NDP.</p> <p>On page 23 of the NDP it states that the plan identifies a list of green spaces across the parish that have an enduring significance to residents because of their history, recreational value, landscape value, tranquility or richness of wildlife. I fail to see how AS1 and AS2 meet any of these criteria. As a Curtisden Green resident of 29 years I can certainly vouch that they are not significant to me personally, they have no recreational value to me personally, the presence or absence of these fields will not adversely affect tranquility in Curtisden Green and I am not aware of the wildlife that exists in either one of these two identified fields.</p>	
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## Submitted Responses

	<p>To compare either one or both of those areas to the Glebe Field, the Plain or Millennium Field is, I believe, both unwarranted and unfair.</p> <p>To the best of my knowledge, the owners of AS1 and AS2 were not contacted in advance that these two fields were even being considered which, if true, is at best discourteous.</p> <p>I very much look forward to seeing the evidence on which the selection of both of these fields were identified because for the life of me I cannot see why they have been or indeed should be included and humbly suggest that they should be removed at the earliest possible opportunity.</p>		
16.	<p>With regards to pedestrians, twice in the last week I assisted elderly residents to cross the road. With HGV's blocking, white vans congesting and cars speeding through the main road trying to not get caught up in lengthy queues it is almost impossible for the elderly or young to cross the road. Is a pedestrian crossing in the pipeline to be requested? It would be great if it were please.</p> <p>The drawing on P19 showing the LBD areas, is the top drawing showing an expansion of area to be built upon?</p>		<p>Traffic is a key concern and the plan identifies the need for a community led project to gather detailed evidence and options that together will allow us as a community to help address some of our traffic issues.</p> <p>The LBD drawings show the boundary of the LBD and the pink areas show the conservation area. These are not areas identified for development.</p>
17.	<p>We need to spell out Sustainable Development and what it means. Make a clear link from 'item c' on page 5 (The Context) to definition in section 15 p. 73</p>		<p>Sustainable development is the golden thread that runs through our plan and the plan supports sustainable development as set out in the NPPF paragraphs 78 (supporting growth in villages with services) and 79 (avoiding development of isolated homes).</p>

## Submitted Responses

18.	Section 12, Selecting Sites for Development, page 68. The Neighbourhood Plan Team have discussed and reviewed 25 sites across our parish amongst themselves and also with TWBC. Unfortunately the findings of these discussions have been kept secret. The reason offered for the secrecy , duplication of work ,cannot convince and jars badly in particular as the whole exercise of putting a Neighbourhood Plan together was supposed to support transparency and inclusion.	We would therefore propose that details of the sites together with the current state of discussions thereon will form part of the GNDP.	Our overall response to site assessment and allocation can be found in section 4.2.
19.	Policy B2./Retention of Business Premises, page 48 Policy B2 also states that the loss of retail/services/business/hotel premises, (in practical terms inevitably a change from business/retail to residential use) may be supported if at least 2 independent valuation reports and an active marketing campaign of at least 18 months show that the premises are not commercially viable with their current use class attached. To our mind this is not stringent enough. Anecdotal evidence within our and other nearby parishes would suggest that these stipulations are being wilfully circumvented due to the use class change to residential being so very profitable.	Maybe one could stipulate valuation reports and marketing campaigns from one of the top (say, one of the 5 largest in the Southeast) estate agents only so that considerations of professional standing may prevent any potential collusion. We would welcome the GNDP to be more specific here.	We will review the policy with a view to creating tighter controls.
20.	Policy B2./Retention of Business Premises, page 48 The policy will generally not allow the loss of retail and/or business premises. However, it does make an exemption for use classes A2, B1a, B2, B8. There is no explanation given why e.g. offices of estate agents or financial services should be excluded or why e.g. storage and/or distribution sites.	The GNDP should clearly rectify this omission or indeed remove the exemptions.	It was not the intention to exclude A2.
21.	Policy B1./New Business Space, points 1.-3., page 46,47 The policies B1., 1.-3. are not consistent with the findings and the comments made under 9.1-9.4.	Policy B1. seems to have been drafted with the interests of the big parish farmsteads in mind.	The business survey of existing businesses did indeed identify that 64% would not need additional space on the next 5 years. However, we also noted that the main reason for businesses

## Submitted Responses

	<p>In the findings and comments it is mentioned that almost two thirds of all businesses responding to the questionnaire will not need additional space within the next five years and that local unemployment is less than a third of the national figure. These statements lead to the conclusion that there is only limited need for additional local business premises, that investment for expansion is currently only envisaged by a few and that the local employment situation is exceptionally good.</p> <p>It is also posited that tourism is an important contributor to our economy and thus important to our community. However, no attempt has been made to underpin this statement with any figures or other factual evidence. On the contrary, it is stated that TWBC is at the bottom of the tourist income list.</p> <p>Current business plans, the employment situation and the volume of tourism the parish enjoys would therefore not underpin Policy B1, 1.-3. This Policy outlines an almost unquestioning support for applications for New Business Space, including for tourist use - in practical terms it will be restricted to the conversion of rural and/or farmstead buildings or of the use of farming land. This is inconsistent with the findings and comments made under Section 9.</p>	<p>Whilst we definitely support their potential for employment opportunities, a shift in emphasis on the interests of the average parishioner should be undertaken.</p>	<p>being located in the Parish is because the owner lives here and this, coupled with the increasing numbers working from home and running businesses from home, led us to the conclusion we need to be supportive of those that wish to run businesses in the Parish.</p> <p>TWBC is bottom of the list for tourism so we can expect support for tourism projects in the borough. Goudhurst's largest employer, Forestry Commission Bedgebury, and businesses in Goudhurst village depend on tourists (including passing trade)</p>
22.	<p>P4 on page 70TThis is not exactly a disagreement. However I see no mention of broadband facilities in the Plan.</p> <p>Whilst broadband services in central Goudhurst (near to the 4 green cabinets) is good, in many parts of the Parish it is very poor. I do believe that small businesses (perhaps people working from home)</p>	<p>Should we have a Policy which is designed to press central government, KCC, BT, OpenReach, CallFlow and others to provide facilities and funding to improve our broadband? A local resident, xxxxxxxxxx, knows a lot about this subject. I can put</p>	<p>Policy C5 deals with the requirement around supporting new services. We have made initial contact with groups in the Parish organising upgrades to local broadband and fibre services.</p>

## Submitted Responses

	have moved away from Goudhurst because of inadequate broadband services that do not meet their needs.	him in touch with you if that would help.  Clerk 03 Dec 2018	
23.	Thank you for all your hard work on behalf of our village. It's a commendable document. I hope the implementation of new housing doesn't result in expensive housing schemes like the market place development. How the village utilises these opportunities to strengthen community and promote new initiatives for social bonding is probably the best outcome for all of us.		Our objective is to deliver development that matches need within the community and, as stated, to strengthen the community.
24.	Page 68 Site number 366. Currently accessible by private lane. What would happen regarding extra traffic? This site was rejected for housing development for many years as it's owner wished to build a home on it what has happened to change its status?		This site was originally submitted to the TWBC call-for-sites but was withdrawn by owner so has not been considered by this plan or the TWBC new local plan.
25.	C1 and 8.9 New housing to be solar powered. The village would benefit from generating its own solar powered heating system. There should be local buses running to the village along b2079 especially if the bedgebury road sites are selected for development. Bedgebury manor must be preserved as an architectural gem.		We would suggest that policy D1 and our recommended design guidelines look at a lot of the requirements for renewables in design. The updated plan also sets out our expectations around Bedgebury Manor for which planning may be submitted in the future.
26.	8.3 and 8.4 affordability and housing need. Affordability means 1 bed properties at ~£120,000 and 2 bed at ~£160,000. This is not being delivered in the southeast without selling the equity from a downsizing property. Age 55 + housing should be active living community style with attached leisure and sporting facilities open to all the 55 + village residents to use. A progressive and assisted policy of downsizing should be implemented as 30% of		Throughout the process we have recognised that market housing is often un-affordable for many in our community. We have identified project activity to deliver more affordable housing and have had discussion with organisations that specialize in delivering affordable and community living projects.

