

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

**Comments on Section 5: Place  
Shaping Policies: Southborough:  
Policy STR/SO 1: The Strategy for  
Southborough**

## Comment

Consultee	Ms Margaret Borland [REDACTED]
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Southborough [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Ms Margaret Borland [REDACTED]
Comment ID	PSLP_1182
Response Date	04/06/21 12:28
Consultation Point	Policy STR/SO 1 The Strategy for Southborough ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Question 1	
Respondent's Name and/or Organisation	M Borland
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.	
STR/SO 1 The Strategy for Southborough.	
Question 4	
Do you consider that the Local Plan:	
Is legally compliant	Don't know
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

#### 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.**

As a Southborough resident I am pleased to see that the development strategy in the Local Plan has reduced allocations, especially major developments, in the High Weald AONB. With 64% of the parish of Southborough in the AONB and 66% in the Green Belt I believe that it is very important that these areas are not lost to built development. In particular I support the removal of site 445 from the Southborough allocations, following the LVIA (Nov 2020) assessment.

However, I strongly object to policy STR/SO 1, the Strategy for Southborough. It provides a confused and incomplete place shaping policy for Southborough and is ineffective in defining a development strategy for the parish.

#### Gaps in the Policy Provisions

I am concerned that the policy does not :

- 1 propose delivery of a luxury hotel and leisure development with spa and conference facilities set within a restored historic park and garden and wider attractive landscape (AL/SO 2). This allocation is set out within the Southborough section of the Place Shaping Policies but does not appear to form part of the development strategy for Southborough. As this allocation is the only one within the whole of the Local Plan that meets the need identified in the Hotel Capacity Study (April 2017) it must surely form an important part of the future economic development of the parish and the borough;
- 2 support delivery of additional housing inside the defined LBD over the lifetime of the Plan. The settlement of Southborough (as defined by the LBD on Inset Map 1) forms part of the Main Urban Area of the borough where such development over the lifetime of the Plan is to be expected;
- 3 require best use to be made of previously developed land – again a vital part of the policy for both the urban and rural areas of the parish;
- 4 promote retention, expansion, and intensification at Southborough/High Brooms Industrial Area as marked on Inset Map 3. This is defined as a Key Employment Area in policy ED 1 and is important in providing local employment;
- 5 resist the loss of local shops and community facilities. Policy ED 8 defines a town centre (Southborough) and two neighbourhood centres (High Brooms and North Southborough), all of which are marked on the Inset Map 3. Southborough town centre is marked on Inset Map 3 as having shop fronts of historic interest (Policy EN 6), but North Southborough – referred to as Southborough North Parade in the preamble to policy EN 6 - is not. Due to the scale of Inset Map 3 it is impossible to comment on whether all green spaces are shown;
- 6 support active travel as set out in the LCWIP. A number of improvements to cycling and walking infrastructure, including the provision of Low Traffic Networks are proposed for Southborough (LCWIP Phase 2 Report and Appendices, March 2020);
- 7 support improvements to local bus network and infrastructure. While London Road is well served by day-time bus routes, the services fall away rapidly after evening rush hour times resulting in continued car dependency for homeward travel for an evening out in the centre of RTW;

- 8 provision of public electric vehicle charging points. These must form an essential part of the strategy to address climate change. Much of the settlement of Southborough is densely populated with on-street car parking. Lack of public charging points is likely to severely impact the take-up of electric vehicles in this area;
  - 9 deliver measures to reduce congestion on A26 through Southborough. The IDP refers to a smart traffic management system on the A26 to address the continuing congestion issues through Southborough. Poor air quality at the A26 roadside from such congestion affects both pedestrians and cyclist both within and outwith the A26 AQMA in Southborough;
  - 10 seek developer contributions to be used towards schemes to support transport measures (see points (6) and (9) above); and
  - 11 seek developer contributions from commercial schemes as well as residential. I am very uncomfortable that developer contributions may not be required from the major development proposed at AL/SO 2 nor for leisure or mixed use developments within the LBD in the future.
- I also question whether amendments are required to the following points in the policy as currently drafted.

STR/SO 1.2 Could this include percentage of affordable housing (as is done for other parishes)?

STR/SO 1.3 Should provisions re sport and recreation areas also include Pennington Grounds?

STR/SO 1.5 Should this apply to the neighbourhood centres as well as the town centre?

