

**TWBC comments on Southborough and High Brooms Neighbourhood Development Plan 2024 – 2038 Submission Version (Regulation 16)**

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General comments		
References to the TWBC emerging Local Plan		<p>It should be noted that once the emerging Local Plan is adopted (autumn 2025 and ahead of the SHBNDP being made) the policy references listed to the current Development Plan Documents (i.e. the 2006 Local Plan, Core Strategy and Sites Allocation Local Plan) will be out of date as the emerging Local Plan will supersede these. The references to the Submission Local Plan (SLP) will also be out of date.</p> <p>The approach to policy references and references to the Submission Local Plan will therefore require further thought. At the current time of writing it would be best to refer to the Plan/policies within the Plan as the emerging Local Plan (as proposed to be modified through the <a href="#">Schedule of Proposed Main Modifications</a>). However, as mentioned above, the emerging Local Plan will most likely be adopted ahead of the referendum and ‘making’ of the SHBNDP.</p>
References to the Limits to Built Development		<p>Similar to the comment above, specific care should be had regarding references to the Limits to Built Development (LBD) boundary. The emerging Local Plan LBD boundary should be shown and it should be clear that the LBD boundary is set through the borough-wide Local Plan and may be amended through a review of the Local Plan.</p>
1. Introduction		
Paragraph 1.10		<p>The recently reviewed Kent Minerals and Waste Local Plan has now been adopted. The following amended wording with a link to the latest document is suggested:</p> <p><b>1.10 Minerals and Waste:</b> The Development Plan also comprises the <a href="#">Kent Minerals and Waste Local Plan 2024 to 2039 (adopted March 2025)</a>. Kent Minerals and Waste Local Plan (KMWLP) 2013-2030 (adopted 2016, modified in 2020, since subject to further review and currently subject to examination, the main modifications to the KMWLP having been subject to a public consultation in October/November 2024). In addition, The County Council, as Minerals and Waste Planning Authority, confirms that within the plan area, there are significant safeguarded land-won minerals, mainly a suite of sandstones that have low to no current demand. These minerals are, in all probability, now only</p>

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		<p>suitable for historic building/structure restoration and building purposes. The 'growth' identified by the Neighbourhood Plan aligns with the emerging Tunbridge Wells Borough (TWBC) Local Plan and the County Council has commented on the allocations in terms of mineral safeguarding. Therefore, any development that comes forward in the future would need to accord with the emerging Local Plan. Any mineral safeguarding considerations would have to be addressed, as required by the adopted Kent Minerals and Waste Local Plan <b>2024-2039 (March 2025)</b>, 2013-30 (Adopted Early Partial Review 2020) policies <b>DM 7 and DM8 where relevant</b>.</p>
Paragraph 1.11		<p>An update on the emerging Local Plan is needed. Suggested amended wording:  A new Local Plan for Tunbridge Wells borough is in the process of being developed. <b><u>The <a href="#">Submission Local Plan</a> is at an advanced stage of examination. Following examination hearing sessions held between 2022 and 2024, the Borough Council has consulted on proposed Main Modifications (these being changes to the Plan needed to make it 'sound') and awaits the Inspector's Final report (which marks the end of the Local Plan Examination). Once the Final report is received the final stage is for the Borough Council to adopt the new Local Plan.</u></b>  <del>Following the Regulation 19 consultation it was submitted to the Secretary of State for independent Examination on 1 November 2021. Upon receipt of the Inspector's Initial Findings Letter in November 2022, TWBC decided to progress the examination with revisions to the Development Strategy to the Tunbridge Wells Submission Local Plan (SLP).</del> <b><u>Upon adoption the new Local Plan will replace the saved policies of the 2006 Local Plan, the Core Strategy (2010) and the Site Allocations Local Plan (adopted 2016).</u></b> <i>(moved from paragraph 1.12)</i></p>
Paragraph 1.12		<p>Would suggest deleting this paragraph as TWBC's LDS is currently out of date in relation to adoption dates for the Local Plan. The suggested amendments to paragraph 1.11 above provide the latest position. It is also suggested the last sentence of paragraph 1.12 be added to paragraph 1.11 (as above).</p> <p>Reference to the October 2024 LDS is incorrect as there was an LDS update in March 2025. The text should be amended to reflect the updated LDS. It is suggested that a general reference to the LDS be included here rather than reference to a specific date, as this would quite quickly become out of date.</p>
Paragraph 1.14		Factual correction:

