

Horsmonden Neighbourhood Plan

Parish Council's response to the Independent Examiner's Initial Comments

Paragraph number	Description	Response
4	Comment on representations submitted at Reg 16	Schedule of comments attached as Appendix A.
7	Any site within the Limit to Development is likely to be within safe walkable distance of the village centre?	Fig 5 Strategy Map page 25 shows 400m and 800m radii from village centre. It shows the absence of pavements particularly along the Brenchley and Goudhurst Roads. Also, where pavement improvements, a pedestrian crossing and a school crossing patrol are needed. These all need to be addressed to make the TWBC proposed development sites AL/HO2 and AL/HO3 within a <u>safe</u> walkable distance of the village centre. There are also parts of the AL/HO3 site that are beyond 800m or 10 minutes walk that would suggest that these parts are outside of a reasonable walkable distance for example if someone was to walk their child to school and then drive to work in Maidstone or Tunbridge Wells, they might well simply take the car option.
8	Examples of what measures to minimise traffic speeds.	SHNP Paragraph 74 states 'the HNP will seek to create 'home-zones' in new development where traffic is restricted to 20mph'. Geometry of new housing layouts is part of this. Also see Kent Design Guide ¹ Movement p136-137 in regard of Homezones and 2.3.2 Design to Control Speed p138-144 tight kerb radii at junctions (entrance to sites), speed tables, planting and differentiated surface textures. With regard to the control of traffic speeds on the existing road system in the village, HPC continues to liaise with KCC (via the Highways Improvement Plan – HIP - process) to prioritize and introduce appropriate safety measures.
10	Is the expectation of the Parish Council, that pavements will just have to be incorporated within the development or	As per response to question 7, the expectation of the parish council is that deficiencies in pavement provision within the wider village should be addressed by new development so that the new residents of the development can safely access the

¹ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/regeneration-policies/kent-design-guide>

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	is the expectation that deficiencies in pavement provision within the wider village should be addressed by new development?	village centre on foot (push chairs, mobility scooters). Within new developments, as long as it can be demonstrated to be safe, shared spaces / surfaces should be permitted.
11	Is it premature to seek to collect funding for a new crossing until it is demonstrated that a suitable crossing point can be delivered?	It has not been possible to get KCC Highways to comment on the plan including provision of school access crossing. AL/HO1 went ahead without provision despite being west of the Maidstone Road. It is therefore considered important to learn lessons from previous planning decisions to prioritise children's safety and seek to collect funding for a new crossing from developers of AL/HO2.
13	Can the area to be subject to Section 106 funding be shown on a map and does the Parish Council consider that children in the south west quadrant of the village, south of Brenchley Road will travel on the west side of Maidstone Road before crossing to the school or will they cross the B2162 on the east side, say by the Village Green?	Fig 5 shows a proposal for a school crossing patrol (orange dot) on the Maidstone Road opposite Back Lane. This point is the natural point for families with children to cross the Maidstone Road from west to east including people who might choose to walk up Gibbet Lane. It is acknowledged that there is no pavement on the west side of the Maidstone Road near the junction with the Brenchley Road and that families with children are quite likely to cross the road to the Village Green side of the road at this point.
15	<p>Is it the Parish Council's aspiration that there should only be one new allotment site provided and that this should be on the allocation site AL/HO3 or could there be another site?</p> <p>Does the Parish Council expect that the developers should only make the land available for the allotments or does it expect that the associated infrastructure should be provided such as the car parking and water supplies?</p>	<p>It is the parish council's aspiration that there should only be one new allotment site and that this should be on the allocation site AL/HO3.</p> <p>The parish council does expect that the associated infrastructure for the allotment such as car parking and water supplies should be provided.</p>

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16	Is the intention of the Parish Council that the Character Analysis and Design Guidelines should form part of the neighbourhood plan? Has that document been the subject of public consultation?	It is intended that the Character Analysis and Design Guidelines should form part of the Neighbourhood Plan. These have been publicly consulted on at both Regulation 14 and 16 and are in the List of Supporting Documents on page 98-99 of the SHNP including with a link.
17	How should that document be read in conjunction with the High Weald AONB Housing Design Guide. I assume the latter document only applies within the part of the parish within the AONB.	The parish council considers that the character of the village is typical of High Weald villages even though the main settlement lies just outside the boundary and so the principles of the HW AONB Housing Design Guide could be applied appropriately to new developments in or close to the main settlement.
18	Is the support for sheltered housing limited to sites with the limits of development or does it apply anywhere within the parish?	Within the limits of development.
19	Can the Parish Council provide me with the full assessment of all the proposed LGS sites?	Here is a link to a Dropbox folder containing the LGS assessments: https://www.dropbox.com/sh/lkghnjnrsqbjgi/AACnHOPTOIJgurBQwFE9Zbboa?dl=0
20	Is the protection of the views solely to and from the views shown in Figure 35 or does the policy seek to protect views into and out of settlements from <i>any</i> publicly accessible area?	While the intention of the parish council was to focus on the views listed in Fig 35, the principle of protecting views into and out of the settlement from any publicly accessible area is also considered desirable.
21	Can the Parish Council explain why is Grade 3A agricultural land not included in the policy, when it is within the definition of best and most versatile agricultural land set out in the glossary to the NPPF?	The parish council is happy to be guided by the Examiner and include Grade 3A agricultural land for protection from development within the policy.

Appendix A: Horsmonden Regulation 16 Responses

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
Brenchley and Matfield Parish Council	All of the plan	Brenchley and Matfield Parish Council congratulates Horsmonden Parish Council on all the careful work that has evidently gone into producing this very comprehensive draft plan and confirm that BMPC has no objection to any of the proposed policies.	No	Yes	
Southern Water	Water Infrastructure	<p>Additional policy on the provision of water and wastewater infrastructure</p> <p>Southern Water is the statutory wastewater undertaker for Horsmonden and as such has a duty to serve new development within the parish.</p> <p>Southern Water may have to provide additional wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. It is likely that there would be limited options with regard to location, as the infrastructure would need to connect into existing networks. Planning policies should therefore support proposals that come forward in order to deliver necessary water supply and wastewater infrastructure.</p> <p>We could find no policies to support the general provision of new or improved utilities infrastructure. The NPPF (2019) paragraph 28 establishes that</p>	No	Yes	Although arguably this is dealt with by the SLP, HPC and SG, welcome this suggestion particularly in the light of recent surface water flooding in the parish. The suggested policy including addressing surface water flooding / from drains could be incorporated in Chapter 7

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		<p>communities should set out detailed policies for specific areas including 'the provision of infrastructure and community facilities at a local level'. Also the National Planning Practice Guidance states that 'Adequate water and wastewater infrastructure is needed to support sustainable development'.</p> <p>Although the Parish Council is not the planning authority in relation to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system.</p> <p>Proposed amendment</p> <p>To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy as follows:</p> <p><u><i>New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan</i></u></p>			Landscape and Environment after Policy 7.11 Flooding perhaps with the addition of after infrastructure of "for water drainage, waste water and sewerage"
Carol Read	Bassets Farm	The whole idea of around 200 houses on Bassetts Farm is ridiculous. The access for this amount of cars is impossible. It has taken planning around 20 years to allow (mainly because of highways) 20 houses to	Yes	Yes	While sympathetic to the concerns raised, the SNP

