

# **Local Plan Regulation 19 representations in document order**

## **Comments on Section 5: Place Shaping Policies: Horsmonden**

# **Local Plan Regulation 19 representations in document order**

**Comments on Section 5: Place  
Shaping Policies: Horsmonden: Policy  
PSTR/HO 1: The Strategy for  
Horsmonden parish**

## Comment

Consultee	Rose Harrild [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Brenchley [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Rose Harrild [REDACTED]
Comment ID	PSLP_349
Response Date	24/05/21 12:57
Consultation Point	Policy PSTR/HO 1 The Strategy for Horsmonden parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Rosemary Harrild
Question 3	
To which part of the Local Plan does this representation relate?	Paragraph(s)
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
PSTR/BM1	
PSTR/HOI	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	No
Is sound	No

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not consistent with national policy

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Policy PSTR/ BM1 Brenchley and Matfield Overview

5.479 Not enough weight is given to the Parish being within the High Weald AONB. Although it states a little more than 75% is in the AONB it is not highlighted as being an extremely important consideration for any planning application or proposed development. It should be stressed much more strongly as a major constraint. It should be worded "more than 75% is within the AONB"

PSTR/HOI Strategy for Horsmonden

Land w. of Fernandez Drive and South of Brenchley

5.482 This is an undeveloped site in the countryside. It is grassed fields and there are no buildings on the site.

5.484 It is IMMEDIATELY adjacent to The High Weald AONB boundary and is also next to Sprivers - an historic park and garden which is open to the public (not closed as stated)

5.591 It is completely wrong to propose to develop this site with 80-100 houses and a new village hall.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

#### Question 7a

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

To press the case that Brenchley and Matfield parish are more than 75% AONB and development is generally undesirable and inappropriate.

## Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

Yes, I wish to be notified of future stages of the Local Plan

## Comment

Agent	Darren White [REDACTED]
Email Address	[REDACTED]
Address	
Consultee	Darren White [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Horsmonden [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Darren White [REDACTED]
Comment ID	PSLP_412
Response Date	26/05/21 09:05
Consultation Point	Policy PSTR/HO 1 The Strategy for Horsmonden parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Darren White
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy PSTR/HO 1 The Strategy for Horsmonden parish

Question 4a

If you consider that the Local Plan is not sound, please answer this question.

**Do you consider that the Local Plan is not sound because:**

**Question 5**

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

The proposed numbers for Horsmonden will have a significant detrimental effect to the parish on a number of accounts: the loss of vital habitat and biodiversity due to the development on greenfield sites, the increase in traffic from the proposed 320 new properties, the endless construction impacts - both Horsmonden and Matfield have experienced developers breaching their construction management plans with regards to ecology and traffic. There also is insufficient infrastructure to support the proposed increase of properties. The site at Brenchley Road would be unsustainable as people cannot safely walk to the village centre, and the site at Bassetts Farm would be unsafe due to the high numbers of vehicles attempting to access Goudhurst Rd. Overall a number such as 100 would be realistic and acceptable.

**Question 7**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?** . Yes, I wish to participate in hearing session(s)

**Question 7a**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

The proposed numbers for Horsmonden will have a significant detrimental effect to the parish on a number of accounts: the loss of vital habitat and biodiversity due to the development on greenfield sites, the increase in traffic from the proposed 320 new properties, the endless construction impacts - both Horsmonden and Matfield have experienced developers breaching their construction management plans with regards to ecology and traffic. There also is insufficient infrastructure to support the proposed increase of properties. The site at Brenchley Road would be unsustainable as people cannot safely walk to the village centre, and the site at Bassetts Farm would be unsafe due to the high numbers of vehicles attempting to access Goudhurst Rd. Overall a number such as 100 would be realistic and acceptable.

## Comment

Consultee	Julie Davies [REDACTED]
Email Address	[REDACTED]
Company / Organisation	CPRE Kent
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	CPRE Kent [REDACTED]
Comment ID	PSLP_563
Response Date	28/05/21 11:51
Consultation Point	Policy PSTR/HO 1 The Strategy for Horsmonden parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	CPRE Kent
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
PSTR/HO1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes
Is sound	No



Complies with the Duty to Cooperate

Don't know

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not justified
- . It is not consistent with national policy

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

The supporting text recognises that while Horsmonden village is outside the AONB and green belt, it is within the setting of the AONB and is largely served by designated rural lanes. The sustainability appraisal notes that one of the main detractors from this settlement is the lack of local facilities and private car use dependency. Therefore, the increased vehicular traffic which will result from the provision of 240-320 new dwellings will have a seriously damaging effect on some of the historic rural lanes and further measures are needed to mitigate this.

We object to point 3 of the policy. Instead of merely requiring contributions to information boards and public art for the Hop Pickers Line, contributions should be required to enable the Hop Pickers line to become a green infrastructure corridor, which will provide an active travel route to Paddock Wood and its station, thus helping to mitigate the increased motor traffic on the historic rural lanes between Horsmonden and Paddock Wood that will result from an increase of 240-320 new dwellings.

Contributions should also be required to investigate and if appropriate fund a traffic calming solution for the narrow and historic Furnace Lane, which also has a high recreational and biodiversity value, and which will otherwise be used as part of a rat run to Paddock Wood.

#### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Revise point 3 to require contributions (financial or in kind) to enable the Hop Pickers Line to become a green infrastructure corridor.

Add a new point requiring contributions to investigate and if appropriate fund a traffic calming solution for Furnace Lane.

### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?**      Yes, I wish to participate in hearing session(s)

### Question 7a

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

To discuss the modifications proposed above

### Question 8

**If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.**

By failing to take account of the effect of the proposed new housing on the historic rural lanes, the Sustainability Appraisal underestimates the damaging effect of the proposed developments on landscape, heritage, travel and biodiversity. However, the modifications we propose would help to mitigate that damage.

We generally agree with the Council that the sites that are not proposed for allocation are not suitable.

### Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**      Yes, I wish to be notified of future stages of the Local Plan

# Supporting Information File Ref No: SI\_39

## Comment

Agent	Mr Roger Nightingale [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Kember Loudon Williams
Address	[REDACTED] [REDACTED] ROYAL TUNBRIDGE WELLS [REDACTED]
Consultee	Mr J Elliott [REDACTED]
Company / Organisation	J E Properties
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	J E Properties [REDACTED]
Comment ID	PSLP_579
Response Date	28/05/21 11:10
Consultation Point	Policy PSTR/HO 1 The Strategy for Horsmonden parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Files	<u><a href="#">PSLP_579_Kember Loudon Williams for J E Properties_site location plan.pdf</a></u>
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	J E Properties
Question 2	
Agent's Name and Organisation (if applicable)	Kember Loudon Williams
Question 3	

**To which part of the Local Plan does this representation relate?**

Policy

**Question 3a**

**Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.**

Policy PSTR/HO 1 The Strategy for Horsmonden parish

**Question 4**

**Do you consider that the Local Plan:**

Is sound

No

**Question 4a**

**If you consider that the Local Plan is not sound, please answer this question.**

**Do you consider that the Local Plan is not sound because:** . It is not effective

**Question 5**

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

*After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

The LBD for Horsmonden as shown on the Draft Inset Map for the village should include the land shown on the plan attached to these comments.

This land immediately abuts the existing LBD for the village. In addition, it forms part of the former route of the 'Hop Pickers Line', for which the Council is seeking to encourage initiatives that would enable it to be used as part of a "wider green infrastructure corridor".

In practical terms this land can never be reinstated as part of a public access corridor for recreational purposes based on the old hop pickers line for two main reasons. Firstly, it is in private ownership, and secondly the northern end of the land is enclosed and blocked by the rear gardens of two existing residential properties (Boundary Cottage and Maythorn). The Inset Map excludes part of the curtilages of these two properties, which is misleading. The path could not continue through this land to the north.

There is a public footpath running along the eastern side of this parcel of land, leading from Back Lane to the recreation ground to the north-east. From the recreation ground there is a link through to the B2162. While this footpath link exists, it is somewhat restricted in width and only of basic standard, and there would be an opportunity to significantly enhance it if some of the adjoining former route of the railway line were used. This could then link into the new public access route proposed for the former railway land to the south, which is part of one of the proposed housing allocations for Horsmonden.

If the land shown on the attached plan were to be included in the LBD for the village a limited number of dwellings could be provided to help meet the housing need for the area, and at the same time a key link within the Hop Pickers line strategic corridor could be safeguarded and greatly enhanced. This a

much more positive initiative and would achieve more planning benefits for the village than the unsound approach currently proposed

[TWBC: see site location plan attached]

For office use only

**New Site Submission? Enter site address**

former railways land Horsmonden

#### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please see comments set out above.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?**

No, I do not wish to participate in examination hearing session(s)

#### Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

Yes, I wish to be notified of future stages of the Local Plan

## Comment

Consultee	Dr Ian Anderson [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] BRENCHLEY [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Dr Ian Anderson [REDACTED]
Comment ID	PSLP_830
Response Date	29/05/21 11:13
Consultation Point	Policy PSTR/HO 1 The Strategy for Horsmonden parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Ian Anderson
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

**Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.**

Policy PSTR/HO 1 The Strategy for Horsmonden parish

**Question 4a**

**If you consider that the Local Plan is not sound, please answer this question.**

**Do you consider that the Local Plan is not sound because:**

## Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Horsmonden local plan

The development proposals for this village are now in the very advanced stages and from my perspective whatever argument has been proposed has been totally ignored.

In your missive detailing the present situation it is full of reasons why further development is impractical. You mention the bus service to Tunbridge Wells, it may run as described, but try getting a return at a convenient time. As for commenting on the public transport to Maidstone,, has anyone actually done this return journey?

You mention the stretched education, medical and youth facilities; the developers offer a few square metres so these can be improved and rectify the problem but their overall proposals will rip the heart out of this community.

Finally, the main, totally impractical reason for these proposals is the traffic and parking, to ignore these deficiencies is totally crass. Suggesting putting approximately 200houses shows lack of thought and total greed. People live in villages for the warmth and local companionship, if they wanted to live like battery chickens they could live in a town or city. The failure to recognise the congestion these proposals exhibit demonstrate and basic lack of understanding , extraordinarily, a fleeting visit by the Planners would not show the complete picture. Of course I understand there is a need for new houses, wrecking the infrastructure of villages to sate greed and tick boxes is hardly the right way to satisfy this problem. There have been notices already threatening double yellow lines along Gibbet Lane. Cars parked in Furnace Lane make that narrow already and is frequently used as a "rat run" to Paddock Wood station. It's an accident waiting to happen.

Finally it is noted that the hedgerows are to be preserved, this will be very closely monitored.

## Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?**

For office use only

**If responder hasn't ticked an option on this box, data inputter to tick 'not stated' box.** Not Stated

## Supporting Information File Ref No: SI\_49a-b

### Comment

Agent	Mr Gary Mickelborough [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Bloomfields
Address	77 Commercial Road PADDOCK WOOD TN12 6DS
Consultee	[REDACTED] [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Rosconn Strategic Land
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Rosconn Strategic Land [REDACTED]
Comment ID	PSLP_847
Response Date	01/06/21 14:10
Consultation Point	Policy PSTR/HO 1 The Strategy for Horsmonden parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Files	<a href="#">PSLP_847 &amp; 850-852 Rosconn SI 2 and 3.pdf</a> <a href="#">PSLP_847 &amp; 850-852 Rosconn SI 1.pdf</a>
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Rosconn Strategic Land
Question 2	
Agent's Name and Organisation (if applicable)	Bloomfields



### Question 3

To which part of the Local Plan does this representation relate? Policy

#### Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy PSTR/HO 1 The Strategy for Horsmonden parish

### Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	No
Complies with the Duty to Cooperate	Yes

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not effective
	. It is not justified
	. It is not consistent with national policy

### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Rosconn Strategic Land (RSL) is promoting land south of Benchley Road, Horsmonden ("the Site") for residential development and a new village hall. It is welcome that the Pre-Submission Local Plan ("the Plan") proposes to allocate this site for development and it is in this context that RSL wishes to express its general support for the Plan's strategy for Horsmonden.

Draft Policy PSTR/HO 1 sets out the Plan's ambitions in respect of Horsmonden which is based on the provision of between 240 and 320 new dwellings over the plan period. RSL supports the apportionment of this level of growth to the village as it will help deliver the Plan's strategic objective of improving infrastructure, local services and amenities in line with community needs and to ameliorate the loss of Green Belt and encroachment within the Area of Outstanding Natural Beauty in order to meet development needs.

As the Draft Policy recognises, development in Horsmonden brings the need to mitigate impacts on local infrastructure including medical, education and recreation provision. We consider that these requirements have been informed by a comprehensive understanding of local infrastructure needs as set out in the Infrastructure Delivery Plan (IDP). However, as is recognised within paragraph 5.593 of the Plan's supporting text, the Site will deliver land for a new village hall in order to address an identified

local need by Horsmonden Parish Council for this facility. In addition to providing the land for the new village hall, the Site can also provide a proportionate capital contribution. For the reasons set out in RSL's representations to Draft Policy AL/HO 2, however, it is also necessary for other sites allocated in the village to make financial contributions towards the new village hall in order to mitigate the impact of these sites on community provision. RSL would note that the Borough Council has already secured a financial contribution towards the provision of a new village hall under planning permission reference 18/01976/FULL in relation to 49 dwellings at Gibbet Lane/Furnace Lane, Horsmonden. The contribution other sites should make towards the provision of the new village hall should be expressly recognised by Draft Policy PSTR/HO 1 since it is a key local ambition and one that should be delivered through new development in a comprehensive manner.

Given the above, RSL has requested a modification to Draft Policy PSTR/HO 1 as set out below to recognise the need for a new village hall and requirement for sites coming forward in the village to contribute towards its provision.

## Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

- 1 Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of:
- 1 a replacement village hall and associated parking.

## Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?** Yes, I wish to participate in hearing session(s)

## Question 7a

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

Rosconn Strategic Land is promoting Land South of Brenchley Road, Horsmonden for development and is seeking changes to Draft Policy PSTR/HO 1. Rosconn Strategic Land requests participation in the hearing sessions in order to contribute to discussions in relation to this Draft Policy and to articulate its case for suggested changes as well as to address any relevant points raised by the Local Planning Authority, the Inspector or by stakeholders.

## Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

Yes, I wish to be notified of future stages of the Local Plan

## Comment

Consultee	Cynthia Kirk [REDACTED]
Email Address	[REDACTED]
Address	
Event Name	Pre-Submission Local Plan
Comment by	Cynthia Kirk [REDACTED]
Comment ID	PSLP_1180
Response Date	04/06/21 10:10
Consultation Point	Policy PSTR/HO 1 The Strategy for Horsmonden parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Question 3	

To which part of the Local Plan does this representation relate? Policy

### Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy PSTR/HO 1 The Strategy for Horsmonden Parish

### Question 4

Do you consider that the Local Plan:

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	Don't know

### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	. It is not positively prepared
	. It is not effective

- . It is not justified
- . It is not consistent with national policy

### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

I am not against some expansion of house building. The Government's National Planning policy allows for "limited infilling in villages" which I would not oppose, although the proposed development across the area is not fairly distributed. However, I am strongly opposed to the scale of the proposed developments in Horsmonden which would increase the number of houses potentially by 320 and would completely alter the character of our village and make the traffic problems much more severe. As Horsmonden already has a notable danger spot at the crossroads in its centre (with many near misses as outlined on the SE News) the substantial increase in traffic necessitated by the huge influx in residents living in the proposed housing developments could cause significant health and safety issues.

The infrastructure is not suitable to support the proposed increase of properties. The roads leading from the centre of Horsmonden village are minor roads, which are narrow and have many dangerous bends with poor sight lines. E.g. Access onto the Goudhurst Road by potential residents and school traffic at the site HO3 would be problematical. The inadequate roads simply cannot safely sustain the amount of traffic which would be generated if all these houses were built. Further health and safety issues would be caused by the lack of continuous footpaths (especially on blind bends) along the roads out of Horsmonden village to the proposed new developments at HO2 and HO3 with little availability to develop these.

The proposed developments at HO2 and HO3 would involve a significant loss of trees with HO3 in particular having a significant number of established and mature trees. The natural open countryside views in these sites would be lost forever to the detriment of us and our future generations.

Both of these developments are mostly planned to be built on good quality agricultural land. HO2 is next to Sprivers which is an area of natural beauty designated for the local people providing them with essential recreational opportunities and is an important habitat for wildlife. It would be greatly affected by the development of the significant number of houses proposed to be built adjacent to it.

### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Plans to develop on sites HO2 and HO3 need to be reconsidered in light of the above.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?** . No, I do not wish to participate in examination hearing session(s)

#### Question 8

**If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.**

There is also the issue that Horsmonden does not have an adequate public transport system and employment opportunities are limited so any additional residents living in the new developments would be dependent on traveling anywhere by car which is unacceptable in so many ways, especially environmentally. The bulk of the housing development in the plan will not contribute to Horsmonden's economic growth as people will have to work away from the village. The proposal of building a new primary school at the eastern edge of the village to cope with the increased number of children does not appear to have fully examined other options for the better use of the existing site.

## Comment

Consultee	Ms Alison Burchell [REDACTED]
Email Address	[REDACTED]
Company / Organisation	NHS Kent and Medway Clinical Commissioning Group
Address	[REDACTED] [REDACTED] Ashford [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	NHS Kent and Medway Clinical Commissioning Group [REDACTED]
Comment ID	PSLP_1568
Response Date	04/06/21 09:16
Consultation Point	Policy PSTR/HO 1 The Strategy for Horsmonden parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	NHS Kent and Medway Clinical Commissioning Group
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

**Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.**

Policy PSTR/HO 1 The Strategy for Horsmonden parish  
Paragraph Number: 5.563

[TWBC: this representation has been input against Policies AL/RTW 8, AL/RTW 15, STR/CRS 1, AL/HA 5, STR/SS 3, PSTR/HO 1, PSTR/BM 1, STR/SS 1, PSTR/GO 1 and AL/HO 3– see Comment Numbers PSLP\_1550, PSLP\_1551, PSLP\_1552, PSLP\_1553, PSLP\_1556, PSLP\_1568 PSLP\_1570, PSLP\_1554, PSLP\_1559 and PSLP\_1569]

#### Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	Yes
Complies with the Duty to Cooperate	Yes

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

I can confirm that the CCG has been engaged in the local plan development process in order to assess implications for primary medical care provision. The impacts are set out in the IDP and will be regularly reviewed and updated in line with the CCG's GP Estates Strategy. The following comments are provided on specific policies in relation to general practice provision for completeness.

#### Horsmonden

**Horsmonden Overview**5.563 The Howell Surgery provides main general medical service provision for the parish and has premises in Brenchley (main) and Horsmonden (branch). The existing premises do not have capacity to accommodate the estimated growth of registered patients within Horsmonden and Brenchley and Matfield. To meet the increased demand identified, land has been identified and safeguarded for the provision of a new health centre/doctors surgery has been identified as part of a wider development of Policy AL/HO 3: Land to the east of Horsmonden (at Horsmonden village). This will serve the wider area, including the parish of Brenchley and Matfield.

Comments (Horsmonden, Brenchley and Matfield): To clarify the delivery of services from a single site for the practice population has not been considered at this time. The CCG has highlighted that an allocation or safeguarding of land for a doctors practice in Horsmonden may be required to ensure delivery of required infrastructure in the future. It is however important to stress that a more detailed discussion and assessment is required in this area to define any future requirements; specifically noting that the majority of housing growth proposed in Horsmonden is expected in the latter part of the plan period.



The statement regarding safeguarding of land for a new health centre in Policy AL/HO3 is noted as an opportunity to inform the planning for primary medical care services in the area.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?**

No, I do not wish to participate in examination hearing session(s)

#### Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

No, I do not wish to be notified of future stages of the Local Plan

# Supporting Information File Ref No: SI\_104a-d

## Comment

Agent	Christopher Sampson [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Kember Loudon Williams
Address	[REDACTED] [REDACTED] Tunbridge Wells [REDACTED]
Consultee	[REDACTED]
Company / Organisation	Wedgewood (New Homes) Ltd
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Wedgewood (New Homes) Ltd [REDACTED]
Comment ID	PSLP_1804
Response Date	04/06/21 14:36
Consultation Point	Policy PSTR/HO 1 The Strategy for Horsmonden parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">PSLP_1803-1804_KLW_for_Wedgewood_Ltd_SI-1_Appendix_1_Highways_Technical_Note.pdf</a> <a href="#">PSLP_1803-1804_KLW_for_Wedgewood_Ltd_SI-2_Appendix_2_Illustrative_Layout.pdf</a> <a href="#">PSLP_1803-1804_KLW_for_Wedgewood_Ltd_SI-3_Appendix_3_Heritage_Impact_Statement.pdf</a> <a href="#">PSLP_1803-1804_KLW_for_Wedgewood_Ltd_SI-4_Appendix_4_KLW_Reg_18_Report.pdf</a>
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Wedgewood (New Homes) Ltd
Question 2	

Agent's Name and Organisation (if applicable) Kember Loudon Williams

### Question 3

To which part of the Local Plan does this representation relate? Policy

### Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy PSTR/HO 1 The Strategy for Horsmonden parish

Policies Map (Inset Map No(s)) 26

### Question 4

Do you consider that the Local Plan:

Is legally compliant No

Is sound No

Complies with the Duty to Cooperate No

### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not positively prepared
- . It is not effective
- . It is not justified
- . It is not consistent with national policy

### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Objection to draft policy PSTR/HO1 for Horsmonden.

The Plan is not legally compliant because insufficient consideration has been given towards the meeting of housing needs in adjoining authority areas and delivering sufficient small and medium sites to ensure the housing trajectory can be delivered. As such it has in our view resulted in a Plan which is unsound and does not properly comply with the duty to cooperate. As a result of the lack of overall housing allocations as well as an over emphasis on large strategic sites, not maximising suitable smaller and medium sized sites that are available, the Plan cannot be said to be effective or consistent with National Policy. This explained in more detail in our representations on Policy STR1.

The overarching deficiencies have filtered down to the local level. Although a modest increase in housing numbers in Horsmonden has occurred, compared with the reg. 18 plan, this is below the

suggested uplift made in our reg. 18 representations on this site, and does not include this site within the proposed site allocations. Opportunities for suitable sites to be delivered outside of the AONB should be optimised, in order to help bolster overall delivery – especially on medium sized sites that can be delivered early in the plan period.

Furthermore, a large proportion of the overall provision under this Policy is dependent on one strategic site, AL/HO3, which is a very large scale site extending the form and extent of the village significantly eastwards. This is in contrast to the site at land south of Goudhurst Road, which represents a far more modest and natural rounding off of the village. A strategic site with landscape challenges and community and educational requirements is likely to have a longer lead time than more modestly sized sites.

Additionally, there is acknowledged landscape sensitivity at AL/HO3 (see para. 5.604 of the draft Local Plan) which means lower densities may need to be adopted at the fringes of the site, therefore the total quantum of housing delivery accruing from this proposed housing allocation is very uncertain – leading to a wide range of potential housing numbers delivered from AL/HO3 (115-165 units, a range of some 50 units). There is also a fairly wide range of potential housing numbers at site AL/HO2 (80-100 units), which is the other significant contributor to the housing numbers for Horsmonden within PSTR/HO1. The combined effect is that the overall range of housing numbers given for Horsmonden under PSTR/HO1 is very broad ranging from 240-320 housing units.

Accordingly, given these uncertainties on both quantum and timing, it is considered there is scope to increase the overall upper end of the range of housing delivery in Horsmonden by a further 35 units. This is a modest level of uplift which will optimise the opportunities to deliver housing outside of the AONB and MGB constrained areas, and at the same time mitigating the risk of delivery in the village towards the lower end of the identified ranges on the two larger sites suggested for allocation, as well as helping re-balance the larger sites with smaller allocations. This will help support a smooth housing trajectory, rather than a risk of ‘backloading’.

It is therefore submitted that the land south of Goudhurst Road site be included as an additional residential allocation, under a suggested new Policy reference AL/HO4, for approximately 35 units.

The Council's Sustainability Assessment and SHELAA report revealed that the site scored favourably in comparison to the great majority of the reasonable sites in the village, and the potential concerns raised concerning access and landscape impacts have been comprehensively dealt with in this and previous submissions.

The ADAS Landscape Statement confirms that the site has a low visual value and is of medium/low sensitivity to residential development. The regulation 18 site assessment prepared by ourselves is attached by way of information – with the Landscape and Transport information submitted at that stage enclosed. These representations should be read in conjunction with this information, which set out further context regarding the credentials of the site.

At the time of the reg. 18 representations, there were two potential alternative access solutions. The deliverability of the site has further improved as the site access from Goudhurst Road, along with the rest of the site, is now under the sole control of our client.

Additional feasibility work has been undertaken recently in order to confirm that access is achievable from Goudhurst Road – this removes the potential uncertainty regarding site access. A site access report / technical note has been prepared to support these regulation 19 submission – this has been prepared by GTA Civils and is attached herewith. In summary, this concludes:

- There is a low level of recorded accidents on the local highway network, with only 1 slight injury accident in the last 5 years within 200m of the site;
- The site is in a sustainable location – local retail, education, leisure and health facilities are all located within close proximity to the site;
- Visibility splays have been confirmed on an access drawing to the standard required in a 30mph speed limit area – the required splays being 2.4m x 43m
- A 2m wide footway will adjoin the site to the existing footway to the northern side of Goudhurst Road, via an uncontrolled crossing point with a dropped kerb and tactile paving. This will connect the site to the village centre.
- Vehicle trip generation has been calculated, and will be low during the A.M and P.M peaks (17 two way vehicle trips in each), which will not represent a severe impact on the local highway network.

- Overall, the report demonstrates access and internal circulation and vehicle parking can be achieved in accordance with relevant standards and that there are no unacceptable highway or transport impacts resulting from the proposed development.

In addition to the previous KLV site submission report and enclosed Landscape and Transport submission, we also attach the illustrative layout for the site. This has been prepared taking into account appropriate advice from the wider project team, including ecologists, landscape and transport consultants as well as a professional heritage specialist.

The layout takes account of the need to retain key views from the Conservation Area through to the surrounding landscape, and is assessed as having a cumulatively neutral impacts upon the Conservation Area and preserve the settings of nearby Listed Buildings (see conclusions of the attached Assessment of Significance and Heritage Statement prepared by DGC Architectural and Historic Building Consultants). This assessment takes account of the need to demolish the garage to Bucklers which is stated to be a modern addition.

The Heritage Assessment states, on page 20:

*“Due to the low density of the proposed development on the southern half of the site and the proposed landscaping scheme with enhanced planting, any views looking north would result in sections of the built form interspersed with mature planting. This would create a sense of a semi-rural openness akin to the character of the conservation area, rather than a typical suburban development, and provide a transition between the village settlement and open countryside”.*

It is therefore considered that the positive credentials of the site are very clear, and the site is suitable, available and deliverable.

*[TWBC: the below text is from the covering email sent by KLV to TWBC; for appendices, please see supporting documents]*

we also attach the following documents in support of the representations made in respect of PSTR/HO1 and in particular, demonstrate the deliverability and strong credentials of the site at Land south of Goudhurst Road, Horsmonden:

- . Appx 1: Highways Technical Note / Report (by GTA Civils)
- . Appx 2: Illustrative Site Layout drawing
- . Appx 3: DGC Heritage Assessment
- . Appx 4: KLV regulation 18 report which set out information regarding the site that remains relevant – with ADAS Landscape Report attached within the appendices

## Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Modify PSTR/HO1 and inset map 26 as follows:

Criterion 1: Text to remain the same, but amend inset map 26 to include all but the south eastern corner of the site within the revised Limits to Built Development (LBD) for the village. The south-eastern corner of the site is to be left as an open space with landscaping.

Criterion 2: Amend the upper end of the range of units by 35 housing units, to 355 new dwellings and reference an additional allocation policy (AL/HO4) for Land South of Goudhurst Road, Horsmonden.

No changes to be made to criteria 3 and 4.

This is a modest level of uplift which will optimise the opportunities to deliver housing outside of the AONB and MGB constrained areas, and at the same time mitigating the risk of delivery in the village towards the lower end of the identified ranges on the two larger sites suggested for allocation, as well as helping re-balance the larger sites with smaller allocations. This will help support a smooth housing trajectory, rather than a risk of 'backloading'.

Policy AL/HO4 to be added to the plan for the provision of up to 35 residential dwellings which would include requirements as follows:

- To retain and enhance the existing landscape structure and retain the open view south from the site entrance at Goudhurst Road;
- The design and layout to give consideration to the edge of settlement location and the setting of the Conservation Area;
- The site to provide an area of open space at the south-eastern corner linking into the existing footpath network
- Incorporation of 40 per cent affordable housing on-site.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?** . Yes, I wish to participate in hearing session(s)

#### Question 7a

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

Wedgewood New Homes and Kember Loudon Williams wish to preserve the right to participate in order to address the issues around soundness, overall housing numbers, and the balance of strategic and smaller sites, and furthermore to promote this additional site in order to help re-balance the Plan; optimising housing delivery outside of the AONB and on smaller sites.

#### Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:** Yes, I wish to be notified of future stages of the Local Plan

# Supporting Information File Ref No: SI\_99

## Comment

Agent	Ryan Johnson [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Turley
Address	[REDACTED] Southampton [REDACTED]
Consultee	[REDACTED]
Company / Organisation	Taylor Wimpey UK Ltd
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Taylor Wimpey UK Ltd [REDACTED]
Comment ID	PSLP_1824
Response Date	04/06/21 09:57
Consultation Point	Policy PSTR/HO 1 The Strategy for Horsmonden parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Files	<a href="#">PSLP_1772-1828 (not inclusive)_Turley for Taylor Wimpey_SI.pdf</a>
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Taylor Wimpey
Question 2	
Agent's Name and Organisation (if applicable)	Turley
Question 3	

To which part of the Local Plan does this representation relate?

