

TWBC comments on Pre-Submission Southborough and High Brooms Neighbourhood Development Plan 2024 – 2038 (Regulation 14)

Page/paragraph number	Policy Details	TWBC Comments / Proposed Change
General comments		
	References to Southborough	Be clear on whether these references refer to the town of Southborough or the whole Southborough Town Council area.
	References to LBD	Be clear on whether this is the adopted LBD or as proposed in the emerging Local Plan.
	References to the NPPF	<p>The NPPF 2024 was published in December after this NDP consultation started. References to the NPPF will need to be updated along with the paragraph numbers.</p> <p>References to specific NPPF paragraphs should reference which NPPF version they apply to in case the paragraph numbers change in future updates to the framework. For example, the NPPF paragraph references beneath the policy boxes or in paragraph 8.7 should reference the NPPF version.</p>
Foreword		
	Reference to Tunbridge Wells Local Plan	It would be better to refer to this as the Tunbridge Wells Borough Local Plan
1. Introduction		
Para 1.3	Reference to status of SHBNDP	Set out that the NDP and the policies within it will form part of the development plan for the borough once the NDP is 'made'.
Para 1.10	Kent Minerals and Waste LP	<p>Suggested additions in relation to an update on the Kent Minerals and Waste Local Plan:</p> <p><i>The Development Plan also comprises The Kent Minerals and Waste Local Plan (KMWLP) 2013-2030 (adopted 2016, modified in 2020, <u>since subject to further review and currently subject to examination, the main modifications to the KMWLP having been subject to a public consultation in October/November 2024</u>)...</i></p>
Para 1.15	TWBC LP Policy for Southborough	It is suggested that this has a caveat added that the TWBC new Local Plan is subject to main modifications and public consultation in due course and therefore the policy could be amended.
Para 1.18 and sub-heading	High Weald Management Plan	This is still referred to as the High Weald AONB Management Plan (not the High Weald National Landscape Management Plan).
4. Spatial Strategy		
Para 4.3 - 3 rd bullet point	Reference to Brownfield Register	Note that TWBC updates the Brownfield Register on an annual basis. It might be helpful to include the general Brownfield Register webpage link to that so that the link remains up to date, rather than a link to the 2023-24 Brownfield Register

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		<p>(which has since been replaced by the 2024-25 Brownfield Register).</p> <p>This should also be changed in Section 16 – list of evidence/other documents.</p>
Figure 3	Limits to Built Development	Clarify whether this is the LBD proposed by the emerging Borough Local Plan or the current adopted LBD.
Policy SHB1	Criterion B)iii	To assist the reader, it would be helpful if the successor policy in the Submission Local Plan (SLP) is referenced.
5. Housing		
Para 5.5 and Policy SHB2 criterion A)ii and iii	Affordable housing tenure mix	<p>Tenure mix for affordable housing is proposed as 50/50 split between affordable home ownership and social rent. This conflicts with TWBC's SLP policy which proposes 60% social rent and 40% affordable home ownership.</p> <p>We would recommend a meeting with TWBC officers to discuss this difference in policy.</p>
Policy SHB2	Criterion A – housing size mix	<p>Sizes of market housing</p> <p>The Housing Needs Assessment has compelling evidence on affordability, (particularly paragraphs 1.9 – 1.14), that mean that the NDP may want to put more emphasis on the size of market and affordable housing. Of note is that the current median house price in the neighbourhood area is £425,000. The lower quartile price, which is a good proxy for entry level housing, is £325,000. Whilst this is slightly less than for Tunbridge Wells as a whole, with average household income in the neighbourhood area being £56,150 in 2020, and the lower quartile income per person being £20,835, affordability of housing is a problem for local people.</p> <p>The HNA found that local households on average incomes are unable to afford even entry level homes and the median house price would require an income of 94% above the current average.</p> <p>To assist with affordability, it is suggested that the number of large (i.e. 4+ bed) dwellings in new developments, is restricted to a low percentage of the overall site total, perhaps up to 5% of overall dwelling numbers. Para 1.32 of the Housing Needs Study notes that if the NDP are seeking to improve housing affordability then more 1 – 3 bed homes should be provided. Smaller 1 and 2 bed homes should also be designed to be accessible and adaptable to help meet the growing need for older persons housing.</p> <p>Size of Affordable Housing</p>