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		<p>be built on the front area of Bassetts Farm - right in front of my parents home which they have been in for the past 52 years (both now in their 80's). This is all really stressful for my parents especially as my dad suffers with depression. They have, however, come to accept 20 houses in front of them now because the area has become such a mess but now it seems there are new plans for a medical centre. So 180 houses behind them and a medical centre in front of them or 20 houses in front of them!! They'll be completely surrounded. How would a medical centre work? How would the elderly from the village get there? 200 houses in this village says a minimum of 400 cars. Our village is already like Piccadilly Circus and there have been many accidents at our small crossroads. This amount of cars, especially coming out of Bassetts Farm, or going across the crossroads at the Green, is an accident (fatal accident) waiting to happen. I have so many things to say about this whole plan but I would be writing for hours. To summarise our village has had its quota of houses built I know because I've lived here for 52 years and I have seen the changes (for the worst). This plan would completely ruin this village. I should say the changes that have already been made to this village have changed it irrevocably. There is one last subject I would like to touch on. If the 20 houses or the medical centre is built in front of my parents home I hope the fir tree hedge will be left as a screen from everything that is going on.</p>			<p>isn't allocating sites for housing, but responding to TWBC's proposed allocation. TWBC's SLP has allocated the this site AL/HO3 for 115-165 dwellings and the medical centre. The extant planning permission is for 30 homes subject to suitable pavement access being provided which Persimmon haven't yet demonstrated that they can achieve this.</p>

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Tunbridge Wells Borough Council (TWBC)	All of the plan	Comments attached at Appendix 1.	Yes	Yes	
Karen Evelyn	Policy 7.1	<p>71. states that the proposed allocation for 115-165 dwellings on the Goudhurst Road on the Bassetts Farm site (H03) could result in excess of 300 additional vehicle movements on this road at peak times as people travel to work.</p> <p>More detail needs to be given in the plan as to how the plan proposes to manage the resulting congestion along the Goudhurst Road and how this will impact the village crossroads.</p>	No	Yes	Again as the allocation is in the SLP, and Neighbourhood Plans aren't strictly designed to address highways matters, it was felt the SNP went as far as it could on this point. The SLP does require a Highways Assessment prior to planning permission.
Karen Evelyn	Policy 7.2	'Policy 7.2 protecting important views' is of fundamental importance to the village to protect the beautiful Wealden style landscape that the village benefits from. The proposed AL/H03 (Bassetts Farm) development will destroy for ever the important views 6, 7 and 13 identified in 'Figure 35: important	No	Yes	The SNP policy 7.2 is unchanged: Policy 7.2 Protecting

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		<p>views of the Horsmonden Neighbourhood Plan' which will be a great loss to the village, to village life and to visitors.</p> <p>We note in the document that HNP has agreed to amend 'Policy 7.2' to accommodate Persimmon's point on page 5, first paragraph, of their formal response letter to HNP Planning Group dated 20 October 2021, that 'Protecting Important Views' has the potential to significantly impact upon the deliverability of development at Land East of Horsmonden'. Policy 7.2 is in the plan to protect the village and should not be amended at the request of the developer. The policy is there to protect the village from losing beautiful views and should not be compromised.</p> <p>The important views can and should be respected by Persimmon even if it means reducing the number of houses they propose to build. Persimmon may have to accept that they will need to reduce their housing numbers nearer to the minimum numbers proposed. Policy 7.2 should not be amended it is there to protect the village.</p> <p>Also referring to Persimmon's formal response letter to HNP Planning Group dated 20 October 2021, allowing space for large species trees to break up rooflines on the slopes as they mature will not prevent the destruction of the important views 6, 7</p>			<p>important views</p> <p>Development must not cause any loss or diminution of historical or significant views (mapped in Fig 35 and listed in table) into and out of settlements from any publicly accessible area.</p>

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		and 13 and is contrary to Policy 7.2 which was put in place to protect the village. Policy 7.2 should not be amended.			
Historic England	All of the Plan	<p>We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you to if appropriate any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</p> <p>We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.</p>	N/A	Yes	Historic England's comments were addressed in the SNP (Reg 16)
Bloomfields, Matthew Beasant	Policies 2.1, 2.2, 2.3, 2.6, 2.7, 2.8, 3.2, 4.1, 4.2, 4.3, 5.1, 6.1, 7.2, 7.3, 7.4, 7.5, 7.9, 7.11	Persimmon Homes South East are the promoters of "Land to the east of Horsmonden" which is proposed for allocation by Policy AL/HO3 of the Tunbridge Wells Submission Local Plan (2020-2038) (SLP) for	Yes	Yes	Persimmon's response is generally positive about the SNP policies

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	Projects 2.1, 2.3	<p>approximately 115-165 dwellings, safeguarding of land for the future of expansion of Horsmonden Primary School, a new health centre/doctors surgery, and a community orchard and open space.</p> <p>Persimmon Homes South East welcomes the opportunity to provide comment on the Submission Draft of the HNP and are supportive of the objectives and projects that it seeks to achieve and deliver. In this context, this letter therefore includes a number of comments in respect of the policies within the Draft HNP.</p> <p>Persimmon Homes South East welcomes the opportunity to provide comment on the Submission Draft of the HNP and are supportive of the objectives and projects that it seeks to achieve and deliver. In this context, this letter therefore includes a number of comments in respect of the policies within the Draft HNP.</p> <p>Policy 2.1 – Walkable Village & Policy 2.4 – Adequate Pavements – We are broadly supportive of the objectives of Policy 2.1, and in accordance with the requirements of Policy AL/HO3(2), any proposed development of “Land to the east of Horsmonden” will incorporate appropriate pedestrian links into the village where these can be delivered, and will seek to achieve improvements of the footway to the north of</p>			and commits to addressing them in their plans. There are one or two areas where they quibble for example around Lifetime homes but the Examiner will probably address these. Positively they have agreed to reserving land for the medical centre close to the Goudhurst Road rather than further towards the centre of the site including a public car park. They do suggest the Manual for Streets are guidelines might not be strictly

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		<p>Goudhurst Road (both in discussion with Kent County Council Highways), in order to comply with Draft HNP objectives for new housing proposals to be demonstrably safe and within walkable distance of the village centre.</p> <p>In respect of the requirement of Policy 2.4, this outlines that development proposals will be supported where pavements are provided in line with Manual for Streets for all users to the village centre. The Draft HNP is prescriptive in that it specifically includes technical excerpts from Manual for Streets in respect of pavement widths. We would note that Manual for Streets standards are guidance, and that this policy should potentially be caveated to take into account that standard highways solutions may not always be possible, particularly where villages have existing street patterns that are unlikely to conform to standard layouts.</p> <p>Policy 2.2 – Minimising Traffic Speeds – The design and layout of “Land to the east of Horsmonden” will look to incorporate measures to minimise traffic speeds where appropriate, and will seek to achieve desired ‘home zones’ where possible so that traffic can be restricted to 20mph. Opportunities to achieve this will be identified through the design stage leading up to the submission of a planning application, working in conjunction with appointed</p>			<p>applied to a village situation but the HNP steering group remain committed to these. The examiner may be encouraged to walk the pavement to the Bassetts Farm site so they can make a judgement themselves on whether the pavement can be achieved safely. Overall a positive outcome and a good guide for the parish council in future discussions in regard of the site with TWBC and the developer.</p>

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		<p>transport consultants.</p> <p>Any future planning application will also be supported by a Transport Assessment that will consider the existing road network in relation to anticipated numbers of vehicle movements and the speed of vehicles in and around the development. Through this process, and engagement with KCC Highways, the design of the new access will include any mitigation or enhancement measures deemed necessary to minimise traffic speeds and ensure safe and suitable access to and from the development.</p> <p>Policy 2.3 – Enhancing Public Rights of Way – We are broadly supportive of the objectives of this policy which sees to enhance existing PRoW within, or adjacent to, development sites in order to improve connectivity within the site and links with other PRoWs and pavements suitable for active travel modes. Policy AL/HO3(3) requires development to provide a link to, and preserve the amenity of Public Rights of Way WT340a and WT341.</p> <p>The design of any development relating to “Land to the east of Horsmonden” will look to provide connectivity to the identified PRoWs and include any appropriate enhancements to encourage use and onward connectivity in support of active travel. Discussions with KCC PRoW Officer and Tunbridge</p>			