Policy

#### Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy PSTR/HO 1 The Strategy for Horsmonden parish

*[TWBC: this representation has been input against the Pre-Submission Local Plan as a whole, Policies STR 1, STR 7, STR/SS 1, STR/SS 3, STR/CRS 1, AL/CRS 3, PSTR/HO 1, EN 2, EN 9, EN 14 and EN 26– see Comment Numbers PSLP\_1772, PSLP\_1813, PSLP\_1818, PSLP\_1819, PSLP\_1820, PSLP\_1821, PSLP\_1823, PSLP\_1824, PSLP\_1825, PSLP\_1826, PSLP\_1827, and PSLP\_1828. The full representation has been attached as Supporting Information]*

#### Question 4

Do you consider that the Local Plan:

Is legally compliant

No

Is sound

No

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

#### **TUNBRIDGEWELLS PRE-SUBMISSION LOCAL PLAN (REGULATION 19) CONSULTATION LAND WEST OF FRYTHE WAY, CRANBROOK (SHELAA REF: 25)**

Thank you for the invitation to comment on the above consultation. We write on behalf of our client, Taylor Wimpey UK Ltd, who control land west of Frythe Way, which abuts the south eastern edge of Cranbrook (SHELAA Site Ref: 25).

We have examined the Pre-submission Local Plan (PSLP) and conclude that as drafted it is neither legally compliant, nor sound. The Council's Sustainability Appraisal (TWBC, 2021) concludes Option 13 (The Pre-Submission Local Plan) to be an 'appropriate strategy'. We are unable to reach the same conclusion, as the SA has not first taken into account 'reasonable' alternative strategies, contrary to paragraph 35 of the NPPF and the corresponding SEA Regulations.

We also conclude that Tunbridge Wells Borough Council's (TWBC) statutory Duty to Cooperate under Section 33A of the 2004 Act has not been discharged. The Council has not in our view demonstrated that there has been active, constructive or on-going engagement with adjoining authorities, including Sevenoaks District Council (SDC), in respect of known unmet housing needs. Nor has an effective



strategy been put in place between the authorities to address such needs. The justification drawn from the SA process that TWBC are unable to assist SDC is contested. Distributing such unmet needs solely in line with SA Option 9 (Dispersed Countryside) is not a reasonable alternative in our client's opinion. It serves only to support a pre-determined outcome to select Option 13 (Pre-Submission Local Plan) as the 'appropriate strategy'.

In addition, the site selection process that flows from the SA (TWBC, 2021) and SHELAA (TWBC, 2021) contains notable errors and inconsistencies, which appear to have contributed significantly to the omission of more suitable and sustainable sites in favour of those proposed in the PSLP.

The quantum of growth proposed in the PSLP, and the over reliance placed on two large strategic sites to deliver between 67-69% of newly allocated supply is also questioned. In relation to the first, we contend adjustments are required to the overall housing requirement to both reduce the evident shortfall in affordable homes, and to assist adjoining authorities with known and growing unmet housing needs. We contend this is particularly important given three of the adjoining LPAs have been reported on as failing to discharge their statutory duty to cooperate, with their Local Plan's either withdrawn or delayed as a consequence. In addition, the Secretary of State for Housing, Communities and Local Government has confirmed there are significant unmet and mounting housing needs requiring collaborative action with London within the next five years. All of which highlights how important it is for the emerging TWBC PSLP to be positively prepared.

Turning to the second issues, we outline concerns over the justification for, lead in times and annual yields purported for the two strategic sites. It is our contention that these are unrealistic, and are contrary to leading evidence bases published for sites of this scale. As a consequence, we suggest the quantum of growth envisaged will not come forward as fast or at the rates envisaged, nor will it be delivered within the plan period. We accordingly recommend additional allocations are made to compensate for this shortfall, in sustainable locations that are capable of being delivered in the first five years of the plan period. We outline concerns in relation to TWBC's land supply assumptions in this period to evidence such a need.

We also outline concerns over the quantum of growth directed to certain locations and settlements. We contend these proposals are unlikely to support the climate change objectives set out in Policy ST7 of the PSLP. Our client supports the justification for and benefits of strategic growth at Cranbrook, ranked 2nd in the Settlement Role and Function Study (TWBC, 2021). In this respect, our client's site (Site 25) represents a modest proposal for 70 homes that is well contained by woodland, is partly within the settlement, has good accessibility to the high street and other facilities by foot (far better than some of those chosen for allocation), and no other overriding constraints to development. We set out in detail the factual errors, inconsistencies and missing evidence in our comments on the SA and SHELAA process below, which has thus far led to the omission of this site for allocation.

Our client continues to respectfully purport the justification for and benefits of this site's allocation. This includes the sharing of an emerging vision for the future of this site (See Document A); and confirmation from Kent County Highways there are no overriding highway constraints to the delivery of the site (see Document B). The land required to deliver the proposed development, its accompanying infrastructure and community benefits is in the control of Taylor Wimpey. It is available for development now, can be delivered well within five years and is considered a suitable and logical location to direct some of the future growth needed at Cranbrook. The emerging vision document appended confirms there to be no known overriding constraints to the delivery of these proposals.

Given the nature and detail of our representations, specifically in relation to the plans legal compliance and soundness, we would respectfully request attendance to participate in the examination of the PSLP. In the interim, the following representations are made to assist the Council and Inspector in their examination of the PSLP.

## **Soundness**

### **PSTR/HO1 – Strategy for Horsmonden Parish**

For avoidance of repetition, see our comments on Policy STR7. The quantum of growth proposed at this village is not commensurate with its sustainability rank in Table 5 of the Settlement Role and Function Study (TWBC, 2021). Growth should be reduced to that which is commensurate with the village's sustainability, assisting the Council in fostering more sustainable travel patterns and adherence to Policy STR7. The deficit should be directed to more sustainable settlements, such as Cranbrook.

We trust these comments are useful and duly noted. We would welcome the opportunity to elaborate on such matters at the forthcoming Examination into the subsequently submitted version of this Plan.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?** . Yes, I wish to participate in hearing session(s)

#### Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:** Yes, I wish to be notified of future stages of the Local Plan

## Supporting Information File Ref No: SI\_156

### Comment

Consultee	Strategic Planning ( [REDACTED] )
Email Address	[REDACTED]
Company / Organisation	Kent County Council (Planning and Environment)
Address	Invicta House County Hall MAIDSTONE ME14 1XX
Event Name	Pre-Submission Local Plan
Comment by	Kent County Council (Planning and Environment) ( Strategic Planning - [REDACTED] )
Comment ID	PSLP_2214
Response Date	04/06/21 16:56
Consultation Point	Policy PSTR/HO 1 The Strategy for Horsmonden parish ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Files	<a href="#">Kent County Council-full representation.pdf</a>
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Kent County Council (Growth, Environment & Transport)
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	Policy PSTR/HO 1 The Strategy for Horsmonden parish

[TWBC: see attached full representation, which has been input against the following: Section 1 (PSLP\_2164), Section 2 (PSLP\_2168), Section 3 (PSLP\_2169), Policies STR1 (PSLP\_2170), STR2 (PSLP\_2171), STR4 (PSLP\_2172), STR5 (PSLP\_2174), STR7 (PSLP\_2175), STR8 (PSLP\_2176), Section 5 (PSLP\_2177), Section 5: Royal Tunbridge Wells (PSLP\_2178), Policies AL/RTW1 (PSLP\_2180), AL/RTW5 (PSLP\_2181), AL/RTW7 (PSLP\_2183), AL/RTW14 (PSLP\_2184), AL/RTW17 (PSLP\_2185), AL/RTW21 (PSLP\_2187), STR/SO1 (PSLP\_2188), AL/SO1 (PSLP\_2190), Strategic Sites (PSLP\_2192), STR/SS1 (PSLP\_2193), STR/SS2 (PSLP\_2195), STR/SS3 (PSLP\_2196), STR/PW1 (PSLP\_2199), AL/PW1 (PSLP\_2200), STR/CA1 (PSLP\_2201), AL/CRS1 (PSLP\_2202), AL/CRS2 (PSLP\_2203), AL/CRS3 (PSLP\_2204), AL/CRS4 (PSLP\_2205), AL/CRS6 (PSLP\_2206), AL/CRS7 (PSLP\_2207), STR/HA1 (PSLP\_2208), PSTR/BE1 (PSLP\_2209), PSTR/BI 1 (PSLP\_2210), PSTR/BM1 (PSLP\_2211), PSTR/FR1 (PSLP\_2212), PSTR/GO1 (PSLP\_2213), PSTR/HO1 (PSLP\_2214), AL/HO1 (PSLP\_2215), PSTR/LA1 (PSLP\_2216), AL/LA1 (PSLP\_2217), PSTR/PE1 (PSLP\_2218), AL/PE4 (PSLP\_2219), PSTR/RU1 (PSLP\_2220), PSTR/SA1 (PSLP\_2221), AL/SA1 (PSLP\_2222), PSTR/SP1 (PSLP\_2223), EN1 (PSLP\_2224), EN3 (PSLP\_2225), EN4 (PSLP\_2226), EN5 (PSLP\_2227), EN8 (PSLP\_2228), EN9 (PSLP\_2229), EN10 (PSLP\_2230), EN12 (PSLP\_2231), EN13 (PSLP\_2232), EN14 (PSLP\_2233), EN18 (PSLP\_2234), EN19 (PSLP\_2235), EN20 (PSLP\_2236), EN25 (PSLP\_2237), EN26 (PSLP\_2238), H1 (PSLP\_2239), H3 (PSLP\_2240), H7 (PSLP\_2241), ED1 (PSLP\_2242), ED2 (PSLP\_2243), ED3 (PSLP\_2244), ED4 (PSLP\_2245), ED5 (PSLP\_2246), ED6 (PSLP\_2247), Town, Rural Service, Neighbourhood, and Village Centres (PSLP\_2248), Policies TP1 (PSLP\_2249), TP2 (PSLP\_2250), TP3 (PSLP\_2251), TP4 (PSLP\_2252), TP5 (PSLP\_2253), TP6 (PSLP\_2254), OSSR1 (PSLP\_2255), Appendix 4 (PSLP\_2256) and Evidence Base (whole Plan) (PSLP\_2257)

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

#### Public Rights of Way

The County Council requests that the policy includes reference to the need for appropriate development contributions to be made towards improvements to the PRow network to provide Active Travel opportunities in the area.

#### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

#### **Question 7**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?**

#### **Question 7a**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

The County Council may wish to attend hearing sessions in respect of its statutory and non statutory functions.

#### **Future Notifications**

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

Yes, I wish to be notified of future stages of the Local Plan

# **Local Plan Regulation 19 representations in document order**

**Comments on Section 5: Place  
Shaping Policies: Horsmonden: Policy  
AL/HO 1: Land adjacent to Furnace  
Lane and Gibbet Lane**

## Comment

Consultee	Julie Davies [REDACTED]
Email Address	[REDACTED]
Company / Organisation	CPRE Kent
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	CPRE Kent [REDACTED]
Comment ID	PSLP_565
Response Date	28/05/21 11:34
Consultation Point	Policy AL/HO 1 Land adjacent to Furnace Lane and Gibbet Lane ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	CPRE Kent
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
AL/HO1	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes
Is sound	Yes

Complies with the Duty to Cooperate

Don't know

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

This land already has planning permission for 49 dwellings. Therefore comment on its allocation would probably be fruitless. We would have wished to see some traffic calming measures to reduce the impact of the additional traffic this development will create on the historic Furnace Lane, and a financial contribution made to the reinstatement of the Hop Pickers Line as a green transport corridor, rather than just contributions to information boards and public art.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

#### Question 8

If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.

The SA underestimates the damaging effect that this development will have on heritage and landscape, because of its direct and indirect effects on the remaining historic part of Gibbet Lane and on Furnace Lane, a partly sunken historic ironway.

#### Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:

Yes, I wish to be notified of future stages of the Local Plan



## Supporting Information File Ref No: SI\_156

### Comment

Consultee	Strategic Planning ( [REDACTED] )
Email Address	[REDACTED]
Company / Organisation	Kent County Council (Planning and Environment)
Address	Invicta House County Hall MAIDSTONE ME14 1XX
Event Name	Pre-Submission Local Plan
Comment by	Kent County Council (Planning and Environment) ( Strategic Planning - [REDACTED] )
Comment ID	PSLP_2215
Response Date	04/06/21 16:56
Consultation Point	Policy AL/HO 1 Land adjacent to Furnace Lane and Gibbet Lane ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Files	<a href="#">Kent County Council-full representation.pdf</a>
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Kent County Council (Growth, Environment & Transport)
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	Policy AL/HO 1 Land adjacent to Furnace Lane and Gibbet Lane

[TWBC: see attached full representation, which has been input against the following: Section 1 (PSLP\_2164), Section 2 (PSLP\_2168), Section 3 (PSLP\_2169), Policies STR1 (PSLP\_2170), STR2 (PSLP\_2171), STR4 (PSLP\_2172), STR5 (PSLP\_2174), STR7 (PSLP\_2175), STR8 (PSLP\_2176), Section 5 (PSLP\_2177), Section 5: Royal Tunbridge Wells (PSLP\_2178), Policies AL/RTW1 (PSLP\_2180), AL/RTW5 (PSLP\_2181), AL/RTW7 (PSLP\_2183), AL/RTW14 (PSLP\_2184), AL/RTW17 (PSLP\_2185), AL/RTW21 (PSLP\_2187), STR/SO1 (PSLP\_2188), AL/SO1 (PSLP\_2190), Strategic Sites (PSLP\_2192), STR/SS1 (PSLP\_2193), STR/SS2 (PSLP\_2195), STR/SS3 (PSLP\_2196), STR/PW1 (PSLP\_2199), AL/PW1 (PSLP\_2200), STR/CA1 (PSLP\_2201), AL/CRS1 (PSLP\_2202), AL/CRS2 (PSLP\_2203), AL/CRS3 (PSLP\_2204), AL/CRS4 (PSLP\_2205), AL/CRS6 (PSLP\_2206), AL/CRS7 (PSLP\_2207), STR/HA1 (PSLP\_2208), PSTR/BE1 (PSLP\_2209), PSTR/BI 1 (PSLP\_2210), PSTR/BM1 (PSLP\_2211), PSTR/FR1 (PSLP\_2212), PSTR/GO1 (PSLP\_2213), PSTR/HO1 (PSLP\_2214), AL/HO1 (PSLP\_2215), PSTR/LA1 (PSLP\_2216), AL/LA1 (PSLP\_2217), PSTR/PE1 (PSLP\_2218), AL/PE4 (PSLP\_2219), PSTR/RU1 (PSLP\_2220), PSTR/SA1 (PSLP\_2221), AL/SA1 (PSLP\_2222), PSTR/SP1 (PSLP\_2223), EN1 (PSLP\_2224), EN3 (PSLP\_2225), EN4 (PSLP\_2226), EN5 (PSLP\_2227), EN8 (PSLP\_2228), EN9 (PSLP\_2229), EN10 (PSLP\_2230), EN12 (PSLP\_2231), EN13 (PSLP\_2232), EN14 (PSLP\_2233), EN18 (PSLP\_2234), EN19 (PSLP\_2235), EN20 (PSLP\_2236), EN25 (PSLP\_2237), EN26 (PSLP\_2238), H1 (PSLP\_2239), H3 (PSLP\_2240), H7 (PSLP\_2241), ED1 (PSLP\_2242), ED2 (PSLP\_2243), ED3 (PSLP\_2244), ED4 (PSLP\_2245), ED5 (PSLP\_2246), ED6 (PSLP\_2247), Town, Rural Service, Neighbourhood, and Village Centres (PSLP\_2248), Policies TP1 (PSLP\_2249), TP2 (PSLP\_2250), TP3 (PSLP\_2251), TP4 (PSLP\_2252), TP5 (PSLP\_2253), TP6 (PSLP\_2254), OSSR1 (PSLP\_2255), Appendix 4 (PSLP\_2256) and Evidence Base (whole Plan) (PSLP\_2257)

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

#### Public Rights of Way

The County Council requests direct reference to Restricted Byway WT340A and Public Footpath WT341. Reference should also be made within the policy to the need for wider network improvements to support connectivity.

#### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The County Council has set out its full response to the consultation in the attached Appendix. Comments are linked to relevant policies where appropriate.

#### **Question 7**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?**

#### **Question 7a**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

The County Council may wish to attend hearing sessions in respect of its statutory and non statutory functions.

#### **Future Notifications**

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

Yes, I wish to be notified of future stages of the Local Plan

# **Local Plan Regulation 19 representations in document order**

**Comments on Section 5: Place  
Shaping Policies: Horsmonden: Policy  
AL/HO 2: Land south of Brenchley  
Road and west of Fromandez Drive**

## Comment

Consultee	Julie Davies [REDACTED]
Email Address	[REDACTED]
Company / Organisation	CPRE Kent
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	CPRE Kent [REDACTED]
Comment ID	PSLP_567
Response Date	28/05/21 11:39
Consultation Point	Policy AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	CPRE Kent
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
AL/HO2	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes
Is sound	No

Complies with the Duty to Cooperate

Don't know

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not justified

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

CPRE Kent generally supports this allocation, which will provide a site and parking for a new village hall, as well as new housing at a reasonably efficient density on the part of the site that is to be used for housing. The housing density also means the site will provide a good quantity of affordable housing.

However, it will be important to ensure that the buffer for the ancient woodland is wide enough. The Woodland Trust recommends a buffer of 50 metres and the western boundary of the built area should be adjusted in order to provide this.

#### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Adjust map of allocation in order to provide a 50 metre buffer for the ancient woodland.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

#### Question 7a

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

To ensure that the justification for providing a buffer for the ancient woodland of less than 50 metres is fully examined

#### **Question 8**

**If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.**

The biodiversity score for this site should be negative unless the proposed buffer for the ancient woodland is extended to 50 metres.

#### **Future Notifications**

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

Yes, I wish to be notified of future stages of the Local Plan

## Supporting Information File Ref No: SI\_49a-b

### Comment

Agent	Mr Gary Mickelborough [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Bloomfields
Address	77 Commercial Road PADDOCK WOOD TN12 6DS
Consultee	[REDACTED] [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Rosconn Strategic Land
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Rosconn Strategic Land [REDACTED]
Comment ID	PSLP_851
Response Date	01/06/21 14:10
Consultation Point	Policy AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
Files	<a href="#">PSLP 847 &amp; 850-852 Rosconn SI 2 and 3.pdf</a> <a href="#">PSLP 847 &amp; 850-852 Rosconn SI 1.pdf</a>
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Rosconn Strategic Land
Question 2	
Agent's Name and Organisation (if applicable)	Bloomfields



### Question 3

To which part of the Local Plan does this representation relate? Policy

#### Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive

### Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	No
Complies with the Duty to Cooperate	Yes

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Rosconn Strategic Land (RSL) is promoting land south of Brenchley Road, Horsmonden ("the Site") for residential development and for a new village hall. It is welcome that the Pre-Submission Local Plan ("the Plan") proposes to allocate this site for development and it is in this context that RSL wishes to express its general support for Draft Policy AL/HO2, to which we would add the following detailed comments:

#### Availability, Suitability & Achievability

RSL welcomes the Strategic Housing and Economic Land Availability Assessment (SHELAA) which concludes that the Site is available, suitable and achievable for development. RSL is an experienced land promoter and has a demonstrable track record of gaining deliverable planning permissions that both add value for local communities and result in a rapid onward sale to a suitable developer.

The Site, having been submitted for consideration through a previous "Call for Sites," is in a single-ownership and the owners have entered into a promotion agreement with RSL in order to promote it for development. Following grant of outline planning permission, the Site will be marketed

and sold to a housebuilder. Given the above, the Site is available for development and can commence development and deliver completions within the first five years of the plan period.

As stated in the SHELAA, the Site directly abuts the existing built-edge of Horsmonden therefore sitting in close proximity to the services and facilities available within the settlement and forming, as the Council's assessment recognises, "a logical extension" to it. The Site is outside of the Green Belt and Area of Outstanding Natural Beauty (AONB) and whilst there is the need to pay regard to certain detailed considerations as identified in Draft Policy AL/HO2, the Site is subject to no overwhelming constraints whatsoever. We therefore agree with the Council's assessment that the Site is suitable for development. We consider the Site's suitability further below with reference to detailed criteria contained within Draft Policy AL/HO 2.

Given the Site's lack of technical, planning and infrastructure constraints, commencement of development can occur within the first five years of the plan period contributing towards meeting the Borough's needs for market and affordable housing early on, thus bridging the gap between plan adoption and delivery of large-scale, strategic sites elsewhere in the Borough.

#### Accessibility

An initial access drawing has been prepared (Drawing No. 197720-002 Rev A) in support of these representations which has been included as Enclosure 1. This demonstrates how safe and effective access can be achieved to Brenchley Road for 80-100 dwellings plus the new village hall. As such, a vehicular link can be provided onto Brenchley Road in line with Criterion 1 of the Policy. In terms of visibility splays, these can be provided in line with prevailing technical standards as shown by Drawing No. 197720-002 Rev A and to the satisfaction of Kent County Council as the Local Highway Authority (LHA).

The preparation of the Framework Plan (Enclosure 2) for the development of the Site has taken a landscape-led approach throughout, particularly along the site frontage, and the identified key design principles will ensure that the rural character of Brenchley Road on the approach to the village is retained. Access to the Site is proposed via a simple priority junction that would be well-associated with the existing built-edge of the village. That means that the rest of Brenchley Road to the west of the Site access can retain its strong contribution to the rural character of the road. Whilst at this stage a limited amount of existing hedgerow would need to be removed along the Site frontage to accommodate the visibility splays and the access, this can be more than compensated for through the replacement planting behind the visibility splays, made possible by the significant setback that would be provided along Brenchley Road.

Within the Site it is envisaged that a loose arrangement of detached dwellings would be appropriately orientated to face the Brenchley Road frontage but again set back behind an internal green corridor that will facilitate pedestrian connectivity in and around the site as well as providing opportunities for new planting to retain and enhance the rural character of Brenchley Road.

This sensitive design approach will provide a "soft" edge to built development that would ensure its sympathetic assimilation into the landscape, particularly in views along Brenchley Road.

As such, safe and effective access can be achieved to Brenchley Road by the Site in a manner that would not compromise the street scene's rural character. For this reason, Criterion 2 of the Draft Policy can be appropriately addressed.

In relation to Criterion 4, RSL has engaged in extensive highway investigations in order to support the delivery of a pedestrian link from the Site, running along Brenchley Road and connecting to the wider footway network within the village. The conclusion of these investigations, as informed by discussions with the LHA, has been that adequate land is available within the public highway to provide a suitable footway link along Brenchley Road from the Site and into the village. Whilst further detailed work is ongoing to establish the precise nature of the highway arrangement necessary to deliver such a link, fundamentally, a satisfactory solution is capable of being provided within public highway land and thus Criterion 4 of the Draft Policy can be met.

#### Landscape & Open Space

The Framework Plan (included as Enclosure 2 in support of these representations) sets out the key design principles for the Site which have been informed by a detailed understanding of its opportunities and constraints, as illustrated by the Opportunities and Constraints Plan (Enclosure 3).

As set out above, the Framework Plan shows a set back to Brenchley Road thus retaining its rural character and much of the vegetation along the Site's frontage. Where some vegetation removal is necessary to facilitate access, replacement planting can be provided to retain the verdant character of the road on the approach to the village.

The ancient woodland to the west of the Site has been addressed through provision of an appropriate stand-off of at least 15m in line with guidance from Natural England and Criterion 7 of Draft Policy AL/HO 2. Taken together with the buffer along the southern boundary of at least 10m and that provided along Brenchley Road to the north, there is an opportunity to create a high quality circular route for pedestrians, linking the formal open space in the south-east corner of the Site with the green areas around the Site's fringe thus delivering potential for an interconnected network of formal and informal play and recreation opportunities. In addition, the green buffers around the Site allow opportunities for new planting such as for a potential community orchard, recognising the particular significance of orchards to Horsmonden as set out in the Historic Environment Review (January 2018), for example.

The provision of the green buffer to the south of the Site will allow for appropriate landscape reinforcement to the southern boundary. The green buffers provided to the Site fringes generally will allow for the retention of existing hedgerows. The rural edge along the north western, western and southern boundaries will be further respected through the provision of lower density development near these locations as indicated on the Framework Plan thereby providing a sensitive transition from the Site to the wider countryside.

For the reasons set out above, the Site can be developed in a way that conforms fully with the landscape-related requirements of Draft Policy AL/HO 2 and other relevant Draft Policies of the Plan.

#### Heritage & Conservation

The opportunities and constraints analysis shows that the Site sits opposite a Grade II listed building known as Milestone Cottages located on the north side of Brenchley Road. Further afield, to the West of the site albeit separated by intervening built-form, lies Horsmonden's Conservation Area. To the west and to the south of the Site lies Sprivers Historic Park and Garden.

Taking each of the above in turn, the setting of Milestone Cottages would be addressed by the proposed development in two principal ways. Firstly, the set back and lower density nature of development along Brenchley Road, in addition to the retention of vegetation along the Site's frontage, would safeguard the setting of this heritage asset ensuring its continued contribution to the character of the area and to the street scene. Secondly, the Framework Plan provides a tree lined street opposite the listed building which provides a break in the building line along Brenchley Road in order to further respect and enhance its setting.

As set out above, the Conservation Area of Horsmonden lies to the east of the Site albeit separated from it by a considerable intervening distance and by the modern development accessed from Fromandez Drive. A key principle of the Framework Plan is to respond to the existing built-edge of Horsmonden positively but sensitively hence it provides for buffer planting along the eastern boundary, which would only strengthen the intervening features between the Site and the Conservation Area thereby screening any effects.

The Historic Park and Garden to the west and to the southwest of the Site would have its setting safeguarded by the proposed development due to the significant buffers provided to the western and south-western boundaries of the Site, as already described above and shown in the Framework Plan. The reinforcement planting provided to the southern boundary would bolster the already substantial natural features, such as the dense woodland to the west, that contain the Site from the wider countryside and from Historic Park and Garden. For this reason, the Framework Plan positively responds to this heritage asset.

Development of the Site in the manner proposed by the Framework Plan would properly safeguard the settings of surrounding heritage assets and comply with Criterion 9 of Draft Policy AL/HO 2 in this regard.

#### The Village Hall

An important aspect of the Site is that it brings an opportunity to provide land and a financial contribution toward the provision of a new village hall for Horsmonden. As show on the Framework Plan, this has been located to the very east of the Site at the closest point to the village possible in order to promote its accessibility to the wider settlement. RSL has engaged in active discussions with Horsmonden

Parish Council in order to understand its requirements and ambitions for the new village hall and will continue this dialogue to ensure feedback is taken into account in determining the overall land-take for the building and its configuration on the Site.

The fact that the Site can contribute to the delivery of the new village hall at an appropriate location is a key sustainability credential in its favour and a substantial benefit that can be delivered through development of the Site, as it will contribute to the retention and development of an accessible community facility in line with paragraph 83 of the National Planning Policy Framework (NPPF) thereby supporting rural prosperity and fulfilling a key national policy objective in this regard.

#### Question 6

**Please note:** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

*After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

These representations refer to the aspects of Draft Policy AL/HO 2 of which Rosconn Strategic Land is generally supportive, including its overall thrust. They should be read in conjunction with the further, separate representations that have been made by Rosconn Strategic Land setting out requested changes to Draft Policy AL/HO 2 that are necessary for plan soundness.

#### Question 7

**Please note** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?** . Yes, I wish to participate in hearing session(s)

#### Question 7a

**Please note** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

Rosconn Strategic Land is promoting Land South of Brenchley Road, Horsmonden for development and is seeking changes to Draft Policy AL/HO 2 as part of its separate representations to this Draft Policy. Rosconn Strategic Land requests participation in the hearing sessions in order to contribute to discussions in relation to the Site and to articulate its case for why modifications are necessary for the soundness of Draft Policy AL/HO 2, as well as to address any relevant points raised by the Local Planning Authority, the Inspector or by stakeholders.

#### Question 8

**If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.**

The Sustainability Appraisal (SA) underpinning the Plan has tested the Site against defined sustainability objectives. The Site performs well or neutral across a number of sustainability objectives, but in common with every other site that has been assessed in Horsmonden it has received a “negative” rating for Services and Facilities and “minor negative” rating for Travel, respectively. We recognise from Appendix B to the SA that these scores are the result of applying standard criteria as they are across other sustainability objectives. For example, in order to score positively for “Services and Facilities,” a settlement would need to have more than nine “key services.” Less than nine key services would result in a negative score. However, this does not alter the fact that the Settlement Role and Function Study (February 2021) identifies Horsmonden, in sustainability terms, as the best performing rural settlement outside of the AONB and Green Belt. The SA similarly does not recognise that, in common with the other sites at Horsmonden proposed for allocation, the Site can make a material contribution to enhancing the sustainability credentials of the settlement through contributing towards the provision of new services and facilities, in this case a new and improved village hall, thereby meeting an identified local need. We consider that this should be noted in the “commentary” section of the SA in regard to the scoring of individual sites at Appendix P.

