

# Pembury Neighbourhood Plan

## 2020 to 2038



**Consultation Statement to accompany the  
Submission Version Pembury Neighbourhood Plan**

**November 2022**

**Prepared by the Pembury Neighbourhood Plan Steering Group  
on behalf of Pembury Parish Council**

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## 1 INTRODUCTION

- 1.1. The policies contained in the Pembury Neighbourhood Plan (the PNP) have been developed following extensive interaction and consultation with the community and businesses within the area.
- 1.2. This Consultation Statement sets out the story of how the Neighbourhood Plan has been developed and, in accordance with Regulation 14 of Neighbourhood Planning Regulations 2012:
  - details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - how they were consulted;
  - a summary of the main issues and concerns raised by the persons consulted; and
  - how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

### **The Pembury Neighbourhood Plan Steering Group**

- 1.3. Pembury Parish Council is the qualifying body officially responsible for the Neighbourhood Plan. A Steering Group, comprising local councillors and volunteers from the community, was set up to lead on the development of the PNP. Beneath this, a series of Working Groups exploring specific topics were set up, each reporting in to the Steering Group.

## 2 SUMMARY OF ENGAGEMENT AND CONSULTATION ACTIVITIES, ISSUES AND OUTCOMES

2.1. A high-level summary of the engagement and consultation activity is shown below:

Year	Milestones	Key activities
2020	Initial engagement on the future of Pembury	<ul style="list-style-type: none"> <li>• A steering Group comprising local residents and councillors set up.</li> <li>• Formal consultation on Designation of Pembury as a Neighbourhood Area for the Neighbourhood Development Plan. Decision made by Tunbridge Wells Borough Council (TWBC) 7<sup>th</sup> July 2020.</li> <li>• Pembury Village News (PVN) article sets out the steps in developing the Plan and asks for volunteers including for four Working Groups (Heritage, Movement, Environment and Local Businesses).</li> <li>• 1<sup>st</sup> Community Survey launched.</li> <li>• Photography competition launched asking for photos of: Favourite Views, Green Spaces and Notable Buildings.</li> <li>• Calls to local businesses by the Local Economy Working Group.</li> </ul>
2021	Further engagement, surveys and workshops	<ul style="list-style-type: none"> <li>• Business survey completed by 21 local businesses.</li> <li>• An online interactive visioning event took place on 21<sup>st</sup> April with 80 people registering to take part.</li> <li>• Exhibition in the village hall foyer during August and September.</li> <li>• Second community survey online and delivered door to door received 160 responses.</li> <li>• Community policy options and mapping workshop.</li> <li>• Pembury Wishes from Primary School collated.</li> <li>• Meetings with site promoters (ongoing)</li> <li>• Initial draft plan issued to TWBC for informal health check.</li> </ul>
2022	Pre-Submission Plan drafted and consulted on  Submission Plan drafted	<ul style="list-style-type: none"> <li>• Pre-submission Regulation 14 draft finalised and released for consultation from Sunday 5<sup>th</sup> June to Monday 18<sup>th</sup> July.</li> <li>• Community consultation stall at Queen's Jubilee celebration on 5<sup>th</sup> June and copies made available online and at various village venues.</li> <li>• Community consultation event on 16<sup>th</sup> June, Baptist Church.</li> <li>• Input into the Submission Local Plan hearings.</li> <li>• Comments analysed from Regulation 14 consultation; Plan updated.</li> <li>• Submission Version Plan finalised and submitted to TWBC.</li> </ul>
2023	Final stages to Referendum	<ul style="list-style-type: none"> <li>• Regulation 16 consultation to take place.</li> <li>• Independent Examination.</li> <li>• Referendum.</li> </ul>

2.2. The sections below describe, in fuller detail, the engagement and consultation process which took place during the Plan preparation. This is divided into four stages:

Stage I: Engaging the local community to understand main issues

Stage II: Developing a Vision and Objectives and planning policies

Stage III: Developing and testing the emerging planning policies

Stage IV: The Pre-Submission (Regulation 14) Draft Neighbourhood Plan

Stage V: Finalising the Submission (Regulation 16) Neighbourhood Plan

### **Stage I: Engaging the local community to understand main issues – 2020 to 2021**

2.3. The Parish Council decided to embark on a neighbourhood plan in early 2020 and a call for volunteers from the community was issued to support the project, supported by an online survey to enable people to fill in areas they were interested in. At the Council meeting of February 2020, a number of local councillors volunteered to join the Steering Group and a brief for external consultancy support was assembled.

2.4. Cllr Stratton was appointed as Chair of the NDP Steering Group at the full Council meeting of 8<sup>th</sup> June 2020. It was at this meeting that the appointment of external consultants (Alison Eardley and Jim Boot) was agreed to provide technical support on the Plan.

2.5. In the context of the Covid-19 pandemic, a Virtual Workshop for the volunteers was organised, to introduce them to the neighbourhood plan and to agree the overarching themes to explore. The external consultants undertook a familiarisation visit to Pembury in July 2020. The application to designate the neighbourhood area to coincide with the parish boundary was agreed and submitted to Tunbridge Wells Borough Council (TWBC), to be ratified on 7<sup>th</sup> July 2020.

2.6. Based on experience from the consultants and a review of other neighbourhood plans, the Steering Group established four themes to explore for the PNP. These were:

1. Heritage, Design, Character and Housing
2. Environment & Green Spaces
3. Transport & Movement
4. Community Facilities, Employment and Local Economy

2.7. Each theme was explored in within a separate Working Group, which drew in additional volunteers. Each Working Group was chaired by a member of the Steering Group, so that progress could be easily fed back to the main Steering Group. At the first meeting of each Working Group, the consultants presented an introduction to neighbourhood planning and outlined the scope of work that might be considered.

2.8. One member of the Steering Group provided the lead on engagement and communications and a Strategy was drawn up to identify key groups within the parish to consult with. It covered:

- General communication activities – that would be undertaken on a rolling basis to keep people informed of the plan and progress, for instance the development of a mailing list, drop in events, social media, exhibitions and displays and articles in the local magazine.
- Targeted engagement – to identify the different demographic groups around the parish and the best mechanisms to engage them.
- Topic based engagement – to identify, by theme, specific interest groups and individuals who could most helpfully input.

- 2.9. The strategy was adapted to allow for social distancing and other pandemic measures.
- 2.10. An intense period of engagement and evidence gathering took place during this initial phase of the project and this is described below.
- 2.11. **1st Community Survey:** An initial survey was launched to gather high-level views from the community about what people liked about Pembury and what could be improved. The survey was available to complete online and paper copies were also printed and made available via local outlets for those without internet access. The survey was promoted via the Pembury Village News, posters and fliers, the website, social media and word of mouth. A mailing list of local organisations was compiled and these were emailed with the link to share with their members.
- 2.12. Questions were kept open and simple:
1. What do you like most about living in Pembury?
  2. What do you think needs to be improved in Pembury?
  3. Would you like to be informed about progress on the plan/ get involved?
- 2.13. Respondents were invited to provide free text responses and these were analysed to identify key issues and ideas to be addressed in the plan.
- 2.14. Figure 1 illustrates the range of topics that were raised by local people in the survey.

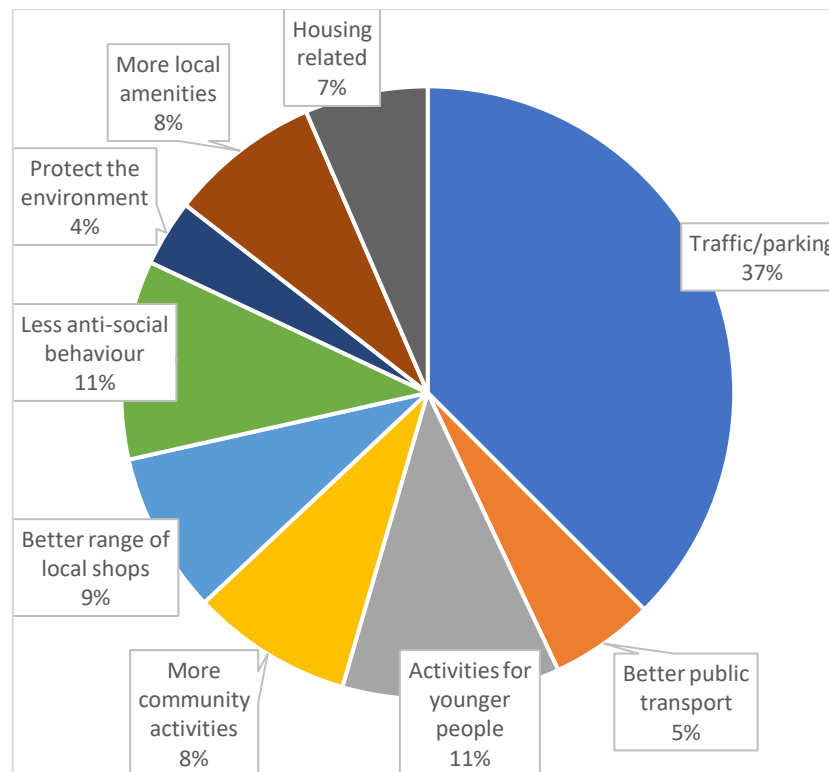


Figure 1: Percentage of comments received by topic area

2.15. Overwhelmingly, residents valued the sense of community and community spirit in the parish and the beautiful rural setting. Comments highlighted friendliness, neighbours (particularly valued during lock-down), the woodlands, walks and closeness to countryside. Many respondents mentioned their desire for the countryside and Green Belt to be safeguarded. Others called for local initiatives to encourage biodiversity, such as planting wildflowers and installing wildlife friendly features into development, such as hedgehog holes. Some people were keen to ensure that views across the High Weald were protected.

2.16. Example comments included:

- We are still a village and not been swallowed up into the town- we identify as a community which you don't get in the town
- Village feel but not too far from towns/conveniences
- Vast majority of people are friendly. We have Doctors, Chemist, PO, 3 good pubs, a farm shop, barbers and cafe. It is still a village and PPC put on some nice events. There are several good organisations.
- Community spirit, good pubs, lovely woodland
- The village atmosphere. People say good morning to each other even if they are not acquainted. The village green is a lovely focal point for events and celebrations. The woodlands and country walks with clear running streams for walking. No through

traffic thanks to A21 but quick access to it. Lots of village clubs and interest groups.  
People with pride in their village live here.

- 2.17. In terms of what needs to be improved in the parish, many comments focussed on the need to address traffic issues, including speeding near the school, the need for traffic calming measures and discouraging people from parking on the pavements.
- 2.18. Housing was also frequently mentioned with many people concerned about the quantum of homes being proposed as part of the emerging Local Plan. In particular, there was a desire to retain the village-feel, perhaps by restricting larger scale and dense developments. Suggestions were made about the potential mix and tenure of future housing developments: housing suited to older people and those wishing to downsize (including bungalows); and affordable housing to help younger people onto the housing ladder.
- 2.19. Many comments were received about the need for more activities and facilities, particularly for younger people in the parish – ideas included a café at the rec, resurfacing the tennis courts, an off-road bike track and skateboard area, as well as places for teenagers to meet safely.
- 2.20. Each Working Group was provided with the survey comments to inform their work on the themes.
- 2.21. **Business Survey:** In parallel with the 1st Community Survey, a questionnaire targeted at the businesses was developed by the Community Facilities, Employment and Local Economy Working Group. A spreadsheet of local business contacts was compiled – there is a high number of sole traders in the parish, many working from home, and social media was considered a key mechanism to reaching those people. The survey was also promoted through the Pembury Village News and with local fliers and visits to the village centre businesses.
- 2.22. The survey was completed by 21 local businesses. The survey posed 16 questions about the nature and needs of local businesses. It revealed that a high proportion of employees drive to work but most employers reported insufficient staff parking. A wide variety of business sectors were represented, mostly serving the local population (hairdresser, vet, legal). Most were not seeking to expand their premises but if they were would do this through conversion of existing buildings including farm buildings or on previously developed land. Lack of parking was the biggest restraint on business. Members of the Working Group also made phone calls to businesses and local estate agents, to add to the findings.
- 2.23. **Photography competition:** A photography competition was launched, asking people to submit favourite views, green spaces and notable buildings. The results were used to both inform work on important views, local green spaces and important local heritage assets for consideration in the emerging PNP and also to provide images for inclusion in the final document. The competition was promoted via the Pembury Village News, the website and at local events. The winner was presented with a gift voucher.