## Submitted Responses

	population over 50. This would keep older people connected sociable and physically healthy living in good quality housing that could also be rentable at affordable rents. Currently developers are building small luxury apartments at ~£400,000. The village needs to take a proactive role in downsizing to maximise its potential to release housing.		
27.	H1 - H3. It's not so much a concern as an observation. The numbers seem low and I wonder if it takes 'upsizing' into consideration. There are a number of our young families living in unsuitable accommodation, either because it is too small or without access to outside space.  It is a concern though that a number of properties within the social housing sector (bungalows and ground floor flats), intended for elderly and disabled residents, seem to have other tenants in them, thus restricting the 'freeing up' of family houses where appropriate.  Local housing for local people is not currently applied, with many recent allocations to tenants from elsewhere. Our own young people are then having to rent in other villages.	Within the booklet there is reference to people downsizing. I wonder how many older residents in social housing would be happy to downsize if suitable (new purpose built) housing was made available?	Our policies focus on smaller houses because we have more larger houses and fewer smaller houses than other communities. This does not mean we do not recognise the need in the community for up-sizing. Our view has been that by delivering more homes for those requiring less space larger homes would be freed for upsizing. Your comment though does reflect a need to actively manage the process and we will consider how this might be delivered in the final version of the plan.
28.	Page 7 and onward, "The Parish" 47% of the population of the parish live outside the main village of Goudhurst. The fact that very nearly half of the population DO NOT live in Goudhurst village is ignored in much of the document and the thinking. E.G. Page 10 "A History" is a history of Goudhurst only. More seriously, the proposals on Community and Wellbeing (Section 7) and even on Traffic (Section 11) virtually ignore the needs of these 47%.  a. Drainage of Kilndown Millenium	1. Throughout the document, where appropriate, refer to "Goudhurst Parish" not simply "Goudhurst" which should be taken to mean Goudhurst village.  2. Include throughout the document proposals of value to those who do not live in Goudhurst. Examples could be:-	The document is intended to support the needs of the Parish and not simply the largest population centre. All of the proposals have been developed based on input from the community and all areas in the Parish have been represented in those discussions. We will review the document in light of the comments made.



## Submitted Responses

		<p>Field.</p> <p>b. short-term parking for shoppers in Goudhurst centre.</p> <p>c. Improved internet and mobile phone signals in Curtisdens Green and Klindown.</p>	
29.	<p>section 8 Housing needs to be regarded in relation to development that has already occurred outside of the village and the Borough but will have significant impacts.</p> <p>The village of Marden which is just 3 miles away has seen a dramatic increase of new house building but it is outside of the Borough of TW. To look at Goudhurst without assessing the development in neighbouring villages because they are not in TWBC would be erroneous.</p> <p>Though boundaries end, the interchange of roads, services and schools between neighbouring villages is continuous and based on locality and proximity - not on where a Parish or Borough boundary ends.</p>	<p>To look at areas outside of the village when considering any local development because although outside of the area of consideration, it still represents development in the local area thus lie within spheres of influence that should be included as geographically significant.</p> <p>The number of new houses that have been built within a given radius from a central point (eg St Mary's Church) and in the last 3 (?) years should therefore be a consideration when assessing whether local housing needs are being met.</p>	<p>As a plan team we would agree with the comment and we have raised the concern that as Tunbridge Wells is the main economic centre any development to the east of Goudhurst will likely result in increased traffic through the Parish.</p> <p>The Neighbourhood plan has a boundary and the boundary of our plan is the Parish boundary. The legal basis for neighbourhood plans means that it cannot extend beyond that</p> <p>The relationships between parishes and so overall traffic flows is the responsibility of the borough and would fall under their new local plan. We all have the option of feedback on the TWBC local plan.</p>
30.	<p>section 11. Though I agree, the problem of traffic speed around the rural schools (Bethany) is not addressed. Given that Curtisdens Green is used as a through route, any policy should not just look at the Goudhurst village problems which are significant but the speed cars are travelling. That is more dangerous to those on foot than blocked roads and congestion. It is difficult to encourage walking unless the issue of speed is regulated. The cars entering Curtisdens Green lane come around a blind</p>	<p>Suggest identifying traffic red zones - ie 'school zones' and working with highways for a 20 mph limit around the sensitive areas. Safer for walkers, children walking to and from the campus and families living along the rural lanes in the vicinity. In order to create a safer environment for walkers, it is important to restrict</p>	<p>This will be discussed with highways as the Cranbrook road is an 'A' road and unlike the other roads mentioned responsibility falls wholly with Kent Highways. We will pass this comment to the Highways sub-committee of the Parish Council.</p>

## Submitted Responses

	corner on one side and across lanes on a fast bend on the other.	traffic as is done around Colliers Green school and also Cranbrook School.	
31.	The green lane between the A262 and Mile Lane (the original road) is a space that should be considered for addition to the list for Green Space designation.		This is the line of the old road. This will be considered as a part of the overall review of Green Spaces resulting from the consultation, but, given its usage, explore options for designation as a routeway or footpath.
32.	Not sure what is meant or gained by " <u>wholly</u> exceptional circumstances".		This has been taken from the NPPF. We will review the policy for clarity.
33.	We (Hawkhurst) were told by our Examiner to change all "will"s and "must"s to "should"s.		This will be considered in the updated plan.
34.	Policy L8 A good light pollution policy, we will watch with interest where this one goes.		
35.	Policy H2 25% affordable for 5 or more houses won't work as housing associations won't take on a single affordable house. Better to ask for a financial contribution to Goudhurst affordable houses from sites of <10 houses.		The Parish Council are seeking a partner to develop affordable housing in the Parish and this will be one of the considerations. The proposal made may well be an alternative we should consider.
36.	Policy H3 "In perpetuity" may be difficult to get through depending on the <i>current flavour</i> from government.		We have developed our plan based upon current circumstances. We recognise that changes in legislation in the future may change the legal basis upon which this policy relies.
37.	Policy H5 "Such development may be subject to conditions" may prove too vague for an Examiner.		The policy will be reviewed
38.	Policy B2 Suspect that this policy overlaps with TWBC policy so needs to align.		For our regulation 14 draft we have included all policies identified in the process reflecting the needs of the community. Our expectation was that some of our policies may overlap with those of the borough. In developing these we have sought to provide greater clarity around the needs in Goudhurst but recognise that any duplication would be removed prior to inspection.

## Submitted Responses

39.	Policy D2 This may be regarded as restrictive as the boundaries listed are not (for example) secure. There should be more flexibility as (for example) there are circumstances where "ornate gates" are appropriate.		The point is accepted and the policy will be reviewed to ensure it can be more widely applied.
40.	Policy T1 This is contrary to KCC guidelines for parking spaces, most developers stick to the minimum and this may be a step too far. It is good to push the boundaries but all bedrooms aren't used as bedrooms these days so perhaps "no of bedrooms minus 1" would work for more than 3 beds.		Our concern in Policy T1 is to ensure that existing public and street parking is not impacted by development of new homes or businesses. This is particularly important in the centre of Goudhurst where businesses rely on passing trade. Outside of this central area we would support more flexibility. The policy will be reviewed in this light.
41.	Traffic calming measures required in Lidwells Lane. The volume and in particular the speed of traffic using Lidwells Lane whenever there is a delay on the main road is of considerable concern. Lidwells Lane is one of the lanes that is within walking distance of the centre of the village and also has a number of smaller affordable houses in the area that attracts young families. We have a number of children walking in the lane; teenagers skate-boarding, cyclists and some locals riding horses. Cars using the lane rarely adjust their speed despite it being narrow in places. Even when they see walkers, cyclists and horse riders, any suggestion from residents to the driver that there is a need for caution is routinely ignored. I believe residents would be willing to contribute towards the costs of traffic calming in the lane.		Traffic issues have formed a major part of the consultation response. There is an overall response to traffic concerns in section 4.1. You raise an interesting issue that lanes surrounding our settlements can become overloaded when there is congestion in central areas.
42.	I am aware this comment is beyond the time frame for the draft sent before Christmas, however this morning I was in the village on the bend by Church Gate and watched the manner in which vehicle		Traffic issues have formed a major part of the consultation response. There is an overall response to traffic concerns in section 4.1. We will include your suggestions in the terms of reference for the proposed Traffic Project P2

## Submitted Responses

	<p>drivers attempt to navigate the corner, in both directions.</p> <p>Coming up the hill, vehicles tuck in closely to the bells on the bend outside Church Cottage, this results in the vehicle presenting itself at a tangent to the corner and being placed in a position requiring the vehicle to cross into the path of vehicles coming in the opposite direction, causing vehicles to back up towards Chequers field and beyond, and vehicles to back up on the hill.</p> <p>I looked at the road and noted the vehicle pathway heading from Chequers Field toward the hill has a larger turning circle in front of the Star and Eagle; I noted the majority of vehicles heading in this direction clip the corner and do not use their full carriageway, causing vehicles heading up the hill to stop, as their carriageway is being impinged up.</p> <p>A simple solution for smaller vehicles, those below 7.5 tonnes would be to mark a centre line up to and maybe including the bend in both directions, clearly identifying the carriageway. There are 'cats eyes' in the road on Chequers field side too, marking the centre line, but no physical road markings.</p> <p>When I drive up towards the Church, I attempt to present my vehicle towards the centre of the road, therefore not impinging on normal sized vehicles, which are in the correct position on their carriageway, coming in the opposite direction. This seems to enable free passage though this bottleneck.</p>	
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## Submitted Responses