STR/SO 1.6(e) Why does this not specify recreation and sports provision at Southborough Hub and Pennington Grounds rather than Hawkenbury and Rusthall, attendance at which would require a journey through the centre of RTW?

### **Active Travel**

I support active travel. However I do have a number of concerns re the proposals for Southborough in the LCWIP. I believe that there will be formal consultation on all such measures before they are introduced and therefore have only made some high level observations in this response.

The proposals for an A26 inter-settlement cycleway between RTW and Tonbridge do not pay due regard to the narrow road widths and high volume of HGVs and delivery vans using this route in addition to private cars. I am unsure how adding an on-road cycle track on the A26 in Southborough will provide a safe and attractive route for cyclists. Will the speed limits for the whole of this route be reduced from the current 30mph and 40mph limits? How will a Low Traffic Network at North Southborough/Bidborough reduce rather than increase the traffic congestion at the Bidborough Ridge/London Road junction?

"Quiet routes" options suggested for Southborough also utilise roads outside the LBD. Traffic speeds are likely to be an even greater safety issue than at the A26 as forward visibility is limited by bends in the road. Vauxhall Lane, one of the proposed quiet routes, was well used by walkers and cyclists at the start of the pandemic when there was hardly any traffic. Now it has returned to being a rat-run from Vauxhall Interchange to Southborough, avoiding traffic in Tonbridge, and is once again very unsafe even in a car. Additionally this is a Rural Lane outside the LBD and within the AONB and the Green Belt. Lighting this route for the safety of cyclists and walkers will adversely impact an area of Dark Skies and potentially urbanise the roadway.

### **Scope of the Policy**

A number of the issues raised result from it being very unclear as to what area the Policy is covering. Para 5.132 refers to "Southborough", "the town of Southborough", "the parished area" and "the LBD of Southborough" with no attempt to explain how these terms relate to each other, or to which one the policy relates. Confusion also seems to have been generated by references to the Main Urban Area which is formed by RTW and Southborough.

The *Settlement Role and Function Study Update* (Feb 2021) notes that it is "...important to make the distinction between 'settlements', which are the focus of this study, and 'parishes'. The term 'settlement' in this context is defined as a village or settlement that has a Limits to Built Development (LBD) boundary. In contrast, parishes have their administrative area definition and may contain any number of villages in addition to large areas of countryside containing dispersed dwellings."

According to the Southborough Town Council website it administers both the town of Southborough and the civil parish; High Brooms falls under the civil parish i.e it forms a separate settlement within the parish (see <https://southborough-tc.gov.uk/>) The parish boundary is obscured by other designations

on Inset Map 3 but the LBD is clear and the Town Council website maps help to clarify the parish boundary. My understanding is that the parish of Southborough is bounded by the parishes of Speldhurst and Bidborough to the west, by the borough of Tonbridge and Malling to the north, by the parish of Capel and RTW, which is unparished, to the east and by RTW also to the south.

From the Policy maps (and indeed the Town Council maps) there is no clear boundary between the settlements of Southborough and High Brooms; together with RTW, both are within the LBD of the Main Urban Area. The preamble to the Policy however appears to view the town of Southborough as distinct from "the parished area". The policy gaps set out above suggest that this place shaping policy is for the (undefined area of the) town of Southborough and neither High Brooms nor the areas of the parish outside the LBD are covered by the policy. It further appears that the town of Southborough is considered to be an unparished area and "inherits" policy provisions from STR/RTW 1.

Please also see comments on paa 5.1 to 5.4 for further evidence that this policy is for an unparished area.

As a resident I place a great store on the special character and amenities of the parish of Southborough. In the Local Plan this is currently very poorly served; those who live here will struggle to recognise, new residents will learn nothing of its character, assets and community life. Southborough residents now and in the future must be able to easily find information about how the Local Plan policies affect their community and this is well-nigh impossible with the current approach.

I suggest that Policy STR/SO 1 needs to be the strategy for the parish of Southborough as a whole as the simplest and most obvious ways to deal with the gaps and misconceptions identified and to ensure that the contribution of Southborough to the social, economic and environment purposes of this Local Plan are clearly defined and can be monitored.

## 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.**

**Inset Map 3 :** Improve visibility of designations on map. Scale is so small that many are not visible - to ensure that the "phrase" as shown on the policy map is not rendered meaningless by overlays of designations and scale of map hiding important designations.