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		<p>Wells Borough Council (TWBC) will take place to discuss opportunities for the PRoWs and how they can be integrated successfully into the development.</p> <p>Persimmon also recognise the objectives of Project 2.1 and are open to any discussions with the PC, KCC and neighbouring parishes to identify and put in place enhancements of the existing PRoW network to increase provision for cycling, riding and walking within the parish and connectivity with neighbouring settlements where possible.</p> <p>Project 2.3 – Bus Provision – We note the objectives of the PC to encourage discussions between developers and transport providers to provide a daily (possibly demand responses) bus service) to Paddock Wood railway station during the morning and evening commuting peak and off-peak during weekday and weekends, as well as to monitor and evaluate its viability after two and five years.</p> <p>It is not considered that on its own, the size of the development site the subject of Policy AL/HO3 justifies a new bus service. It is noted that Submission Local Plan Policy PSTR/HO1 “The Strategy for Horsmonden parish” does not make any specific reference to new bus services to be delivered by the developers of the allocated sites. Any financial contributions towards a new bus service would need</p>			

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		<p>to be directly related to the development, fairly and reasonably related in scale and kind, and in accordance with Policy AL/HO3(12) necessary to mitigate the impact of the development.</p> <p>Policy 2.6 – Public Parking – We note the requirements of this draft policy to include suitably designed, shared, publicly accessible visitor parking spaces in accordance with TWBC parking standards. Through the detailed design of the development, appropriate levels of visitor parking will be provided, alongside turning and other facilities to ensure servicing and delivery vehicles can be suitable accommodated. It is not considered appropriate to provide a new public car park within the development, rather visitor spaces will be suitably spread across the site.</p> <p>It is also noted that Policy AL/HO3 requires the provision of a new health centre/doctors surgery. Whilst at this stage it would appear that the CCG has not committed to specific requirements for health care provision at the site or Horsmonden (TWBC Hearing Statement Matter 7: Residential Site Allocations Issue 13: Horsmonden (Policy PSTR/HO1 – TWLP/048) at the appropriate time there will be a need for further liaison with the CCG and local community about the design of this element of the development, and an appropriately sized public car</p>			

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		<p>park to serve the new health care facility will be considered at that time.</p> <p>Policy 2.7 – New Parking – We are broadly supportive of this policy which requires development proposals to include sufficient allocated and visitor parking provision with due regard to TWBC residential parking standards.</p> <p>Policy 2.8 – Charging Points – We note the requirements of this policy for developments to make provision for electric car and cycle charging points in the parking areas (for resident, visitor and public spaces). Notwithstanding this, the introduction of Building Regulations Part S in June 2022 means that the provision of new homes to provide facilities for charging electric vehicles is now covered by other legislation and that Policy 2.8 may no longer be necessary as a result.</p> <p>Policy 3.2 – Broadband – Persimmon note the requirements of this policy for development proposals to include the provision of fibre broadband and are supportive in principle, noting that this is a generally expected requirement for new residential development.</p> <p>Policy 4.1 – New Medical Facilities – We note the requirements for new medical facilities within the</p>			

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		<p>village of Horsmonden to provide parking and pedestrian access and for new housing development to provide financial contributions, where justified, to ensure the provision of necessary medical infrastructure for residents. At Paragraph 126, the Draft HNP notes that the “SLP makes provision for a new medical centre to be built on the Bassets Farm site (AL/HO3) on land which will be reserved by the developer for that purpose. This is a cautious welcome as the site is quite removed from the centre of the village compared to the existing surgery”.</p> <p>As required by Policy AL/HO3(4) Persimmon are developing an emerging masterplan which identifies suitable land for a doctors surgery use, and whilst the exact location of the surgery is to be determined, it will be in accordance with the Draft HNP comments which referenced an AECOM Masterplan suggesting that these facilities would be located in the southern part of the site as close as possible to the Goudhurst Road to facilitate easier access.</p> <p>It is also noted, as referenced above, that the CCG has not set out its specific requirements for health care provision at either this site, or indeed Horsmonden as a whole. At this stage, Persimmon are therefore committed to safeguarding the land for a doctor’s surgery as required by Policy AL/HO3(4), but if it arises that the CCG do not wish to progress a new</p>			

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		<p>surgery at the site, Persimmon would potentially be agreeable to providing financial contributions instead, in accordance with Policy 4.1 and SLP Policy PSTR/HO1.</p> <p>Policy 4.2 – Allotments – We note the drafting of this policy which requires land to be set aside for allotments within larger developments (AL/HO3) and made available to the new and existing residents, as well as a requirement for it to have sufficient parking provision for allotment holders, mains water and location within 800 metres of the village centre.</p> <p>Whilst SLP Policy AL/HO3 is not explicit in respect of allotment provision at the site, it does require provision of a community orchard and open space. Further, SLP Policy PSTR/HO1(4)(d) does require provision of additional allotments in Horsmonden with an expectation that these would either be provided as land within a residential scheme or a financial contribution. On the basis that allotments would constitute an open space typology, consistent with the provision of a community orchard, then it is envisaged that the objectives of Policy 4.2 could be met through development of land east of Horsmonden.</p> <p>Policy 4.3 – Facilities for Children and Young People – We note the requirements of this policy for</p>			

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		<p>development of 50-99+ homes to provide play facilities for young children on site, and for larger developments of 100+ homes to contribute towards a skate park and basketball court/multi-use games area for young people and outdoor gym to be sited at the Horsmonden Sports Ground. This is generally consistent with the requirements of SLP Policy AL/HO3 for provision of on-site children's and youth play space, albeit any contribution towards off-site improvements would need to be directly related to the development and fairly and reasonably related in scale and kind.</p> <p>Policy 5.1 – Design of New Development – We note the requirements of this policy that new development will be expected to demonstrably apply the Horsmonden Character Analysis and Design Guidelines, as well as the other criteria that will allow for support in principle. Persimmon is committed to fully referencing this guidance in the design of the development of land east of Horsmonden and will demonstrate how this has been considered as part of any future planning application.</p> <p>The requirement for development to meet Lifetime Homes Standards (or successor schemes) is noted, however following the Government's 2015 'Housing Standards Review' Lifetime Homes standards were replaced by Building Regulations Standard M4(2)</p>			

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		<p>'Accessible and Adaptable Dwellings'. National Planning Policy Guidance</p> <p>(Paragraph: 008 Reference ID: 56-008-20160519) requires that any policy to provide enhanced accessibility or adaptability should only be by reference to requirements M4(2) and/or M4(3) of the optional requirements in the Building Regulations and should not impose any additional information requirements.</p> <p>In this respect SLP Policy H6 addresses requirements for all new build housing development to meet optional technical standard M4(2) for accessible and adaptable dwellings, as set out in the Building Regulations, unless demonstrably unviable. It is therefore suggested that requirements for Lifetime Homes standards within Policy</p> <p>5.1 be deleted, and the policy updated to be consistent with SLP Policy H6.</p> <p>Policy 6.1 – Meeting Housing Need – We note the requirement for new housing development to provide an appropriate proportion of smaller homes in line with latest available housing need data at parish or borough level and provide, in line with SLP Policy H3, affordable housing in a range of tenure including for social rent and shared ownership that meets latest identified local need.</p>			