43.	Policy B2 – Curtisden Green is a prime example of losing these amenities. It used to have a pub, shop and Post Office, now it has none of these		
44.	Policy H2/3 Affordable housing in our Parish is a huge challenge and every effort should be made to help families stay in the area they grew-up in rather than being forced to move to lower cost areas.		There are options to ensure that new housing can be retained and prioritized for local people.
45.	Policy L2, 3, 4 & 10 Preservation of the look and feel of our Parish are imperative not just for residents but for generations to come. The AONB is very important as is land adjoining and overlooking or being overlooked by it.		We share your view that the AONB and land adjoining it are all important to the look and feel of our Parish.
46.	Policy L9. One of the most important aspects in my opinion. This is vital in preserving the main attractions of our rural location. As a resident of Curtisden Green the two sites are an intrinsic part of the character of the hamlet and are viewed from the rear.  With both sites being part of the Bethany School complex they to must be concerned to preserve these areas as their promotion and marketing material, including their website, makes special reference to being 'Set on a rural campus in the heart of the stunning Kent countryside', their words not mine.		Our overall response to comments raised around Green Spaces can be found in section 4.3. In the plan we recognise the importance of green spaces to our residents and have looked to use the designation of Green Spaces introduced by the NPPF (2012) to ensure that the overall setting of our settlements is retained.
47.	Policy L8 – You only have to look to the horizon in certain directions to see light pollution in the town – our is a hilltop village parish and 'dark skies' are part of the character.		
48.	Policy T3 – Like many people, I am sure, I have concerns about traffic volumes and road safety.	If possible Goudhurst needs a bypass but I am sure it would be	Traffic issues have formed a major part of the consultation response. There is a overall response to traffic concerns in

## Submitted Responses

	Goudhurst Village is getting worse with increased traffic and more parked vehicles than ever.	difficult to find a satisfactory route.	section 4.1. The option of a bypass can be pursued under the Project P2 but it is outside the scope of a Neighbourhood Plan.
49.	I thought the NDP was a very well written and executed plan that ensured the preservation of our Parish whilst still accepting the need for housing. I full support the NDP, with particular emphasis on the preservation of Green Spaces as part of the Landscape and Environment Policies.  These green spaces, whether inside the AONB or not, are part of the essential fabric and character of the area we live in and their preservation is essential. I am delighted that the NDP recognises this. I live in Curtsden Green and the maintenance and protection of the green spaces identified is so important to the fabric of our area.  Please do pass on my full support of the NDP.		Our overall response to comments raised around Green Spaces can be found in section 4.3. In the plan we recognise the importance of green spaces to our residents and have looked to use the designation of Green Spaces introduced by the NPPF (2012) to ensure that the overall setting of our settlements is retained.
50.	To whom it may concern:  Thank you for consulting Historic England on the pre-submission version of the Goudhurst Neighbourhood Plan. I am happy to confirm that Historic England do not have any comments to make on the plan at this time. We are pleased to see the focus the plan has placed on conserving the character or appearance of the conservation area. For matters relating to the most appropriate wording to use in heritage policies we recommend discussing these with the District Council's conservation advisors.		



## Submitted Responses

	<p>As the plan does not contain site allocations we have not reviewed the assessment of sites undertaken and, as such, our comments are without prejudice to comments we may make on site allocations with regard to the local plan or individual planning applications.</p> <p>Yours faithfully</p>		
51.	<p>Hi there.</p> <p>Firstly sincere congratulations for developing such a comprehensive and professional Neighbourhood plan. It really is excellent. I have also been impressed that as part of the development process of the plan everyone in the parish has had every opportunity to have their say and become involved in a whole range of key topics. If they haven't then it has been their choice and there can be no reason for people to complain.</p> <p>I have a couple of points I would like to make:</p> <p>Housing Policies:</p> <ul style="list-style-type: none"> <li>- HI I fully support the need to improve the balance of the housing stock by delivering smaller properties as I believe this will enrich the diversity of the population in the Goudhurst parish – particularly attracting younger individuals and families into the area.</li> <li>- H5. I really can't see why replacement properties should be subject to the original being unstable /</li> </ul>		<p>We will look at the rationale for policy H5.</p> <p>Bedgebury Manor is mentioned in policy H6 and is also mentioned in more detail in our design guide. Bedgebury Manor, with over 12,000 M2 of floor space, provides a site for potential significant residential and/or commercial development in the future.</p> <p>Green Spaces have been raised a number of times in this consultation and our overall response to comments can be found in section 4.3.</p>

## Submitted Responses

	<p>uneconomic to repair / footprint restrictions. There are many instances where relatively large plots have the most awful but very useable properties built on them – often bungalows dating back to the 1950's which despite the very best efforts would be difficult to transform into high spec accommodation. Surely in this situation a well thought through, modern / contemporary/ traditional property of much larger proportions would improve the character and amenity of the surrounding area. The alternative to this is an ever creeping extension by planning applications which often results in a thoroughly horrible building that indeed does detract from its surroundings. I do not believe that by adapting this policy to be more flexible conflicts with the overall objectives as outlined in H1.</p> <p>Landscape and Environmental Policies</p> <ul style="list-style-type: none"> <li>- LBD 6.6. Agree in principle but if there are major sites such as the Bedbury Manor which could offer potential for conversion into a mixed development , thereby fulfilling the objectives of the housing policy these should be thoroughly investigated – providing of course this does not lead to further creep in the LBD areas.</li> <li>- L9 Green spaces. This is indeed a key area for the Neighbourhood plan to include to ensure the lungs and general well being of key areas currently enjoyed by the community are not eroded. As a resident of Curtisden Green for over 24 years I have always enjoyed walking on the first pitch with my family which I am sure you know has been an open space for over 100 years. It is indeed critical this area is</li> </ul>	
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## Submitted Responses

	<p>retained as a green space and under your definitions on page 73 qualifies on all counts. I cannot imagine any resident or indeed the school who use their surroundings as a key pillar in their advertising not fully supporting this.</p> <ul style="list-style-type: none"> <li>- On the lower field this of course was an orchard some 25 years ago but since then has been sown with grass and again continues to be enjoyed by many members of the community as an open space. It is also worth mentioning that both are hill top locations and of course can be viewed from afar and any development would have a very adverse impact not only on the immediate surroundings but the whole area.</li> <li>- The little triangle also included in the green space (outside of my property) is also a good example where the local population harnessed their energy and transformed what was a terrible derelict location into a small peaceful area where cyclist in particular take a breather on the seat after the arduous ascent from the valley.</li> <li>- To lose any of the above areas to any form of development would indeed be catastrophic to the area and of course all three locations as proposed in the plan should be retained as Green spaces for the long term benefit of current and future residents.</li> </ul>		
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## Submitted Responses

52.	On behalf of GPC, I attended the KCC Parish Highways Seminar on 20th November. A point arose in the presentation by Andrew Hutchinson (East Kent Area Manager), which potentially affects our NDP. The point he made is that existing Public Rights of Way (PROWs) that are of particular importance to the community as well as potential projects to create new or improved PROWs should be identified in the NDP. The reason is that in their recently published Rights Of Way Improvement Plan (see attached pdf), KCC have a budget to partner with parish councils to implement such projects.	This was something that was discussed by the working groups.	If possible, we should review the option to include a policy on Public Rights of Way into the plan as the questionnaire identified this as important to residents.
53.	Tunbridge Wells Borough Council Response		See section 8.6

## Section 8 Responses

### 8.1 Environment Agency

creating a better place



Goudhurst NDP Consultation  
South Oast Smugley Farm  
Bedgebury Road  
Goudhurst  
TN17 2QU

**Our ref:** KT/2006/000284/OR-  
16/IS1-L01  
**Your ref:**  
**Date:** 06 December 2018

#### Goudhurst Draft Neighbourhood Plan Regulation 14 Consultation

Dear Craig,

Thank you for consulting us on the Goudhurst Draft Neighbourhood Plan. Please see our comments below.

#### Flood risk

The neighbourhood plan does not state a specific policy on flood risk, however the policy within the National Planning Policy Framework (NPPF) and Tunbridge Wells Borough Council (TWBC) Local Plan is sufficiently detailed for this area. As set out in the National Planning Policy Framework, any new development should be directed outside areas at highest risk of flooding, taking account of all sources of flooding. All new development should be restricted to Greenfield run off rates.