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		The emerging Local Plan seeks to deliver, across the borough, a minimum of 41,880 <del>12,204</del> dwellings and 14 hectares of employment (Use Classes B (Business use) and E (Commercial use)) land, together with supporting infrastructure and services over the plan period (Policy STR 1).
Paragraph 1.15		<p>Amend part of last sentence:  ...although the TWBC new Local Plan is subject to main modifications and public consultation in due course and therefore the policy could be amended <b><u>depending on the Inspector's Final Report</u></b>.</p> <p>The Inspector's Final Report is likely to be published ahead of the referendum version of the SHBNDP so it is likely this suggested amendment will have to be amended further. The <a href="#">Schedule of Proposed Main Modifications</a> consulted on between March and April 2025 also contains a modification to Policy STR/SO 1 so as to reflect the removal of site allocation AL/SO 1 (as development on the site is now complete).</p>
Paragraph 1.16		<p>For information – main modification MM227 (Table of appropriate uses for Policy ED1) also proposes that Class B2 (general industrial) uses be included for Southborough and High Broom Industrial Area. Such uses should be of an appropriate type and scale and compatible with the area. The policy could therefore be amended to include this depending on the Inspector's final report.</p> <p>See page 334-335 of the <a href="#">Schedule of proposed Main Modifications</a>.</p>
Paragraph 1.17		Change Policy AL/S02 to Policy AL/SO 2.
2. About Southborough and High Brooms		
Paragraph 2.6		This paragraph will need to be updated as a new off-peak bus route ( <a href="#">Metrobus 284</a> ) linking High Brooms and Southborough launched in June 2025.
4. Spatial Strategy		
Paragraph 4.4 and Figure 3		Typo – LBC should be LBD. Also consider other comments about the LBD boundary and how it is represented in Figure 3.

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Policy SHB1	Criterion A	Consider how the references the Borough (adopted/emerging) Local Plan and the LBD/updated LBD boundaries are phrased in the policy.
Policy SHB1	Criterion B	This seems inconsistent with the NPPF and TWBC emerging Local Plan Green Belt policy. It is much more restrictive than NPPF Green Belt policy – for example, there is no reference to the Grey Belt or Golden Rules (paras 155-56). It also excludes some Green Belt development which is deemed appropriate under NPPF 154 (e.g. outdoor sports and facilities, extension/alteration of a building, replacement of a building provided it is in the same use etc).
Paragraph 4.3		<p>The SLP allocating 42 new dwellings for the parish figure needs to be updated. The figure as proposed in the <a href="#">Schedule of Proposed Main Modifications</a> is 26 (see MM73-MM75). This reflects the removal of AL/SO 1 from the plan as the site has been built out.</p> <p>The first bullet point currently reflects the LBD boundary may be amended on adoption of the new Local Plan. Given the new Local Plan is likely to be adopted ahead of the SHBNDP, or at least the Borough Council will have received the Inspector's Final Report, an amendment to this is recommended to show the LBD in the new Local Plan and comment that it may be amended further as part of a review of the Local Plan.</p> <p>The seventh bullet point refers to flood zone mapping. The referenced flood mapping has recently been replaced by the Environment Agency's new national flood and coastal erosion risk information. The mapping for this may be viewed online via <a href="#">this webpage</a>. More information on the new data, including links to GIS data downloads, may be viewed on <a href="#">this webpage</a>.</p>
Policy SHB1	Criterion B)vi	Is "sited away from areas" meant to be "away from areas"?
<b>5. Housing</b>		
Policy SHB2	Criterion A	<p>The policy should reference that 'specialist housing need' includes households such as those with learning disabilities and other care and support needs, including extra care housing. This could be an asterisk at the bottom of the policy. The asterisk should go on to say that:</p> <p>The housing needs of such specialised groups are normally assessed by Kent County Council.</p>

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Policy SHB2	Criterion A)i	“Perhaps up to 5% of overall dwelling numbers” is not precise or clear what would be required of developments. The policy needs to be more specific about this.
Policy SHB2	Criterion A)iv	It is noted that First Homes are still referred to in the policy. This is acceptable given they are part of the findings of the HNS and can form part of the emerging Local Plan affordable housing Policy H 3 40% home ownership tenure to be negotiated on a site-by-site basis. However, the NDP group should be aware that promoting First Homes over and above other routes to home ownership, notably shared ownership, may restrict interest from Registered Providers in affordable housing coming forward as part of S106 sites.
<b>6. Character, Heritage, and Design</b>		
General comment on Chapter 6 and Appendix A: Design guidance and Codes		The comments made to the previous consultation on the Pre-Submission SHBNDP have been addressed in this version of the SHBNDP.
Paragraph 6.18		The TWBC Borough Climate Change Strategy went to Cabinet on 26 <sup>th</sup> June and is going to Full Council for adoption in July. The latest version can be accessed here (item 9): <a href="#">Agenda for Cabinet on Thursday, 26th June, 2025, 6.00 pm - Tunbridge Wells Borough Council</a> . Paragraph 6.18 should be updated to reflect this and should note the proposed 2050 net zero target date for the borough.
Policy SHB4	Criterion B)ii-iii	Reference should be made to utilising a ‘fabric first approach’, aligning with TWBC’s emerging Local Plan Policy EN 3.
Policy SHB4	Criterion B)iv	Ground source heat may not be appropriate for all properties. It would be good to see air source heat also referenced.  It would also be good to reference and note support towards low carbon heat networks for major developments.