*Photograph entry (taken by Nicola King)*

2.24. **Walkabouts:** In the context of the Covid-19 restrictions, many of the Working Groups found it helpful to meet outside while conducting walkabouts. These focused on particular themes, including the environment, heritage and local character and housing. A brief was issued prior to each walkabout, to encourage the group to focus on certain aspects (Figure 2). The walkabouts were successful in enabling information and images to be collected that would contribute to the Pembury Character Assessment and other themes in the plan.

**Walk about instructions:**

The purpose of the Walkabout is to start thinking about **what we like about Pembury, what we dislike, and what we need to work on.** Your Walkabout will focus primarily on the character of Pembury, design of the buildings and local heritage. Ultimately, we are trying to identify what makes Pembury special in terms of its 'character', which might be best described as:

- The period of properties
- The use of particular materials or colours or designs in the architecture
- The topology of the area
- How the village has evolved historically and whether there are remnants of the past still visible today.
- Particular landmarks or historic buildings/assets that exist
- The use of green space
- Local views that contribute to the character of the area
- The way the streets are laid out – are they accessible? Are there some routes that are more important than others? What is the signage like?

*Figure 2: Example Walkabout instructions*

2.25. **Ongoing communications:** Starting in this initial phase of the project, and continuing throughout, a range of communications activities were undertaken:

- **Regular articles in the Pembury Village News:** this is a quarterly publication prepared by the Parish Council and delivered to every household. A double page article about the Neighbourhood Plan was included in every edition.
- **Logo:** A logo was created to apply to all communications activity.



*The PNP logo*

- **Website:** A section dedicated to the PNP was established on the Pembury Parish Council website.
- **Facebook updates:** The Parish Council Facebook page was used to issue regular updates on the project. Posts were also published on other Pembury Facebook pages, to promote the surveys and generally provide updates.
- **Mailing list:** A mailing list of community members, local community organisations and local businesses was maintained by the Steering Group.
- **Posters, banners and fliers:** These were posted at strategic times at various locations around the Parish (including shops, pubs, bus shelters, churches) in the project, to promote the surveys, workshops and other activities. A QR code was used to enable easy access to the surveys. A banner on the central Village Green was a useful way to publicise activities.



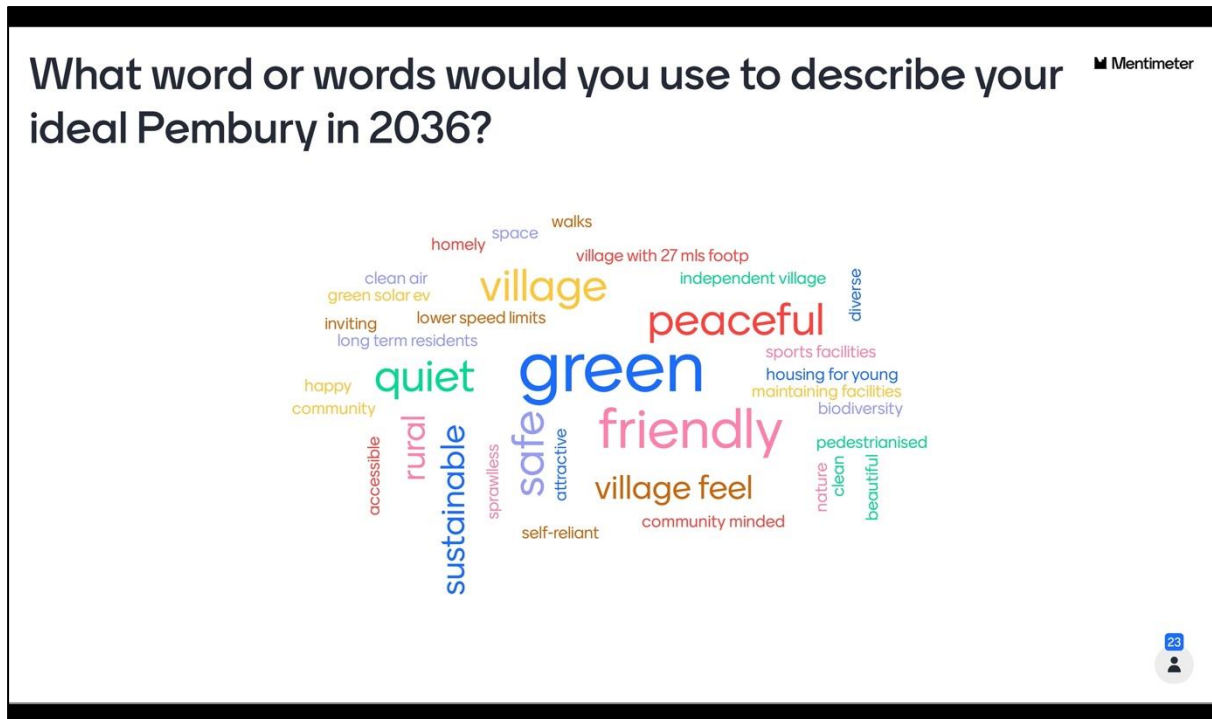
*Example banner on the Village Green*

- **Annual Parish Meeting:** These meetings have provided an opportunity to share progress updates on the emerging PNP, answer questions and seek volunteers.

- 2.26. **Meetings with key stakeholders:** Regular meetings with key individuals and organisations took place throughout the project including:
- **TWBC officers:** In the context of the emerging Local Plan, close contact has been maintained with planning officers to keep up-to-date with progress.
  - **High Weald AONB:** To ensure that the aims and objectives of the AONB were integrated into the PNP.
  - **Site promoters:** To enable two-way discussions about the sites being promoted through the emerging Local Plan and how the emerging PNP policies might impact on proposals.
  - **Pembury Society:** Regular updates to the Society to share information and gain feedback.
  - **Kent County Council:** Discussions with some of the teams at KCC including the Flood Team, Highways and the Rights of Way team.
  - **Local service providers:** including Tunbridge Wells Hospital, Pembury Primary School, and Southern Water.

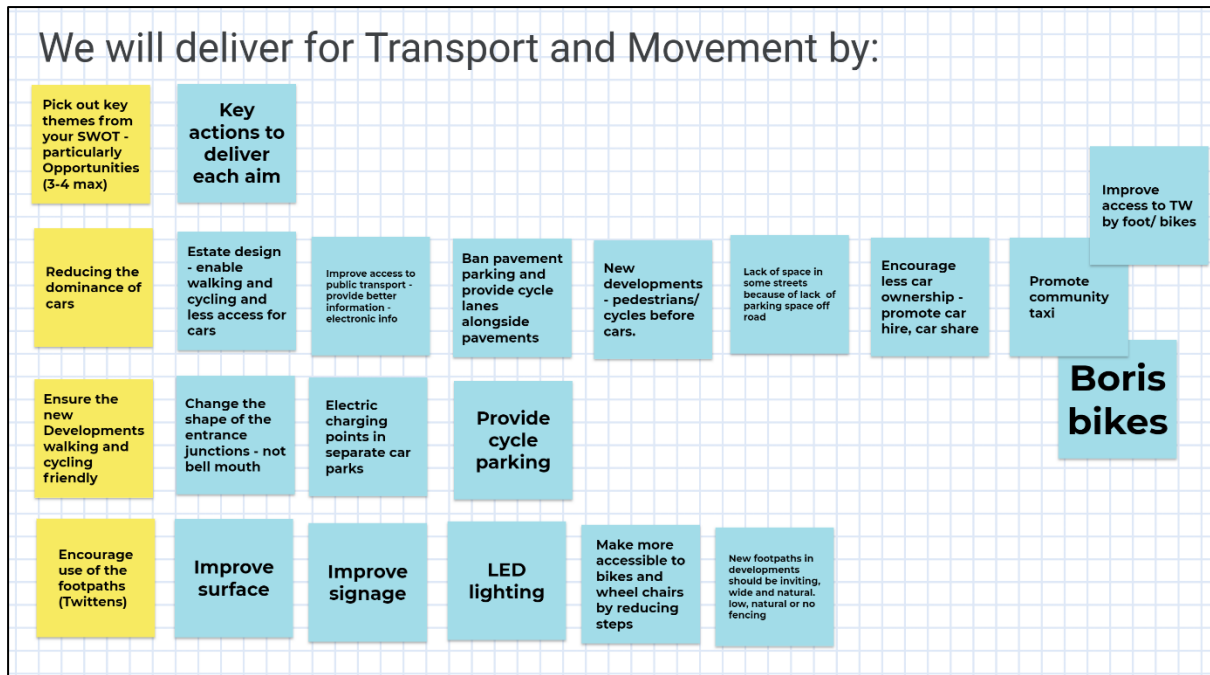
## **Stage II: Developing a Vision and Objectives and planning policies - 2021**

- 2.27. Following on from the initial surveys and other evidence gathering, the Steering Group was in a position to establish a vision and objectives for the PNP.
- 2.28. **Visioning event:** On 21 April 2021, an online, interactive visioning event was held with the local community. It was promoted through the Pembury Village News, the website, social media, the direct mailing list and on posters and banners throughout the parish.
- 2.29. Over 80 people signed up to take part in the event, which was recorded and shared on the Parish Council website, with the findings included in the spring edition of the PVN. The event provided an opportunity to share with the community the progress of the neighbourhood plan.
- 2.30. The attendees were invited to take part in an interactive poll to submit words and phrases describing what they would like Pembury to be like in 2036 (the end date was ultimately moved to 2038 to coincide with the Submission Local Plan). The findings very much chimed with the feedback from the 1<sup>st</sup> community survey and other discussions to date, with key phrases including:
- the importance of the rural location
  - valued for its beauty, tranquillity and village atmosphere
  - the friendly community spirit
  - sustainability, clean air and access to nature
  - and local facilities



*Words and phrases shared by delegates at the Visioning event*

- 2.31. Those attending were divided into five breakout rooms to discuss particular elements of the emerging vision in more detail. These elements mirrored the Working Group topics that were being explored, although separating out community facilities from the economic theme:
- Housing, Heritage, Design and Character
  - Environment and Green Spaces
  - Transport and Movement
  - Community facilities
  - Employment and local economy
- 2.32. Each group first undertook an exercise to identify the strengths, weaknesses, opportunities and threats (SWOT) for their particular topic in relation to Pembury. They were then encouraged to pick out the key overarching themes, using post-it notes, to consider which elements might be most salient within an overarching vision statement.



*Example of the Transport and Movement break out group visioning exercise*

2.33. Delegates were then able to discuss how those themes might be delivered, with a view to beginning to set out some overarching objectives for each topic area. An opportunity to flag ideas and thoughts related to other topics was also provided to ensure that attendees felt able to fully contribute their views. Themes that stood out, which could be incorporated into a vision for the parish included:

- **Pembury as a community that people will feel happy to be part of:** retaining the village feel of Pembury, distinct from Royal Tunbridge Wells, and welcoming newcomers (as the village expands) into community life. Within the parish, the smaller ‘hamlets’ too retain their own feel, as well as looking to the village as the focus for community activity and events.
- **The village green and village centre are at the heart of the village:** safeguarding valued facilities and amenities will mean that everyday needs are catered for locally. There will be a full programme of local events celebrating village life, utilising shared spaces around the parish.
- **Pembury reflects the beauty and character of the High Weald:** both in terms of its landscape – orchards, woodland, agricultural fields, ponds – and its built environment – a mix of styles and materials and colours. New developments are well-designed, high quality and sustainable.
- **The parish is first and foremost rural:** The green infrastructure underpinning the parish plays an integral role in the future of the parish: the contribution, maintenance and expansion of green spaces, wildlife corridors, landscape features, streams and woodlands is central to any development in Pembury.
- **Pembury as a home for life:** new housing meets the needs of local people, meaning that those who live here, or choose to relocate to Pembury, can continue to do so for as long as they wish including downsizing in later life.

- **People will be able to work locally, without the need to commute if they wish:** by encouraging new developments to support home-working and providing start-up units and flexible shared space for co-working and other uses.
- **A parish that offers something for everyone:** children and teenagers are involved in determining what they want and need for the village as they grow up; workers can access fresh air and leisure facilities while working from home; and older people feel included.
- **A walkable and cyclable parish:** A cared for and well-promoted network of footpaths and cycle paths means that local people can get from home to work, to the local facilities and amenities easily and safely.