In contrast to the scoring method for Services/Facilities and Travel, those categories for Heritage and Landscape appear, on the basis of Appendix B to the SA, to have been assessed more subjectively. In both of these areas, the Site has been judged to have “slightly negative” effects. In relation to landscape, it must first be said that the Site does not form part of a formal landscape designation, in contrast to many the Plan’s proposed allocations which lie within the AONB. Secondly, as is recognised within the Draft Policy, there is significant scope for mitigation; for instance, through the provision of green buffers and the sensitive siting of built development, opportunities that the Framework Plan for the Site has fully taken into account. Thirdly, as is recognised elsewhere in the Plan’s evidence base including within the SHELAA, the Site is well-related to the existing built-edge of Horsmonden and, we would add, benefits from a high degree of visual containment by the existing built-edge to the east and the dense woodland to the west. Strong framework planting can be provided to the south to punctuate and screen new development alongside adequate separation distance, as required by the Draft Policy. These interventions will considerably mitigate landscape impact.

In relation to heritage, the Site has been scored as “slightly negative.” This assessment is difficult to reconcile with the facts on the ground, namely that there are no designated or above-ground undesignated heritage assets on the Site. In terms of proximity of the Grade II listed building to the north, this will be intervisible with new development in views along Brenchley Road but there is clearly scope to mitigate this through, for example, retaining a set back and the existing vegetation along the Site’s frontage with the road. This has been fully taken into account as part of the Framework Plan. Other heritage assets near to the Site, such as Sprivers and Horsmonden Conservation Area, are some distance from the Site and separated from it by intervening built and natural features..

Notwithstanding the above, the SA’s broad comparative assessment of the sites promoted on the edge of the village is correct and it is clear that, once assessed against the SA framework as a whole, the best performing and most logically-related sites have been chosen for allocation, including Land South of Brenchley Road, Horsmonden.

## **Future Notifications**

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

Yes, I wish to be notified of future stages of the Local Plan

# Supporting Information File Ref No: SI\_49a-b

## Comment

Agent	Mr Gary Mickelborough [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Bloomfields
Address	77 Commercial Road PADDOCK WOOD TN12 6DS
Consultee	[REDACTED] [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Rosconn Strategic Land
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Rosconn Strategic Land [REDACTED]
Comment ID	PSLP_852
Response Date	01/06/21 14:10
Consultation Point	Policy AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3
Files	<a href="#">PSLP 847 &amp; 850-852 Rosconn SI 2 and 3.pdf</a> <a href="#">PSLP 847 &amp; 850-852 Rosconn SI 1.pdf</a>
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Rosconn Strategic Land
Question 2	
Agent's Name and Organisation (if applicable)	Bloomfields

### Question 3

To which part of the Local Plan does this representation relate? Policy

#### Question 3a

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive

### Question 4

Do you consider that the Local Plan:

Is legally compliant	Yes
Is sound	No
Complies with the Duty to Cooperate	Yes

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:	.	It is not effective
	.	It is not justified
	.	It is not consistent with national policy

### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Rosconn Strategic Land (RSL) is promoting land south of Brenchley Road, Horsmonden ("the Site") for residential development and for a new village hall. It is welcome that the Pre-Submission Local Plan ("the Plan") proposes to allocate this site for development and it is in this context that RSL wishes to express its general support for Draft Policy AL/HO2, as elaborated in our further representations to the policy. However, there are several detailed requirements set out by Draft Policy AL/HO2 which are unsound for want of justification, effectiveness, and consistency with national policy thus requiring modification. The reasons for this are set out below:

Criterion 3 – Explore opportunities to extend the 30mph speed limit westwards to incorporate the Site frontage

This requirement is superfluous because the 30mph speed limit has already been moved westwards along Brenchley Road. It now sits slightly beyond the western boundary of the Site. We propose that this clause is deleted in accordance with the schedule of proposed modifications below.

Criterion 5 – Explore opportunities to provide a pedestrian access from the Site into the Sprivers Historic Park and Garden

Whilst recognising this is not an absolute requirement, the Site is separated from Sprivers by third party land to the south. The Site does, however, directly abut the formally delineated boundary of Sprivers to the west although it is separated from the formal north/south National Trust footpath that runs through Sprivers by dense woodland, much of which is ancient woodland. Given the potential for disturbance arising from an increased intensity of use, it is doubtful that directing foot traffic westwards from the Site and through the woodland to the formal north/south footpath would be consistent with nature conservation objectives. A similar link along Brenchley Road to the west would be impractical on the basis that introducing pavement here of sufficient width would disrupt the dense vegetation either side of Brenchley Road, which is integral to the road's rural character. Thus, having investigated the possibilities, provision of a link into Sprivers is impractical given the distance and intervening natural features and landownership. We propose that this criterion is deleted for want of justification in accordance with the schedule of proposed modifications set out below. That said, the Framework Plan (Enclosure 2) provides a generous buffer to the woodland to the west that would form part of the Site's open space provision the management of which could be transferred to the Parish Council. Thus development of the Site would not prejudice such a link should it be desired in the future.

#### Criterion 6 – Land uses located in accordance with the Site Layout Plan

The Site Layout Plan (Map 61) identifies the amount of land for residential development, community use and open space on the Site. Whilst we acknowledge that such a plan could be helpful as a purely illustrative tool, Criterion 6 requires the uses on the Site to be located in accordance with the Site Layout Plan. This approach is overly prescriptive and not justified since the disposition of uses on the Site should be the product of a comprehensive masterplanning exercise that optimises the Site for development whilst respecting its constraints. RSL has engaged in such an exercise and the development envelope proposed is different from that shown in the Site Layout Plan.

Based on the Site Layout Plan (Map 61), we have calculated that it provides for a residential development area of approximately 1.71 hectares. In order to meet the minimum capacity for the Site stated in Draft Policy AL/HO2 of 80 units, dwellings would need to be provided at approximately 46 to the hectare (net), an inappropriately high density for an edge of settlement location. Applying a reasonable net density of about 35 dwellings per hectare to this small development area, the capacity of the Site would fall to about 60 dwellings, well below the minimum capacity of 80 dwellings identified within Draft Policy AL/HO2 and elsewhere in the Plan. Criterion 6 therefore renders the Plan ineffective as it would result in either inappropriately dense development or a scale of development considerably below the stated minimum capacity. It should be deleted for this reason and the Site Layout Plan (Map 61) labelled as illustrative or indicative. RSL has confirmed with officers that the Council's intention is for the Site Layout Plan to be illustrative and the Plan should be modified to align with that intention.

In addition, the Site Layout Plan allots about 0.5ha for community use. RSL remains fully committed to providing the land on the Site for a new village hall as well as a proportionate capital contribution towards its construction. However, the size and nature of the new village hall and therefore its land take is still the subject of discussion with the local community and it is not justified at this stage for the Plan to pre-empt how much land will be required for it.

As elaborated upon in our separate, generally supportive representations to Draft Policy AL/HO2, RSL has commissioned a comprehensive Framework Plan (see Enclosure 2) which has been informed by a full understanding of the Site's opportunities and constraints. The Framework Plan demonstrates how 80 dwellings and a new village hall can be provided on the Site in a manner that fully respects the local character and context as well as the detailed requirements of Draft Policy AL/HO2.

As a general strategic point, it is essential to the overall soundness of the Plan that it demonstrates it has exhausted the possibility of directing proportionate growth towards sustainable sites outside of the Green Belt and Area of Outstanding Natural Beauty (AONB). Optimising the potential of sites that have been allocated in this area is vital to ensuring that encroachment into the Green Belt and AONB is avoided to the extent that is reasonable. By virtue of criterion 6, Draft Policy AL/HO2 fails to achieve this and for that and the above reasons should be deleted as set out below.

#### Criterion 11 – Provide a suitable legal mechanism to ensure the provision of the replacement village hall is tied to the delivery of the housing at a suitable stage of the development

RSL remains committed to working with the local community to play its part in the delivery of a new village hall. Planning obligations, however, as well as being necessary to make the development acceptable in planning terms, must also directly relate to the development proposed and be fairly and reasonably related in scale and in kind to it (National Planning Policy Framework, paragraph 56).



In this instance, the new village hall will not only benefit future residents of the Site, but also the village at large and other sites that have been allocated around Horsmonden. Therefore, whilst the Site can provide the necessary land and an appropriate capital contribution for a replacement village hall to be secured through legal agreement at suitable trigger points, other sites that are being brought forward in Horsmonden should also provide financial contributions towards the hall's construction. As set out in RSL's representations to Draft Policy PSTR/HO1 (The Strategy for Horsmonden Parish), this should be expressly recognised within the Plan as well as in Draft Policy AL/HO2. We propose that this clause is altered in accordance with the schedule of proposed modifications below in order to make Draft Policy AL/HO2 consistent with national policy.

## Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Criterion 3: Opportunities to be explored for extending the 30mph speed limit westwards along Brenchley Road to include the site, and provision of associated gateway features

Criterion 5: Opportunities to be explored to provide a pedestrian access into the Sprivers historic park and garden from the site

Criterion 6: Residential development shall be located on the areas identified for residential use on the site layout plan, with the provision of a village hall on the land indicated for community use on the site layout plan;

Criterion 11: A suitable legal mechanism shall be put in place to ensure that the provision of land and an appropriate financial contribution towards the replacement village hall and associated parking is tied to the delivery of the housing, at a suitable stage of the development, to be agreed at the planning application stage

## Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?** . Yes, I wish to participate in hearing session(s)

## Question 7a

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

Rosconn Strategic Land is promoting Land South of Brenchley Road, Horsmonden for development and is seeking changes to Draft Policy AL/HO 2. Rosconn Strategic Land requests participation in the

hearing sessions in order to contribute to discussions in relation to the Site and to articulate its case for why for modifications are necessary for the soundness of Draft Policy AL/HO 2, as well as to address any relevant points raised by the Local Planning Authority, the Inspector or by stakeholders.

#### **Future Notifications**

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

<input type="checkbox"/>	Yes, I wish to be notified of future stages of the Local Plan
<input type="checkbox"/>	No, I do not wish to be notified of future stages of the Local Plan

## Comment

Consultee	Katy Wiseman [REDACTED]
Email Address	[REDACTED]
Company / Organisation	National Trust
Address	Scotney Castle (Hub) ROYAL TUNBRIDGE WELLS TN3 8JB
Event Name	Pre-Submission Local Plan
Comment by	National Trust [REDACTED]
Comment ID	PSLP_1102
Response Date	03/06/21 11:12
Consultation Point	Policy AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	National Trust
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

**Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.**

Policy AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive

**Question 4a**

**If you consider that the Local Plan is not sound, please answer this question.**

**Do you consider that the Local Plan is not sound because:**

**Question 5**

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

The National Trust are the owners and custodians of Sprivers Historic Park and Garden that adjoins the proposed site allocation on its western edge. This allocation presents a number of significant opportunities for the National Trust in relation to Sprivers with potential for improved public access, new parking and greater community engagement and we would welcome constructive engagement at the pre-application design stage with the applicant. We also support criterion 5 which requires opportunities to be explored to provide a pedestrian access into the Sprivers historic park and garden from the site. The historic park is open to the public, so correction needed at paragraph 5.587 please remove '(not open to the general public)'.

**Question 7**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?**

## Comment

Consultee	[REDACTED]
Email Address	[REDACTED]
Company / Organisation	Southern Water Services Plc
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Southern Water Services Plc [REDACTED]
Comment ID	PSLP_1198
Response Date	03/06/21 15:31
Consultation Point	Policy AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	HB
Question 1	
Respondent's Name and/or Organisation	Southern Water
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
<b>Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.</b>	
Policy AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes

Is sound	Yes
Complies with the Duty to Cooperate	Yes

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Southern Water is the statutory water and wastewater undertaker for Horsmonden. Our assessment has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required, which may affect the site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.

#### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

In consideration of the above, we recommend the following criterion for Policy AL/HO 2

Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purposes.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in examination hearing session(s)

## Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

Yes, I wish to be notified of future stages of the Local Plan

## Comment

Consultee	Ms Bridget Fox [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Woodland Trust
Address	Kempton Way Grantham NG31 6LL
Event Name	Pre-Submission Local Plan
Comment by	Woodland Trust [REDACTED]
Comment ID	PSLP_1425
Response Date	04/06/21 16:31
Consultation Point	Policy AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.2
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Woodland Trust
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
<b>Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.</b>	
Policy AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes



Is sound

Don't know

Complies with the Duty to Cooperate

Don't know

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not consistent with national policy

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

We previously expressed concerns at this site allocation as it was adjacent to Sprivers Wood ASNW at TQ69524043.

#### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Where development sites are adjacent to ancient woodland, we recommend that as a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.

Buffer zones can form part of the accessible natural green space required for future residents.

This will improve compliance with national policy by protecting the ancient woodland from loss or fragmentation and from harmful effects of pollution or encroachment on root areas. It will also make a positive contribution to requirements for net gain and nature recovery.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)? . Yes, I wish to participate in hearing session(s)

**Question 7a**

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

The Woodland Trust is the UK's leading woodland conservation charity with specific expertise on the management and protection of ancient woodland.

# **Local Plan Regulation 19 representations in document order**

**Comments on Section 5: Place  
Shaping Policies: Horsmonden: Policy  
AL/HO 3: Land to the east of  
Horsmonden**

## Comment

Consultee	Granville Davies [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Granville Davies [REDACTED]
Comment ID	PSLP_87
Response Date	04/05/21 18:06
Consultation Point	Policy AL/HO 3 Land to the east of Horsmonden ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Granville Davies
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

**Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.**

Policy AL/HO 3: land to the east of Horsmonden

### Question 4a

**If you consider that the Local Plan is not sound, please answer this question.**

**Do you consider that the Local Plan is not sound because:**

### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

AL/HO3 The surface water drainage from this site is proposed to go via an existing gully and sewer in front of and beside 6 Station Cottages, discharging via a neighbouring garden and thence to the watercourse to the rear of Station Cottages. This pipe blocks on an annual basis and flood conditions then occur around and sometimes in Station Cottages. At present both Southern Water and Kent Highways disclaim ownership of this sewer and it cannot be right that a development of any size should be considered when the responsibility for the removal of surface water rests with no-one. This problem is further complicated by a spring which rises on the site and, in times of heavy rainfall, adds considerably to the flow of water. I would hope that the matter of surface drainage can be addressed in the plan as a matter of some priority.

#### **Question 7**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?**

#### **Future Notifications**

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

Yes, I wish to be notified of future stages of the Local Plan
---

## Comment

Consultee	Horsmonden Parish Council [REDACTED]
Email Address	[REDACTED]
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	Horsmonden Parish Council [REDACTED]
Comment ID	PSLP_133
Response Date	14/05/21 16:28
Consultation Point	Policy AL/HO 3 Land to the east of Horsmonden ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.5
Question 1	
Respondent's Name and/or Organisation	Horsmonden Parish Council
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

**Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.**

Horsmonden Parish Council's comments on the earlier Consultation are reiterated.