**Policy:** Please see response to Question 5

### Preamble to Policy

Based upon a policy for the parish of Southborough rather than the town of Southborough the following changes are required :-

References to the A26 should note that the section from the parish boundary in the south to Birchwood Avenue is part of the AQMA.

The Key Employment Area in High Brooms should be mentioned, as should other main employment in Southborough that is outside the town and neighbourhood centres e.g. farming and forestry plus rural diversification into commercial leisure (live events, drive-in cinemas) and tourist accommodation, Salomon's Estate.

A better description of the Green Belt, AONB and Landscape character areas in Southborough, and their relationship to the LBD (c.f. para 5.8 for STR/RTW 1) would assist in understanding the area characteristics and local issues.

I would also like to see more reference to the natural and built heritage assets of Southborough, including

- . the Conservation Area (which includes not only Southborough Common but also North Parade neighbourhood centre and surrounding houses);
- . mention of the significant areas of Ancient Woodland, and areas of archaeological potential;
- . Historic Parks and Gardens (Bentham Hill House (David Salomon's estate) and parts of Mabledon (house and grounds)); and
- . ecological/wildlife designations (Southborough Common, Southborough Cemetery, Brokes Wood, Barnett's Wood, Vauxhall Lane Woods, parts of Bidborough Woods and Pasture; two SSSIs at Southborough Pit) across the parish.

The Southborough Hub is poorly described (particularly as it reads as if it is the doctors surgery is offering enhanced community and cultural facilities). As a minimum, a list of facilities provided is needed to set out the platform for future changes/enhancements.

Para 5.14 for STR/ RTW 1 also makes important points regarding new development in the Main Urban Area which should be repeated in the preamble to the policy. References to the IDP that supports the Local Plan (c.f para 5.19) should also be included .

### 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

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

To discuss these issues further.

## 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_521
Response Date	27/05/21 16:27
Consultation Point	Policy STR/SO 1 The Strategy for Southborough ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
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.	
Policy STR/SO 1 The Strategy for Southborough	
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 effective
- . It is not justified

#### Question 5

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CPRE Kent objects to policy STR/SO 1, the Strategy for Southborough. We are concerned that the policy does not appear to include requirements/provisions for the whole of Southborough, limiting its scope to a smaller, but undefined, area of "the town".

The Southborough Town Council website provides a brief description of the formation of Southborough Town Council in 1974 together with maps of the town's three electoral wards (see <https://southborough-tc.gov.uk>). From these maps it can be seen that the "town" of Southborough includes the whole of the area within the parish boundary (edged in blue on Inset Map 3), stretching from the borough boundary with Tonbridge in the north to RTW unparished wards in the south. To the east Southborough is bordered by the parishes of Speldhurst and Bidborough, while to the west it is bordered by the parish of Capel and RTW unparished wards, with the border primarily following the Tonbridge to Tunbridge Wells railway line.

CPRE Kent additionally questions references to "the parished area" in the policy preamble as this suggests that some part or parts of Southborough are "unparished", mirroring the status of the adjoining areas of Royal Tunbridge Wells. This is also suggested in paragraphs 5.1 to 5.3 (Section 5: Place Shaping Policies) and in policy STR/RTW 1 which state that Inset Map 1 shows the "unparished area at Royal Tunbridge Wells" when in fact it shows the Main Urban Area including the whole of the Southborough LBD. Again, Town Council website does not appear to support the Plan's view

In light of the above, CPRE Kent has considered this policy as the development strategy for the whole of Southborough as defined on the Southborough Town Council website and our comments below reflect our key areas of concern. This is not intended as a full list of additional policy provisions that may be required.

Please also see our responses to Policies STR1, STR2, STR3, STR5, STR6, STR7, STR8 and STR9.

The Policies Maps does not appear to separate the Southborough LBD from the RTW LBD. While together forming the Main Urban Area, we suggest that each should have a fully bounded LBD for clarity, mirroring the approach taken to the north west of Southborough where its LBD adjoins that of Bidborough.

The sites that have been allocated for housing development (AL/SO 1 and AL/SO 3) have already received planning permission. Both are within the Southborough LBD in sustainable urban locations; AL/SO 1 is a greenfield site in close proximity to the town centre area on London Road while AL/SO 3 is a brownfield site near the High Brooms neighbourhood centre and High Brooms railway station. What is the density proposed for these sites? We have highlighted our concerns re effective use of land in our responses to policies STR 1 and H3 and would like to be assured that housing developments in within the Southborough LBD are being built at an appropriate density to their urban local, to ensure that countryside is not built over unnecessarily.