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		<p>Affordable and social rented housing should assist in meeting the needs of local people on the housing register and the sizes be determined by the numbers of households waiting. In general, affordable, and social rented housing should provide a mix of smaller one bed and family, three bed plus accommodation but up to date housing statistics should always be obtained from the TWBC affordable housing officer.</p> <p>However, being too prescriptive in terms of the sizes of housing, particularly market housing, runs a risk of housing sites not coming forward. Any policy on the size of housing units in should therefore be kept under review.</p>
Policy SHB2	Criterion C	<p>The commuted sum part of this policy criterion should be separate to the physical integration.</p> <p>The commuted sums part also needs strengthening and should refer to the 'exceptional circumstances' paragraph in the SLP Policy H3 and any future government guidance and testing on viability.</p>
Policy SHB2	Criterion A) iv.	<p>First Homes are no longer being promoted as an affordable housing tenure. Policy should refer to the NPPF definition Annex 2 - <i>'Other affordable routes to home ownership... includes low-cost homes for sale (at a price equivalent to at least 20% below local market level)'</i>.</p>
Para 5.6	Reference to exception sites	<p>Southborough is not a designated parish in The Housing (Right to acquire or enfranchise) (Designated Rural Areas in the Southeast) Order 1997 and would be too large population wise to be designated. This means that whilst rural exception sites can be developed, there is a risk of losing the housing through tenants exercising their Right to Acquire or through mutual exchange. These rights can only be restricted through the parish being listed as a 'designated protected area'. It is therefore suggested that the reference to exception sites is removed.</p>
6. Character, Heritage, and Design		
Policy SHB3	General comment on policy and supporting text	<p>This all looks very good but the policy wording itself could do with a little bit more of a framework to bring out the local distinctiveness in the guidelines.</p>
Policy SHB3	Criterion A	<p>Suggest adding 'to' after 'responds' in the first sentence, and 'appearance' to the list in the third sentence.</p>
Policy SHB3	Criterion B	<p>Applicants may need more direction to understand the direction of 'as appropriate to their scale, nature and location'. It may be worth including a table showing which guidance relates to which character area/use class/size of development.</p>

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Policy SHB3	Criterion B)i.	This provides a good reason to review the conservation area appraisal, which could be done in partnership with the Borough Council.
Policy SHB3	Criterion B)iv.	There should be a link to the guidance supporting this. Streets for a Healthy Life?
Policy SHB3	Criterion B)vi	How will 'unacceptable' be defined?
Policy SHB3	General	The policy works well in conjunction with the design guidelines but it also needs to stand on its own, hence the points above.
Pages 31-32	Policy SHB4 supporting text	Further evidence that may be useful - KCC produce a climate change risk and impact assessment for Kent , which highlights key projections for future Kent and Medway climate and findings on the impacts of these projections.
Para 6.16	Policy SHB4 supporting text	Note that TWBC consulted on a borough-wide Climate Change Strategy in summer 2024, which is due for adoption in early/mid-2025. This strategy sets out the Borough's approach to achieving net zero.
Policy SHB4	Criterion B	Reference to reduced embodied carbon through the use of sustainable building materials could be added to policy criterion B) ii or vi.
Policy SHB4	Criterion B	Reference could be made under policy criterion B) v. to the use of smart water butts as an adaptation measure to reuse water, whilst also reducing demand on the sewerage system during periods of high rainfall / extreme weather events.
Policy SHB4	General	Reference could be made to EV charge point provision or the future proofing of houses to allow for their installation. Urban greening could be considered through the use of green walls, roofs or bin storage sheds. Sustainable urban drainage (SuDS) could be referenced to help mitigate impact of surface water run-off and consequent discharges into the sewerage system.
Policy SHB5	Criterion B: list of non-designated heritage assets	It would be helpful if non-designated heritage assets 14 and 15 were named as brick pavements rather than just pavements to better relate to the supporting text and figures 6 and 7.
7. The Town Centre and Key Employment Sites		
Para 7.1	Economic Needs Study 2016 reference	It would be helpful to include the context for the Economic Needs Study 2016. It could just state that it was prepared as evidence for the Borough Local Plan.
Para 7.8	Reference to High Brooms neighbourhood centre	This paragraph could be deleted as it does not follow on from any mention of neighbourhood centres and is covered under paragraph 7.15
Para 7.10	North Southborough	At the end of the paragraph add in: <i>TWBC defines this as a Neighbourhood Centre (known as North Southborough).</i>