2.34. A full summary of the Visioning event is contained in the Evidence Base. The emerging Vision and Objectives were:

**In 2038, Pembury Parish will continue to be an engaged and inclusive community, offering a range of facilities and recreational opportunities for all ages, underpinned by an active volunteer base.**

**It will have retained its rural feel, remaining distinct from neighbouring settlements, including Royal Tunbridge Wells. The new housing developments that have emerged will have been sympathetically and sustainably designed and will have provided a range of housing opportunities and prices for those wishing to buy or rent in the Parish, whether newly arriving or relocating locally.**

**The attractive High Weald setting will be safeguarded, including the features that are typical to Pembury, such as the trees and woodland, ponds, orchards and hedgerows. Treasured green spaces and views will be retained for the future. Equally, the history of the Parish will be celebrated through the preservation of historic assets, the features of which will be perpetuated through new developments.**

**The Parish will continue to offer a range of work opportunities, both for those commuting out to work, but also those wishing to work locally or from home.**

**Pembury will be a very walkable and cyclable Parish, with additional footpath connections and improvements to the main paths. Opportunities to improve road safety for all users will have been integrated.**

**Objective 1: Pembury as a community that people will feel happy to be part of:** retaining the village feel of Pembury, distinct from Tunbridge Wells, and welcoming newcomers (as the village expands) into community life. Within the parish, the smaller 'hamlets' to retain their own feel, as well as looking to the village as the focus for community activity and events.

**Objective 2: The village green and village centre are at the heart of the village:** safeguarding valued facilities and amenities and enabling access to them will mean that everyday needs are catered for locally. There will be a full programme of local events celebrating village life, utilising shared spaces around the parish.

**Objective 3: Pembury reflects the beauty and character of the High Weald:** both in terms of its landscape – orchards, woodland, agricultural fields, ponds – and its built environment – a mix of styles and materials and colours. New developments are well-designed, high quality and sustainable. Local heritage is conserved and opportunities to celebrate it are sought.

**Objective 4: The parish retains its rural feel:** The landscape underpinning the parish plays an integral role in the future of the parish: the contribution, maintenance and expansion of green

spaces, wildlife corridors, landscape features, streams and woodlands is central to any development in Pembury.

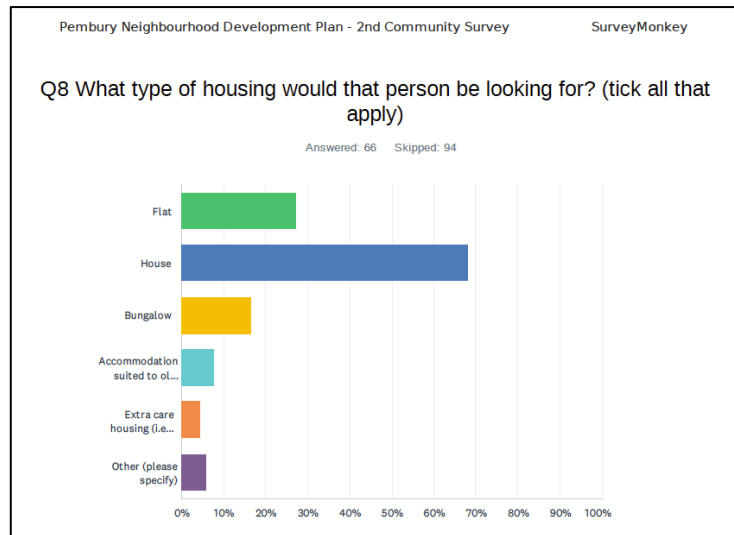
**Objective 5: Pembury as a home for life:** new housing meets the needs of local people, meaning that those who live here, or choose to relocate to Pembury, can continue to do so for as long as they wish including downsizing in later life.

**Objective 6: People will be able to work locally, without the need to commute if they wish:** by encouraging new developments to support home-working and providing start-up units and flexible shared space for co-working and other uses.

**Objective 7: A parish that offers something for everyone:** children and teenagers are involved in determining what they want and need for the village as they grow up; workers can access fresh air and leisure facilities while working from home; and older people feel included.

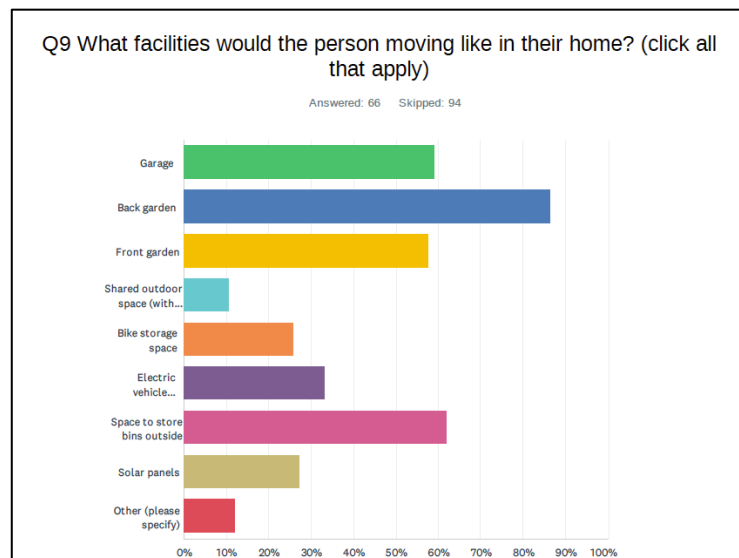
**Objective 8: A walkable and cyclable parish:** A cared for and well-promoted network of twittens (a colloquial term for a narrow path or passage between two walls or hedges), footpaths, cycle paths, and bridleways, means that local people can get from home to work, to the local facilities and amenities, and to pursue leisure, easily and safely.

- 2.35. **Design Guidance and Codes for Pembury:** AECOM consultancy were commissioned (using the Locality Technical Support) to prepare Design Guidance and Codes for Pembury parish. This was felt to be important in the context of the proposed sites in the emerging Local Plan and being able to influence those effectively.
- 2.36. The consultants visited the parish and met with the Steering Group. They took information gained from the Walkabouts and the 1<sup>st</sup> Community Survey, in order to put together draft guidance. This was consulted on with the Steering Group and the community via the 2<sup>nd</sup> Community Survey and Policy Workshops (see below). TWBC would also have an opportunity to comment on it prior to it being completed. Finally, the site promoters themselves were able to see copies of the draft for comment.
- 2.37. **2<sup>nd</sup> Community Survey:** A second community survey was launched in July 2021 to gather detailed information on the specific topic areas. The survey was promoted as before, with the addition of a doorstep survey specifically on the Housing Section, to ensure a good geographic spread of responses, and a presence at the Picnic on the Green event. In total, 160 responses were received. Detailed findings can be found in the Evidence Base, with a summary provided below:
- 2.38. **Housing:** Of those wishing to move within the next 5 to 10 years, most respondents suggested that they would like to stay in Pembury, either to set up a new home or be able to downsize, with two- and three-bedroom houses or bungalows being cited as the most sought after. The main challenges faced included the lack of (truly) affordable homes in Pembury and the fact that many homes tend to be on the larger side.



*Findings on the type of homes required by local residents*

- 2.39. Design of new houses: Residents were asked about features that would be most required in new homes, with outdoor garden space, outdoor storage space for bins and parking areas the most sought after.



*Findings on the type of homes required by local residents*

- 2.40. Community facilities: While older people and younger children are well catered for in the parish, the survey revealed that more provision is required for teenagers and younger people. The sorts of facilities requested include somewhere for teenagers to spend time and socialise, a café and toilets at the recreation ground, a community garden, and facilities like a skatepark.
- 2.41. Character and heritage: Respondents were invited to share details of buildings and other structures that they felt were important locally. Many of those noted were in fact already protected, but others were not and would be considered in terms of whether they could be protected as Non-Designated Heritage Assets.



- 2.42. Local environment and green spaces: Access to natural green spaces in and around Pembury was very important to the majority of respondents. Many mentioned the woods, the village green and the recreation ground as particularly important spaces. Numerous important views and viewpoints were identified as warranting protection, including views across the Weald to the North Downs, views of the village green and views of the sunset from the ridge at the south of the village. Encouraging biodiversity was a key theme and the provision of wildlife-friendly features in new development.
- 2.43. The village centre: Whilst the local shops and independent businesses are very much valued, many residents were concerned about the lack of parking spaces in and around the village centre and the need for more usable cycle paths. In particular, the fact that the cycle lane in the village centre is constantly blocked by parked vehicles was raised as a major issue.
- 2.44. Getting around: The network of footpaths was very significant, with many people using them particularly during the Covid-19 lockdown. Some areas where improvements could be made to the paths and new linkages formed between paths were noted. The village centre cycle lane was again raised with one respondent, for instance, stating: *“the cycle lane on the High Street is normally clogged up with parked cars making cyclists join the main flow of traffic. It needs to be made safer so it can join up with the cycle path leading to the industrial estate. A proper crossing needs to be installed at the roundabout at the end of Maidstone Rd past the hospital so people cycling from the village to the industrial estate can cross this busy junction safely.”* Similar remarks were made by other respondents.
- 2.45. **Topic-based engagement and evidence gathering:** In addition to and informed by the 2<sup>nd</sup> Community Survey, the Working Groups undertook further engagement and evidence gathering during this period:
- 2.46. Heritage, Design, Character and Housing: The Working Group undertook the following activities to inform their sections of the PNP:
- Working with the Pembury Society to undertake an audit of heritage assets in the parish that might be suitable for identification as non-designated heritage assets.
  - Meetings with the Submission Local Plan site promoters to discuss housing need, character and design.
  - Preparing a Local Housing Needs Assessment for the parish to understand better the type, tenure, size and mix of homes that might be required over the period of the Plan. Also to understand affordability issues to inform a Housing Needs policy.
- 2.47. Environment & Green Spaces Working Group: The Group established a Local Wildlife Group that will exist beyond the lifespan of the current Neighbourhood Plan project. Collectively, the Wildlife Group and the Working Group, undertook the following to inform the emerging PNP, supported by the local feedback:
- An audit of potential local green spaces leading to a final shortlist. Owners of the proposed local green spaces were contacted.
  - An audit of current biodiversity opportunity areas including meetings with the RSPB and Kent Wildlife Trust to discuss how sites could be enhanced.

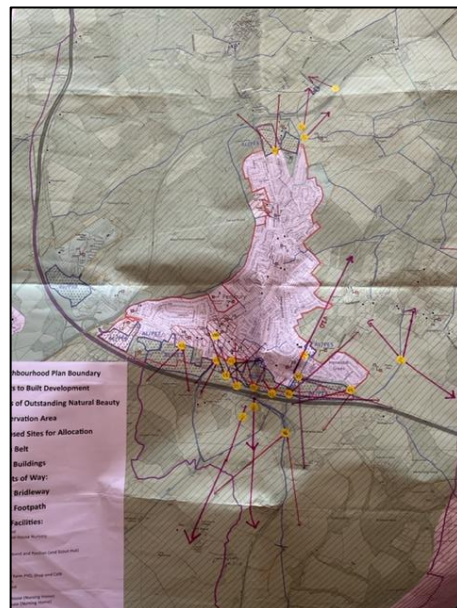
- Commissioning a report from the Kent Biodiversity Record Centre to understand the flora and fauna recorded in the parish.
  - An audit of locally significant views, plotting these on a map, taking photographs and writing descriptions.
- 2.48. Transport and Movement: The Working Group examined other neighbourhood plans and transport work in other villages to put together a presentation to the Parish Council on ‘Making Pembury a Happier and Healthier Village’. This set out options for traffic calming (including a 20s plenty scheme), design of junctions, layout of roads within new housing developments, promotion of active travel and opportunities for a one-way system. This led to the development of key transport principles for Pembury, which would inform both the Design Guidance and Codes and the Transport and Movement chapter of the PNP.
- 2.49. In addition, a member of the local footpath group was engaged to understand where specific improvements or greater connectivity might be required. This work was undertaken in parallel with the development of a new footpath map for the parish by the Parish Council.
- 2.50. Meetings with the site promoters along the A21 also included discussions about transport, in particular how the sites could be designed in a way to incorporate cycle paths and assist in reducing the speed along the High Street and Hastings Road.
- 2.51. Community Facilities, Employment and Local Economy: The group undertook the following activities to inform the emerging PNP policies:
- Flooding – this had been raised by some community members as problematic. Discussions with the primary school revealed that flooding had been a significant issue for them. Southern Water were engaged to discuss this in more detail as were the Kent County Council Flood Team. Both provided information to inform the emerging policies.
  - Engaging young children: The primary school assisted the group in engaging with the children to understand their top three wishes for Pembury. Some fantastic ideas were received, which are illustrated below as a word cloud with the larger words getting the most support.