#### Biodiversity

The Biodiversity policy could be improved by aligning with the 2018 NPPF paragraph 170 by removing the caveat of "where possible" from the requirement for biodiversity net gain.

The policy is currently quite generic as it replicates local and national planning policy. It would be advantageous if the policy included reference to the specific local area, for example Water Framework Directive actions from the Thames River Basin Management Plan for the River Teise, which is a key component of the blue infrastructure network in the parish.

#### Groundwater protection

There are no specific policies relating to groundwater protection, however these are addressed in the NPPF and TWBC Local Plan.

We have no detailed comments in relation to groundwater protection and contaminated land to make in reference to the Neighbourhood Plan. We would recommend that site allocations on land with previous use will need to address potential contamination issues by adequate investigation and risk assessment. Detailed comments on any specific site will be provided at the planning application stage, to ensure adequate investigation and if necessary remediation is carried out to address any identified contamination and risks to controlled waters.

Environment Agency  
Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH  
Customer services line: 03708 506 506  
Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)



## Responses

Any new proposals should ensure that sustainable drainage design will achieve appropriate protection of groundwater. In the case of limited mains sewer provision, we would also object to major development sites that do not tie into upgrade of sewer capacity in the area. This is for TWBC and the utility company to manage in terms of timing for release of permissions for sites being developed.

I trust you find this information to be of use. Do not hesitate to contact me if you require further details.

Yours faithfully,

**Mrs Karolina Allu**  
**Planning Advisor**

Direct email: [kslplanning@environment-agency.gov.uk](mailto:kslplanning@environment-agency.gov.uk)

Environment Agency  
Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH  
Customer services line: 03 708 506 506  
Email: [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk)  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)



## 8.2 Response from Bethany School



26 November 2018

Dear Mr Willis,

On behalf of the Board of Governors of Bethany School, I write to register the Board's objection to the inclusion of two of Bethany's school fields in the Neighbourhood Development Plan.

I believe that the draft Goudhurst Neighbourhood Plan is fundamentally flawed in its treatment of Bethany School. It falls outside the established parameters for neighbourhood plans (The Localism Act 2013, National Planning Practice Guidance and the National Planning Policy Framework 2018) and is unsound in both legal and policy terms. The particular treatment of Bethany School is unacceptable in the following respects:

- The document is misleading in as much as it gives the impression that Goudhurst Parish Council is the Local Planning authority with the power to determine planning applications in order to enforce the provisions of the Neighbourhood Plan. This is clearly not the case.
- The draft plan incorporates specific proposals for School land **with no prior consultation**. This is not only an unsound approach but flies in the face of natural justice and the whole legal and regulatory framework around Neighbourhood Planning.
- The plan seeks to fetter the future discretion of both the School and the Local Planning Authority for the next fifteen years. This is unreasonable and conflicts directly with statute, regulation, case-law and policy.
- There is an apparent conflict of interest with individuals named in the document having a direct private interest in some of the proposed restrictions on development at the School. It is well established that the planning system is not designed to protect property values and private views.

### Unsound approach to plan formulation

The Foreword to the Plan makes it clear that the authors have deliberately avoided the normal route of instructing professional planners to prepare the document. The approach is apparently to establish a local political consensus to prevent development. It also includes a pejorative reference to the Planning Appeals System which is often the only recourse open to applicants faced with planning decisions based upon local politics rather than sound planning principles.

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Curtisden Green, Goudhurst, Cranbrook, Kent TN17 1LB  
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Bethany School Ltd. • Registered Charity Number: 307937

The language of the document reflects the fact that it was not written by professionals. It claims that if adopted the policies will be “enforceable in all future planning applications”. This is clearly cannot be the case. Why can this be justifiably said? Indeed, it would be deeply worrying if it were the case given the way in which the document seeks to restrain the discretion of decision makers for fifteen years. Applicants will continue to have the right to make applications to Tunbridge Wells Borough Council that do not align with the Neighbourhood Plan and can legally expect them to be dealt with having regard to both policy and other material considerations. Decisions will still be made by Tunbridge Wells Borough Council, or the Planning Inspectorate, or in a very few cases by the Secretary of State or even Parliament. The Parish Council does not have the power to determine any planning applications it is merely one of many statutory consultees and the weight to be given to its views is a matter for the decision maker. This reality does not come across in the document which could mislead an untutored reader into thinking that The Parish Council is the *de facto* and *de jure* Local Planning Authority.

### **Presumption in Favour of Sustainable Development**

The National Planning Policy Framework (NPPF) adopted by Central Government in March 2012 established a presumption in favour of sustainable development i.e. development which is beneficial in economic, environmental and social terms. It is national policy that such development is approved without delay.

After six years of evidence of the effect of the NPPF it was reinforced by the updated version adopted by Government in July 2018. The presumption in favour of sustainable development is firmly established as being “at the heart of the Framework” (para 10, page 5).

The Draft Goudhurst Neighbourhood Plan mistakenly purports to be able to override the NPPF. In reality, applicants will continue to have the legal right for their applications to be dealt with on their planning merits irrespective of any purported development embargo written into the plan. If the proposal is for sustainable development then it must be approved irrespective of any provisions of the Neighbourhood Plan.

### **Private Interests**

There does not appear to be any acknowledgement that a conflict of interest exists by some of those named in the document who live in the vicinity of privately owned land where the draft policies seek to block future development. This is very far from the intended function of a Neighbourhood Plan.

### **Unsound Policies**

1. A number of draft policies are unsound, as follows:

- Policy L1 – This adds nothing to the established level of AONB protection.
- Policy L2 – Again it has no value as a policy as the AONB is already protected.
- Policy L3 – Is too vague to have any value as a land use policy.

Policy L4 – This adds nothing to landscape protection policies and is actually a weaker level of protection of heritage assets than the established statutory and policy framework.

Policy L9 and on Page 24 of the NDP booklet, Figure 8 Green Spaces AS1 and AS2 in Curtisden Green – The designation of these “Green Spaces” is a misuse of the Neighbourhood Plan. This land comprises of private grounds within the School estate. Designation would conflict with NPPF paragraph 100 which states that:

*“Local Green Space designation should only be used where the green space is:*

- (a) In reasonably close proximity to the community it serves*
- (b) demonstrably special to a local community, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife...”*

It is quite clear from the NPPF that the open spaces to be protected should have some public benefit. These two spaces are part of the private School estate, and one of them is currently in use as a sports pitch. The actual use by the school might change in future as the needs of the School are dynamic and susceptible to numerous potential factors leading to change. Any plan which seeks to freeze the status quo and prevent proposals from coming forward for determination on their own merits is clearly unsound.

### Conclusions

In order for the Neighbourhood Plan to be found sound it should completely exclude the whole of Bethany School and its grounds from the plan area. At very least the references to AS1 and AS2 must be deleted.

The Plan should make it clear that the Parish Council is not the Local planning authority and has no power to determine any planning applications or enforce the provisions of the document. It will take into account the provisions of the Plan in forming its views as a consultee when responding to future planning applications for development. However, such applications will continue to be dealt with on their merits having regard to the provisions of the Development Plan (at the time) and any other material planning considerations.

A number of unsound policies will need to be deleted or rewritten for the reasons given above (L1, L2, L3, L4, L9 Figure 8).

Yours sincerely



**Wendy Kent**

Vice Chair of the Board of Governors of Bethany School

## 8.3 Southern Water



Goudhurst Parish Council

Your Ref:

By Email Only

Our Ref:

Date:  
6 December 2018

Contact:  
Tel: 01273 663143

Dear Sir/Madam,

### **Goudhurst Pre-Submission Neighbourhood Plan 2013 -2033**

Thank you for the opportunity to comment on the pre-submission Goudhurst Neighbourhood Plan.

Southern Water is the statutory wastewater undertaker for the settlements of Goudhurst, Kilndown and Curtisden Green. Southern Water has a statutory duty to serve new development, and is committed to ensuring the right wastewater infrastructure in the right place at the right time in collaboration with developers and the local planning authority.

We look to Goudhurst Parish Council and Tunbridge Wells Borough Council to ensure, through planning policies and conditions, that the delivery of new or improved utility infrastructure development is supported and not unduly restricted. This will ensure that levels of service are maintained to both new and existing customers.

Please find following our response. We hope that you will find this useful and that it will be taken into account in the next version of your Neighbourhood Plan. We would be grateful if you could keep us informed of future progress.