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	neighbourhood centre and connectivity with main High Street	The sentiment to link the main High Street with the other part of the old High Street is agreed. However, in practice how many people walk between the two areas? It operates more as a Neighbourhood Centre which is why it is defined as such in the SLP.
Para 7.11	High Street priorities	Not sure if the last bit is required from this bullet point: <i>'Supporting residential uses at first floor level and above (where this is accessible and adaptable to changing needs) <u>provided there is no adverse impact on the highway</u>'.</i>
Policy SHB6	References to town centre use classes	Appropriate town centre Sui Generis uses (e.g. pubs, music venues, theatres) could also be mentioned and could complement the cultural and creative ambitions of Policy SHB7.
Policy SHB6	Criterion C	This policy criterion is very restrictive when compared to the SLP policy and the national approach, and taking into account permitted development rights. This should be carefully considered and it may be helpful to add in some wording around permitted development rights.
Para 7.19	Creative Tunbridge Wells	Further explanation of what Creative Tunbridge Wells (CTW) is could be included. CTW is a strategic partnership including TWBC, KCC, Applause Rural Touring, Royal Tunbridge Wells Together (BID) and The Forum which have recently prepared a Creative Economy Strategy for Tunbridge Wells borough. CTW has formed a Southborough Working Group including representation from STC to explore opportunities for future cultural and creative activity in the neighbourhood area.
Para 7.20	References to Knot Works and Applause	The reference to Knot Work should be amended to Knot Works and the text about Applause should be amended as follows: In addition, Applause Rural Touring is based at the Civic Centre. Applause Rural Touring is a cultural charitable organisation with Arts Council England (ACE) National Portfolio status (NPO). Applause collaborates with people across Kent, Sussex, Essex and the wider south east to create opportunities for creative experiences in their local communities. Applause has trialled a year-long pilot family theatre programme at the Civic Centre and has recommendations for future activity.
Para 7.21		The Cultural Planning Toolkit (Creative Estuary/Kent County Council) should also be referred to.
Para 7.22		Suggest changing 'KCC recommends' to 'the Cultural Planning Toolkit recommends...' Suggest amending the reference to 'proposed proposals' (also in Criterion A of Policy SHB7).
Policy SHB7	Criterion A	See the comment above on amending the 'proposed proposals' wording. Is the requirement to produce and engage on a Cultural Wellbeing Action Plan appropriate for all development

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		proposals in the town centre? For instance, should this be required for householder applications in the town centre boundary?
Policy SHB8	Supporting text	It would be worth making reference to permitted development rights for home extensions/outbuildings in supporting text. (i.e. such proposals may not always require full planning permission).
Policy SHB8	Criterion A) i.	'within the town' should be clarified, does this mean within the defined town centre, or the town as a whole (i.e. the LBD), or the whole area of the Town Council?
8. Environment and Green Space		
Figure 10	Tree hierarchy	<p>Some species are contrary to the proceeding text being not native and some are highly unsuitable. There also seems to be some confusion on whether these are recommendations for street planting or rural areas, but the list fits neither and should be removed or revised.</p> <p>Individual comments on species: Laurel – this is a not street tree and is invasive in native woodlands causing loss of wildlife and ground flora. Pinus Nigra – a non-native suitable for parklands but why not the native pine – is this meant to be Pinus Sylvestris? English Elm – Only disease resistant varieties should be planted and only in small numbers Lawson and Leyland Cypress - non-native suitable for parklands and not streets or woodlands Lilac – not suitable and non-native</p>
Para 8.27	Reference to Local Green Spaces map	The paragraph refers to Figure 9 as showing the proposed LGS designations, when it should refer to Figure 12 (Figure 9 is the town centre boundary and neighbourhood centres map)
Policy SHB10	Proposed Local Green Space designations	<p>TWBC supports the majority of the proposed LGS designations being pursued through the NDP but questions whether LGS24 and LGS25 are demonstrably special due to their considerable distance away from the settlements in the neighbourhood area. Additionally, the Boot Fair at LGS25 is listed as reason for it being demonstrably special. The land is used as a Boot Fair under permitted development rights. This use could stop, and therefore, this reason for it being demonstrably special would no longer apply.</p> <p>Additionally, the list of proposed LGS designations notes where they are also proposed for designation in the SLP but misses a few off: LGS11 – this is essentially AS_83 in the SLP (albeit mapped slightly differently) LGS17 and LGS19 – together with LGS18 these form 238 in the SLP</p>