*Word cloud of primary school children's ideas*

### Stage III: Developing and testing the emerging planning policies – late 2021 to early 2022

- 2.52. The work outlined above enabled the Steering Group to begin preparing the draft Neighbourhood Plan. Once the suite of policies had been developed, a Policy Options Workshop was held to present the options and, in particular, to enable any additional detail to be gathered for the purposes of the evidence base.
- 2.53. **Policy Options workshop:** The event was held at the Village Hall and was promoted across the community, with 21 people attending on 17<sup>th</sup> October 2021. The workshop provided a summary of the plan so far, followed by interactive mapping sessions on the following themes:
- Community facilities and village centre
  - Getting around
  - The environment
- 2.54. Community facilities and the village centre – as well as reasserting the commitment to improved parking at the village hall, a public toilet, a new library was suggested, and the desire for more shops. Reflecting the results of the survey, provision for teenagers was discussed with suggestions including a multi-use games area and AstroTurf sports pitches.
- 2.55. Getting around – again reflecting the survey, cycling provision was seen as inadequate with the problem of cars parked in the High Street cycle lane a particular concern. It was agreed that all the proposed SLP sites should work together to create a joined up off-road cycling and walking route that links to an improved High Street cycle lane assisted by 20mph speed limits through the village centre.
- 2.56. Environment – the list of Local Green Spaces was agreed for inclusion in the plan. Wide verges were recognised as a particular feature of the parish contributing to biodiversity and as corridors for wildlife. Views into and out from the village were identified on a map.



*Images from the Policy Options Workshop*

- 2.57. **Presentation to the Pembury Society:** A presentation on the emerging draft PNP was made to the Pembury Society in November 2021 to share information and answer any questions.
- 2.58. **Informal comments from TWBC:** In January 2022, the draft PNP was sent to officers at TWBC for draft comments and to enable screening for the need for a Strategic Environmental Assessment (SEA) and/or Habitats Regulations Assessment (HRA).
- 2.59. Informal comments were received on 22<sup>nd</sup> March 2022 on both the Plan itself and the Design Guidance and Codes. On the whole, the comments were supportive of the emerging PNP and offered advice on where policies might be strengthened or brought into greater alignment with the Submission Local Plan. The Steering Group discussed the comments carefully and amended the Plan accordingly.
- 2.60. The SEA/HRA screening determination reports were issued in April 2022 confirming that neither would be required. Further information on this is contained in the Basic Conditions Statement.

#### **Stage IV: Pre-Submission (Regulation 14) Draft Neighbourhood Plan Consultation**

- 2.61. The Steering Group finalised the Pre-Submission draft in May 2021, in readiness for the Regulation 14 consultation, which was held between Sunday 5<sup>th</sup> June 2022 and Monday 18<sup>th</sup> July 2022.
- 2.62. The PNP and supporting evidence were uploaded onto the Parish Council website and the consultation was advertised to the local community in the following ways:
- The Annual Parish Meeting (April 28<sup>th</sup>) was used to provide an overview of the Plan and to promote the forthcoming formal period of consultation
  - An online survey was created to enable people to provide feedback. Hard copies of the survey (and the Plan itself) were available on request
  - An article was placed in the Pembury Village News, delivered to all households
  - Posters were printed and posted at locations around the parish
  - A large banner was placed on the Village Green
  - Social media updates were posted on Facebook
  - Emails were sent to all those who had joined the Neighbourhood Plan mailing list
  - Local groups and organisations were written to directly
  - The Local Green Space owners were contacted again
  - Stall at the Platinum Jubilee celebrations on the Recreation Ground (5<sup>th</sup> June)
  - Drop in event and exhibition at the Baptist Church (16<sup>th</sup> June)



*The Regulation 14 consultation*

2.63. In addition to consulting with the local community, the Steering Group wrote to statutory consultees and other organisations who had an interest in the Plan. A list of the consultees contacted is contained in Appendix A and responses were received from the following:

- Tunbridge Wells Borough Council – Planning Policy
- Natural England
- Historic England
- Environment Agency
- National Highways
- Southern Water
- British Horse Society
- Countryside Partnerships (UK) Ltd
- Owner of Downingbury Farm (proposed local green space)
- Stonecourt Fruit Farms
- Pembury Society

2.64. Representations received at the Pre-Submission Consultation were recorded by topic/policy and carefully considered by Steering Group members and in discussion with officers at TWBC. A summary of the comments and responses from the Steering Group, are set out in Appendix B. The following paragraphs provide a summary, by topic area, of the comments received during this process and how these were integrated into the Submission Version PNP.

2.65. **General comments:** The comments are very much supportive of the Plan. Many respondents have raised concerns about the amount of development proposed for Pembury, but this is set out in the SLP and hence housing numbers are outside the scope of the PNP. The emphasis of the PNP has been, therefore, to influence these proposals, for instance through design and layout, while protecting spaces and areas that are important to the community or for local flora and fauna.

- 2.66. The PNP has been reviewed to ensure that it meets accessibility requirements.
- 2.67. **Challenges, Vision and objectives:** The vision and objectives were considered clear and effective. A number of minor points were raised largely to assist in ensuring greater clarity.
- 2.68. **Spatial Strategy:** The approach was supported. Discussions with TWBC had led to the agreement that the Neighbourhood Plan would not seek to allocate sites, although this could be reconsidered at a future review of the plan. Some residents expressed concern about the quantum of development proposed for Pembury in the Submission Local Plan (SLP), but this sits outside the scope of the PNP. The proposed Limits to Built Development in the SLP were added to Figure 4.2 of the PNP on the advice of TWBC. In addition, the proposed SLP site allocation at Downingbury Farm was amended to reflect the SLP inspection findings.
- 2.69. **Housing:** TWBC supported the policy on Housing mix. However, they raised a comment about the viability of requiring an uplift on the discounts on First Homes. The Steering Group considered that affordability is a significant issue in the Parish, as demonstrated in the Local Housing Needs Assessment and were keen to retain particular support for developers providing greater discounts, with the TWBC level included as a baseline. A meeting was held with planning officers and an agreed amendment to the policy was made, to add greater clarity to achieve what is required.
- 2.70. **Character, heritage and design:** Policy P3 (Character of development) was amended to make the clauses clearer. The Design Guidance is not a supplementary planning document. It forms an integral part of the PNP and was amended to reflect comments from TWBC and also the British Horse Society in terms of encouraging bridleways where this is safe to do so.
- 2.71. Policy P5 (Sewage and drainage infrastructure) received support from all parties. Southern Water provided text to set out their position, which has been incorporated. The emphasis of the policy is supporting activities that will help to alleviate surface water.
- 2.72. **Employment in Pembury:** The policy in this section was supported. References to additional relevant SLP policies have been added.
- 2.73. **Environment and Green Space:** The policies in this section were very much supported. Minor amendments have been made to enable clarity. Only one local green space private owner responded (the majority of the proposed spaces are in public ownership), who was supportive of the proposal to designate Downingbury Pond. TWBC raised a query about how the views policy might impact the sites proposed for allocation in the SLP. The Steering Group confirmed that the views in this part of the parish, which are viewable from the public footpath running adjacent to the proposed sites, are significant locally. The aim, however, is not to prevent development in those areas, rather to ensure that the design of that development, where possible, retains and incorporates these views. A response from one of the site promoters in question supported this ambition.
- 2.74. **Transport and Movement:** The policies here were supported. Additional reference has been made to equestrian use in the parish, which is high. Whilst largely outside the scope of the PNP, an additional section on public transport has been added to reflect the views received from the community on this issue. The PNP seeks to support active travel where possible, but it is also mindful of the needs of residents who may be reliant on their car to get around, leading to a

need for additional car parking particularly to serve the village centre. This has been further explained in the plan.

- 2.75. **Community facilities:** The policy was supported. TWBC raised a query about the extent to which the proposed sites may be able to deliver this, given that the detail about their provision is already described in the SLP. This has been made clearer in the PNP.

### **Stage V: Submission Version Neighbourhood Plan**

- 2.76. Following the changes made to the PNP as a result of the Regulation 14 consultation, the Submission Version was formally submitted to TWBC who, once satisfied that the correct set of documents have been received, will undertake the Regulation 16 consultation. The document will then proceed to Examination and, assuming a favourable outcome, to referendum.

### **3 CONCLUSION**

- 3.1. The Steering Group has undertaken a very thorough engagement programme in order to develop the Pembury Neighbourhood Plan. It has set out a comprehensive vision and objectives and guiding principles. In developing the policies to achieve the vision and objectives, the Group has actively engaged with a wide range of stakeholders and the Plan has evolved accordingly.
- 3.2. Feedback from the Regulation 14 consultation has enabled the Plan to be shaped into its final version, to submit to TWBC.
- 3.3. This report fulfils the requirements for the Consultation Statement, set out in Regulation 15(2) of the Neighbourhood Planning Regulations 2012.
- 3.4. Gratitude is extended to everybody who has contributed to the Plan's development, either as a valued member of the Steering Group and Working Groups or those who have taken the time to contribute their views and opinions. This has been invaluable in helping to shape the scope and content of the Neighbourhood Plan.



## APPENDIX A: LIST OF THOSE CONSULTED AT REGULATION 14 (PRE-SUBMISSION STAGE)

- Local Residents
- Local Businesses
- Local organisations
- Statutory Consultees:

TWBC (Planning)
Rother DC (Planning)
Kent County Council (Planning)
KCC (Rights of Way)
KCC Flooding and Drainage
East Sussex CC (Planning)
KCC (Historic Environment Record Manager, Planning & Environment Division)
KCC (Heritage Conservation Manager and County Archaeologist, Planning and Environment)
Director of Property & Infrastructure
Sustainable Communities Project Officer (Kent Adult Social Services – West Kent)
Social Care Health and Wellbeing, Strategic Commissioning (Accommodation Solutions)
The Coal Authority (not contacted as not relevant to the area)
Homes England
Natural England
Environment Agency
Historic England
Network Rail
National Highways
Marine Management Organisation (not contacted as not relevant to the area)
Water supplier (SE)
Sewers (Southern)
Gas (Cadent Gas)
Electric (UK Power Networks)
National Grid
BT
NHS West Kent CCG

**Local Green Space owners:**

1.	Pembury Allotments
2.	Pembury Green Space for Properties (Beagles Wood)
3.	Pembury Cricket Ground
4.	Woodside Recreation Ground
5.	Lower Green Recreation Ground
6.	Belfield Road green space
7.	Lower Green Burial Ground
8.	Pembury Churchyard
9.	Green Space adjacent to 33 and 37 Ridgeway
10.	Old Church Burial Ground
11.	Bo Peep Corner
12.	Church Lawn
13.	War Memorial Lawn
14.	Downingbury Pond

**Site promoters of sites proposed in the SLP:**

AL/PE1
AL/PE2
AL/PE3
AL/PE4
AL/PE5
AL/PE6
AL/PE7
AL/PE8

**Neighbouring Local Councils:**

Matfield Parish Council
Capel Parish Council
Frant Parish Council (for Bells Yew Green)
Lamberhurst Parish Council
Brenchley Parish Council

## **APPENDIX B: SUMMARY OF COMMENTS RECEIVED AT PRE-SUBMISSION REGULATION 14 CONSULTATION AND RESPONSE FROM THE STEERING GROUP**

Representations (Reps.) were received from the following:

1. Tunbridge Wells Borough Council – Planning Policy
2. Natural England
3. Historic England
4. Environment Agency
5. National Highways
6. Southern Water
7. British Horse Society
8. Countryside Partnerships (UK) Ltd
9. Resident (Downingbury Farm) – LGS landowner
10. Stonecourt Fruit Farms
11. Local Resident
12. Local Resident
13. Local Resident
14. Local Resident
15. Local Residents (via SurveyMonkey)
16. Pembury Society

**Comments are listed in the table below by paragraph number / policy, with general comments at the end.** Summaries have been taken from responses, and any typos within them have not been corrected.

The original responses (in full) have been supplied to TWBC.