Yours faithfully,

**C Mayall**

Charlotte Mayall  
Development Manager

Southern Water, Southern House, Lewes Road, Falmer, Brighton, East Sussex BN1 9PY [www.southernwater.co.uk](http://www.southernwater.co.uk)

Southern Water Services Ltd Registered Office: Southern Water, Southern House, Yeoman Road, Worthing, BN13 3NX, Registered in England No. 2366670

## Section 6.14 Rivers and Watercourses

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Southern Water is the statutory wastewater undertaker for the settlements of Goudhurst, Kilndown and Curtisden Green. A network of sewers collect wastewater arising from properties within these settlements for treatment at one of four small wastewater treatment works (WTWs) located within the parish, in proximity to the settlements they serve.

Whilst Southern Water supports the requirement for development to ensure no risk to groundwater sources, it is not clear why it is considered that there is a 'lack of mains drainage in the Parish' as stated in the third paragraph of Section 6.14.

Any new development would be required to connect to the existing sewer network, where it is feasible to do so, in accordance with the foul water drainage hierarchy set out in requirement H1 of the Government's Building Regulations (2010) Approved Document H. This will ensure that wastewater arising from new development is treated at one of Southern Water's WTWs in accordance with its environmental permit, issued and enforced by the Environment Agency, who define the standards of treatment that must be met in order to protect water quality objectives.

### Additional policy supporting the provision of water and wastewater infrastructure

We could find no policies in the neighbourhood plan to provide for new or improved infrastructure to support development. The National Planning Policy Framework (NPPF) outlines the importance of achieving sustainable development and paragraph 177 states that *'It is equally important to ensure that there is a reasonable prospect that planned infrastructure is delivered in a timely fashion....For this reason, infrastructure and development policies should be planned at the same time'*. Also the National Planning Practice Guidance states that *'Adequate water and wastewater infrastructure is needed to support sustainable development'*.

Although the Parish Council is not the planning authority to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system.

On this basis, we propose the following policy provision:

*Proposals for new and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community.*

## 8.4 Natural England

Date: 24 December 2018  
Our ref: 264385  
Your ref: Goudhurst Neighbourhood Development Plan REG 14



Mr C Broom  
Secretary to the Goudhurst NDP Steering Group  
South Oast Smugley Farm  
Bedgebury Road  
Goudhurst  
TN17 2QU

Hornbeam House  
Crewe Business Park  
Electra Way  
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T 0300 060 3900

**BY EMAIL ONLY**

[enquiries@ndp.goudhurst.co.uk](mailto:enquiries@ndp.goudhurst.co.uk)

Dear Mr Broom

**Goudhurst Neighbourhood Development Plan Regulation 14 Consultation**

Thank you for your consultation on the above dated and received by Natural England on 11<sup>th</sup> November 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

As this neighbourhood plan doesn't allocate any development we agree with the conclusion of no likely significant effect and therefore do not have any specific comments to make on the neighbourhood plan itself.

If the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely

Sharon Jenkins  
Consultations Team





Borough Local Development Plan) has not referenced it as having any historic association with the settlements of Goudhurst or Tattlebury. The site is currently and has always been known to have been used, as it has been described, as 'agricultural' land.

Section 6.12 of the draft NDP says 'local green space designation allows this plan to provide protection to areas that are and have been *historically important* to residents in our communities'. The historic significance of the locality is evidenced within the Goudhurst and Kilndown Conservation Area Appraisal (which is an adopted Supplementary Planning Document forming part of the current Tunbridge Wells Borough Local Development Plan) describes the locality here as follows; *"Approaching Tattlebury from Goudhurst, the old line of Church Road approached Maypole House directly, meeting the centre point of the estate's west boundary wall. The original line of the track then turned north running around the Maypole House estate and east again to the junction at Tattlebury House. In the 20th century the road was realigned for vehicle traffic, crossing the field to the north, flattening the sharp bends and forming the elliptical area planted with trees"*. Thus it is clear that site 103 has some historic interest, essentially being the site of a 'green' in front of Maypole House and adjacent to the course of the original roadway. However, the Conservation Area Appraisal says that that site *"has little spatial relationship with the centre of the hamlet"*.

Site 102, to which this letter relates, became separated from Site 103 when the roadway was realigned in the 20<sup>th</sup> Century. Unlike the adjacent parcel of land known as Tattlebury Green (proposed Local Green Space area 103), the agricultural land known as Site 102 has not previously been considered to be worthy of mention within the Conservation Area Appraisal for the locality.

With regards to the recreational value of the agricultural land opposite Tattlebury Green, it is clear that this land is, by definition, agricultural land, and so does not have recreational value in the same way that a playing field may provide. It is noteworthy that the nearby Glebe playing fields, which is more accessible to the local community and represents an appropriately sized parcel of land as intended to be allocated for such purposes, has not been proposed for designation as a Local Green Space. This is understood to be on the basis that that site has been accepted for designation as a Village Green. It is unclear why that historically special area for the local community cannot also be designated as a Local Green Space instead of sites like the agricultural land opposite Tattlebury Green (and also the agricultural fields west of Goudhurst) which are clearly not special for any recreational purpose. We would at this point question the methodology which has been adopted for assessing sites for allocation as a Local Green Space? To this end we may formally request, under the Freedom of Information Act 2000, that such assessment methodology is made available for our client's viewing.

With regards to the tranquillity of the agricultural land opposite Tattlebury Green, this is evidently negligible. The land abuts the busy A262 highway, which as noted at Paragraph 5.95 of the Conservation Area Appraisal for the locality, 'has been undermined by vehicle traffic'. The site is not tranquil and could not reasonably be said to be demonstrably more special to the local community than other land surrounding the village, due to its tranquillity.

With regards to the richness of the wildlife at the agricultural land opposite Tattlebury Green, again, it is respectfully submitted that there is no evidence that this particular tract of land does not merit any specific designation on the basis that it is demonstrably more special to the local community than other land surrounding the village, due to its wildlife. The land is actively used for agricultural purposes and there is therefore considered to be already sufficient policy means in place to ensure the appropriate protection of wildlife here.

Given that the agricultural land opposite Tattlebury Green is not considered to fulfil any of the example criteria as to why the site might otherwise be considered demonstrably special to the



local community or hold any particular local significance, it has been considered whether the designation of the site as a Local Green Space would fulfil any other objectives for the NDP, as follows;

#### *A means to prevent development at the site?*

Consideration has been given to whether the Steering Group sees the proposed allocation of the agricultural land opposite Tattlebury Green as a means to prevent future development at the site. It is noted that draft Policy L5 says *"Proposals that maintain the separate identity and character of the two Goudhurst settlements and prevent their coalescence or the erosion of the undeveloped gaps will be supported"*. The site clearly includes land to which any proposal would be subject to consideration under this Policy. It is therefore strongly submitted that it should not be designated as a Local Green Space on the grounds that the implementation of management policies would therefore have any greater prospect of preventing development at the site.

This being said, it is recognised that the site would also be affected by a number of other policies proposed as part of the draft NDP. These include the following;

Policy L1 - Proposals for development in the AONB will be permitted only where they satisfy the objectives of the High Weald Area of Outstanding Natural Beauty Management Plan.

Policy L3 - Development must not alter the profiles of the three hilltop settlements (Goudhurst, Kilndown and Curtisden Green), as seen from the surrounding countryside.

Policy L4 - Development must conserve the unique historic landscape of the Parish and the settings of its heritage assets

Policy L10 - Development must not cause any loss or diminution of important views into and out of the settlements from any area to which the public has access; it is recognised that key view 3 is across the site from Church Road by Maypole north to Curtisden Green and Ridge.

It is therefore respectfully submitted that there would be adequate policies implemented to ensure the management of any proposed development in the future, notwithstanding the proposed designation of the site as a Local Green Space. There are also other policies, relating to biodiversity, trees and light pollution, for example, which would be likely to reduce any developable area further still.

#### *Worthy of Green Belt designation?*

The proposed draft Policy L9 says *"development that results in the loss or degradation of Green Spaces will be considered only in wholly exceptional circumstances"*. It is not made clear within the draft policy under what circumstances a proposal would be considered to be exceptional?

Considering this point further, it is noted that Paragraph 101 of the NPPF says 'policies for managing development within a Local Green Space should be consistent with those for Green Belts' and this is reflected at Section 6.12 of the draft NDP, which also says that the protection afforded will be similar to that afforded to Green Belt. Paragraph 145 of the NPPF is most relevant as a policy for managing development within Green Belts. This Paragraph confirms that the construction of new buildings is inappropriate in the Green Belt but also lists a number of exceptional circumstances when new buildings may be considered acceptable. This includes the following circumstances;

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) limited infilling in villages; and



d) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites).