*[TWBC: see Horsmonden Parish Council's previous Regulation 18 Draft Local Plan comments, which are on the Local Plan website at <https://tunbridgewells.gov.uk/planning/planning-policy/local-plan/previous-stages/local-plan-comments> as follows:*

*DLP\_1732 – Policy STR 1: The Development Strategy*

*DLP\_1733 – Policy STR/HO 1: The Strategy for Horsmonden parish*

*DLP\_1734 - Policy AL/HO1 Land adjacent to Furnace Lane and Gibbet Lane*

*DLP\_1735 - Policy AL/HO2 Land south of Brenchley Road and west of Fromandez Drive*

DLP\_1736 - Policy AL/HO3 Land east of Horsmonden  
DLP\_1739 - Policy STR 3: Masterplanning and use of Compulsory Purchase powers  
DLP\_1740 - Policy STR 5: Essential Infrastructure and Connectivity  
DLP\_1741 - Policy STR 6: Transport and Parking  
DLP\_1751 - Policy STR 7: Place Shaping and Design  
DLP\_1752 - Policy STR 8: Conserving and enhancing the natural, built, and historic environment  
DLP\_1754 - Policy STR 9: Neighbourhood Plans  
DLP\_1755 - Policy STR 10: Limits to Built Development Boundaries  
DLP\_1757 - Policies EN2-32 (Environment and Design, Natural Environment, Air, Water, Noise and Land)  
DLP\_1756 - Policy EN2- Sustainable design and construction  
DLP\_1758 - Policy EN 11: Net Gains for Nature: biodiversity  
DLP\_1759 - Policy EN 21: High Weald Area of Outstanding Natural Beauty (AONB)]

In addition to this, under Policy AL H0 3, point 13, the Council would like the phrase “and a community orchard” to be removed on the grounds that there are various other possibilities in that space which Horsmonden Parish Council is currently exploring.’

#### Question 4a

**If you consider that the Local Plan is not sound, please answer this question.**

**Do you consider that the Local Plan is not sound because:**

#### Question 7

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?**

#### Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

Yes, I wish to be notified of future stages of the Local Plan

## Comment

Consultee	Karen Evelyn [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Horsmonden [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Karen Evelyn [REDACTED]
Comment ID	PSLP_138
Response Date	15/05/21 18:51
Consultation Point	Policy AL/HO 3 Land to the east of Horsmonden ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Karen Evelyn
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
<b>Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.</b>	
Land to the east of Horsmonden- Policy AL/HO 3, Point 5.600 and Point 10 of Policy AL/HO 3 Policy STR 2 Place Shaping and Design.	
Question 4	
<b>Do you consider that the Local Plan:</b>	
Is legally compliant	Don't know
Is sound	No



Complies with the Duty to Cooperate

No

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Land to the east of Horsmonden- Policy AL/HO 3,  
Point 5.600 and Point 10 of Policy AL/HO 3 refer to:

*A terrace of cottages, New Bassetts Cottages (not listed, but non designated heritage assets) are located 'in the middle' of the site but outside the site boundaries. It will be important that any development takes account of, and respects, the nearby listed buildings and the setting of New Bassetts Cottages; the area immediately fronting these cottages (within the site boundary) is allocated as open space.*

To the south west of the site is an additional pair of cottages 1 & 2 Bassetts Villas which are akin to non-designated heritage assets for which no consideration has been made. In the plan these residences are surrounded on all four sides by the proposed housing development and I believe the same consideration should be shown to these houses as for New Bassetts Cottages. The plan neither 'takes account of' nor 'respects' these properties as it does for New Bassetts Cottages. I can see no reason why they should be treated differently. 1 & 2 Bassetts Villas are Victorian properties and were originally used as the office for the surrounding apple farm and provided accommodation to the farm workers, as such it was very much part of the Fruit Belt Landscape Character Area as referred to in point 5.557.

#### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

1 & 2 Bassetts Villas should be accounted for and shown respect by allocating open space around the properties. A green and open space should be allowed to the north, west and south of the properties' boundaries to protect the amenity of the existing residents and their use with regard to noise, privacy and overbearing impact as required in Policy STR 2 Place Shaping and Design.

### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?** . Yes, I wish to participate in hearing session(s)

### Question 7a

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

The impact to properties 1 & 2 bassetts Villas is significant and detrimental.

### Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:** Yes, I wish to be notified of future stages of the Local Plan

## Comment

Consultee	Karen Evelyn [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] Horsmonden [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Karen Evelyn [REDACTED]
Comment ID	PSLP_139
Response Date	15/05/21 19:22
Consultation Point	Policy AL/HO 3 Land to the east of Horsmonden ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Question 1	
Respondent's Name and/or Organisation	Karen Evelyn
Question 3	
To which part of the Local Plan does this representation relate?	Paragraph(s)
Question 3a	

Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.

Policy AL/HO 3 - Land to the east of Horsmonden - Point 1.Horsmonden Overview 5.558

### Question 4

Do you consider that the Local Plan:

Is legally compliant	No
Is sound	No
Complies with the Duty to Cooperate	Don't know

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

- . It is not effective
- . It is not justified
- . It is not consistent with national policy

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

I have a concern that the highways assessment referred to in point 1 may not take into consideration the poor visibility at the junction, the narrowness of the road or street parking along the Goudhurst Road. The Goudhurst Road is a minor rural road as stated in 5.558.

At present, visibility on to the Goudhurst Road is poor to the left and right and combined with the narrow road width makes for a very unsafe junction. With on street parking along the Goudhurst Road this will only compound the problem.

#### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The road access point does not support the potential increase in vehicle numbers entering and leaving the proposed housing site.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?

- . No, I do not wish to participate in examination hearing session(s)

#### Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

Yes, I wish to be notified of future stages of the Local Plan

## Comment

Consultee	Julie Davies [REDACTED]
Email Address	[REDACTED]
Company / Organisation	CPRE Kent
Address	- - -
Event Name	Pre-Submission Local Plan
Comment by	CPRE Kent [REDACTED]
Comment ID	PSLP_571
Response Date	28/05/21 11:46
Consultation Point	Policy AL/HO 3 Land to the east of Horsmonden ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Question 1	
Respondent's Name and/or Organisation	CPRE Kent
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
AL/HO3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Yes
Is sound	No

Complies with the Duty to Cooperate

Don't know

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because: . It is not consistent with national policy

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

While the loss of this large and mainly green field site is regrettable, it is outside the green belt and AONB, although within the AONB's setting, and is therefore more suitable for development than some other sites that have been selected. It is, however, essential that if this site is to be sacrificed to development, it is used to its full potential.

We note that planning permission for up to 30 dwellings on the southern part of the site exists already and there is a current application for only 20 dwellings on that site. This, coupled with the provision in point 8 of the policy for the eastern area of the site to be developed at lower density, together with the proposed amenity/green spaces, children's and youth play spaces, land safeguarded for school expansion, land for community and health uses, the Restricted Byway that runs through the site and the land to be safeguarded for the Hop Pickers Line green infrastructure corridor, leads us to question whether the overall housing numbers proposed for the site will be achievable.

It is vital that on green field land which is now to become within the Limits to Built Development, sufficient densities are achieved to make really efficient use of land and thus reduce the need for further greenfield development elsewhere, especially in the AONB and green belt. We refer to our responses to Policies SRT1, STR2, STR3, STR4 and H2 on this issue.

We therefore recommend deletion of point 8 of the policy.

Point 5 and map 62 should require the provision of a public green infrastructure route (preferably of bridleway or restricted byway status) along the whole of the disused railway within this site. The proposal in map 62 for the built area to cover the south eastern part of the line within the site is unacceptable, since this is the link to the road. We refer to our responses to STR5, STR6, STR7, TP3 and above all TP5.

#### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant**

**or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Point 5 is far too weak, since it will neither fully preserve the route nor give any guarantee that the route will ever be made available as a green infrastructure route for public use.

Point 5 and map 62 should require the dedication of a public bridleway or restricted byway along the whole of the disused railway within this site and a financial contribution to re-establishing the route outside the site should also be required.

The proposal in map 62 for the built area to cover the south eastern part of the line within the site is unacceptable, since this is the link to the road.

Delete point 8 of the policy

#### **Question 7**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?** . Yes, I wish to participate in hearing session(s)

#### **Question 7a**

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

To ensure that the site will be developed at an efficient density, and to ensure that the section of the Hop Pickers Line that runs through the site will be preserved and dedicated for public use.

#### **Question 8**

**If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.**

Landscape, travel and biodiversity should be scored more negatively, given the likely effect of the additional motor traffic from this development on the rural lanes, unless the Hop Pickers Line is fully brought back into use as an active travel corridor.

#### **Future Notifications**

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:** Yes, I wish to be notified of future stages of the Local Plan



## Comment

Consultee	Karen Evelyn [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Horsmonden [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Karen Evelyn [REDACTED]
Comment ID	PSLP_704
Response Date	31/05/21 20:47
Consultation Point	Policy AL/HO 3 Land to the east of Horsmonden ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Karen Evelyn
Question 3	
To which part of the Local Plan does this representation relate?	Policy

### Question 3a

**Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.**

Policy EN1 Sustainable Design, Point 6. Residential Amenity. Points 1 & 2 Page 326

Policy EN27, Noise, Points 2 a. and b. Page 394

### Question 4

**Do you consider that the Local Plan:**

Is legally compliant	Don't know
Is sound	Don't know

Complies with the Duty to Cooperate

Don't know

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Policy EN1 Sustainable Design, Point 6. Residential Amenity, Points 1 & 2 (Page 326) states '*Proposals should not cause significant harm to the .. occupiers of neighbouring properties...*'. This development will inevitably expose 1 Bassetts Villas to excessive noise, vibration, odour, air pollution, activity, vehicular movements and overlooking. The property is currently surrounded by orchards with very minimal activity and minimal noise and since the proposed development is located on a slope above and overlooking this property the noise, vibration, odour, air pollution, activity, vehicular movements and overlooking will inevitably be significant and detrimental.

Policy EN27, Noise - states Development will only be permitted where it can be demonstrated that re points 1 & 2 (page 394), the development will not expose existing users to noise or unacceptable noise. As the location of the development is so close to the boundaries of 1 Bassetts Villas and on a slope above the property, the noise levels will inevitably be unacceptable and hence under this development must not be permitted.

#### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Policy EN1 Sustainable Design, Point 6. Residential Amenity, Points 1 & 2 (Page 326) states '*Proposals should not cause significant harm to the .. occupiers of neighbouring properties...*'. This development will inevitably expose 1 Bassetts Villas to excessive noise, vibration, odour, air pollution, activity, vehicular movements and overlooking. The property is currently surrounded by orchards with very minimal activity and minimal noise and since the proposed development is located on a slope above and overlooking this property the noise, vibration, odour, air pollution, activity, vehicular movements and overlooking will inevitably be significant and detrimental.

Policy EN27, Noise - states Development will only be permitted where it can be demonstrated that re points 1 & 2 (page 394), the development will not expose existing users to noise or unacceptable noise. As the location of the development is so close to the boundaries of 1 Bassetts Villas and on a slope above the property, the noise levels will inevitably be unacceptable and hence under this development must not be permitted.

As above, the proposed development is too close in proximity to 1 Bassetts Villas and therefore does not meet the policy criteria and must not be permitted.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?** . Yes, I wish to participate in hearing session(s)

#### Question 7a

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

I don't feel that the rights of 1 Bassetts Villas will otherwise be fairly represented.

#### Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:** Yes, I wish to be notified of future stages of the Local Plan

## Comment

Consultee	Karen Evelyn [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED], [REDACTED] Horsmonden [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Karen Evelyn [REDACTED]
Comment ID	PSLP_706
Response Date	31/05/21 21:05
Consultation Point	Policy AL/HO 3 Land to the east of Horsmonden ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	Karen Evelyn
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Land to the east of Horsmonden - Policy AL/HO3, point 5.600 and Point 10 of Policy AL/HO3	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
Is sound	Don't know
Complies with the Duty to Cooperate	Don't know

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

**Do you consider that the Local Plan is not sound because:**

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

Re Land to the east of Horsmonden - Policy AL/HO3, point 5.600 and Point 10 of Policy AL/HO3 - further to my submission on the 15/05/21 with Comment ID PSLP\_138 I would like to add that property 1 & 2 Bassetts Villas dates back to the 1900s and is of late Victorian or early Edwardian construction. It is therefore likely to be significantly older than New Bassetts Cottages for which special consideration has been given in point 10. I therefore ask that 1 & 2 Bassetts Villas should be accounted for and shown respect by allocating open space to the north, west and south of the properties.

#### Question 6

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Re Land to the east of Horsmonden - Policy AL/HO3, point 5.600 and Point 10 of Policy AL/HO3 - further to my submission on the 15/05/21 with Comment ID PSLP\_138 I would like to add that property 1 & 2 Bassetts Villas dates back to the 1900s and is of late Victorian or early Edwardian construction. It is therefore likely to be significantly older than New Bassetts Cottages for which special consideration has been given in point 10. I therefore ask that 1 & 2 Bassetts Villas should be accounted for and shown respect by allocating open space to the north, west and south of the properties.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?**      Yes, I wish to participate in hearing session(s)

### Question 7a

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

I don't feel that the rights of 1 & 2 Bassetts Villas are being fairly represented.

### Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:**

Yes, I wish to be notified of future stages of the Local Plan

## Comment

Consultee	Ms Alison Burchell [REDACTED]
Email Address	[REDACTED]
Company / Organisation	NHS Kent and Medway Clinical Commissioning Group
Address	[REDACTED] [REDACTED] Ashford [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	NHS Kent and Medway Clinical Commissioning Group [REDACTED]
Comment ID	PSLP_1569
Response Date	04/06/21 09:16
Consultation Point	Policy AL/HO 3 Land to the east of Horsmonden ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.5
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	NHS Kent and Medway Clinical Commissioning Group
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

**Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.**

Policy AL/HO 3 Land to the east of Horsmonden

*[TWBC: this representation has been input against Policies AL/RTW 8, AL/RTW 15, STR/CRS 1, AL/HA 5, STR/SS 3, PSTR/HO 1, PSTR/BM 1, STR/SS 1, PSTR/GO 1 and AL/HO 3– see Comment*

Numbers PSLP\_1550, PSLP\_1551, PSLP\_1552, PSLP\_1553, PSLP\_1556, PSLP\_1568 PSLP\_1570, PSLP\_1554, PSLP\_1559 and PSLP\_1569]

#### Question 4

Do you consider that the Local Plan:

Is legally compliant	Don't know
Is sound	Yes
Complies with the Duty to Cooperate	Yes

#### Question 4a

If you consider that the Local Plan is not sound, please answer this question.

Do you consider that the Local Plan is not sound because:

#### Question 5

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

I can confirm that the CCG has been engaged in the local plan development process in order to assess implications for primary medical care provision. The impacts are set out in the IDP and will be regularly reviewed and updated in line with the CCG's GP Estates Strategy. The following comments are provided on specific policies in relation to general practice provision for completeness.