Ref.	Page/ Para	Rep.	Summary of comment	Response
	<b>General Comments</b>			
1.	Images	1	For legal accessibility compliance, all pictures should be inserted to the left margin, and not embedded within the text. Text should come before or after the image, and not next to it.	All images have been properly aligned, with alt text added.
2.	Figures/ Maps	1	e.g., 4.1 and 4.2 on page 15 show the Limits to Built Development (LBD) – this is the proposed LBD in the TWBC Submission Local Plan, and is not yet adopted. The NDP group may wish to note/clarify this in the document	This has been noted – we have included both existing and proposed LBD to ensure longevity of the Plan in case of either the Local Plan being adopted or not.
3.	Weblinks	1	Weblinks should be inserted as hyperlinks to the text to comply with accessibility regulations.	Hyperlinks are inserted within the document.
4.	General	2	No specific comments.	Noted.
5.	General	3	No detailed comments.	Noted.
6.	General	4	No comments.	Noted.
7.	General	5	Generally supportive. Amend to National Highways.	Noted.
8.	General	12	List of helpful typos to be corrected.	Noted and these have been amended.
9.	General comments	15	* Traffic calming measures on Henwood Green Road and Lower Green Road: such as, speed bumps, 20mph limit throughout. *Dog waste and Glass cleanup on henwood green road and Lower green road. This is often soiled and hazardous when walking with small children and with pushchairs/wheelchairs: such as, patrol, penalties, CCTV, dog waste bins with bags. * Toilet facilities at the park. * Shade solution at the Play Park. * Air-conditioned community space near the park.	Many already covered already in the non-policy actions. Additional suggestions to be added.
10.	General comments	15	The principal of the NDP is laudable, but the final document must be deliverable. Some of the ideas set out are definitely not deliverable and others have not been thought out sufficiently or are not practical, eg making Hastings Rd one way. Car ownership is unlikely to decrease, particularly now that the bus	Noted. The one-way system is included as a project to explore as part of the wider (non-policy) actions.

Ref.	Page/ Para	Rep.	Summary of comment	Response
			service is being reduced rather than increased as it needs to be. Therefore, proper and adequate provision must be made for cars, remembering that several areas of the village do not have access to off-road parking and never will. Proper provision can be provided for in any new built development (provided the Planning Dept can be persuaded to be realistic, which is unlikely) but it is necessary to accept the constraints of the present situation and work round them. Parking at the Green could be radically improved for local residents if a parking policy was introduced and enforced. A few spaces at the top, 4 say, should be restricted to 30 minutes or possibly 1 hour and the rest on the side of the Green only to 4 hours. This would stop all day parking by people who then join with friends and go elsewhere.	
11.	General comments	15	There is an over emphasis on accommodating cars, and a lack of understanding of the detriment they cause (electric or not). Roads such as Cornford Lane and Pembury Walks should be stopped up, and the turning off the A21 north bound into Henwood Green Road.	The PNP seeks to support active travel, but there has to be a balance in accommodating cars for those who require them, and whilst a longer-term shift to more sustainable transport is possible (including electric vehicles).
12.	General comments	15	I would like to record my appreciation for all the work that has been done by everyone involved in producing this very valuable and important Neighbourhood Plan for Pembury.	Noted.
13.	General comments	15	Not sure if this part of the councils remit, but the there was not reference to public transport, which given the moves to encourage cycling and walking in the village, how about improving public transport access to the village as well.	We have added a paragraph about public transport, but note that this is a private sector responsibility so we cannot enforce provision.
14.	General comments	15	No development on Maidstone road and the land next to the hospice. No development on PE4 that impacts the residents of Maidstone road and the views they have from there houses. All	Noted.

Ref.	Page/ Para	Rep.	Summary of comment	Response
			development should be in keeping with the village and no housing estates as this breeds high crime and undesirable residents. Housing should not be too affordable that it affects the houses prices of other homes. Keep areas of natural beauty.	
15.	General comments	15	Keep Pembury a beautiful little village, add a charming tea room and a few more local independent shops (not mass high street stores) on the green but keep all development to a minimum and keep it in keeping with the local houses. Protect areas of outstanding natural beauty, protect Downingbury farm. Keep the land next to the hospice as beautiful orchard and only for the use of the hospice. If any development needs to happen on PE4 off of church road it should be small and not visible to the residents of Maidstone Road as we do not want our open countryside views ruined by housing developments, keep the trees and make the houses in keeping with the local area. Not housing estates which breed high crime and undesirable residents.	Noted. The policies seek to retain local character and green spaces and local views.
16.	General comments	15	Doctor provision is essential the current provision is not acceptable and neither is school provision. The problems in the village need addressing before adding to the problems the area has. By building and encouraging more residents it will add to traffic , car parking issues, pollution ,loss of wildlife and green spaces.	Noted. The provision of GPs is within the remit of the Primary Care Trusts.
17.	General points to be corrected/ further explained	16	A list has been prepared for consideration.	Amended.
18.	Road and traffic structures	16	Consideration to be given to the impact of the 3000+ dwellings on this side of the Borough on Pembury. Potential for cross-working with relevant authorities. The Pembury Society has given though to this, detailed on their website.	Noted as an action and for further discussion with TWBC and other bodies.

Ref.	Page/ Para	Rep.	Summary of comment	Response
19.	Motor vehicle – ownership, home parking, speed, EV charging, future	16	<p>The PNP should seek to include cars as part of the future, as many people rely on them:</p> <ul style="list-style-type: none"> <li>• There have to be solutions that include the use of cars, and the knock-on consequences in terms of parking and electric charging.</li> <li>• There should be extra allocated parking areas in the Plan with electric charging points, drawing cars off the public roads. Such areas with only on-road parking need to be identified and nearby parking areas created.</li> <li>• A reduction of speed to 20mph and changes to road design should be a priority.</li> </ul>	<p>The Plan acknowledges the ongoing reliance for many on the use of cars, while supporting active travel too. This includes support for additional village centre car parking, the provision of EV points in private and public car parks and adequate off-road parking provision to support new development. Parking standards are set on a borough/county-wide level.</p> <p>Speeding control and enforcement sits outside the remit of the PNP.</p>
20.	Cycling, walking and public transport – usage, safety, access	16	<ul style="list-style-type: none"> <li>• It is the provision of public transport with high frequency and flexible choices of destination that would make any in-road to meeting this policy. The provision or at least reinstatement of a proper bus service is an essential feature to achieve this. At present a car is a necessary requirement, and appropriate provisions need to be made for their use.</li> </ul>	<p>Noted, but again this is not something that can be compelled through the planning system.</p>
21.	Roads and pavements – use of available space	16	<ul style="list-style-type: none"> <li>• Parking on pavements should be outlawed</li> <li>• Parking around the centre of the village should be limited by time</li> <li>• More spaces required to serve the village centre and top of Lower Green Road</li> <li>• Survey of those with mobility issues to identify where pavements need to be lowered, levelled etc.</li> </ul>	<p>Noted. Much of this sits outside the remit of the NDP.</p> <p>There could be merit in exploring a Local Walking and Cycling Infrastructure Plan with TWBC and KCC, which could provide the mechanism to address these points. This is included in the non-</p>

Ref.	Page/ Para	Rep.	Summary of comment	Response
				policy action table for consideration.
22.	Infrastructure and impact of 10%+ rise in population.	16	<ul style="list-style-type: none"> <li>Need to understand the impacts on e.g. school places, GPs, flooding, traffic etc.</li> </ul>	Agreed, but each of these issues are the responsibility of specific agencies, who are engaged in the Local Plan process and emerging housing numbers. These are strategic issues that need to be addressed that the strategic, as opposed to parish level.
	<b>Introduction</b>			
23.	Images of the NPPF/SLP/AONB Management Plan	1	Are these images necessary? An embedded hyperlink may be more suitable so that readers online can click on the links to view. If they are considered appropriate to include, please see our earlier comments regarding accessibility and the legal requirements of this.	These have been properly aligned and labeled.
24.	1.4	1	End of the paragraph – consider referring to the wider development plan	We only need to show conformity to the strategic policies of the adopted Local Plan.
25.	1.4	1	PNP is more than guidance – it is policy forming part of the development plan.	Amended to make clearer in text.
26.	1.10	1	Reference to the weight to be given to the Submission Local Plan. More accurate to say the LP has increasing weight as the Plan goes through the process.	Noted and amended.
27.	1.11	1	Reference to scale of development - Should refer to the date at which this information is accurate to i.e., 1 April 2021, for example.	Noted and added date of SLP being referred to.
28.	1.13	1	High Weald AONB Management Plan - Please note that the High Weald AONB Management Plan is NOT a planning policy document but is a material consideration in the determination of planning applications. The document should be removed from the Planning Policy Context title or be given its own	Noted and agreed to include within a new sub-heading.



Ref.	Page/ Para	Rep.	Summary of comment	Response
			separate subtitle outside of Planning Policy Context.	
29.	1.15	1	End of the supporting text states 'a timeline of activity is summarised...' It is unlikely that the NDP will progress to examination ahead in 2022. May be more suitable to place under 2023 heading.	Agreed and amended.
	<b>About Pembury</b>			
30.	2.14 bullets	1	Ensure reference is to 'Royal Tunbridge Wells'  Add in a bullet referring to parking?	Noted and amended.  Added in.
	<b>Vision for Pembury</b>			
31.	3.1 Policy Box	1	Refer to Royal Tunbridge Wells when referring to the built up area/town to avoid confusion with the Borough	Agreed and amended.
32.	3.2 Objective 8	1	Twittens - May read better if 'colloquial' is removed and it just has your own definition in brackets (a narrow path or passage...).	Agreed and amended.
	<b>Spatial Strategy</b>			
33.	4.3	1	2 <sup>nd</sup> sentence typo (The NPPF attaches great importance to Green Belt, the fundamental aim of Green Belt policy being)	Amended.
34.	4.5 bullet about STR3	1	Prioritising the use of brownfield sites and only permitting greenfield development on the edge of the settlement in exceptional circumstances, with clear and strict guidance on what is appropriate (Policy STR3).  Where TWBC Policies are referred to, this should be clarified e.g., 'TWBC SLP Policy STR3'  Optimising the use of brownfield sites reducing the pressure to develop greenfield land, with clear and strict guidance on what is appropriate (Policy STR3).  (STR 3 does not mention greenfield sites at all).	Noted and amended throughout.  Noted – moved policy reference to after brownfield.

Ref.	Page/ Para	Rep.	Summary of comment	Response
35.	Policy P1: Location of Development	1	<p>Is there the potential for criteria (vi) to (ix) (that development must comply with) to be at odds with some of the preceding criteria within the policy?</p> <p>For example, criterion (iv) refers to allocated sites in the TWBC Local Plan; there could be a tension between criterion (iv) and these criteria that all development must comply with;</p> <p>Criterion viii – ‘harm in terms of additional traffic’ – how can this be defined. Give consideration to the reference in NPPF at paragraph 111. This should be reworded to reflect that which is set out in NPPF.</p> <p>Part B: a note that ‘exceptional circumstances’ relates only to major development in the AONB (as per the NPPF). Not all development coming forward will be major. What does the policy seek for proposals that are not major?</p>	Amended.
36.	Policy P1: Location of Development	6	Support the wording, in particular reference to necessary utilities infrastructure.	Noted.
37.	Policy P1: Location of Development	7	<p>The BHS can not comment on the suitability of land for redevelopment however the proximity to existing bridleways does raise cause for concern, especially PE4. Church Road is used by horse riders accessing Marshleyharbour Woods so increased vehicular traffic will be hazardous. There is a bridleway bridge crossing the A228 which will also be affected. Consideration and compensatory routes must be considered and created for the equestrian community in Pembury, there is an estimated total of over 3400 contributing almost £19 million to the economy annually, much of it spent locally.</p> <p>We would be very happy to consult with developers and planners</p>	Noted. The sites in question are being considered in the Local Plan process.

Ref.	Page/ Para	Rep.	Summary of comment	Response
			to map and suggest routes which could be multi-user paths to connect circuits and communities via Active Travel.	
38.	Policy P1: Spatial Strategy	8	Notes that the NDP does not allocate sites. Expresses that Site AL/PE3 will contribute to Borough housing need.	Noted.
39.	General	10	Concern about lack of affordable places for people in Pembury. Consider that areas should be set aside in the PNP for natural growth of the population.	Noted. The PNP does not allocated sites, which is being considered through the Local Plan process and a significant number of dwellings are proposed for Pembury. This can be reviewed in a future iteration of the PNP/LP.
40.	Site allocations in the SLP	11	<p>AL/PE4: Concerned about the traffic implications of this site on Church Road. Concerned about the extent of the site.</p> <p>AL/PE3: Concerned about impact on views across the North Downs, increase in traffic. Queries what will happen to the existing hedgerow and what is planned for the recreational area.</p> <p>AL/PE2: Concern about traffic entering and existing Belfield Road, adjacent to bus stops, drainage issues, loss of visual amenity.</p> <p>AL/PE1: Loss of vision points. Capacity of the school? Parking issues.</p>	The sites are being considered through the SLP process. However the PNP includes policies on design, transport and views, to assist in safeguarding against some of the issues expressed.
41.	General	15	These developments are very close to current bridleways and we cannot lose access. The access needs to encompass riders and be safe to use due to increase in traffic levels Riders need to be included in access for cyclist, pedestrians.	Noted and this is included in the PNP.
42.	General	15	P4 should not be developed - it pushes the boundary of the village into the green belt and AONB unnecessarily and destroys the orchards. There is scope to increase the density of housing in the south of the village so that P4 does not need to be developed. It	Noted, but this is a Local Plan matter.