It is therefore taken that, in being consistent with policies which apply to the Green Belt, notwithstanding any proposed designation of the site as a Local Green Space, it would still be permissible for buildings to be erected at the site, for any of the fore-listed purposes.

***What change would you like to see / what additional evidence should we include?***

In light of these comments, it is considered that the area of land currently proposed for inclusion of Tattlebury Green (as Site 103) would, by itself, fulfil the appropriate criteria for inclusion within the NDP, whereas the tract of agricultural land on the opposite side of the highway which is currently also drafted for inclusion as a Local Green Space (as Site 102) does not fulfil the relevant criteria and so should be omitted in its entirety.

Evidence which should be included within Policy L9 or at least the pre-ambles should include details as to the methodology for including sites within this important land designation.

## **Policy L5 – Retention of the gap between Goudhurst LBDs**

### ***View***

Disagree

### ***Comments***

This proposed draft policy says *“Proposals that maintain the separate identity and character of the two Goudhurst settlements and prevent their coalescence or the erosion of the undeveloped gaps will be supported”*.

The text accompanying this Policy says that ‘the 2006 TWBC Local Plan identifies this gap as important to the character of the Parish’. It is unclear where the 2006 Local Plan says that this gap is important to the Parish? The 2006 Local Plan does not designate land within this area as any Area of Important Open Space (covered by Policy EN21), Area of Landscape Importance (covered by Policy EN22), or Important landscape approach (covered by Policy EN23). However, the site would of course be subject to Policy EN25 of the TWBLP, which requires that development proposals ‘would have no detrimental impact on the landscape setting of settlements’. It would also be subject to Policy EN1 of the TWBLP, which requires that ‘the design of the proposal, encompassing scale, layout and orientation of buildings, site coverage by buildings, external appearance, roofscape, materials and landscaping, would respect the context of the site’.

Given that the character of the two Goudhurst settlements is to some degree defined by their separate identity and the landscape setting of the settlements, it is acknowledged that Policies EN25 and EN1 of the TWBLP may already be an effective mechanism for ensuring any proposals would prevent their coalescence. Whilst it is acknowledged that there is merit in retaining a degree of landscaping and openness between the two settlements to reflect the historic pattern of development in the area, which is not to say that there is any specific reference within the 2006 Local Plan which identifies that this gap is important to the character of the Parish.



***What change would you like to see / what additional evidence should we include?***

It is submitted that the proposed implementation of draft Policy L5 is in itself additional evidence that it would be superfluous to allocate site 102 as a Local Green Space. It is therefore requested that additional information is presented in relation to Policy L9, to explain how the agricultural land opposite Tattlebury Green is necessary to be allocated as a Local Green Space, given the separate requirement of maintaining the character of the two Goudhurst settlements, as per Policy L5, anyway?

If you have any concerns or queries about this representation, please feel free to reach me on 01892 831600 or at [gary.mickelborough@bloomfieldsltd.co.uk](mailto:gary.mickelborough@bloomfieldsltd.co.uk)

Yours sincerely,

A handwritten signature in black ink, appearing to read "Gary Mickelborough", written in a cursive style.

**GARY MICKELBOROUGH**  
BSc (Hons) MA MRTPI  
Director

## 8.5 Tunbridge Wells Borough Council Feedback

### TWBC Planning Policy Comments on Goudhurst Draft NDP

#	Page number and Section.	Comment
1.	Pg.4 First para	Within the first paragraph it says 'Enforceable in all future planning applications' – It is advised that this should be amended to read 'considered in the determination of....' or similar.
2.	Pg. 5 Section 1: Purpose  - The Context - Our Parish	Under 'The Context' Heading <ul style="list-style-type: none"> <li>Document needs to explain/clarify that TWBC is working on new LP which will replace the current LP 2006, Core Strategy 2010 and Site Allocations LP 2016</li> <li>TWBC LP has been published- amend this reference to 'approved';</li> </ul> Under 'Our Parish' Heading <ul style="list-style-type: none"> <li>Cranbrook – correctly is Cranbrook and Sissinghurst;</li> <li>Marden and Staplehurst are both in Maidstone Borough Council.</li> </ul>
3.	Pg. 6 Section 1  - Accompanying Documents - Monitoring and Review	Under 'Accompanying Documents' Heading <ul style="list-style-type: none"> <li>Refers to 'Sustainability Analysis'. This is normally referred to as an Appraisal.</li> <li>Advised that the following rewording and additional bullet point would be more appropriate; <ul style="list-style-type: none"> <li>Sustainability Appraisal determining the sustainability of the proposals in the plan</li> <li>A SEA and HRA screening report</li> </ul> </li> </ul> Under 'Monitoring and Review' Heading <ul style="list-style-type: none"> <li>The use of 'regular monitoring' may be a better term than 'continuous monitoring'.</li> </ul>
4.	Pg. 7 Section 1 - The Parish of Goudhurst	Under 'The Parish of Goudhurst' Heading <ul style="list-style-type: none"> <li>Regarding figures in this paragraph, these are noted to be incorrect and should read; '80% of the Parish falls within the High Weald Area of Outstanding Beauty, 27% of the Parish is ancient woodland'.</li> <li>These figures should be corrected within this section and anywhere else referenced in the document.</li> </ul>
5.	Pg. 8 Section 2: How we developed our plan	Under 'Community Engagement' Heading <ul style="list-style-type: none"> <li>says questionnaire launch was 25 May – however later on in the document it refers to this as having been 23 May. Please clarify.</li> </ul>

## Responses

	- Community engagement	<ul style="list-style-type: none"> <li>Mention meeting was attended by TWBC planning officers?</li> <li>Meeting on 25 May 2015 – worth mentioning? That Head of Planning at TWBC attended this meeting</li> </ul>
6.	<p>Pg. 11 Section 4: Our Vision, Goals and Objectives</p> <ul style="list-style-type: none"> <li>Our vision</li> <li>Areas of focus</li> </ul>	<p>Under 'Our Vision' Heading</p> <ul style="list-style-type: none"> <li>It is advised that the 'Next 15 years' reference should be changed to the end year of the Local Plan Period (2033)</li> <li>The document refers to the landscape as the 'unique'. TWBC advises that this may not be the most appropriate term to use as it can be challenged. Therefore please consider whether a more suitable term can be used instead.</li> </ul> <p>Under 'Areas of Focus' Heading</p> <ul style="list-style-type: none"> <li>How do the 6 policy areas related to the 5 groups on page 8? This will need to be addressed</li> </ul>
7.	Pg. 12 Section 4: - Objectives	<p>Within table of objectives</p> <ul style="list-style-type: none"> <li>Under Housing – delivering more affordable housing point is very similar to point below – both talk about local need;</li> <li>Under Traffic and transport – facilitating safe walking etc. – facilitating and enhancing?</li> </ul>
8.	Pg. 13 and 14 Section 5: Our Policies	<p>Within table of policies</p> <ul style="list-style-type: none"> <li>L2 – and falls within AONB? (in addition to reference for proposals adjoins AONB)</li> <li>L6 – Could seek a net gain in biodiversity (as per LP and NPPF)</li> <li>H4 – the term 'suitable' needs to be defined.</li> <li>T1 – this could be tricky to implement; what if there are ancillary rooms e.g. a study or office or snug that later become bedrooms? Requires thought as to get round this parking requirement developers could simply label the room differently on a floor plan</li> <li>Traffic policies (T1, T2 and T3) – the title of the policies in this table does not reflect the title of the policies in Section 11, and therefore needs amending so they correlate.</li> </ul>
9.	<p>Pg.15 Section 6: Landscape and Environment Policies</p> <ul style="list-style-type: none"> <li>6.1 High Weald Area of Outstanding Natural Beauty</li> </ul>	<p>Under '6.1 High Weald Area of Outstanding Natural Beauty' Section</p> <ul style="list-style-type: none"> <li>80% of the Parish is within the High Weald AONB, not 90%</li> </ul> <p>Under '6.2: Managing development in the AONB' Section</p> <ul style="list-style-type: none"> <li>98% - clarify that this is of respondents; clarify what is meant by least favoured location for development;</li> </ul>