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9. Transport and Movement		
Para 9.1		Note that Local Transport Plan 5 – Striking the Balance was adopted by KCC in December 2024.
Para 9.2		The A26 AQMA was revoked in 2024.
Para 9.4		This paragraph could include a reference to the role of active travel in reducing carbon emissions and that it can also help to support local businesses.
Para 9.9		<p>The aspirations align with Policy STR6 in the Submission Local Plan for Tunbridge Wells which prioritises active travel and then public transport.</p> <p>Following the engagement on the Better Streets project, a decision has been taken to focus on a series of enhancement measures that were supported by local residents which would make the area safer for those walking, wheeling and cycling.</p>
Para 9.10		TWBC has been awarded further funding to explore opportunities to improve walking routes within Southborough and High Brooms as identified in the KCWIP Southborough Walking Zone.
Para 9.11		This paragraph references Figure 15 as illustrating the local walking opportunities findings from the Mapping Workshops and Community Survey. Figure 15 is 'Principles of the '20 minute' neighbourhood (source: TCPA)' should instead reference 'Figure 16: Public Rights of Way and potential improvements'.
Table 3	Table of potential walking improvements	<p>Ref 4 does not explain which recreation ground it is referring to.</p> <p>Ref 7: Access to High Brooms Station has been addressed to some extent in the Better Streets project and will be considered further within the funded Southborough Walking Zone project (commencing January 2025).</p>
Para 9.13		Note the Barnett's Wood Route is included in TWBC's LCWIP Phase 1.
Table 4	Table of potential cycling improvements	Ref 9: The A26 Cycle Route is a priority for TWBC and is included in the Borough Council's LCWIP Phase 2 document.
Figure 16	Public Rights of Way and potential improvements	<p>This map is referenced in Policy SHB13 but does not relate well to the policy, instead it relates more to the supporting text and the 20-minute neighbourhood aspiration. For instance, the public transport network is mentioned in criterion A, before the figure reference, but is not mapped. In contrast, features such as the (now revoked AQMA) and 20-minute walk zones are not mentioned in the policy but are mapped in the figure.</p> <p>Additionally, whilst the aspiration for 20-minute neighbourhoods is fully supported, it is unclear what benefit the red circles bring to the map. The policy is about improving</p>

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		<p>the walking, cycling and equestrian network, and not other aspects of 20-minute neighbourhoods, such as the location of services. It could be seen as active travel improvements outside of the circles (and where there is likely to be greater car dependency) as not necessary, which brings the question of why were those areas chosen and why is the northern end of Southborough excluded?</p> <p>Finally, there are a couple of improvements which should be made to the map key. The green line on the map is not in the key and it is not clear what this represents. What the numbers mean should also be added to the key as it is not obvious what they represent to someone who just reads the policy and then looks at the map without going through the supporting text.</p>
Policy SHB13	Criterion A	This criterion should refer to safe pedestrian and cycle routes.
Para 9.19	Policy SHB14 justification	The policy is about the provision of off-road parking, especially around high visitor use areas such as the High Street and High Brooms railway station. This paragraph at the beginning of the justification, whilst partially relevant as some residents will use these spaces as the primary parking place, sets the context of residents needing vehicles for journeys outside of their neighbourhoods.
Policy SHB14		TWBC notes that there is some contradiction between the ambition of this policy to create additional parking spaces and the ambition to enhance, and create additional, cycling and walking infrastructure in Policy SHB13.
10. Community Facilities		
Para 10.4	The TWBC Infrastructure Delivery Plan	Note that the TWBC IDP is a working document and is being updated and will be consulted upon through the Local Plan Main Modifications consultation.
Policy SHB15	Criterion A and B	<p>It would be helpful to add in reference to what types of facilities for teenagers as it is a bit vague to just state 'facilities for teenagers'.</p> <p>Criterion B could be deleted and incorporated into criterion A to include new and upgraded play areas for children.</p> <p>Would also suggest putting the wording from criterion B into the supporting text to the policy and changing '<i>in accordance with</i>' to having regard to the Tunbridge Wells Local Plan/Open space Study standards and adding in (or any subsequent guidance) (the use of 'having regard to' is something the Inspector mentioned on a number of occasions at the Tunbridge Wells Local Plan examination hearings (when making reference to guidance/supporting documents) and proposed modifications to the Local Plan will reflect this).</p>
Policy SHB15	General	Sport England take a keen interest on such criteria based policies about the loss of any sports facilities/space and the