Ref.	Page/ Para	Rep.	Summary of comment	Response
			contradicts P8 directly and other policies due to the destruction it will cause of the environment and the habitat the orchard has created. Rowleys must be preserved as a non-motorised route if P4 is developed. No access for cars should be given to Rowleys Hill. The development of P4 should not increase traffic along Church Road, nor cause residents of Church Road to create parking in their front gardens as this incrementally decreases open space and habitats to the detriment of the environment. A dedicated cycle access route to the south of the village should be created and to the cycle way on the A21 via Rowleys Hill and through Pembury Walks.	
43.	General	15	The emerging New Local Plan decrees that Pembury provides more than its fair share of development in the Borough of Tunbridge Wells. The New Local Plan's development sites proposed in the Green Belt are extremely unwelcome but unfortunately necessitated by central government policies.	Noted.
44.	General	15	Do not build on downingbury farm keep the land next to the hospice as protected for hospice use only. Keep building on PE4 to a minimum	Noted. The Downingbury Farm site includes an area to be safeguarded for future hospice use.
45.	General	15	Protect the land next to the hospice which is a area of natural beauty. Leave this land for the hospice for there development needs. Not for housing. The land behind Downingbury farm off of church road should not be developed as this will cause more traffic on church road and more traffic on Maidstone road. Leave Protected land protected and do not build upon it.	Noted – see above.
46.	General	15	The protection of the green spaces for leisure is critical, with facilities such as the cricket ground essential to maintaining the health of our community.	Noted – the PNP includes a LGS policy

Ref.	Page/ Para	Rep.	Summary of comment	Response
47.	General	15	Pembury is one of the cheapest areas to buy, there has been an influx from London with younger and larger families bringing more than two cars to the property. Roads in this village are already at dangerous capacity. Visibility at junctions and cars parked over pavements make this village undesirable to live or drive through. By encouraging more families brings more transport and parking issues. Please also note a number of large commercial vehicles are being parked throughout the village on narrow roads.	Noted.
	<b>Housing</b>			
48.	5.4	1	Reference to the Local Housing Need Assessment:  Please add a reference to the date of this Assessment and consider adding a direct weblink to enable the reader to view the document.  It is recommended that the Neighbourhood Plan group make direct contact with the TWBC Housing Team for comments on the Local Housing Needs Assessment.	Agreed and added in date and link to the website.
49.	5.10	1	First Homes:  TWBC's own work on viability suggests that a 50% discount would have adverse impacts on viability, and it is likely that TWBC will be recommending a 30% discount borough wide.  The Pembury NDP needs to provide robust viability evidence, considering all other development plan requirements to demonstrate that the NDP policy requirement will not render development unviable in Pembury parish. TWBC is not currently aware of evidence in this regard and welcomes continued discussion with the NDP group/Parish Council about this policy.	Text amended. The group consider an up to 50% uplift would be preferable, and this has been incorporated, where it is viable, otherwise a 30% uplift is required.

Ref.	Page/ Para	Rep.	Summary of comment	Response
			This also impacts on the relevant criterion (B) of policy P2.	
50.	5.11	1	<p>Re: “The site allocations for Pembury as set out in the emerging Local Plan would deliver approximately 389 to 417 dwellings, of which approximately 124 to 128 units would be affordable homes.”</p> <p>124 to 128 should be 155 to 156 as in para 5.8. Or if calculations differ it would be useful to explain why.</p>	Noted and amended to agree with 5.8.
51.	Policy P2: Meeting Local Housing Need, p21 policy box	1	“Subject to viability’ – Repeated twice in the same sentence, at criterion A.	Delete repetition.
52.	Policy P2: Meeting Local Housing Need, p21 policy box	1	Criterion B: Might be worth inserting a link to the Housing our Ageing Population Panel for Innovation Principles.	Agree and insert.
53.	Policy P2: Meeting Local Housing Need, p21 policy box	1	<p>Criterion C: Ref: “Should it be demonstrated that the required level of affordable housing cannot be met on-site for legitimate reasons, a commuted sum will be required to ensure that the provision of affordable units is not lost.”</p> <p>‘exceptional circumstances’ rather than ‘legitimate reasons’ is a more recognisable planning term.</p> <p>‘Where exceptional circumstances exist to demonstrate that affordable housing cannot be met on- site, a commuted sum will be required to ensure that the provision of affordable units is not lost.</p>	Amend.
54.	Policy P2: Meeting Local Housing Need	8	No objection in principle but would propose that the policy supports all housing types and sizes. (see fuller comments)	Noted. The policy does not preclude types of development, but emphasises the need (as demonstrated in the Housing Report) for particular types of homes to redress the current

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				imbalance in terms of size, type and affordability.
55.	Affordability	15	Not a particularly good place to live next to A21 re noise and air quality House prices should be attainable for working families	Noted. The sites are being considered as part of the Local Plan process.
	<b>Character, Heritage and Design</b>			
56.	Policy P3: Character of Development	1	Appendix B: Design Guidance and Codes for Pembury.  It would be helpful to clarify for readers of the PNDP to clearly set out the status of this document – is it guidance or forms part of formal policy?	The document forms part of the formal policy. Amend word 'guidance' within the policy to clarify this.
57.	Policy P3: Character of Development	1	Parking Standards: It is noted that, within point B.IV, that space for off-road parking and cycle parking for residents, visitors and services vehicles is to be in accordance with the SLP parking standards, which is supported. However, the Council notes that the standards set out within the SLP are yet to be adopted.  It may also be worth clarifying within the text that the off-road parking is for vehicular off-road parking.	Amended to make reference to "current standards or their successor".  Noted and amended.
58.	Policy P3: Character of Development	1	Criterion (vii)  Clarity required over the term 'visual intrusion' – is this the same as loss of privacy?	Further clarity has been added.
59.	Policy P3: Character of Development  Para 6.8	7	Point 3 - add equestrian.  Point 7, create new circular bridleways and join up/improve existing paths.  Page 26 diagram, add equestrian into top right hand annotation.	The Design Guide has been amended to give greater prominence to equestrian.

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60.	Policy P3: Character of Development	8	<p>Clause B ii: agree but concerned whether this is in the gift of the developer.</p> <p>B.viii: repetition of B.iii</p> <p>Clause C: nuance to account for the A21 e.g.:</p> <p>“Where development sites abut open countryside, development on the rural boundary edge should mitigate any detrimental visual impacts on the countryside. This should be achieved through the siting of lower density development at the rural boundary of the site, <b>where necessary and appropriate</b> in order to provide a gradual transition from the built form to open countryside, or by other means such as through a layout that clearly minimises the visual impact of any larger buildings on both the open countryside and existing village-scape.”</p>	<p>Noted.</p> <p>Consolidated</p> <p>Noted – the SG considered this should be retained.</p>
61.	Policy P3	15	<p>Character of the village has already been destroyed by building high rising properties in extreme proximity to an oast house with no thought or consideration to the residence close by and to the cars parked at distance from properties as the roads are already cluttered. Local wildlife has disappeared and water tables depleted or disturbed due to the number of extensions and boundaries disturbed. Pollution from A21 has been exacerbated with the duelling and noise levels continue throughout the night. The developments in the past 15 yrs are not in keeping with the promises made on this village , it will change further beyond recognition if more house building is to go ahead.</p>	<p>Noted. The policy is seeking to protect local character.</p>
62.	Policy P4: Energy efficiency and design	1	<p>Figure 6.2 – suggest that the colours on this figure be re-considered since the colours for the combined and foul sewers are not easy to differentiate.</p>	<p>On discussion with Southern Water and KCC, the map has been removed. Reference to the state</p>



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				of the existing system is retained in the text.
63.	Pages 27-29	1	Energy Policy - Strongly support.	Noted.
64.	Page 29 Policy P4 Energy Efficiency and Design	1	Criteria A - Consider switching emphasis to carbon emission reduction instead of energy to encourage transition away from fossil fuels.	This has been added in.
65.	Page 29 Policy P4 Energy Efficiency and Design	1	Criterion vi.:  Consider whether this criterion is necessary. Criterion B already includes the caveat “as appropriate to scale, nature and location”. We should expect very high standards in all development as we move towards the Government’s Future Homes Standard which will be introduced in 2025.	The SG are minded to retain this criterion.
66.	Policy P4: Energy Efficiency and Design	6	Support clause B(v). Support the NP approach to seeking to reduce the amount of rainfall getting into the sewer network. Less supportive of the replacement of the sewer system (to separate out) as this is considered to expensive etc.	Noted.
67.	Policy P4: Energy Efficiency and Design	8	Does this duplicate EN2 and EN3 of SLP?	Potentially but the SLP is not yet adopted.
68.	Page 31, paragraph 6.21, bullet point 4 and Policy P5: Sewage and Drainage Infrastructure point C	1	Remove reference to Urban as this term is no longer referred to in this way and can equally apply to more rural areas, i.e. Sustainable Drainage Systems.	Agree and amended.
69.	Policy P5: Sewage and Drainage Infrastructure	1	Page 31, para 6.21 second bullet point: separation of foul sewer network – TWBC is unclear on the justification for this and seeks clarification on the evidence for this.	This was included following discussions with the KCC Flood Team, who recommended that the ideal scenario would be to separate the networks as it is the narrowness of the pipes that get overloaded swiftly in heavy rainfall events.

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			Policy box, point B: has a requirement for “rigorous analysis”. The plan should clearly set out what is meant by this/what the plan expects developers to do.	Agree to add additional detail in the supporting text/ reference to drainage strategy.
70.	Policy P5: Sewage and Drainage Infrastructure	5	<p>Typo – A12 should be A21.</p> <p>Recommend: The Neighbourhood Plan needs to state that developers of sites within the vicinity of the Strategic route network (SRN) are required to liaise with us at the earliest opportunity with regards to drainage matters. It should be noted that in accordance with national policy in Department for Transport Circular 2/13, no surface water from sites may drain onto the SRN nor any connections made to the SRN drainage system.</p>	<p>Amend.</p> <p>Add in.</p>
71.	Policy P5: Sewage and Drainage Infrastructure	6	<p>Generally support A, B and C wording but proposed amendments as follows:</p> <p>Having regard to the issues around climate change set out above, Southern Water proposes the following amendments to Policy P5 parts A and D as follows (additional wording is bold):</p> <p>A. ..Development will be supported where it is demonstrated that its surface water drainage will not add to existing site runoff, <b>enter the foul/combined sewer network</b> or cause any adverse impact to neighbouring properties and the surrounding environment.</p> <p>D. Proposals which allow surface water drainage into the combined sewer system will <del>not only</del> be supported <b>unless</b> if the developer can <b>robustly</b> demonstrate that the proposal is unable to make provision for surface water drainage to ground, watercourses or surface water sewers.</p>	The Southern Water wording has been incorporated.

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			<p>Section 6.20 (supporting text) amendments:</p> <p>There <del>is a</del> <b>has in the past been</b> a particular problem in the southern end of the village caused by the fact that there is a combined sewer system here. This is where <b>at the point in the village</b> where domestic sewerage, <del>industrial wastewater</del> <b>from the nearby hospital, and, in compliance with the requirements of past Building Regulations, rainwater runoff</b> <del>are all collected in one pipe collect together within the combined sewer system that serves the Parish.</del> At times of heavy rainfall, the additional rainwater run-off can cause the pipes to fill beyond capacity, which in turn then leads to localised flooding.- <del>there have been instances of flooding in the A12 area, after 30 minutes of heavy rain. Sometimes this flooding can include raw sewage, which can back up into basements, causing property damage and creating health problems for anyone exposed to untreated sewage and wastewater. Prior to 2014, Pembury School has reported ongoing issues of this with flooding which has required that lead the school to close on occasion. The water company confirmed from records that these past issues were resolved, and no further issues have been reported since 2014.</del></p>	
72.	Sewage policy	15	The sewage infrastructure is already overloaded and can't cope during periods of moderate rainfall. More needs to be done to alleviate the situation before any further development is allowed.	Noted.
73.	Sewage policy	15	My concern about sewage, drainage, or any other utility infrastructure provision is who pays for it? If development demands additional infrastructure, the utility provider is obliged to provide it and charge the developer. There should be no loopholes enabling developers to pass on any such infrastructure costs to residents via general or local taxation. Regrettably there seems to be little that can be done through the medium of the Neighbourhood Plan.	Noted and this is written into the policy.