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		<p>Policy 7.1 – Local Green Spaces – We note the designation of Bassets Farm Cottages Orchard as Local Green Space, justified on the basis that it is a former orchard with a few remaining fruit trees between Bassetts Farm Cottages and the Goudhurst Road and that this could be re-planted with traditional varieties typical to the area. It is noted that Map 62 Site Layout Plan accompanying SLP Policy AL/HO3 identifies this land as Open Space, and this will be incorporated into the design of the emerging development proposals.</p> <p>Policy 7.2 – Protecting Important Views – We note the requirement that development must not cause any loss or diminution of historic or significant views into and out of settlements from any publicly accessible area. In this respect, View 6 (Bassetts Farm towards Hazel Street Farm), View 7 (Bassetts Farm towards EE Mobile Mast) and View 13 (Hazel Street Farm towards Bassets Farm) are all identifies as historical or significant views.</p> <p>As required by SLP Policy AL/HO3(6) any scheme must be fully informed by landscape appraisals (primarily to respond positively to views out of the High Weald Area of Outstanding Natural Beauty) and layout and design must consider any impact upon its setting. Further, landscape and visual</p>			

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		<p>impact assessment is required (primarily in respect of integrating existing hedgerows and mature trees).</p> <p>The emerging development proposals will consider in detail all of the above, and provide evidence to demonstrate how it will successfully be integrated sympathetically into the existing landscape, and in accordance with Draft HNP Policy 7.9, demonstrate how it would not damage or detract from the environment, character and landscape setting of the AONB (located to the south-east of the site).</p> <p>Policy 7.3 – Biodiversity Net Gain – We note the requirement for all development to minimise impacts on and result in measureable long term net gains for biodiversity secured to the lifetime of the development and demonstrated with use of accepted metrics for Biodiversity to Net Gain (BNG).</p> <p>Policy EN9 of the SLP sets out a requirement for the percentage of net gain to be a minimum of 10% as required by legislation or greater where required by supplementary planning guidance. It is suggested that Draft HNP Policy 7.3 be worded to be amended in accordance with SLP Policy EN9 so as to provide certainty for developers about BNG expectations, and ensure consistency with the new Local Plan.</p> <p>Policy 7.4 – Trees and Hedgerow – We note this policy</p>			

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		<p>and a requirement for development not to encroach on or cause harm to ancient woodland, ancient or veteran trees of ecological or amenity value, or protected hedgerows insofar as it is relevant to the emerging development proposals for land east of Horsmonden (noting that it is not adjacent to any ancient woodland in particular).</p> <p>Policy 7.5 – New Open Spaces – We note this policy requirement for new development to provide new open amenity spaces, reflecting and expanding the existing network of accessible open space in the parish. This is consistent with the requirements of SLP Policy AL/HO3(13) to provide on-site amenity/natural green space and the emerging development proposals will reflect this.</p> <p>Policy 7.11 – Flooding – We note the requirements of this policy requiring that development should not compromise the ability of the natural environment to mitigate flood risk and requiring developers to utilise natural environmental techniques to mitigate extreme weather events and flooding, such as Sustainable Urban Drainage and permeable surfaces.</p> <p>Whilst the site is not located within a Flood Zone, due to its size (over 1 hectare) a Flood Risk Assessment and Drainage Impact Assessment, including details of any sustainable drainage features, will be provided</p>			

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		<p>with any future application for development on land east of Horsmonden.</p> <p>Overall, Persimmon Homes South East are supportive of the Neighbourhood Plan, subject to the comments and recommendations which may assist in making it compatible with national policies and advice, and accord with the strategic policies in the development plan (SLP) in order for it to meet the basic conditions to allow it to proceed to referendum.</p>			
Kent County Council	Chapter 1, Objectives, Chapter 6, Chapter 7	<p>Chapter 1: Overall Strategy</p> <p>Heritage Conservation: Although the Neighbourhood Plan discusses the rich heritage of the parish, the discussion is currently being presented in a number of different places. The result is that the reader does not get an accurate overall view of the heritage of the parish with some key heritage assets being omitted. KCC recommends that for such a historic area, an introductory section titled 'Landscape History and Heritage' should be included within the Neighbourhood Plan. This could present not only the history of the parish, but also review the range and quality of the surviving heritage assets. This would in turn make it easier to relate this heritage to the themes that are developed later in the Plan. Additional information could be provided on the history of iron-working in Horsmonden, including</p>	N/A	Yes	We do not believe we can amend the plan at this late stage. An (additional introductory section 'Landscape History and Heritage'). This might be more for noting and including in a subsequent Review of the HNP. The steering group

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
		<p>reference to the site at Horsmonden Furnace, the designed landscapes at Sprivers, Rectory Park and Scotney Castle, the range of agricultural buildings in the parish, the moated sites including the scheduled monument at Share Farm and the historic farmsteads (at least 48).</p> <p>Objectives</p> <p>Landscape and Environment</p> <p>Objective: To retain the distinctive agricultural heritage of the parish, protect views, enhance biodiversity, protect ancient woodland and green spaces and retain dark night skies</p> <p>Heritage Conservation: The County Council is supportive of this objective but would suggest the term ‘agricultural heritage’ is amended as there are many aspects of Horsmonden’s landscape that are not agricultural in origin. For example, natural woodlands, streams and gills form key elements in the parish’s landscape.</p> <p>Chapter 6: Housing development</p> <p>Heritage Conservation: Historic England (together with the County Council and the Kent Downs AONB Unit) has published guidance on historic farmsteads in Kent that considers how rural development</p>			<p>acknowledge that the woodlands, streams and gills are separate (although linked) to the agricultural heritage but feel that the agricultural aspect is dominant and that the objective already includes addressing biodiversity (gills), and ancient (semi-natural) woodlands and so isn’t inconsistent with the submission. In terms of Sustainable Urban Drainage</p>

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		<p>proposals can be assessed for whether they are consistent with existing character of the countryside¹. This guidance should be referred to within the Neighbourhood Plan.</p> <p>Chapter 7: Landscape & environment</p> <p>Introduction</p> <p>The introductory text provides a reasonable review of the quality of the landscape, however, it should be noted that there is potential for the discovery of archaeological sites of earlier periods than the medieval. Although Horsmonden was unlikely to have been extensively settled in earlier periods, the lack of such sites in the parish may also be as a result of a lack of investigation.</p> <p>The text rightly identifies the Tunbridge Wells Borough Council Landscape Character Assessment 2017 as a key information resource for consideration of landscape issues. However, it is recommended that the Neighbourhood Plan should also refer to the Historic Landscape characterisation for the Borough², and specifically that for Horsmonden. The characterisation is designed to help developers, planners, decision-makers and the public assess the historic importance of Horsmonden's landscape and its component elements.</p>			<p>and archaeology, again it is acknowledged this is a factor but it wasn't an area that the HNP steering group felt qualified to address themselves.</p>

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
		<p>Policy 7.11 Flooding</p> <p>The County Council would reiterate commentary raised within its Regulation 14 consultation dated 9 November 2021 (Appendix A) in respect of the direct and indirect impacts that Sustainable Drainage Schemes (SuDS) may have on the historic environment, and the associated guidance on the matter.</p> <p>1 http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance 2 https://tunbridgewells.gov.uk/data/assets/pdf_file/0008/387665/i-HLC_Horsmonden.pdf</p> <p>Additional comments:</p> <p>Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, notes that much of the Plan's area is coincident with the safeguarded Tunbridge Wells Sand Formation (Sandstone) (a landwon mineral). The Neighbourhood Plan should acknowledge the existence of a safeguarded mineral in the area and the safeguarding policy provisions within the Kent Minerals and Waste Local Plan (2013-2030), including the need for Mineral Assessments³ to be carried out as part of any planning application in the locality.</p>			

