



Growth and Communities

Southborough and High Brooms
Neighbourhood Plan,
Planning Policy,
Planning Services,
Tunbridge Wells Borough Council,
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Friday 25 July 2025

BY EMAIL ONLY

Dear Sir, Madam

Re: Southborough and High Brooms Neighbourhood Development Plan - Regulation 16 Consultation

Thank you for consulting Kent County Council (hereafter referred to as the County Council) on the Southborough and High Brooms Neighbourhood Development Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

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

Chapter 1: Introduction

Paragraph 1.10

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, confirms that the Plan correctly identifies the existence of safeguarded minerals within the plan area. The County Council supports the reference to the requirement to assess if there may be exemptions to the presumption to safeguard minerals (as set out on Policy DM 7 of the recently adopted Kent Minerals and Waste Local Plan 2024-39) where any development proposals may affect safeguarded land-won minerals.

The County Council has no objection in regard to land-won minerals or waste management capacity safeguarding.

Chapter 4: Spatial Strategy

Paragraph 4.3

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, believes that Southborough and High Brooms Parish Council may wish to consider referencing Chapter 15 of the National Planning Policy Framework (NPPF) and Defra's guidance on National Standards for Sustainable Drainage Systems (SuDS). These documents would provide the assessment criteria for the suitability of site location in relation to flood risk, and the criteria for which SuDS systems are to be designed to in order to manage flood risk suitably and safety.

Policy SHB1: Location of Development

The County Council recommends stating within the document that planning applications are required to meet Defra's guidance on National Standards for SuDS which following the latest update contain a new standard, Standard 6, introducing a requirement on development proposals:

"6.1 A 'SuDS approach' shall be adopted to ensure the surface water drainage system maximises biodiversity benefits throughout the development lifecycle."

Chapter 6: Character, Heritage and Design

Policy SHB4: Energy Efficiency and Design

SuDS: The County Council, as Lead Local Flood Authority, supports the recommendation of improving and promoting sustainability in neighbourhood areas through the reduction in water consumption and use of grey water systems. The County Council notes that these are now the primary methods recommended for surface water management within the latest Defra guidance on National Standards for SuDS.

Paragraph 6.21

The County Council wishes to highlight that the 110 litres per person quoted in the policy is generally considered to be the maximum acceptable value. However, it is understood that there is no existing regulation in place to prevent developers from proposing more or less than this figure. Therefore, the County Council recommends that the wording of Policy SHB4 be adjusted to state that whilst 110 litres per person is the accepted maximum, figures below this volume are encouraged.

Chapter 8: Environment and Green Space Policy

SHB9: Landscape and Biodiversity

SuDS: The County Council, as Lead Local Flood Authority, reiterates the comments made previously in response to the Regulation 14 Consultation. The County Council acknowledges that there are 'parent' policies in place such as the KCC Drainage and Planning Policy, the

emerging Tunbridge Wells Borough Council (TWBC) Local Plan and national guidelines. However, the proposed Neighbourhood Plan lacks adequate consideration of surface water, SuDS and related flood risks. The County Council would recommend that the Neighbourhood Plan considers incorporating SuDS into the requirements or, at the very least, refers to the relevant local and national requirements.

Furthermore, the County Council recommends that Southborough Town Council may wish to consider adding additional wording to Policy SHB9 to strengthen it with regards to the requirement for new development to not contribute to flood risk via the inclusion of SuDS. The County Council does acknowledge that SuDS are considered in the associated design code documentation.

Chapter 9: Transport and Movement

Highways and Transport: The County Council, as Local Highway Authority for Kent, supports the vision and objectives relating to transport and movement which seek to encourage active travel and walkable neighbourhoods, infrastructure for electric cars and improved bus services. The County Council looks forward to continuing to work with Southborough and High Brooms to deliver the schemes listed in line with the Kent/Local Cycling and Walking Improvement Plans.

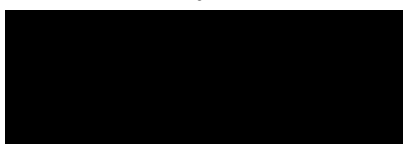
Chapter 12: Infrastructure Improvements and Provision

Waste Management: The County Council, as Waste Disposal Authority, has a Statutory Duty to provide Household Waste Recycling Centres (HWRCs) and Waste Transfer Stations (WTS) with sufficient capacity to accept arisings from across the county. TWBC is the Waste Collection Authority for this area with responsibility for kerbside collection.

The County Council wishes to reiterate that Tunbridge Wells (North Farm) HWRC and WTS are reaching capacity. Mitigation at this site or provision for a new site to provide the required capacity is likely to be needed to deliver the growth proposed in the Local and Neighbourhood Plan. Whilst the Southborough and High Brooms Neighbourhood Plan does not allocate sites for housing, it sets out parameters to support the proposed growth strategy in the emerging Local Plan. The County Council has responded to the Local Plan and welcomes the inclusion of waste in the types of infrastructure to be delivered.

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

Yours faithfully,



Stephanie Holt-Castle
Director – Growth and Communities