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74.	P5	15	P5 - drainage is becoming an issue and will be made worse with new development unless it is addressed. Southern Water sewer and water pipes cross our land and constantly overflow during heavy rain. This land is ancient woodland AONB etc. Southern water technicians have often said the 9"pipes were never intended for the amount of house building that has taken place over the years but they do not ever do anything constructive to correct it - they just fix down the manhole covers again and move on.	Noted.
75.	Policy P5: Sewage and Drainage Infrastructure	8	Unsupportive of Part B.	The SG would like to retain this.
76.	Policy P6: Conserving Heritage Assets	1	Policy box, point B: This should be conserve or enhance rather than conserve and enhance.  Policy box, point E: Suggest that this is also conserve or enhance.	Agree and amended to conform to NPPF.  Agree and amended to conform to NPPF.
77.	Policy P6: Conserving Heritage Assets	8	No objection but duplicates national policy.	The policy identifies additional (non designated) heritage assets that are not noted in national or local plan policy.
78.	Heritage	15	Heritage Assets cannot possibly be conserved while the Planning Dept is prepared to ignore all objections, however relevant, when considering changes to such buildings or their immediate environs. Despite assurances to the contrary, we cannot have confidence that they will take any notice of this document and change their ways.	Noted.
79.	Heritage	15	Development of Sunhill Place is not in character with a heritage building.	Noted. The policy seeks to try to guard against this in future.
80.	Character	15	P6 - We need to keep Pembury a village.	Noted.
	<b>Employment in Pembury</b>			

Ref.	Page/ Para	Rep.	Summary of comment	Response
81.	7.3	1	TWBC Policy reference: Makes reference to policy ED12 as protecting employment sites. This should be Policy ED2 – retention of employment sites and buildings. Policy ED12 does however seek to protect services and facilities within village settlements and so it may be helpful to refer to both policies.	Noted and agreed to amend to include both.
82.	7.5 first sentence	1	Typo - Reference to Green Belt and AONB - Capitals required for Green Belt and should refer to the AONB, not its AONB.	Amended.
83.	Policy P7: Supporting SMEs, Flexible Start-Ups and Homeworking	1	<p>i: reference to historic buildings is not necessary since it does not add anything to the policy.</p> <p>ii: What is meant by an appropriately-sized garden office?, does it need to say this given that proposals for a garden office will be assessed on their own merits taking account of site context, impact on neighbours etc.</p> <p>Suggest reference to historic buildings is deleted and that the words “appropriately-sized” are also deleted. TWBC considers that inclusion of such wording does not add anything to what the policy seeks to achieve.</p>	<p>Amended.</p> <p>Amended as suggested.</p>
84.	Policy P7: Supporting SMEs, Flexible Start-Ups and Homeworking	1	It may be helpful to provide a reference to Local Plan policy ED4 on rural diversification within the text.	Agreed and added in.
85.	Policy P7	15	All that is needed for this to be possible is for residential new-builds to include a study area. This is not rocket science. There is no need for anything complicated.	Noted.
86.	Policy P7	15	The paragraph about the appropriateness of scale, nature, and location is fundamental and essential to this Policy. It should be incorporated into the first paragraph of the Policy not just added as a rider at the end.	Noted.

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87.	Policy P7	15	Internet connection not up to home working unless you can afford to pay for extortionate services. Extensions and garden offices disturb neighbours and wildlife. Again if these micro businesses rely on transport 45 minutes to get into town and what about parking and pollution.	Noted, although the cost of broadband sits outside the planning system.
	<b>Environment and Green Space</b>			
88.	Policy P8: Green and Blue Infrastructure and Delivering Biodiversity Net Gain	8	Consider the policy duplicates emerging policy / national policy. Suggests deleting Clauses A-C.	Emerging policy is not yet adopted. The Plan maps out the local GI network.
89.	Policy P8	15	Protect stone court woods, protect downingbury farm pond, protect areas of natural beauty	Noted – considered in Policies P8 and P9.
90.	Green spaces	15	Protect the land next to the hospice, protect the woodland off of stone court lane, protect Downingbury farm and the pond there	As above.
91.	Policy P9: Local Green Spaces	1	<p>TWBC supports the approach of NDP in seeking to designate sites proposed for LGS in the SLP given that the SLP is yet to be adopted.</p> <p>As per the Council’s Reg.14 comments, it is noted that TWBC and Pembury NDP Group agree on the sites proposed in the SLP: sites 186, 187, 188, 189, AS_4, AS_9, AS_13 (i.e., Pembury sites 1, 2, 3, 4, 5, 6, 7). The Pembury NDP seeks to propose additional sites (i.e., Pembury sites 8, 9, 10, 11, 12, 13, 14), 5 of which TWBC has assessed and considered to not have met the designation criteria.</p> <p>Sites 8, 12, and 13 are assessed as one site in the SLP; the TWBC LGS Assessment states that the site is already sufficiently protected. Site 9 was not considered suitable for</p>	<p>Noted.</p> <p>The SG considers that the spaces meet the criteria and has contacted all landowners.</p>

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			<p>designation as it is considered to be an incidental green space with similar characteristics with many local sites not proposed for designation and therefore not 'demonstrably special'. Site 10 (which is a smaller area within the SLP) was not considered suitable as it was also considered to be already sufficiently protected. Pembury NDP sites 11 and 14 have not been assessed previously by TWBC.</p> <p>The Council notes that supporting justification for the proposed LGS sites in the Pembury NDP are provided in Appendix D of the NDP.</p>	
92.	Policy P9: Local Green Spaces	1	<p>Is the text for P9 effective as beyond the cross-reference to those sites which are proposed to be allocated, it just says that "Local policy for managing development on a Local Green Space should be consistent with policy for Green Belts (NPPF 101); proposals for development on Local Green Spaces will not be supported unless they conform to national policy guidelines". It give no direction to how the policy should be implemented – question whether it add anything. Consider explicit policy wording.</p>	<p>Amended to: <b>"Development proposals within the designated local green space will be consistent with national policy for Green Belts."</b></p>
93.	Local Green Space 14	9	Supportive of the LGS.	Noted.
94.	General	7	Village greens may have equestrian rights unless there are specific byelaws preventing this. A consideration.	Noted. The Plan does not include the Village Green as a LGS, as it is already adequately protected through Village Green status. This is noted in this section of the Plan.
95.	Policy P10: Managing the Environmental Impact of Development	8	<p>Clause B. vii: replace 'and not fragmented' with 'in usable parcels of land'.</p> <p>Clause B. viii: unclear what is meant by a physical barrier.</p>	The SG discussed this point and agreed to retain the text as is.

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96.	Policy P11: Locally significant views	1	<p>Given that two of the views relate to the of the sites proposed for allocation in the Submission Local Plan there should be cross-reference to the Submission Local Plan site policies affected, to ensure all policy requirements are met. This could be at para 8.37 or elsewhere as appropriate. It is noted by TWBC that following the Pembury session of the Local Plan Examination that site policy wording is going to be checked and additional text inserted into some policies to make it clear LVIA's are needed, with wireframe visualisations/parameters for example.</p> <p>Proposed amendment:</p> <ul style="list-style-type: none"> <li>• Add text to cross-refer to specific site allocation policies/site requirements in the Submission Local Plan.</li> <li>• Correct figure in the policy needs to be added – rather than 'figure x'.</li> <li>• Definition of major development should be clarified.</li> </ul> <p>TWBC welcomes continued engagement with the Parish Council/Neighbourhood Plan group about the significant views that relate to the proposed site allocations in the Submission Local Plan.</p>	<p>Noted and agreed to add additional context.</p> <p>Agreed and amended.</p> <p>Amended typo</p> <p>Included definition as per NPPF Glossary.</p> <p>Noted</p>
97.	Policy P11: Protection of Locally Significant Views	8	Supportive of the views and para 8.37. Suggest to amend the wording of View 3 to 'view from higher ground' as opposed to 'from the FP'.	Noted.
98.	Policy P11: Protection of Locally Significant Views	12	Two additional views suggested.	The proposed views were discussed and reviewed. They are considered to be adequately covered in the existing viewpoint



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				list – they are spots in the Parish where the same views can be seen, albeit from a slightly different point in the viewline. This is noted in the text.
99.	General	15	Again, any new development that adversely effects the environment or green spaces is worth fighting against, but we are always at the mercy of the Planning Dept who will, ultimately, make their own decisions.	Noted.
100.	General	15	Protect stone court woods, protect areas of natural beauty, protect the land of downingbury farm do not build on the land next to the hospice. Leave it as open orchards and countryside. Leave the beautiful views from Maidstone road as they are The beautiful open views from Maidstone Road looking toward Downingbury farm should be protected as it is a area of outstanding natural beauty, the beautiful open fields and orchard should not be spoiled	Noted.
101.	General	15	The policies should be more ambitious in creating greater areas of biodiversity, including stopping up roads and preventing the creating of car parking in front gardens. Clean air should be a policy, with walking and cycling given priority throughout the village, with joined up ways. The area around the green should be 'shared space' where the road is primarily for non-motorised vehicles, and secondary for motorised vehicles if there is no alternative route, to pass through at a walking speed. It should be said "it would be quicker to walk" than go by car. All of Pembury should be a maximum of 20 mph for cars with planters and other means to force cars to go slowly and priority routes for cyclists and walkers.	Collectively the policies contribute greatly to biodiversity, within the scope of the NDP.

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102.	General	15	The Dark Skies policy is extremely welcome. Benefits for all animal life (including human) are priceless. Brighter does not mean safer. I note that there is little reference to noise pollution in the Plan. Noise pollution is unwelcome and unnecessary. Perhaps the whole Plan could be checked through to see whether any further references might be relevant.	Noted.
103.	General – P9, 10, 11	15	P9 Keep the green spaces they are essential P10 Manage the development - do not just build thousands of flats - like the 60s P11 the locally significant views have mostly gone already	Noted
104.	General	15	Birds are awake in Pembury throughout the night due to light pollution. The disappearance in the past few years of wildlife is very much noticeable. In the space of ten years hedgehogs , frogs and bats have become a rare sight.	Noted.
	<b>Transport and Movement</b>			
105.	Policy 13: Improving walking and cycling opportunities	7	Add equestrian into the policy title.	Agreed and amended.
106.	P. 60 second bullet	1	G and H – where are these comments talking about?	Amended map to make clearer.
107.	Policy P14: Publicly accessible parking	1	Para 9.11 refers to area as being rural. This is really the parish beyond the settlement of Pembury.	Amended.
108.	General	5	Supportive of improving walking and cycling opportunities. But engage with National Highways at earliest opportunity in relation to the A21.	Noted.
109.	9.7	7	Add equestrian routes. Good to have access improvements suggested. The BHS would welcome the opportunity to work with developers to ensure this happens. Point K is excellent and specific, echoed by local equestrians who ride in the area.	Noted.
110.	9.7	12	Support the idea of improving/creating public footpaths south of the A21 ('A' and 'E'). Also, I think, links are needed between paths south of the A21 and those north of it between Roughlands Shaw and Kippings Cross ie linking WT234, WT235, WT236, WT241,	Additional information added to the section to incorporate these comments.