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
Avison Young OBO National Grid		<p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets: An assessment has been carried out with respect to National Grid's electricity and gas transmission assets</p>	N/A	Yes	No comment required

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
		<p>which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p> <p>National Grid provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ <p>Please also see attached information outlining guidance on development close to National Grid infrastructure.</p> <p>Avison Young (UK) Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS</p> <p>Distribution Networks Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com</p>			
National Highways	All of the Plan	We have been appointed by the Secretary of State for Transport as strategic highway company under the	Yes	Yes	No comment required

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
		<p>provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will be concerned with plans and/or proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of the Horsmonden Neighbourhood Plan, our focus will be on any potential impact to the A21 in the vicinity of Lamberhurst.</p> <p>Horsmonden Parish is located within the Tunbridge Wells Borough Council area, consequently the Neighbourhood Plan must be consistent with the policies set out within the Tunbridge Wells Local Plan.</p> <p>The Horsmonden Neighbourhood Plan has not allocated any sites for residential or business and employment development, and no dwellings have been specified for future development within the Parish. Therefore, we do not have any specific comments to make at this time.</p>			

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
		<p>However, please do continue to consult with us as the Plan progresses so that we can remain aware of, and comment as required on its contents.</p> <p>Thank you for consulting us. Should you or any other parties have any queries regarding our response, please contact us via planningse@nationalhighways.co.uk.</p>			
NHS Kent and Medway	<p>Health Para 126 “...the SLP makes provision for a new medical centre to be built on the Bassetts Farm site (AL/HO3) on land which will be reserved by the developer for that purpose “</p> <p>Policy 4.1: New medical facilities: “Development proposals for new medical facilities within the village of Horsmonden which provide adequate parking and</p>	<p>In response to the Tunbridge Wells Brough Council Local Plan the former CCG (now NHS Kent and Medway Integrated Care Board) highlighted that an allocation or safeguarding of land for a doctors practice in Horsmonden may be required to ensure delivery of required infrastructure in the future. Safeguarding of land as detailed in SLP Policy site AL/H03 is noted as an opportunity to inform the planning for primary medical care services in the area.</p> <p>It is however important to stress that a more detailed discussion and assessment is required in this area to define any future requirements; specifically noting that most of the housing growth proposed in Horsmonden is expected in the latter part of the plan period. All premises proposals are subject to review in line with NHS Kent and Medway’s governance processes.</p>	No	Yes	This suggests that the CCG is more lukewarm about the prospect of a new medical centre than has been previously suggested (principally by TWBC / SLP). It may be sensible for the parish council to manage down expectations in the community.

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
	appropriate pedestrian access will be supported in principle. New housing developments should provide financial contributions, where justified, to ensure the provision of necessary medical infrastructure for residents.”				
Rosconn Strategic Land	AL/HO 2	<p>Policy 2.2: Minimising traffic speeds There have been no changes to this policy since the Regulation 14 Consultation. Our original representations remain and are repeated below for completeness.</p> <p>RSL acknowledge the concern about traffic volumes and speeds which has emerged out of the consultation and evidence base undertaken by the HNP. We would suggest for clarity that a distinction could be made between the two areas of concern that have emerged, the first ambition that within larger new developments speeds are minimised and the second concern related to reducing the speeds of vehicles running through the existing road network. A split approach could take the form of two policies</p>	Yes	Yes	As Rosconn Strategic Land (RSL) themselves indicate, their representations are largely the same as for PSNP (Reg 14). The parish council remain committed to ensuring safe pedestrian access to the village centre

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		<p>which support the use of traffic calming measures, one for new development and one on identified existing roads. It may be more appropriate to identify the speed reduction on existing roads as a Project, as opposed to Policy. KCC will be the ultimate arbitrator for such schemes and clearly identified proposals for support for speed reduction on roads such as Brenchley Road or within the village centre would clearly guide the Highways Authority on community goals.</p> <p>Policy 2.4: Adequate pavements RSL note that there has been a minor change in the wording of this policy since the Regulation 14 Consultation to include reference to Manual for Streets within the actual policy text, which RSL supports.</p> <p>The supporting text remains unchanged and sets out how safe pedestrian movement within the village is a key priority and how the provision of footpaths within historic developments has been lacking. It further sets out recommended guidance within the Manual for Streets regarding carriageway and footpath widths.</p> <p>The practical and design challenges of retrospectively delivering standardised highway dimensions in historical locations are recognised in guidance such as Manual for Streets, such as (paragraphs 2.7.10-</p>			<p>from new developments that are DDA compliant. While it acknowledges this might be challenging to achieve in a rural / historic setting, that doesn't mean that lesser standards should be accepted than in a town or city.</p>

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
		<p>2.7.12), which states that due to the historical evolution of many rural villages, they are unlikely to confirm to standardised highway layouts. RSL consider that reference to these paragraphs in Manual for Streets should also be included within the supporting text to assist with interpreting and implementing the Policy.</p> <p>Policy 4.4: New village hall This policy has had no material changes since the Regulation 14 Consultation. Our original representations remain valid and have been updated and outlined below.</p> <p>Policy AL/HO 2 of the submitted Local Plan sets out that the Land south of Brenchley Road and west of Fromandez Drive is allocated for residential development and a replacement village hall. This preferred area within the eastern section of the allocation is marked out within the supporting Plan contained in the Policy. The Local Plan does not allocate any other area as being suitable for a replacement village hall, whilst allocation AL/HO 3 already has land reserved for a new medical centre. RSL are confident that a safe pedestrian footpath can be delivered to the centre of Horsmonden as part of the development proposals and that we intend to</p>			<p>It wasn't possible to find the reference mentioned in regard of Manual for Streets¹.</p>

¹ <https://www.gov.uk/government/publications/manual-for-streets>

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
		<p>bring forward land as part of the development proposals for a village hall along with a proportionate contribution to fund the construction. RSL are concerned that a Policy which takes a blanket approach to where the village hall is located may fail the test of general conformity with the Local Plan. As such RSL would suggest the policy be amended to reflect the identification location within the Local Plan.</p> <p>Policy 5.1: Design of new development RSL note that since the Regulation 14 Consultation, reference to Lifetime Homes Standards has been modified to include “(or successor schemes)”. RSL consider original representations remain valid and are repeated below for completeness. RSL would note that Lifetime Homes is no longer a recognised standard in planning although is something synonymously used with what is known as Building Regulation Approved Document M4(2). Such standards can only be required through the Local Plan process with reference to viability, and it is noted that Tunbridge Wells Policy H3 Affordable Housing already requires all affordable housing to meet this standard. As such this requirement should be reviewed.</p> <p>Policy 7.4: Trees and hedgerows There have been no changes to this policy since the Regulation 14 Consultation. Our original</p>			<p>The parish council believe that Lifetime Homes is a more commonly understood term and the policy makes accommodation for changes in government policy while remaining true to the principle.</p>

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
		<p>representations are set out in full in the paragraph below as RSL considers this policy does not meet the basic conditions as it does not have due regard to the submitted Tunbridge Wells Local Plan (Policy EN 12) due to the absolute nature of the wording.</p> <p>RSL do not have any objection in principle to this Policy but note that provides no flexibility in respect to protected hedgerows and as such does not have regard to national policies and advice. RSL are currently carrying out ecological and arboricultural surveys to assess the existing trees and hedgerows to ensure they are protected before, during and after development along with confirming whether the hedgerow is classified as protected. A creation of small gap in the existing hedgerow might be required to provide a suitable pedestrian and vehicular access into the site, as such the policy should be amended to provide some flexibility for development affecting hedgerow.</p> <p>Policy 7.9: Development adjacent to the AONB There have been no changes to this policy since the Regulation 14 Consultation. Our original representations remain valid and are set out in full in the paragraph below.</p> <p>RSL would suggest an amendment to this policy so that it better reflects national policy in respect to development in and around the AONB. Paragraph 176</p>			<p>With regard to the remaining comments, the parish council is content that the policies are kept as they are and that exceptions can be dealt with on a site by site basis.</p>