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		SLP policy OSSR1 meets with their requirements. It would be worth referring back to the criteria within this policy and also consulting with Sport England on the proposed approach.
12. Infrastructure Improvements and Provision		
Para 12.1	Community Infrastructure Levy	TWBC does not currently have CIL. If the Government proceed with implementing the Infrastructure Levy from the Levelling Up and Regeneration Act 2023, TWBC will consider and action as necessary.
14. Policies Map		
	Policies map key	What are the purple triangles? Please check the map key to ensure it lists all items on the policies map.
	Shapefiles	Please submit the shapefiles prepared to produce these maps alongside the Regulation 15 submission of the NDP to the Borough Council (or following preparation of the referendum version of the Plan). Once the plan is made and if the shapefiles are provided, TWBC could host an interactive map displaying the spatial policies.
Appendix A Southborough and High Brooms Design Guidance and Codes		
Appendix A	Design Guidelines	This is very welcome and it is good to see the stakeholder engagement outcomes set out in the beginning. The wish to avoid 'out of context brickwork' is good to see.
Page 19	Figure 16	Just a suggestion, but the photo of Runcie Court for Salomons Estate obviously isn't the house itself so it may be misleading?
	Figure 19	If there is a house with vertical sliding sash windows intact, it would be preferable to show that instead of this house. Otherwise, picking up on the local distinctiveness in, for instance, the brickwork detailing and cartouches is supported.
Page 39		<p>There are likely to be more opportunities than those listed. For example, what about better enclosure in the built form of the junction of Yew Tree Green Road and London Road, which includes the former library site owned by KCC?</p> <p>Are there any buildings or spaces at risk which could be identified as opportunities, such as the old Water Margin restaurant?</p> <p>The threats section should give examples of the 'retrospective' applications.</p>
Page 42	General design consideration No 7	The word 'redevelopment' should be removed as it could imply demolition and rebuild. Conserving buildings should also be mentioned as well as just features.

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		The TWBC farmstead guidance could be referenced.
Page 48		<p>Why should front dormers be avoided? There are plenty of Victorian houses with them. They can be suitable provided they are mainly gable-ended rather than box or even hipped dormers.</p> <p>This page should be more specific with the materials. For instance, should the colour of the red brick be light coloured to mimic the stonework? Natural slate roof? Decorative chimney stacks?</p> <p>‘Natural clay tiles’ rather than clay pantiles.</p> <p>Roughcast was not traditionally white, but rather natural (so the colour of the aggregate). Presumably a white coloured finish is more desirable?</p>
LB04	Shop front image and illustrations	The image provided is not a traditional shop front and the proportions in the illustrations are not traditional. For example, see the figure in the supporting text of Policy EN 6 in the TWBC Submission Local Plan, where the supporting text also references the Victorian shop fronts on Silverdale Road.
	Guidance on conversion of shops and pubs	<p>The reference to article 4 directions is missing the 4.</p> <p>First bullet point – there are a few reasons why the shop fronts cannot be retained. For example, there are quite a few good conversion examples on Camden Road where the glazing is covered with opaque film.</p>
AM02	On-plot side or front parking - third bullet point	There are other ways of defining defensible space in addition to hedgerows, such as those noted in the boundary treatments section.
Checklist		The checklist needs to refer to the different categories (LB01, LB02 etc.) in the design guide. It all needs to be gathered together for ease of reference for the applicant and decision maker. Could it also be modified to use as a RAG assessment?
Supporting Evidence	Housing Needs Assessment	
Para 1.12	Income needed to afford to rent says £50,000 / £84,000 to buy	These figures should be clarified on what size dwelling they apply to and if the income figures are per annum.
Para 1.13	First Homes discount	First Homes are not supported in the new NPPF and therefore the discussion on discount should be around NPPF low-cost home ownership definition in NPPF.
Para 1.14	Affordability of affordable rented housing and social	This would benefit from defining what is meant by two ‘lower earners’. Also, would the ‘lower earners’ require subsidy through benefits to afford?

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	renting for couples and singles	
Para 1.20 -1.22	Deviation of affordable housing tenure policy from local plan.	As per the comment made under section 5 of the NDP, TWBC advises a meeting to discuss the difference in Local Plan and Neighbourhood Plan policy on affordable housing tenure mix.
Para 1.30	New development shouldn't provide 2 beds	The report suggests that there is an over supply of two beds but much of this is in the older market housing stock. There is likely a need for good quality, energy efficient two bed housing in both market and affordable sectors.
Para 1.41	Specialist affordable housing	<p>It is unclear whether this relates to all specialist affordable housing rather than just older persons specialist housing.</p> <p>If it is just older people and those with disabilities, then the SLP has a policy and the NDP can therefore just state it will meet the shortfall. However, the SLP does not have a section on all specialist housing (e.g. those with learning disabilities). It is suggested that shortfalls in specialist housing is informed by KCC studies of need, including for extra care housing. This should be reflected in Policy SHB2.</p>