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			<p>WT237 (perhaps trying to use the underpass near Kippings Cross if it can be agreed).</p> <p>Upgrading public footpaths to bridleways should only be attempted where this can be done safely for walkers where they will need to share with cycles and horses.</p> <p>Not everyone will want more bridleways – horses and even worse cycles not welcomed by all walkers.</p> <p>'K' might be a good link to improve but the surface/terrain on the southern stretch of WT226 here is already terrible.</p> <p>Another public right of way link would be useful between WT214 where it meets the A228 road and the electricity substation area near Great Hawkwell.</p>	
111.	Policy P14: Publicly accessible parking	6	Supports wording relating to surface water run-off. Further support for schemes to reduce the amount of rainfall getting into the sewer system – incorporating these into any car parking.	Noted.
112.	General	13	Need to tackle speeding issues. Need to understand how 20 mph has worked and been effectively enforced elsewhere.	Noted.
113.	Policy P13	15	<p>There are very few areas within the built up area that are unsafe for walking due to lack of a pavement, the Bopeep end of Henwood Green Road being a prime exception. The safety of these few areas could easily be improved by a 20mph restriction for motor vehicles. It must also be recognised just how large the built up area is when considering the expectation that people will walk. The 'triangle' of roads measures about 1 mile on each side with the High Street and much of Lower Green lying beyond it. Most of the roads in the built up area are too narrow to accommodate specific cycle lanes and anyway, because of the hilly terrain, cycling is never going to become a major mode of transport around here. Far too much emphasis has been put on cycling as a serious mode of transport although, again, a blanket 20mph speed limit might</p>	Much of this sits outside the scope of the PNP. Potential scope for a local walking and cycling strategy, which is listed as a non-policy action to explore further.

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			make cycling safer. Idealism is fine, but a document like this needs to be practical and deliverable.	
114.	Policy P13	15	Horse riders need to be considered in this policy. They contribute more to the local economy than cyclists, but are not catered for	Noted and see also comments from the British Horse Society.
115.	Policy P13	15	P13 cycle routes throughout the village are required, from south to north, to Rowleys Hill and through Pembury Walks to the A21 cycle lane. Routes are required to the recreational ground and the school which can be used by a competent child safely. A route through Woodhill Park to the recreational ground and then through to the school could easily be created. Another route along Henwood Green Road should be created. Where the route is on road, then cars should be required to go at walking speed. Rowleys must be preserved as a non-motorised route if P4 is developed (the orchard at the north of the village). No access for cars should be given to Rowleys Hill. The development of P4 should not increase traffic along Church Road, nor cause residents of Church Road to create parking in their front gardens as this incrementally decreases open space and habitats to the detriment of the environment. P14 states increased car parking, which means more pollution and dirty air (electric cars are almost as polluting as other motor cars - it is just displacing the pollution - this needs to be recognised). No additional parking is required. The cycle routes need to be kept clear and be protected against ingress by cars. There is no cycle parking except at Notcutts. There needs to be cycle parking at the village hall, the chemist, each pub, the health centre, and the library to encourage cycling. I drove to the village hall because there was nowhere to lock my bicycle. There needs to be a priority to clean the air. No pupil lives more than a mile from the school but the road is completely jammed when	Much of this sits outside the scope of the PNP. Potential scope for a local walking and cycling strategy, which is listed as a non-policy action to explore further.

Ref.	Page/ Para	Rep.	Summary of comment	Response
			school starts and finishes. This detrimental to the health of the children and the population of the village.	
116.	Policy P14	15	Pembury has 3 spaces for shoppers with occasionally roadside parking in the village area. The shops and pubs etc keep the village alive and more space is needed	Noted - the PNP supports the enlarged village hall car parking area.
117.	General	15	You can not cycle in this village safely due to the parking and fast movement of cars . Visibility at junctions is poor and speed limits are not observed. Large commercial vehicles parked in residential areas.	Noted – the PC is in discussion with TWBC and KCC Highways about this.
	<b>Community Facilities</b>			
118.	Policy P15: Improving opportunities for community and cultural facilities, sport and recreation	1	<p>First bullet point: sets out that there is scope for provision of facilities aimed at teenagers to be made as part of the strategic allocations. This is not a requirement of the site allocation policies in the TWBC Submission Local Plan.</p> <p>Policy box, Ai: refers to setting of the AONB. What does the policy intend for sites in the AONB?</p> <p>B refers to the Councils Local Plan Open Space standards – we suggest including reference to Local Plan Policy OSSR2, unless the NPG just want to be flexible about also being in accordance with any future policies?</p>	<p>Removed reference to the strategic allocations.</p> <p>Amended to: ‘...to the AONB and its setting’</p> <p>Agreed and amended to signpost to both.</p>
119.	Policy P15: Improving opportunities for community and cultural facilities, sport and recreation	7	We reiterate the need for a good equestrian centre in the Borough of TW, to enable children and young people particularly to engage with the life enriching experience of equestrianism. In particular, there is a need for a centre which is linked via safe off-road riding routes so that children can learn and enjoy the health benefits both physical and mental of	<p>Noted.</p> <p>Kings Toll Road riding school exists. Infrastructure for further provision not in place as yet. The SG are supportive of this in</p>

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			riding out in the countryside safely.	principle but at a borough level as opposed to within Pembury.
120.	Policy P15	15	All need to be on agendas of Pembury groups as well as PC.	Noted.
121.	Policy P15	15	Our green spaces for sports are stretched to their fullest and an increase in population with new housing must only be considered alongside protecting and enhancing the green spaces that ensure the health and well-being of our community.	Noted.
	<b>Implementation and Plan Review</b>			
122.	Whole section	1	Supports this and no comment.	Noted
	<b>Infrastructure Improvements and Provision</b>			
123.	Part 12: Infrastructure improvements and provision	1	General point: This section could cross-refer to the TWBC Infrastructure Delivery Plan, the strategic parish policy for Pembury, PSTR/PE1, and the Local Plan strategic policy on infrastructure and connectivity, Policy STR5.	Added.
	<b>Non-Policy Actions</b>			
124.	p.75	1	Point 15: See previous comment above re Policy P15.	Noted and cross referenced to comments above.
125.	Project comments	7	Ref 2 – encourage developers to engage with the BHS to actively design bridleways into their plans Ref 10 – this would be highly beneficial to horse riders Ref 11 – an audit of bridleways and a plan to link those that do exist with new paths Ref 15 – include equestrian activities into this Ref 15 – engage with equestrian groups who may be able to put on events	Noted and amended.
126.	Project comments	12	Ref 11 - Consider a one-way system to be unworkable. No realistic route in other direction?	Noted.

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			Ref 13 – yellow lines – won't this simply move the problem elsewhere?	
127.	Project comments	13	<p>Ref 1 – include local estate agents as a key partner.</p> <p>Ref – 13 - yellow lines – won't this simply move the problem elsewhere? Is there scope for a car park behind the village hall? Also near to Bo Peep corner?</p>	<p>Agreed.</p> <p>Village hall car park is to be expanded (supported by PNP) as part of strategic site allocation.</p>
128.	Project comments	15	<p>The proposal that Hastings Rd be made one-way is a non-starter. You cannot have a permanent one-way system that is 3 miles long and there is no other way for the traffic to travel. Also it must be remembered that Henwood Green Rd, although a necessary main thoroughfare, is, in reality, only a country lane that has evolved through use and is not really suitable for the modern traffic that uses it, either in quality or quantity and certainly cannot be expected to take on any more.</p> <p>Proposed cycle ways are too short and not joined up. They are created around cars. Cycle and walk ways should be created and cars move or park around them. Stronger emphasis in cleaning up the air and creating places for cycle parking is required.</p> <p>The 'problem' of the advisory High Street cycle lanes should not be 'solved' by double yellow lines. It could be solved by extending the adjacent footways and allowing shared use for pedestrians and cyclists. The width of the High Street including parked cars would be reduced. This would have the advantage of providing a traffic calming effect where currently the 30mph speed limit is often treated with contempt.</p> <p>All good.</p>	<p>Noted.</p>

Ref.	Page/ Para	Rep.	Summary of comment	Response
			<p>Reduce speed on Maidstone road that goes to and from the bypass, reduce the speed from 50mph to 30mph as the area is well known for horse riders and walkers and cyclists.</p> <p>Put a speed limit on Maidstone road coming off of the bypass as 50 MPH is to fast and road users speed off of the bypass straight into the village of Pembury making it unsafe for cyclist and pedestrians. The speed beside Downingbury farm and pippins should be no more than 30mph as there are a lot of walkers and horse riders in the area.</p>	
	<b>Maps</b>			
129.	Various	1	<p>Various small amendments required:</p> <ul style="list-style-type: none"> <li>• Agree that PE4 needs to have boundary changed in the NP (page 15)</li> <li>• Map on page 15 shows the proposed LBD but that is not labelled as that in legend</li> <li>• Map on page 15 shows the proposed greenbelt but it is not labelled as that in legend</li> <li>• All maps need to contain copyright statements, e.g., Figure 6.2.</li> </ul>	<p>Amended.</p> <p>Amended (also to include the current, adopted LBD)</p> <p>Added to key.</p> <p>Noted and all checked.</p>
130.	Map 4.1	14	Check colouring of Green Belt.	All maps have been altered to a b/w base to make colours clearer.
	<b>Glossary</b>			
131.	Bullet Point: Limits to Built Development	1	Worth a note/cross-reference here to the fact that the LBD shown in the NDP is as per the TWBC Submission Local Plan.	Agreed and amended.
	<b>Appendix A</b>			
132.	Sites AL/PE1 – AL/PE5	1	Add in the word 'Approximately' to reflect wording in the	Agree and amend.



Ref.	Page/ Para	Rep.	Summary of comment	Response
			Submission Local Plan; these are also 40% affordable housing rather than 30%	
			Amend reference to 2033 should be amended to 2038.	Amend.
			Should refer to the date at which this information is accurate to i.e., 1 April 2021, for example.	Amend.
133.	Site AL/PE6 Appendix B	1	Reflect wording 'up to' in SLP.	Amend.
134.	p.7 Figure – key	1	A note that the settlement boundary accords with the proposed LBD in the Submission Local Plan, which differs to the current LBD set out in the current Development Plan.	Comments noted and AECOM have amended the document to incorporate.
135.	p.14 Figure – key	1	A note that the settlement boundary accords with the proposed LBD in the Submission Local Plan, which differs to the current LBD set out in the current Development Plan.	As above.
136.	2.2.2, p.17	1	General Streets: The road definitions are welcome but point 4 on this page shows a car straddling a footway, which isn't a good example of how off- street parking should work. A better understanding of how on street parking can work on roads in this part of the hierarchy is needed.	As above.
137.	2.2.3, p.18	1	Edge Lanes, point No.3: It is not quite clear what sort of access this refers to – pedestrians? Is this safe? The plan drawing doesn't quite fit the Romford Road example as it appears there is an internal road parallel with the main road.	As above.
138.	3.3 Design guidance for Codes	1	General coding/guidance - It looks like the only thing that is actually coded are the street typologies. It would be difficult to code anything else unless it's specific to a site, however, we would say these are more guidelines than codes.	As above.
139.	p.30	1	The bullet point 'new development should make use of the surrounding natural landscape by establishing...'	As above.

Ref.	Page/ Para	Rep.	Summary of comment	Response
			This is not quite clear in its aim. Also, presumably signage clutter is to be avoided so what type of wayfinding this refers to should be clearer.	
140.	p.31	1	Figure 24: sets out need for pedestrian and cycle connections for site AL/PE4.  Can the Guide be more specific on what the NDP group seeks/means by this?	As above.
141.	p.33	1	Second point down: This says that “every possible pedestrian and cycle link should be explored with a view to making it viable”.  This is considered onerous. Perhaps text could be amended to reflect more the fact that proposals are expected to provide appropriate pedestrian and cycle linkages, assessed on a case-by-case basis.	As above.
142.	p.40	1	8 <sup>th</sup> point down about cycle lanes: Says that these are encourages on main streets.  This differs to the emerging policy wording set out for sites AL/PE1 – AL/PE3 in the Submission Local Plan. Please consider inserting additional text about those sites to reflect emerging policy in the Submission Local Plan or add a line to say that cycle linkages for these three sites is to be as per site policies in the Submission Local Plan.	As above.
143.	p.57	1	First point down about AONB and Dark Sky Status: Dark Sky status is not automatic. The NDP Group could consider either cross referencing to the TWBC emerging Dark Sky policy or check back to the AONB Management Plan on this point to inform amended text.	As above.

Ref.	Page/ Para	Rep.	Summary of comment	Response
144.	Page 63 (and page 64)		First point down which talks about any new building above 3 storeys being supported only in exceptional circumstances.  This contradicts text on page 64 (5 <sup>th</sup> point down) which says that apartments can go up to 3 storeys.	As above.
145.	Page 70		Reference to the High Weald AONB Guidance - For ease to assist users of the document, this could be hyperlinked.	As above.
146.	3.8 Questions		TWBC strongly supports the use of this helpful resource.	Noted.
	<b>Appendix C</b>			
147.	Waterworks	12	Is it still in industrial use by SE Water?	Amended to 'industrial use'.