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
		<p>of the National Planning Policy Framework states in respect to development in and adjacent to AONB that “The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas”.</p> <p>As such RSL suggest that the wording “must not damage or detract” is replaced with “avoid or minimise adverse impacts”. To achieve the underlining aims the policy could then make references for development to respect the special characteristics of the High Weald AONB and reflect the landscape objectives and local characteristics set out in the NDP Design Guidelines. This would ensure that the Policy is accordance with the Basic Condition a) that policies must have regard to national policies and advice.</p> <p>Policy 7.10: Development adjacent to Ancient Woodland</p> <p>RSL note that there has been a minor change in the wording of this policy since the Regulation 14 Consultation, to include reference some flexibility in circumstances where the applicant can demonstrate very clearly how a smaller buffer would suffice. Nevertheless, RSL still does not consider the amended Policy meets the basic conditions, as it does</p>			

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
		<p>not have due regard to Policy EN 13 in the Submitted Local Plan. RSL have summarised our original representations below for clarity.</p> <p>RSL are supportive of the principle of protecting Ancient Woodland and ensuring new development provides a sufficient buffer so as not to damage or detract from it. We do however object to the Policy in its current form.</p> <p>The 50m buffer distance has been taken from the precautionary principle set out in the Woodland Trust guidance 'Planners Manual for Ancient Woodland, 2019', however significantly not all the guidance is reflected within the Policy. The supporting text around this 50m makes clear there is no 'one size fits all' and that 50m is a precautionary principle unless the applicant can demonstrate very clearly how a smaller buffer would suffice.</p> <p>It should be noted within the Draft Local Plan Policy EN 13 (Ancient Woodland and Veteran Trees) already sets out stringent policy criteria for the protection of Ancient Woodland including the use of an adequate buffer, whilst the supporting text in paragraph 6.170 makes reference to a precautionary buffer of 25m from the edge of woodland in the absence of site surveys and detailed assessments. The use of a 25m buffer is already in excess of that which is set out by the relevant statutory agency Natural England which in its Standing Advice 2018 which refers to a</p>			

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
		<p>minimum 15m buffer zone (or 15 times larger than the stem diameter of a veteran tree or 5m from the edge of its canopy).</p> <p>We would restate RSL are committed to taking a landscape and ecological-led approach to safeguarding the ancient woodland adjacent to the site. We have undertaken a suite of detailed ecological studies to inform the masterplan of the site and the design of the scheme will continue to be led by site-specific ecological guidance from our consultant team.</p> <p>As such, RSL consider that this policy should be deleted to ensure the Plan confirms with Basic Condition (e), as the Policy duplicates other standards which are already set out by statutory agencies such as Natural England and the Tunbridge Wells Local Plan, resulting in the undermining of the Local Plan's strategic function in allocating sites.</p>			
The Coal Authority	N/A	<p>The Coal Authority is only a statutory consultee for coalfield Local Authorities. As you are aware, Tunbridge Wells Borough Council lies outside the coalfield, therefore there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.</p> <p>This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>	N/A	N/A	

Consultee	Policy/part of plan comment relates to	Comment	Attending a hearing	To be notified of decision	Steering group/ advisor comment
Wealden District Council	All of the Plan	Thank you for the opportunity to review and comment on the Regulation 16 Horsmonden Neighbourhood Plan, which does not physically border Wealden District. Having reviewed the documents we have no comments to make, please note this is an officer view.	N/A	N/A	

Appendix 1: TWBC Response

Page/para	Policy	Proposed change	Comments	Advisor comment
General comments on entire NDP				
General – throughout the NDP	n/a	n/a	It is suggested that where text is quoted that this be <i>Italised</i> for clarity	Possibly change in Referendum version (Examiner to advise).
General – Accessibility of document	n/a	n/a	TWBC notes the changes of the layout/format of the Plan to comply with accessibility regulations.	Noted
General – throughout the NDP	n/a	n/a	The sub-headings in green may be difficult for those with impaired sight to read, it is suggested that a more defined/bold colour be used	Possibly change in Referendum version (Examiner to advise).

Page/para	Policy	Proposed change	Comments	Advisor comment
General – throughout policies	n/a	Some of the policy wording is rather permissive e.g. Policy 2.8 <i>Charging points – “Developments that make provision for electric car and cycle charging points in the parking areas (for resident, visitor and public spaces) will be supported”</i> implies that any development which provides a ECP will be permitted; while several policies such as Policy 3.2 Broadband and 3.5 Mobile phone and data transmission include a caveat <i>“will be supported subject to compliance with other development plan policies, guidance and national policy.”</i>	For consistency is it suggested that such a caveat either be added to all such policies with a supportive stance <i>“will be supported, subject to compliance with other relevant policies of the Development Plan”</i> or <i>“will be supported in principle”</i> ; or a general caveat be included in the introductory sections of the plan to cover all such policies.	The parish council welcomes the suggestion to tighten up the policies but feels that this approach might become rather repetitive. Perhaps the Examiner can advise?
Glossary				
Page 5 – key planning terms	n/a	n/a	It is suggested that this is moved to an appendix in the document and that each term is used within the	It was felt by the SG that the approach used would be clearer for readers.

Page/para	Policy	Proposed change	Comments	Advisor comment
			document first so it appears above the key documents regularly mentioned	
Introduction				
Page 7; para 9	n/a	Typo "Local Plans drawn up by the Local Planning Authority..." Text about status of the NDP	Amend to "Local Plan" Clarify that the NDP, once adopted, is part of the Development Plan along with the TWBC Local Plan and Kent Minerals and Waste Local Plan	The Parish Council believe that a lay person may not understand who is responsible for drawing up a Local Plan and so the longer explanation is required.
Chapter 1: Overall Strategy				
Page 9; para 11	n/a	n/a	Clarify that the NDP gets 'made' by TWBC	Possibly change in Referendum version (Examiner to advise).
Page 11; para 21	n/a	(HO3)	Amend to the correct reference in the SLP as site allocation AL/HO3	Possibly change in Referendum version (Examiner to advise).
Page 11; para 23	n/a	"TWBC are proposing"	Amend to "TWBC is proposing" Delete "had" from "all the sites that had were..."	Possibly change in Referendum version (Examiner to advise).

Page/para	Policy	Proposed change	Comments	Advisor comment
			It is worth, for absolute clarity, setting out at the end of this paragraph, the proposed site allocations in the SLP	
Page 11; para 24	n/a	n/a	It is worth updating the text about the SLP Examination – all the hearing sessions have now taken place and TWBC awaits letter from the Examination Inspector	The Examiner has asked TWBC to update him on the SLP.
Page 16; a challenging planning landscape	n/a	n/a	Amend text at para 47 to update position on the SLP Examination (as per previous comment on this above).	As above.
Page 17; para 50	n/a	“While TWBC’s housing policies AL/HO1.....”	Amend this to read “TWBC’s site allocation policies AL/HO1, AL/HO2 etc....” Add that the design policies etc also apply to ‘windfall’ sites and include a definition of ‘windfall’ in the glossary of the NDP	The parish council confirms that it intended that the HNP policies apply to all sites including windfall sites. Possibly change in Referendum version (Examiner to advise).
Page 19; 2.6	n/a	n/a	Amend public parking to ‘visitor parking’ perhaps	The parish council is concerned at the loss of informal public parking particularly on AL/HO3.