**Policy AL/HO 3 Land to the east of Horsmonden** This site, as defined on the Horsmonden Policies Map, is allocated for residential development providing approximately 115-165 dwellings, safeguarding of land for future expansion of Horsmonden Primary School, new health centre/doctors surgery, and a community orchard and open space.<sup>14</sup> A suitable legal mechanism shall be put in place to ensure that the provision of the new health centre/doctors surgery is tied to the delivery of the housing, at a suitable stage of the development, to be agreed at the planning application stage;

Comments (Horsmonden, Brenchley and Matfield): To clarify the delivery of services from a single site for the practice population has not been considered at this time. The CCG has highlighted that an allocation or safeguarding of land for a doctors practice in Horsmonden may be required to ensure delivery of required infrastructure in the future. It is however important to stress that a more detailed discussion and assessment is required in this area to define any future requirements; specifically noting that the majority of housing growth proposed in Horsmonden is expected in the latter part of the plan period.

The statement regarding safeguarding of land for a new health centre in Policy AL/HO3 is noted as an opportunity to inform the planning for primary medical care services in the area.

#### Question 7



**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?** . No, I do not wish to participate in examination hearing session(s)

#### **Future Notifications**

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:** No, I do not wish to be notified of future stages of the Local Plan

## Comment

Consultee	Mr Calvin Coxside ( [REDACTED] )
Email Address	[REDACTED]
Company / Organisation	Persimmon Homes South East
Address	60 College Road Maidstone ME15 6SJ
Event Name	Pre-Submission Local Plan
Comment by	Persimmon Homes South East (Mr Calvin Coxside [REDACTED] )
Comment ID	PSLP_2014
Response Date	03/06/21 15:47
Consultation Point	Policy AL/HO 3 Land to the east of Horsmonden ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6
Files	<a href="#">PSLP_2014-2088_Persimmon Homes_SI_Appendix3(not inclusive).pdf</a> <a href="#">PSLP_2014-2088_Persimmon Homes_SI_Appendix1(not inclusive).pdf</a> <a href="#">PSLP_2014-2088_Persimmon Homes_SI_Appendix2(not inclusive).pdf</a> <a href="#">PSLP_2014-2088_Persimmon Homes_SI_Representation(not inclusive).pdf</a>
Data inputter to enter their initials here	AT
Question 1	
Respondent's Name and/or Organisation	Persimmon Homes
Question 3	
To which part of the Local Plan does this representation relate?	Policy
Question 3a	

**Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.**

Policy AL/HO 3 Land to the east of Horsmonden

Policies Map 62

*[TWBC: this representation has been input against Policies AL/HO 3, EN 2, EN 3, EN 9, EN 26, H 1, H 2 and H 6 – see Comment Numbers PSLP\_2014, PSLP\_2035, PSLP\_2083, PSLP\_2084, PSLP\_2085, PSLP\_2086, PSLP\_2087 and PSLP\_2088. The full representation is attached as supporting information]*

#### **Question 4**

**Do you consider that the Local Plan:**

**Is sound**

**No**

#### **Question 4a**

**If you consider that the Local Plan is not sound, please answer this question.**

**Do you consider that the Local Plan is not sound because:**

<input type="checkbox"/>	It is not justified
<input type="checkbox"/>	It is not consistent with national policy

#### **Question 5**

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.**

##### **1.0 Introduction**

1.1 These representations have been prepared by Persimmon Homes South East (PHSE) in response to the Regulation 19 Pre-Submission Publication Consultation on the Tunbridge Wells Borough Council (TWBC) Draft Local Plan (hereafter referred to as the Draft Plan). These representation should be read alongside the following supporting submissions:

- . Framework Plan (Drawing Number 1519.SK01.0) prepared by FINC Architects;
- . Transport Appraisal (Dated 3rd December 2020) prepared by Markides Associates;
- . Letter from KCC Highways (Dated 14 January 2021)

1.2 In preparing these representations we have assessed the Draft Plan against the relevant legislation and national policy requirements for 'plan making'. Notably the requirement that the Plan must be 'sound'.

1.3 PHSE are broadly supportive of the Draft Plan.

1.4 In particular PHSE are supportive of the allocation of our Land at Bassetts Farm (hereafter referred to as the Site) with the 'Policy AL/HO3 Land East of Horsmonden' an allocation for "residential development providing approximately 115-165 dwellings, safeguarded land for future expansion of Horsmonden Primary School, new health centre/doctors surgery and a community orchard and open space".

1.5 As these representation demonstrate the Site is in a sustainable location and can deliver gains across all three dimensions of sustainable development in accordance with the requirements of the NPPF and broadly in accordance with allocation AL/HO3. These representations also demonstrate that the Site is deliverable, and can deliver dwellings within the early part of the Plan period.

1.6 Whilst we remain broadly supportive of the Draft Plan, we request some detailed amendments to the Draft Plan, in particular Policy AL/HO3 to ensure that the allocation is deliverable, and thereby sound.

1.7 Critically, the emerging site specific survey work suggest that indicative diagram presented in the Draft Plan for Policy AL/HO3 does not accurately or appropriately reflect the sites constraints and opportunities. We are thereby requesting that Policy AL/HO3 is amended to explicitly confirm that the diagram is indicative only, and that proposals for the site will be assessed against site specific surveys and assessments.

1.8 The structure of the document is as follows:

- . Section 2 provides a detailed overview of the Site and surroundings;
- . Section 3 sets the vision and development potential of the Site, demonstrating deliverability;
- . Section 4 sets out our observations on the emerging Development Strategy Policy AL/HO3 and sets out several recommendations to enhance the robustness and soundness of the Development Strategy policy;
- . Section 5 provides commentary on the development management policies in the Draft Plan; and
- . Section 6 provides a summary and conclusion.

## **2.0 The Site**

2.1 The Site is located in a sustainable location on the north eastern edge of Horsmonden, within walking distance of the village's services and facilities including local bus stops, a village shop, post office, pharmacy, doctor surgery, public house, nursery and primary school.

2.2 The Site extends to approximately 14.7ha and comprises two distinct areas: an orchard area to the north; and to the south-west a complex of former farm buildings (including a Listed Building) and a former orchard. Outline Planning Permission has been granted for the redevelopment of the former farm buildings (this is considered further below).

### **Orchard Land**

2.3 The Site is positioned on the side of a very gently sloping valley; Goudhurst Road runs along the valley contours, therefore in terms of topography the application Site slopes upwards from south to north. A Public Right of Way (PROW) traverses the Site north to south; and PROW also runs along the northern boundary.

2.4 The north boundary of the Site is defined by a field boundary and a Beyond the northern boundary is agricultural land which is currently given over to orchards. To the east of the Site is an area of woodland which enclose the site to views from the east. The western boundary is defined by a former railway line which is now heavily vegetated by mature trees and hedgerows. Beyond the former railway line is a mature residential area which comprises a range of 2 - 2.5 storey semidetached and detached units constructed in the last 20 years. The palette of materials is varied, including red/brown brick, timber weather boarding, cream painted render and tile hanging. To the south of site is situated a terrace of housing and a large detached property situated in extensive grounds.

### **Adjacent Consented Development Site - Bassetts Farm**

2.5 Outline Planning Permission has been granted for development for up to 30 no. residential dwellings on land immediately to the south of the proposed allocation (reference TW/15/505340/OUT). The consented site, which is known as Bassett Farm, is owned and controlled by Persimmon Homes.

2.6 The consented development includes detailed approval for a site access (simple junction arrangement) with Goudhurst Road. As is discussed in Section 5, the approved junction arrangement could provide access to the allocated land and is of sufficient scale to accommodate the traffic generated by the proposed allocation.

2.7 It is envisaged that the consented site and the (proposed) allocated site could be brought forward together to deliver a well-designed sustainable extension to the village. This is discussed further in Section 5 below.

### **Planning History**

2.8 The northern part of the site has no recent planning history of relevance nor a history of unimplemented permissions.

2.9 Outline Planning Permission has been granted for development of up to 30 no. residential dwellings on land immediately to the south of the proposed allocation (under reference TW/15/505340/OUT). The consented land is owned and controlled by Persimmon Homes.

2.10 A Reserved Matters application (reference 19/03657/REM) was submitted to Tunbridge Wells Borough Council in December 2019 for the erection of 20 dwellings, and includes the discharge of a number of conditions related to affordable housing, hard and soft landscaping, arboriculture, foul and surface drainage, biodiversity mitigation and enhancement, tracking and turning, renewable energy, water and energy conservation, boundary treatment and refuse storage. This application is currently awaiting a decision.

2.11 There have also been recent submissions for the discharge of condition 17 (Parts 1, 2 and 3) as well as for the removal of condition 9, both of which are attached to the outline consent. These applications are awaiting validation from the Tunbridge Wells Borough Council Planning Department.

### **SHELAA**

2.12 The Site has been assessed through the submission to the Call for Sites process, and the subsequent Site Assessment, which have fed in to the creation of a Strategic Housing and Economic Land Availability Assessment (SHELAA, 2021). The SHELAA has been utilised as part of the evidence base for the emerging Local Plan and identifies the site as Parcels 297 and 82.

2.13 The assessment of the Site found that the Site has pedestrian access to the Village centre and is situated adjacent to the Limits to Built Development (LBD) area. Whilst there was varying ecological, highway, landscape and heritage sensitivity identified in the assessment this was not a precursor to the Site not being suitable for coming forward for development. The assessment concluded that this site is considered suitable as a potential site allocation.

2.14 As a national housebuilder Persimmon Homes intention to develop the Site. This confirms that the Site is available and achievable.

### **3.0 Constraint & Opportunities**

3.1 Persimmon Homes control the majority of the land allocated under Draft Policy AL/HO3. It is our intention to bring forward the Site for development broadly in accordance with the draft Policy AL/HO3 (subject to some detailed amendments to the draft policy wording which are discussed in more detail in Section 4 below).

3.2 To this end Persimmon Homes are undertaking some surveys and assessment of the Site to inform a preliminary master planning exercise. The following provides a summary of the Sites constraints and opportunities as they are understood at this stage.

#### **Landscape**

3.3 James Blake Associates (JBA) are in the process of conducting a full Landscape & Visual Impact Assessment of the Site, factoring its current state, its position and relationship with the surrounding countryside, and the impact that any development may have on the Site and the surroundings.

3.4 We have been advised of the following landscape sensitivities/characteristics and opportunities:

- . Landform: the landform within the Site follows a shallow valley with the land rising to the Just beyond the Site to the north lies to ridgeline at approximately 75m AOD. Any proposed development should avoid breaking the skyline.
- . PRoW network: PRoW WT340A, PRoW WT338 and PRoW WT341 run through or abut the site boundary. These connections should be retained and provision enhanced through the introduction of additional connecting footpaths;
- . Visibility and Views: From the northernmost boundary of the Site there are panoramic views across the wider landscape. Views towards the Site are also possible from the other side of the shallow valley to the south. Again, any development on Site should avoid breaking the ridgeline;
- . Woodland structure including ancient woodlands: The Site boundaries include some strong tree belts in places. These features should be retained, enhanced and reinforced with native buffer planting;
- . Listed Buildings: The National Heritage List for England (NHLE) indicates that there are a number of Listed Buildings in close proximity to the Site. The setting of these buildings will need to be carefully considered.

3.5 Overall, JBA have advised *“The Site is considered to be a suitable location in landscape and visual terms for development subject to some landscape considerations”*.

3.6 JBA consider that the Site could suitably accommodate an appropriate development scheme, broadly in line with the requirements of Policy AL/HO 3. This would be best achieved through the implementation of our sensitively designed masterplan which incorporates the following key design principles:

- . The location of proposed development areas should respond to the landscape features and characteristics that give the landscape its sense of place and local distinctiveness.
- . The built form should reflect the local settlement with the use of vernacular style materials wherever possible.
- . Hard and soft landscaping materials should be complementary to the proposed dwellings and the local vernacular design.
- . The use of dark/earthy tones will help to integrate the proposed development into the wider landscape, particularly any proposed dwellings towards the north of the Site.
- . Proposed dwelling could adopt a vernacular style, or be more contemporary in style but with vernacular references in their design or materials.
- . Existing boundary vegetation should be retained wherever possible and reinforced where necessary by new structural planting to provide screening value and create a wooded backdrop to the proposed development.
- . Groups of trees should be used within open space and Green Infrastructure corridors, this will help soften the built form and integrate providing connectivity across the Site
- . The Site should look to provide opportunities for multi-functional green infrastructure to provide landscape, visual, ecological, climate and recreational benefits.
- . Residential streets and buildings should reflect the existing settlement form, with a transition in density and building height, creating a lower density settlement edge to the north and east.

### **Trees**

3.7 Tree surveys are underway and are being conducted by arboriculture consultants PJC in order to better understand the Site and inform the masterplan.

3.8 PJC have so far found that the existing apple trees that make up the commercial fruit farm on the main part of the Site are individually not of high quality or high value.

3.9 We have been advised by PJC that the key arboriculture features to be retained and protected on the site are restricted along the boundaries. Surrounding the site boundaries are a number of individual trees, hedges and woodlands which should be retained and respected.

### **Ecology**

3.10 The Ecology Partnership are undertaking a number of Ecological Surveys which have so far found that the *‘The majority of the habitats on site are common and widespread, or of low ecological value due to their intensive management regimes’*.

3.11 The areas of ecological value are primarily located on the boundaries of the site. These areas include, dormouse suitable habitat, reptile suitable habitat and badger setts on the edges of the site that require a buffer from the proposed residential area. Persimmon Homes is seeking to achieve the Council's aspiration to enhance the biodiversity value of the site as well as mitigating any ecological impacts. Overall, we have been advised that *‘several enhancements can be made to the final development to help reduce potential ecological impacts, as well as to try and achieve 10% biological net gain’*.

### **Access**

3.12 Markides Associates have a Transport Appraisal (TA, dated December 2020) to assess the accessibility of the allocated land, alongside the adjacent committed site, and prepared a robust proposed transport strategy for the Site. This is included at Appendix 2.

3.13 The TA establishes that the site is an appropriate place for residential development, benefiting from being located within close proximity of a range of social infrastructure within the village that acts as typical trip attractors for residential land uses, ensuring residents are not wholly reliant on travel by private car to access essential services such as primary education, health and convenience retail.

3.14 Horsmonden also benefits from being served by a number of existing bus services that provide access to higher order settlements such as Royal Tunbridge Wells and Paddocks Wood, from which there are opportunities to access National Rail Services.

3.15 The TA demonstrates that the vehicular and pedestrian access from Goudhurst Road, approved as part of the Bassett Farm planning permission (reference TW/15/505340/OUT) is suitable to serve the whole development. The proposed site access junction has also been demonstrated to operate within capacity, with no material impacts on through traffic on Goudhurst Road.