## Responses

	- 6.2: Managing development in the AONB	<ul style="list-style-type: none"> <li>Policy L1 – it is not always possible for developments to satisfy any objectives of the Management Plan (MP) and even when they can it is often only some e.g. Objective G2 protects sandstone outcrops can only be achieved where there are sandstone outcrops. It might be better worded as “development should where appropriate make a positive contribution to the objectives of the AONB MP”</li> <li>Policy L1 – It is advised that the policy should refer to ‘and any subsequent updates’ of the HW Management Plan.</li> </ul>
10.	<p>Pg. 16 Section 6:</p> <ul style="list-style-type: none"> <li>- 6.2: Managing development in the AONB</li> <li>- 6.3: Managing development outside of the AONB</li> </ul>	<p>Under ‘6.2: Managing development in the AONB’ Section</p> <ul style="list-style-type: none"> <li>Just before 6.3 – adoption of High Weald AONB MP – subsequent reviews will be subject to future adoptions. Advised it would be better to say “this plan supports the production and regular revision of the High Weald AONB Management Plan and its use in planning decisions”.</li> </ul> <p>Under ‘6.3: Managing development outside of the AONB’ Section</p> <ul style="list-style-type: none"> <li>6.3 development outside the AONB This refers to the former SLA - it should also refer to this area as being within the NCA referred to earlier.</li> <li>Policy L2: ‘damage’ – suggest change this word to ‘harm’. ‘environment’ – suggest change this word to ‘quality’.</li> </ul>
11.	<p>Pg. 17 Section 6:</p> <ul style="list-style-type: none"> <li>- 6.4: Parish Setting and Landscape.</li> </ul>	<p>Under ‘6.3: Parish Setting and Landscape’ Section</p> <ul style="list-style-type: none"> <li>Policy L3 – ‘must not alter’ suggest this phrase is changed to ‘harm’ as there may be some alterations that are acceptable;</li> <li>Use of word ‘unique’ – see previous comment on that</li> </ul>
12.	<p>Pg. 18 Section 6:</p> <ul style="list-style-type: none"> <li>- 6.5: Heritage</li> <li>- 6.6: Limits to Built Development (LBD)</li> </ul> <p>Pg. 19 Section 6:</p> <ul style="list-style-type: none"> <li>- 6.6: Limits to Built Development (LBD)</li> </ul>	<p>Under ‘6.5: Heritage’ Section</p> <ul style="list-style-type: none"> <li>Policy L4 – Use of word ‘unique’ – see previous comment on that</li> </ul> <p>Under ‘6.6 Limits to Built Development (LBD) Section (pages 18 &amp; 19_</p> <ul style="list-style-type: none"> <li>Refers to TWBC policy rejecting development outside the LBD – this is not strictly correct due to the current lack of 5 year housing land supply, ie. assessments addressed against sustainability test within NPPF. It is suggested this part should be redrafted.</li> <li>The document should also note that TWBC is reviewing all LBD’s as part of the LP process</li> <li>Page 19 it states that “..Rural Exception sites in the Parish, for example Culpeppers, have historically not been included in the LBD and this will continue to be the case”. There is no explanation/justification as to why exclusion of rural exception sites in the LBD will continue to be the case. This would need to be addressed, as existing built out exception sites may not cause harm subject to appropriate LBD boundary lines, and taking into account TWBC is reviewing LBD’s.</li> </ul>



## Responses

13.	Pg. 19 Section 6: - 6.7: Important Gaps, Views	Under '6.7 'Important Gaps, Views' Section <ul style="list-style-type: none"> <li>• Policy L5 – Policy wording may be too permissive, suggest revised wording to; 'Proposals will only be permitted where they maintain the separate identity and character of the two Goudhurst settlements and prevent their coalescence and/or erosion of undeveloped gaps'</li> <li>• Policy L5 – Could add that the NDP would resist development that would not meet this policy;</li> <li>• Reference is made to LP 2006 – note that this will be superseded by new LP, and the document should reflect this.</li> </ul>
14.	Pg. 20 Section 6: - 6.8: The Natural Environment	Under '6.8 The Natural Environment' Section <ul style="list-style-type: none"> <li>• Policy L6 – It should be noted in the policy that NPPF 2018 and new LP seek/will seek a net gain in biodiversity. (Emerging policy to be shared with NDP).</li> <li>• Policy L6 suggest delete "resulting where possible , in a net enhancement to biodiversity" and replace with "in a demonstrable net gain for biodiversity"</li> </ul>
15.	Pg. 21 Section 6: - 6.10: Soils, Agriculture and Forestry	Under '6.10 Agriculture and Forestry' Section <ul style="list-style-type: none"> <li>• Policy L7 – suggest wording change from 'proposals must' to 'proposals shall'.</li> <li>• Could also add in that a loss of trees could be supported for arboricultural reasons (in which case suitable replacements could be sought)</li> </ul>
16.	Pg. 22 Section 6: - 6.11: Dark Skies and Light Pollution	Under '6.11 Dark Skies and Light Pollution' Section <ul style="list-style-type: none"> <li>• Policy L8 – TWBC advises that planning permission or approval is not required for all external lighting (ie. on a dwellinghouse). This should be clarified within the policy for schemes associated with new development.</li> <li>• Policy L8 – reference to policy EN8, please note this policy will change - reference should be made to the new LP.</li> <li>• Supporting text for Policy L8 notes comments regarding large windows. Perhaps the policy could include restricting large windows in prominent ridge top locations?</li> </ul>

## Responses

17.	Pg. 23 Section 6: - 6.12: Local Green Space	Under '6.12 Local Green Space' Section <ul style="list-style-type: none"> <li>It is advised that the plans should be replaced with simpler versions which just show the proposed allocations.</li> <li>If Goudhurst NDP wish to include these then they should also provide or refer to the methodology and justification provided by the Council.</li> </ul>
18.	24 Section 6: - 6.12: Local Green Space	Under '6.12 Local Green Space' Section <ul style="list-style-type: none"> <li>Policy L9 'Green Spaces' – there is a confusion about whether this relates to green space (amenity space) in developments or designated Local Green Space (the maps refer to designated LGS). This policy needs clarification so it is clear to precisely what this relates to.</li> <li>Policy L9 – It is suggested that the word 'wholly' should be deleted (not needed).</li> <li>It would be beneficial to include stronger justification for each allocated Local Green Space site to ensure there is sufficient evidence to designate under the NDP.</li> </ul> <p>TWBC has produced updated maps for Local Green Space and information with justification for each site which will be shared with Goudhurst NDPG.</p>
19.	Pg. 25/26 Section 6: - 6.13: Views from, into and across the Parish	Under '6.13 Views from, into and across the Parish' Section <ul style="list-style-type: none"> <li>Policy L10 – replace 'must' with 'should'.</li> <li>The supporting text refers to 'Key views' and Policy L10 refers to 'important views' – the terms need to be consistent and needs to say something about not being an exhaustive list and that the plan is indicative.</li> <li>Policy L10 – Some of the views outlined in Policy L10 appear to fall outside the Parish of Goudhurst, any that fall outside the Neighbourhood Plan Area cannot be designated.</li> </ul>
20.	Pg. 29 Section 7: Community and Wellbeing Policies - 7.1 Communities in our Parish	Under 'Communities in our Parish' Section <ul style="list-style-type: none"> <li>It is noted that the second 123 figure in the last paragraph is incorrect.</li> </ul>
21.	Pg. 34 Section 7: - 7.4: Accessibility	Under '7.4 Accessibility' Section <ul style="list-style-type: none"> <li>Policy C2 – assume this is pedestrian connectivity? Please clarify in policy.</li> </ul>

## Responses

22.	Pg. 35 Section 7: - 7.5: Improving Our Community	Under '7.5 Improving Our Community' Section • Figure 22 – It is noted that a line graph shouldn't be used for unconnected data.
23.	Pg. 36 Section 7: - 7.5: Improving Our Community	Under '7.5 Improving Our Community' Section • Policy C3 – This is a vague policy (ie; where a contribution is appropriate, in consultation with residents). Developers need certainty over precisely what is required and in order to ensure they do not over pay for a site and to avoid viability problems (which could mean the community get little or no benefit). This policy needs a re-think so it is clear on what is expected of developers.
24.	Pg. 38 Section 7: - 7.7: Communications	Under '7.7 Communications' Section  • Policy C5 appears to relate more to electronic communication providers. • Suggest this section could also include a policy which seeks that new development  proposals (both residential and non-residential) should include connection to the electronic communications network/high speed broadband.
25.	Pg. 39 Section 8: Housing Policies - 8.1: The need for development in our Parish	Under '8.1 The need for development in our Parish' Section • 3 <sup>rd</sup> bullet point regarding 'smaller scale development' - this should be defined; At end of goal insert ' '
26.	Pg. 40 Section 8: - 8.2: Our Housing Stock	a maximum of 4+ bed houses then the second bullet point is unlikely to be necessary.
27.	Pg. 41 Section 8: - 8.2 Our Housing Stock  - 8.4: Housing Need	Under 8.2 'Our Housing Stock' Section • Last paragraph (pg 41); Not possible to make developers advertise new market homes to existing residents first, can only be sought.  Under '8.4 Housing Need' Section  • Policy H2 – replace 'must' with 'shall' • TWBC Policy to be stronger, will require financial contributions for sites of less than 9 units, and c.35% for sites above 9.
28.	Pg. 42 Section 8: - 8.4: Affordable	Under '8.4 Affordable Housing for Local People' Section