Page/para	Policy	Proposed change	Comments	Advisor comment
Page 21; 4.3	n/a	50-99+ homes "Developers will..."	This could be 50+ homes Amend to "Developers shall..."	We understand that 'shall' is more directive. Possibly change in Referendum version (Examiner to advise).
Page 22; 6.1	n/a		Can the NDP set out what it expects/considers to be an "appropriate proportion of smaller homes"?	The parish council believe this is a general principle which is steered by housing need at time when planning permission is given ie to correct an imbalance from previous development.
Page 22; 6.2	n/a	"And subject to development management policies"	Clarify that this is policies of the SLP	
Page 22; 7.1	n/a	"inappropriate new development will not be allowed except in very special circumstances".	Suggested wording change "inappropriate new development will not be <u>permitted</u> except in very special circumstances".	Possibly change in Referendum version (Examiner to advise).
Page 24; 7.8		"Development in the AONB will be permitted"	It is suggested that this is amended to "...will be supported..." to reflect that this is one part of the overall planning judgement made by the Local Planning Authority when determining planning proposals	Possibly change in Referendum version (Examiner to advise).

Page/para	Policy	Proposed change	Comments	Advisor comment
Chapter 2: Access and Movement				
Page 25; Figure 5	Strategy Plan	The plan identifies delivery of various facilities: village hall, medical centre, play areas, allotments, community orchard/wood	Clarity is required to explain that location of the coloured triangles/squares are indicative/'either/or' locations within the TWBC Proposed site areas; also that the LBD is the LBD proposed by the SLP	Possibly change in Referendum version (Examiner to advise).
Page 29; Figure 6	n/a	n/a	Note that reference to the LBD is the LBD proposed by the SLP	Possibly change in Referendum version (Examiner to advise).
Page 31; para 71	n/a	n/a	This talks about traffic movements – it may be worth a general note that the increased homeworking taking place may off-set some of this; and peak traffic movements may become more spread out	The shift to home-working is still uncertain. School traffic makes up a great part of traffic movement which home-working may have only a very small impact on.
Page 32	Policy 2.1: Walkable Village Development proposals for new housing that are demonstrably within safe, walkable distance of the village centre will	n/a	Query whether policy should refer more generically to 'new development', and not just to new housing development; can the NDP define what is meant by walkable distance?	The focus is on housing as the largest vehicle movement generator. Walkable is defined in paragraph 72 as context for policy 2.1: Walkable village.

Page/para	Policy	Proposed change	Comments	Advisor comment
	be supported in principle.			
Page 33	Policy 2.2: Minimising Traffic Speeds	n/a	It may be worth noting that this may not be needed everywhere – not all roads will need reduced speed limits; this should be informed my Transport Assessments submitted with planning applications	Noted.
Page 34	Policy 2.3: Enhancing Public Rights of Way	n/a	This should be more clear in setting out what developers will be required to do, such as provide a development contribution (money) to be used towards these improvements	Possibly change in Referendum version (Examiner to advise).
Page 39	Policy 2.6: Public Parking	n/a	This relates to visitor parking so it is suggested that the title be amended to 'visitor parking'	The intention is that visitor parking should be publicly available for instance on AL/HO3 as informal public parking currently used by adjacent households is in danger of being lost.
Page 40	Policy 2.7: New Parking	n/a	Within the Policy and Figure 15, it is noted that the HNPD seeks to adopt TWBC's proposed parking standards in Policy TP3 of its emerging Plan. This approach is supported. Note: "7,5m" within the supporting text should be	Possibly change in Referendum version (Examiner to advise).

Page/para	Policy	Proposed change	Comments	Advisor comment
			"7.5m". In addition, it may be useful to provide a link to TWBC's Residential Parking Standards Topic Paper in paragraph 94. Also, the reference to Figure 15 in paragraph 93 is currently incorrect (which refers to Figure 13).	
Chapter 3 Business and Employment				
Page 43, Planning Summary	n/a	n/a	Refer to TWBC ED policies specifically on retention of employment land (Policy ED2)	Possibly change in Referendum version (Examiner to advise).
Page 45	Policy 3.3: Conversion of farm buildings	n/a	As per TWBC's Regulation 14 comment, it may be worth considering whether the policy could be more similar in approach to SLP policies ED 4 and ED 5. It is not clear if consideration has been made to the Permitted Development Rights (PDR) which are in place.	Possibly include a reference in Referendum version (Examiner to advise).
Page 46	Policy 3.4 Business associated with vineyards and fruit growing	n/a	TWBC agrees with the principle, however, think it should be strengthened to refer to something along the following lines - that it would be supported in principle subject to the proposals demonstrating that they	Possibly change in Referendum version (Examiner to advise).

Page/para	Policy	Proposed change	Comments	Advisor comment
			are directly related to the primary business of the vineyard/fruit growing and that the retail outlets, cafes etc should be appropriate in scale and format reflecting the rural location etc.	
Chapter 4: Community Infrastructure				
Page 51; para 126	n/a	Refers to 240 – 320 dwellings being delivered by TWBC SLP	Following the Local Plan hearing sessions, the capacity for TWBC Policy AL/HO2 has been reduced from approx. 80-100 down to approx. 70 dwellings. This reduces the total capacity for allocations in the SLP down from 240 – 320 to approx. 230 - 290	Change in Referendum version (Examiner to advise).
Page 52	Bullet point re new pavilion	n/a	For clarity, it should be stated that this is an aspiration of the Parish.	Possibly change in Referendum version (Examiner to advise).
Page 52	Policy 4.2: Allotments	(AL/HO3)	Amend to “SLP site allocation Policy AL/HO3”	Change in Referendum version (Examiner to advise).
Page 52	Policy 4.3: Facilities For Children And Young People	Where planning permission is given for developments (50-99+ homes), developers will provide a play facility for young children on site, and for larger developments	As suggested above, this could simply be 50+ homes	Change in Referendum version (Examiner to advise).

Page/para	Policy	Proposed change	Comments	Advisor comment
		(100+) contribute for a skate park and basketball court/multi-use games area for young people and outdoor gym to be sited at the Horsmonden Sports Ground.		
Page 53	Policy 4.4: New Village Hall	"...supported provided it is a 400 metres...."	Should this be "...supported provided it is within 400 metres...."?	Possibly change in Referendum version (Examiner to advise).
Chapter 5 Design				
Design principles and policy in general	General	n/a	TWBC supports and notes the amendments to the policy wording in light of its Regulation 14 response.	
Horsmonden Design Guidelines	General	n/a	TWBC would like the opportunity to be involved in further dialogue with the NPG around the design guidelines.	The parish council welcomes the opportunity to discuss the application of the design guidelines in future developments with both TWBC and developers.
Chapter 6 Housing Development				
Page 65	End of paragraph 154	"(The full survey report is a supporting document to this plan and is available from the website.)"	Would suggest adding a direct link to this for ease of reference	Change in Referendum version (Examiner to advise).