3.16 In terms of potential traffic impact, Markides Associates have found that with 175 dwellings and the Health Centre the Site has the potential to generate approximately 133 vehicle movements during the AM peak and 119 vehicle movements during the PM peak, with 1218 vehicle movements across the day (07.00-19.00). This level of vehicular movement is not considered to be a significant and as such would not result in a 'severe' impact on the wider highway network as referenced in the NPPF (2012) paragraph 109.

3.17 Regarding pedestrians the TA demonstrated that the site can be suitably accessed from Goudhurst Road, with additional pedestrian accesses accommodated via Back Lane to the north-west, providing an alternative, and in some cases shorter, walking route to existing social infrastructure within the village centre such as Horsmonden Primary School. Persimmon Homes is also in the process of submitting details to TWBC pursuant to condition 5 of the outline consent at Bassetts Farm, Horsmonden (TW/15/505340/OUT) that would mean the provision of a pedestrian link is provided along Goudhurst Road. This would shorten the walking distance into the village centre and greatly benefit the site.

3.18 The report has therefore concluded that the proposals comply with all relevant Government and local transport planning policies, and that the proposals should not result in significant detrimental impacts to the existing transport network. Therefore, allocating the Site for development in the Draft Plan is acceptable in transport terms.

3.19 In summary, the TA has reviewed emerging transport related planning policy within the Draft Local Plan and concluded that residential development of the envisaged scale at this site would be in compliance.

3.20 This has been reflected in the positive discussions between KCC Highways, Persimmon Homes and Markides Associates as of 20th October 2020. KCC Highways have subsequently confirmed (in a letter dated January 2021, see **Appendix 3**) their *'agreement with the contents and summary detailed in the 'Transport Appraisal' document dated 3rd December 2020'* and that the *'proposals are welcome and should be further explored (along with scheme drawing and RSA1) at application stage as part of the mitigation package'*.

### **Flood Risk**

3.21 The Site is located within Flood Risk Zone 1 (less than 0.1% annual probability of tidal and fluvial flooding), which is the lowest zone in terms of probability of flood. This is confirmed by the Environment Agency flood maps.

### **Summary**

3.22 In summary, Persimmon Homes are in the process of preparing surveys and assessment of the Site to inform our preliminary master planning exercise. Initial feedback from these surveys identified the following key constraints and opportunities which will inform the master planning of the site:

- . Retention of existing vegetation on and around the site boundaries, including the hedgerows and mature trees;
- . Protection and enhancement of existing ecology on and around the site;
- . Respect views to the Site, particularly from the south across the tributary valley, and from adjacent visual receptors, including PRowWs, local roads and residential properties; and
- . Capacity to provide a vehicular access from Goudhurst Road to serve the whole site.
- . Opportunities to provide pedestrian connections along the existing Public Rights of way to the north and also via the new pedestrian footpath being provided along Goudhurst Road as part of our consent scheme.

### **Masterplan**

4.1 Having regard to the Site's opportunities and constraints, PHSE have prepared a 'concept masterplan' for the Site, which accompanies these representations (appendix 1).



4.2 The concept masterplan demonstrates that the Site could sensitively accommodate approximately 150 units, a 0.25ha medical centre site, extensive public open space, vehicular access on to Goudhurst Road and enhanced walking and cycling connections.

4.3 It is important to highlight that the preliminary masterplan suggests a different form and layout of development for the site than is indicated on Map 62 'Site Layout Plan' which is included in the Draft Plan (see image below). Specifically our emerging Preliminary Masterplan proposes:

- . A strong east/west Green Infrastructure Corridor is included through the site to help screen views of the development from the south, and also providing;
- . Natural Buffers along the edges of the site which take consideration of ecological, arboricultural, heritage and landscape constraints;
- . Swales along the northern edge of the development to capture field run off from the POS to the north;
- . Low density housing in the north east section of the site in accordance with Policy AL/HO3;
- . Eased frontage as a sweeping belt following the contours of the site;
- . Potential location for the proposed medical centre (including access); and
- . Long stretches of roads have been broken to allow for an appropriate street hierarchy in line with the local context of Horsmonden.

### **Open Space and GI Framework**

4.4 In accordance with the requirements of the Landscape and Visual Appraisal, the development has been landscape-led with substantial amounts of soft landscaping ensuring that the built development would be sympathetic to the semi-rural character of the surrounding area.

4.5 The existing trees and landscaping have been carefully considered and integrated into the development. In particular, the Framework Plan has sought to provide visual separation between residential areas. This has been achieved through the introduction of green space which follows a central east/west line. This area offers a belt of intervening tree line that would help soften the view from afar whilst creating a central focal theme through the development. As is shown on the Framework Plan, there is also the potential for the SuDS to be positioned throughout the site so that any development can be appropriately attenuated. The retention and strengthening of established landscape features will help ensure the scheme sits comfortably within its surroundings.

4.6 In accordance with Policy AL/HO3, the masterplan shows the scope by which we can deliver large areas of open space and formal recreation land, as well as providing for the Community Orchard.

4.7 There is a real opportunity to open up public access to the site, making best of use of connections into the public right of way that runs through the site, but also pedestrian links west towards the village centre.

### **Residential**

4.8 Sensitively prepared, the masterplan has been informed by site constraints, residential development is proposed in those areas which are least sensitive in terms of ecological, arboricultural, visual and landscape constraints.

4.9 The existing residential properties (particularly New Bassetts Villas) and Old Bassetts Cottages (Grade II listed) located to the south of the site will inform the design approach for the residential use areas.

4.10 Although indicative at this stage, we would propose a traditional, high quality design approach. It is envisaged that dwellings would be constructed from materials that will have a reduced impact on the environment, drawn from a mixed palette of traditional vernacular materials.

4.11 It is also worth noting that in line with New Local Plan Policy H3, 40% would be proposed as affordable, the remainder being market housing for private sale.

### **Health Centre**

4.12 As noted by comments made by NHS West Clinical Commissioning Group in representations to the Reg 18 Draft Local Plan (comment number DLP\_8300), *'The existing premises do not have capacity to accommodate the estimated growth of c 1100 registered patients within the area (Brenchley, Matfield and Horsmonden); the majority of this growth is expected in Horsmonden'*.

4.13 Accordingly Policy AL/HO3 requires the delivery of a site for a Health Centre/GP surgery as part of the development of the Site. We have identified a site for a Health Centre/GP surgery on the



Preliminary Masterplan; it is located in the centre of the Site providing good vehicular access whilst also providing good pedestrian connectivity.

4.14 Thereby the development would help redress the imbalance in the Borough's healthcare provision providing a site for a Health Centre/GP surgery. Thereby this development would support delivery of sustainable services for existing and future residents of Horsmonden

#### **Access Strategy (Pedestrian and Vehicular)**

4.15 Vehicular access is to be created from Goudhurst Road as an improved simple priority junction. The TA demonstrates that visibility splay can be provided be in accordance with the requirements set out in the manual for streets for a 30mph road.

4.16 The development proposals will also include additional pedestrian access via the established public right of way network that runs north of the site via Back Lane.

4.17 The development proposals will be designed in accordance with Manual for Streets and Kent Design Guide principles, future proofing connections with proposed infrastructure such as the Hop Pickers route to Paddock Wood, which runs adjacent to the site, and which will offer convenient and safe cycle access on traffic free routes.

4.18 The development proposals will also support and encourage sustainable travel via the implementation of a Travel Plan and is of a scale of development that will potentially be able to deliver improved public bus services and/or the creation of a demand responsive bus service that is branded to the site.

### **5.0 Land East of Horsmonden Policy AL/HO3**

5.1 The Site has been allocated within Policy AL/HO3 sets out that the Site is allocated for residential development, providing approximately 115-165 residential (C3) dwellings and land for the expansion of Horsmonden Primary School, new health centre/doctors surgery, and a community orchard and open space. Persimmon Homes is broadly supportive of Policy AL/HO3. This notwithstanding we are seeking some minor amendments to Policy AL/HO3 to ensure it is deliverable and makes that anticipated contribution towards the Borough's housing land trajectory.

#### **Map 62 Site Layout**

5.2 As noted above our Preliminary Masterplan for the Site differs to 'Map 62 Site Layout' which has been included in the Draft Plan in support of Policy AL/HO3. The divergence between our Masterplan and the Site Layout has been driven by a better understanding of the Site constraints.

5.3 In light of this difference we seek formal confirmation that the Map 62 (Site Layout) is intended to provide guidance as to how the Site is to be brought forward, and that future applications can, subject to reasoned justification, vary from this. We say this as detailed site investigations associated with site promotions will inevitably bring to light matters that were not known to Council whilst doing their desk top work, and because as discussions with various statutory consultees evolve so will the future scheme. Thus, it would be counterproductive to suggest that Map 62 (Site Layout) is the only option that can be taken forward. As long as the principles enshrined in the Policy are adhered to / addressed then there should be scope for variations from the proposed Map 62 (Site Layout) and Policy AL/HO3 should be clear in this regard (see below).

#### **Policy Text**

5.4 Whilst Persimmon Homes are supportive of Policy AL/HO3 we request some amendments to the Policy text to ensure that the site is deliverable in the timescale required. Please see table below for comments on specific elements of Policy AL/HO3:

#### **Requirement**

#### **Compliance**

#### **Requested amendment**

*1. The number and location of vehicular accesses to be informed by a Highways assessment"*

Persimmon Homes have undertaken a Highways Assessment and submitted this to Kent County Council Highways in support of a formal pre-app for the Site. The Highways Assessment is submitted in support of these representation. Having reviewed our Highways Assessment in detail KCC Highways confirmed that the Site can be accessed via a single vehicular access point from Goudhurst Road.

We consider that the policy should be amended to confirm that vehicular access will be taken via Goudhust Road.

*2.Provision of pedestrian links into the village and footway*

Our masterplan shows this and we can deliver it.

N/A

*3.Provision of link to PROW*

Our masterplan shows this and we can deliver it.

N/A

*4. Residential development shall be located on the areas identified for residential and doctors surgery use on the site layout plan [Map 62]*

Our masterplan does not reflect the 'Site Layout Plan (Map 62)'. Our emerging LVIA indicates that the areas shown for development on the 'Site Layout Plan' (Map 62) does not effectively respect landscape sensitivities and is not the most appropriate layout.

We consider that the policy should be amended to require an LVIA is submitted in support of an application for the Site to inform the master planning process and ensure that landscape sensitivities are properly understood and respected whilst also ensuring efficient use of the land.

*5. No built development on the route of the Hop Pickers Line*

Our Masterplan respects this requirement.

N/A

*6. The layout and design of the scheme to give full consideration to any impact upon the setting of the High Weald Area of Outstanding Natural Beauty*

Our Masterplan has been prepared with due consideration of the AONB, in accordance with a Landscape Appraisal prepared by JBA.

N/A

*7. Regard shall be given to existing hedgerows and mature trees on site*

The masterplan has been prepared following extensive Arboricultural Survey work undertaken by PJC and fully considers the existing hedgerows and mature trees

on site.

N/A

*8. Built development on the eastern area of the site to be at a lower density and informed by a landscape and visual impact assessment*

Our masterplan is informed by an LVIA. Whilst this does indicate that the north eastern area is visually sensitive, it does not suggest that lower density development is required to address this sensitivity. Rather an appropriate layout of development is required.

This requirement should be removed.

*9. The provision of an archaeological assessment as part of any planning application*

An archaeological consultant has been appointed to undertake the appropriate assessments.

N/A

*10. The scheme to take account of, and respect, the setting of New Bassetts cottages*

The Masterplan shows consideration of the setting of New Bassetts cottages

N/A

*11.The scheme to take account of, and respect, the character and appearance of nearby listed buildings*

This is shown in the Masterplan and will be reviewed by the appointed archaeological consultant

N/A

*12. Land to the north of the site for future school expansion*

The Masterplan shows the area allocated for future school expansion and is deliverable.

N/A

*13. Provide on-site amenity/natural green space and children's and youth play space, and a community orchard that will be managed and maintained for this use*

In accordance with the policy our Masterplan shows a community orchard, children's and youth play spaces as well as on-site amenity area/natural green space.

*14. A suitable legal mechanism shall be put in place to ensure that the provision of the new health centre/doctors surgery is tied to the delivery of the housing*

Our masterplan shows a *health centre/doctors surgery site*. However Persimmon Homes cannot be expected to provide the facility itself; this will be delivered by third parties.

The policy needs amending to confirm that provision of the health centre/doctors surgery site must not be tied to the delivery of the housing, but that the facility itself will be delivered by third parties. This must be explicit in the Policy. Requiring a development of no more than 175 homes to deliver a health centre site and facility would not be fair and reasonable and would not be CIL 122 compliant.

*15. Contributions are to be provided to mitigate the impact of the development, in accordance with Policy PSTR/HO 1*

We will provide all CIL compliant contributions to mitigate the impact of the development.

N/A

## **7.0 Summary and Conclusions**

7.1 Persimmon Homes are broadly supportive of the Draft Plan and in particular Policy AL/HO3 which allocates our Site 'Land East of Horsemonden' for residential development.

7.2 Notwithstanding our broad support for the Plan, we would ask for the following key changes to the Policy AL/HO3 to ensure that the Site is deliverable:

- . Confirm that the Map 62 (Site Layout) is only intended to provide guidance as to how the Site is to be bought forward, and that future applications can, subject to reasoned justification, vary from this.
- . Remove the requirement for the eastern area of the site to be at a lower density.
- . Confirm that vehicular access for the development will be taken via Goudhurst Road.
- . Confirm that the development is only expected to provide a health centre site and not deliver a health centre/building facility.

## **Question 6**

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Question 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please see Written Representations accompanying this form for more detail.

Notwithstanding our broad support for the Plan, we would ask for the following key changes to the Policy AL/HO3 to ensure that the Site is deliverable:

- Confirm that the Map 62 (Site Layout) is only intended to provide guidance as to how the Site is to be bought forward, and that future applications can, subject to reasoned justification, vary from this.
- Remove the requirement for the eastern area of the site to be at a lower density.
- Confirm that vehicular access for the development will be taken via Goudhust Road.
- Confirm that the development is only expected to provide a health centre site and not deliver a health centre/building facility.

#### Question 7

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If your representation is seeking a modification to the Plan, do you consider it necessary to participate in examination hearing session(s)?** . Yes, I wish to participate in hearing session(s)

#### Question 7a

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

Persimmon Homes have an interest in land east of Horsmonden – Policy AL HO 3. Persimmon is also active elsewhere in the Borough and have an interest in ensuring the legality and soundness of the Local Plan. Persimmon should therefore wish to participate in the examination.

#### Question 8

**If you have any separate comments you wish to make on the accompanying Sustainability Appraisal, please make them here.**

Please see Written Representations accompanying this form for more detail.

#### Future Notifications

**Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box:** Yes, I wish to be notified of future stages of the Local Plan