## Responses

	Housing for Local People	<ul style="list-style-type: none"> <li>Policy H3 – delete use of word ‘initially’; Please see the emerging TWBC policy as this may assist with the wording of this policy. Look at TWBC cascade approach – eg. adjoining parishes before others.</li> <li>Emerging policy to be shared with NDP</li> </ul>
29.	Pg. 43 Section 8: - 8.4: Rural Exception Sites	<p>Under ‘8.6 Rural Exception Sites’ Section</p> <ul style="list-style-type: none"> <li>Policy H4 – are the rural exception sites to be shown on a plan?; need to define ‘small-scale’</li> <li>Emerging policy to be shared with NDP</li> </ul>
30.	Pg. 44 Section 8: - 8.8: Replacement of existing dwellings	<p>Under ‘ 8.8 Replacement of existing dwellings’ Section</p> <ul style="list-style-type: none"> <li>Policy H5 – The first part of policy refers to footprint and volume and links these together, these are two different measurements and this will need to be looked at again. Could consider relying on emerging TWBC LP for replacement dwellings which will limit volume increase.</li> <li>Policy H5 – Also re 1. Maximum limits allowed under permitted development can allow single storey extensions up to 8m in depth (for detached dwellings) and therefore may result in large increase in scale of a replacement dwellings if permitted development rights are included in the policy.</li> </ul>
31.	Pg. 45 Section 8: - 8.9: Conversion of Existing Buildings	<p>Under ‘8.9 Conversion of Existing Buildings’ Section</p> <ul style="list-style-type: none"> <li>Policy H6 – explain what is meant by village amenity</li> </ul>
32.	Pg. 48 Section 9: Business and Employment Policies - 9.5: Retaining our community facilities	<p>Under 9.5 Retaining our community facilities’ Section</p> <ul style="list-style-type: none"> <li>Policy B2 advise reference to ‘will be refused’ should be changed to ‘will not be supported’; 18 month marketing period is quite a long time and may be onerous, perhaps would be better to change this to 12 months.</li> <li>Suggest that reference to valuation reports includes them being undertaken by suitably qualified professional, and same that marketing campaign be undertaken using appropriate agents, websites, etc, with justification provided for the amount sought by the marketing</li> </ul>
33.	Pg. 53 Section 10: Design Policies - 10.3 Design	<p>Under ‘10.3 Design’ Section</p> <ul style="list-style-type: none"> <li>Policy D1 – some parts of this would be covered by other policies e.g. g) parking and i) biodiversity (and see previous comments on that policy) and j) again relates to parking</li> </ul>

## Responses

		<ul style="list-style-type: none"> <li>Policy D1 – Only brief mention is made regarding boundary treatments and there is no specific mention of landscaping proposals as part of the scheme, ie. ‘where required proposals should be accompanied by an integral landscaping scheme (for both soft and hard landscaping) to enhance the natural and local environment/AONB.’</li> </ul>
34.	Pg. 55 Section 10:	Under ‘10.6 Conservation Areas’ Section
35.	- 10.6 Conservation Areas	<ul style="list-style-type: none"> <li>Last sentence – ‘modern style extensions or new developments will be resisted’ – sometimes this is a better design option than a traditional or pastiche approach. This needs careful consideration. You can have modern interpretations of a traditional approach which can be appropriate – the current wording conflicts with this.</li> </ul>
36.	Pg. 56 Section 10: - 10.6 Conservation Areas	<p>Under ‘10.6 Conservation Areas’ Section</p> <ul style="list-style-type: none"> <li>Policy D4 – The policy appears to repeat the context in the Local Plan and the NPPF, therefore not sure whether this adds any benefit.</li> <li>Policy D4 – if kept, may be worth including a brief explanation of what a Heritage Assessment entails and what it should include.</li> <li>Statement that there are PD rights in CAs is wrong. There are, but often more restricted than outside of these.</li> <li>Policy D5 part 3. – is this in relation to part 1?</li> </ul>
37.	Pg. 57 Section 10: - 10.7: Extending existing properties	<p>Under ‘10.7 Extending existing properties’ Section</p> <ul style="list-style-type: none"> <li>Policy D6 - These points all seem to be largely dealt with by other policies.</li> </ul> <p>Question whether it is needed</p> <ul style="list-style-type: none"> <li>Policy D6 – if kept, part 3 needs to define residential amenity e.g. overlooking, loss of daylight/sunlight.</li> </ul>
38.	Pg. 61 Section 11: Traffic and Transport Policies - 11.2 Private cars	<p>Under ‘11.2 Private cars’ Section</p> <ul style="list-style-type: none"> <li>Policy T1 – see previous comment about this</li> <li>Policy T1 – The policy should clarify whether parking spaces includes garages. (please note that KCC and TWBC do not count garages as parking spaces).</li> </ul>
39.	Pg. 63 Section 11 - 11.4 Sustainable	<p>Under ‘11.4 Sustainable Transport’ Section</p> <ul style="list-style-type: none"> <li>Policy T2: add ‘s’ after Primary School</li> <li>Policy T2: define what is meant by local secondary schools</li> </ul>

## Responses

	Transport	<ul style="list-style-type: none"> <li>Policy T2: iv could be combined with ii</li> </ul>
40.	Pg. 67 Section 11 - 11.5 Traffic Volumes	Under '11.5 Traffic Volumes' Section <ul style="list-style-type: none"> <li>Policy T3; Need to be clear on precisely what mitigation measures would be expected and costings for these; request for a contribution would need to meet the tests</li> </ul>
41.	Pg. 68 Section 12 - Selecting Sites for Development	Under '12 Selecting Sites for Development' Section <ul style="list-style-type: none"> <li>May be worth briefly mentioning this earlier in the document;</li> <li>TWBC timetable has been revised very recently</li> </ul>
42.	Pg. 69 Section 13 - Parish Action Plan	Under '13 Parish Action Plan' Section <ul style="list-style-type: none"> <li>Will need to include costings for these if contributions are to be sought from development schemes</li> </ul>
43.	Pg. 70 Section 13 - P5. Making use of developer contribution	Under 'P5. Making use of developer contribution' Section <ul style="list-style-type: none"> <li>TWBC do not currently have CIL (not likely to going forward, will continue with S106 method)</li> <li>List is beneficial – costings needed</li> </ul>
44.	Pg. 71 Section 14 - Feedback	Under '14 Feedback' Section <ul style="list-style-type: none"> <li>Once certain, suggest consultation dates are inserted</li> </ul>
45.	Pg. 74 Section 15 - Some Useful Definitions	Under '15 Some Useful Definitions' Section <ul style="list-style-type: none"> <li>A lot of these definitions are in the NPPF, it is advised that NPPF definitions are used instead OR the document should set out clearly how they differ from the NPPF definitions</li> </ul>
46.	Pg. 74 Section 16 - Tables of Figures	Under '16 Table of Figures' Section <ul style="list-style-type: none"> <li>Please ensure the links on page 74 direct to the right place/page and have the correct title.</li> </ul>
47.	General Feedback on Draft Plan	<ul style="list-style-type: none"> <li>A map of the parish with constraints shown would be useful ie; AONB, conservation areas, SSSIs, ancient woodland.</li> </ul> <p>It would be normally be expected to see a Sustainability Appraisal alongside the Neighbourhood Development Plan as evidence to show that the results have helped shaped the plan. Has progress been made with this? It is understood that a scoping was completed earlier in 2018. Have the policies now been assessed? It would be helpful if the consultation exercise included this work as an appendix.</p>
48.	General Feedback: Data Sources	<ul style="list-style-type: none"> <li>Need to ensure that the GIS dataset can be provided for any spatially specific policies included in the NDP. This could include things like;</li> </ul>

## Responses

		<p>allocations, green spaces, protected views etc. (This is to ensure that future planning applications can be assessed against the NDP policies).</p> <ul style="list-style-type: none"><li>• If including any data from other data sources then the NDP need clearly signpost the location of this data to TWBC. (For example the Councils Local Green Spaces information has been included as part of the NHP).</li><li>• It appears that the plan uses a lot of Ordnance Survey mapping and only the first map has a copyright/Ordnance Survey reference on it. The plan needs to reference/copyright any Ordnance Survey data they have used as the OS can be quite strict.</li></ul>
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