Page/para	Policy	Proposed change	Comments	Advisor comment
Page 64; para 153	n/a	153. At the same time, TWBC's strategic policy STR/HO1 provides that between 240-320 new dwellings be built on three sites (Furnace Lane, Brenchley Road and Bassetts Farm) before 2038	Following the Local Plan hearing sessions, the capacity for TWBC Policy AL/HO2 has been reduced from approx. 80-100 down to approx. 70 dwellings. This reduces the total capacity for allocations in the SLP down from 240 – 320 to approx. 230 – 290	Change in Referendum version (Examiner to advise).
Page 67; para 161	n/a	As previously indicated, TWBC has proposed between 225 and 305 new homes in Horsmonden until 2038,	Following the Local Plan hearing sessions, the capacity for TWBC Policy AL/HO2 has been reduced from approx. 80-100 down to approx. 70 dwellings. This reduces the total capacity for allocations in the SLP down from 240 – 320 to approx. 230 – 290	Change in Referendum version (Examiner to advise).
Page 67; para 163	n/a	n/a	This should also include an extra sentence here to cross-refer to the SLP affordable housing policy and the requirement for 40% affordable housing on Green field sites – which includes the proposed SLP site allocations at Horsmonden. On PDL sites it will be a 30% requirement. We suggest wording along these lines:	Change in Referendum version (Examiner to advise).

Page/para	Policy	Proposed change	Comments	Advisor comment
			<p><i>“The general approach to tenure provision of on-site affordable housing should be that 60 percent is provided as social rent and 40 percent as intermediate tenures or other affordable routes to home ownership, subject to consideration of any subsequent local policy and/or evidence.”</i></p>	
Page 67, Policy 6.1	Policy 6.1 Meeting Housing Need	n/a	<p>Policy has two elements, promoting smaller (1/2bed) homes and providing affordable housing (AH) in accordance with the SLP.</p> <p>The AH element may need to update the SLP reference in due course</p>	Noted.
Page 68; para 166	n/a	n/a	<p>Following the Local Plan hearing sessions, the capacity for TWBC Policy AL/HO2 has been reduced from approx. 80-100 down to approx. 70 dwellings. This reduces the total capacity for allocations in the SLP down from 240 – 320 to approx. 230 – 290</p>	Change in Referendum version (Examiner to advise).

Page/para	Policy	Proposed change	Comments	Advisor comment
Page 68	Policy 6.2 Windfall residential development Final para in policy box: <i>And subject to development management policies.</i>	Add reference to TWBC SLP	Presumably this refers to development management policies in the TWBC SLP. Explicit reference should be made to this for clarity.	Possibly change in Referendum version (Examiner to advise).
Page 69; para 169	n/a	“made” “....cheap to run....”	Amend to ‘made’ Clarify what the NDP means by ‘cheap’	Possibly change in Referendum version (Examiner to advise).
Page 71	Policy 6.3 Provision Sheltered Housing	n/a	Note that SLP Policy AL/HO3 does not make provision for sheltered housing, but it may be something that could be considered as part of securing a mix of accommodation on the scheme.	Yes please.
Page 73	Social affordable housing retained	n/a	Has this, and housing policies generally been discussed with the TWBC Housing Team?	We look forward to the opportunity.
Page 74	Policy 6.4 Replacing or combining existing	n/a	Note that this policy is less strict than TWBC SLP Policy H10 in terms of not	Possibly change in Referendum version add in wording

Page/para	Policy	Proposed change	Comments	Advisor comment
	dwelling outside the Limits of Built Development		needing to justify demolition and on the size of a replacement dwelling in the countryside. There is considerable concern about this approach. TWBC consider that the text of this policy should match that of the SLP for consistency or defer to the SLP in order not to result in a differing/less stringent approach from the Local Plan.	regarding in particular paragraph 3 where the existing dwelling is a heritage asset, first consideration should be given to its retention or defer to SLP H10 (Examiner to advise).
Chapter 7 Landscape & Environment				
Page 76	Introduction box	n/a	Please refer to our Regulation 14 comment at Appendix A on NCA application – it would be useful for figures to be provided for the Parish rather than NCA as a whole	It is felt that reference to the NCA is a general point but that Horsmonden is typical of the characteristics of the NCA.
Para 188, p77	Figure 31	Remove extract of Landscape Sensitivity Study	It would be preferable if the study was referred to through use of a reference/hyperlink.	It is felt that using the extract is more impactful.
Page 81	Policy 7.1 Local Green Spaces	n/a	It is noted that only 4 sites are proposed as LGS in the TWBC SLP which are also proposed in the HNBP (Bassetts Farm, Furnace Pond, Locket Green, and the Sports Field). The HNBP proposes 3 sites not assessed by	It is felt that the sites proposed by the SNP, not included in the SLP, are local sites that are more appropriately addressed in a Neighbourhood Plan being local in nature. The SG has

Page/para	Policy	Proposed change	Comments	Advisor comment
			<p>TWBC, as well as 1 site (Fromandez Drive) which TWBC considers has insufficient evidence that it is demonstrably special and is already sufficiently protected by the Conservation Area. TWBC and HNDP agree on not designating Heath Village Green due to its existing protection.</p>	<p>carried out site assessments for all the sites and a link to these assessments is to be shared with the Examiner .</p>
Page 82	Note in regard to Furnace Pond		<p>There is reference to the Regulation 18 Draft Local Plan – for clarity, add that this is the TWBC Regulation 18 Draft Local Plan</p>	<p>Change in Referendum version (Examiner to advise).</p>
Page 82	Note in regard to Furnace Pond as well as Figure 32 and 33 (Furnace Pond only)		<p>In accordance with the NPPF, policies for managing development within an LGS should be consistent with those of Green Belt. It would therefore appear reasonable that LGS boundaries should be drawn consistently in accordance with paragraph 143 of the NPPF with regard to defining Green Belt boundaries. This requires, under criterion f, that boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent. Given the current proposed Furnace Pond boundary appears to cut across the pond as it follows the parish boundary, therefore</p>	<p>It is felt that this site is so important to the village, and will soon be even closer when AL/HO1 is completed, that it should be included in the HNP, even if only half the site can be included owing to it crossing into Brenchley. The parish council acknowledges that this is an unusual situation and requests that the Examiner advises them on the best way forward given that the SLP's status is still undetermined.</p>

Page/para	Policy	Proposed change	Comments	Advisor comment
			not following a clearly defined boundary, TWBC considers that it is not appropriate to propose this site for designation in the HNBP. In any case, TWBC is proposing to designate the whole site within its emerging Local Plan.	
Page 88	<p>Policy 7.2 Protecting important views</p> <p>And</p> <p>Figure 35: Important views</p>		<p>To be noted:</p> <p>The descriptions of views need to reflect the proposed allocation Policy AL/HO3 in the SLP. It is considered that the views can be retained, and the amenity identified by these views will not be lost by the development at AL/HO3.</p>	Noted.
P89	Policy 7.3	<p>Biodiversity</p> <p>Mitigation hierarchy</p>	<p>Last word of policy should read 'biodiversity' and not 'diversity'</p> <p>Where it says 'mitigation strategy' it should read 'mitigation hierarchy'.</p>	Possibly change in Referendum version (Examiner to advise).
Page 92; para 211			The font needs amending to reflect rest of the NDP	Done.

Page/para	Policy	Proposed change	Comments	Advisor comment
Page 94	Policy 7.10	<p>“Where development is proposed adjacent to Ancient Woodland, a curtilage or buffer of 50m <u>at least 25 metres</u> must be included.... unless the applicant can demonstrate very clearly how a smaller buffer would suffice.”</p>	<p>The proposed protection zone/buffer of 50m for ancient woodland and veteran trees is considered to be ambitious and should be reduced to 25 metres in line with SLP policy para 6.171 of the supporting text to SLP policies EN12: Trees, Woodland, Hedges, and Development and EN13: Ancient Woodland and Veteran Trees. It should be noted the SLP Policy buffer of 25m is a default in the absence or survey/assessment to agree anything different rather than a new minimum in every case.</p>	<p>The SG is very keen to maintain this buffer given that Ancient Woodland in the parish is a very special feature and almost wholly within the High Weald AONB.</p>