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Policy SHB5	Criterion C	This should be re-worded to state 'C. Proposals affecting the non-designated heritage assets will be determined based on <b>the adopted Development Plan and</b> national planning policy', so it does not appear to try and bypass the soon to be adopted policies in the emerging Local Plan, such as EN 4 which addresses non-designated heritage assets.
7. The Town Centre and Key Employment Sites		
Paragraph 7.11	Reference to cultural opportunities	Could this be changed to opportunities for the cultural and creative sector (businesses/organisations)?
Paragraph 7.19	Reference to the Creative Economic Strategy and the Southborough Working Group	<p>The Creative Economic Strategy has been produced by Creative Tunbridge Wells, not TWBC, but it has been endorsed by the TWBC Cabinet.</p> <p>The Southborough Working Group are not currently meeting regularly but may start again in the future.</p>
Paragraph 7.20	References to Knot Work and Applause Rural Training	<p>Should read Knot Works and Applause Rural Touring.</p> <p>Applause did trial a pilot family programme that was successful but there are no plans for future activity at present, although there may be at some point in the future.</p>
8. Environment and Green Space		
Policy SHB10		To improve the clarity of the policy it would be worth including a reference in the policy itself as to how local green space designations influence the consideration of development proposals. For example, local green space policies for previously made neighbourhood plans in the borough include the following: 'Development proposals within the designated local green spaces will be consistent with national policy for Green Belt', or 'Development proposals within the designated local green spaces will only be supported in very special circumstances'.

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Paragraph 8.37	Policy SHB12: Dark Skies	It would be good to reference the <a href="#">High Weald Dark Skies Planning Technical Advice Note</a> alongside the reference to the High Weald AONB Management Plan. Reference to the Dark Skies Technical Advice Note could also be included within Policy SHB12: Dark Skies.
<b>9. Transport and Movement</b>		
Paragraph 9.1		<p>The paragraph refers to the KCC Local Transport 5 – Striking the Balance as the emerging Local Transport Plan. This Plan was adopted in December 2024. The link also needs updating as it currently links to the Local Transport Plan 4 (see the adopted <a href="#">KCC LPT5 here</a>).</p> <p>Whilst the <a href="#">TWBC LCWIP Phase 1</a> is mentioned later in paragraph 9.13, it would be good to reference it here as well.</p>
Paragraph 9.13		TWBC also considers the A26 to be a key priority for improved cycling infrastructure and a scheme has been prepared for the route, but this has not been supported by KCC to date.
Policy SHB13	Criterion A	Is it necessary to restrict this to major developments? It could apply to all residential and employment developments.
Paragraph 9.16		There is now a bus service between Southborough and High Brooms in the off-peak – Metro Bus 284. It also services North Farm and Tunbridge Wells Hospital.
Paragraph 9.19		It is suggested that ‘for longer journeys’ be added to the end of the first sentence.
<b>10. Community Facilities</b>		
Paragraph 10.4		The TWBC Infrastructure Delivery Plan (IDP) August 2024 has been updated and replaced by version published in March 2025 (see the <a href="#">IDP March 2025 version</a> ) alongside the consultation on proposed main modification to the Local Plan.
<b>12. Infrastructure Improvements and Provision</b>		
Paragraph 12.1 – 12.2		It is noted that any potential S106 infrastructure projects/requirements should be costed and robustly justified if they are to support requests on planning applications. This comment is for the Town Council

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		to note when considering and suggesting infrastructure improvements, although, it could also be noted in paragraph 12.2.
Potential Infrastructure Priorities	First bullet point	As noted in a comment above, there is now an off-peak bus route between Southborough Town Centre to High Brooms Railway Station. This bullet point could therefore be removed, or amended if there is a desire to introduce a peak time service.
<b>13. Non-Policy Actions / Projects</b>		
Paragraph 13.1		It is noted that some of the bullet points listed on page 78 could, if associated with development proposals, be applicable for S106 contributions if justified. Each would have to be considered on its own merits in the context of planning applications.
<b>Glossary</b>		
Reference to SPDs		Note that under the changes to plan-making recently consulted on by the Government, SPDs may be replaced by supplementary plans. These would have the same status as local plans and would be subject to examination.
<b>Appendix B</b>	<b>Non-Designated Heritage Assets</b>	
General comment		TWBC will soon be publishing the Local List, which includes the non-designated heritage assets identified in the NDP document.
Pages 111-115	Designation of post boxes and brick pavements	TWBC supports the designation of these assets but notes the ability for TWBC to protect them is limited. They are within the adopted highway and controlled by non-planning legislation, so the LPA cannot prevent their removal or alteration as such works would not amount to 'development' requiring permission under S.55 of the TCPA.
<b>Appendix C</b>	<b>Local Green Spaces</b>	
Page 116	LGS1: Blackthorn Avenue	The information box states in the planning permissions row: 'None. A Car Park has been placed here without permission, for 4/5 cars'. This is factually incorrect – the car parking spaces were permitted under 22/03487/FULL. The area shown as Local Green Space in the plan also includes part of the garden and access road to Unit 1 of the three houses to the north permitted under 18/01494/OUT and



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		20/01462/REM, alongside their parking areas at the end of the turning head. This text should be re-considered and amended as necessary.