The policy does not cover the provision of additional housing, including windfall developments within the LBD. As part of the Main Urban area, we would expect this to be an important element of the development strategy.

Our response to policy STR1 suggests that it would be helpful to understand the distribution of development in terms of its relationship to the settlement hierarchy, to ensure that development is being planned in the most sustainable locations across the borough. The reasons for the significant reduction in housing allocations (42 dwellings) on that in the draft Local Plan (135-205 dwellings) in what is clearly a sustainable location should be set out in the preamble to the policy, to inform this analysis.

We additionally note from the SHELAA that ALS/SO 3 is part of a brownfield site that was submitted for mixed use development during the draft Local Plan consultation in 2019. The wider site contains a number of ageing industrial workspaces that are still in use but is not a Key Employment Area. It is located close to both the Southborough/High Brooms KEA and the North Farm/Longfield Road KEA. We question why the SHELAA has not provided a potential residential yield for the whole site, which is approximately four times the allocated area and could make a valuable contribution to meeting the borough's housing. Were steps taken to try to release the whole site, for example by offering options for relocation to one of the nearby KEAs or for regeneration of the site for mixed use?

We are surprised that the development at AL/SO 2 is not part of the strategy for Southborough. The development proposed in that allocation meets an identified need in the borough for luxury tourist accommodation and will also deliver health, employment and heritage benefits. Please see Policy AL/SO 2 for our further comments on this proposed development.

We also consider that the policy should safeguard the Southborough/High Brooms Key Employment Area in accordance with policy ED 1 and resist the loss of local shops, community facilities and green space in accordance with policy ED 12.

In the Plan Southborough appears to be valued only as "... a sustainable location for additional future development." (paragraph 5.138). CPRE Kent believes that it is essential to recognise the contribution that those areas outside the LBD also make to creating an attractive and prosperous community and a place where people want to live and work.

With 66% of the parish in the green belt and 64% in the AONB, around half of Southborough is not urban. The rural areas provide employment in agriculture and forestry while some farms have diversified to provide event venues and small-scale tourist accommodation. Barnetts Wood, described in the policy as "a natural green space", is an urban-edge Local Nature Reserve bringing High Weald countryside to local residents. Southborough Common has a variety of habitats including open woodland (wood pasture), dense thickets, acid grassland, heathland and a pond. Both of these are Ancient Woodland. The Salomons Estate which includes a Victorian Mansion designed by the architect Decimus Burton and gardens, parkland and woods is at the south western corner of the parish. (<https://www.salomons-estate.com/>).

We have not attempted to identify whether the policy requires further modification to cover these and the many other environmental and heritage assets in Southborough. As a minimum, the list of relevant policies that follows the policy box should be updated.

We are further concerned that air quality at the A26, a major issue for Southborough, is not addressed by this policy. The town centre, Southborough Common and the neighbourhood centre at Southborough North Parade are all within the AQMA. While the Air Quality Topic Paper (February 2021) indicates that NO<sub>2</sub> levels in the AQMA are reducing, local residents walking to the shops or to the Common continue to suffer poor air quality issues; narrow road widths mean that even a delivery lorry or a bus stopping may cause a long queue of stationary traffic.

CPRE Kent strongly supports proposals to increase active travel as key to improving air quality. Proposals are included in IDP and the LCWIP for improved walking/cycling provision and we suggest that the Plan's standard policy wording re supporting active travel by delivering improvements to the local pedestrian and cycling network is included in the strategy for Southborough.

That said, the proposed approach of an on-road A26 inter-settlement cycling route through Southborough does not pay due regard to the air quality and safety issues. The topography, restricted road widths and volume of commercial vehicles including HGVs using the A26 in Southborough will continue to

make it unsafe for cyclists even with an on-road cycle track. Proximity to the traffic will place them at risk not only of serious injury in a traffic accident but also of permanently damaging their health through breathing vehicle emissions. We believe that cycling and walking routes need to be separate from roads for these reasons and this is a location where provision of off-road cycling infrastructure is essential.

The option of an alternative “quiet route” may be safer and healthier but use of Rural Lanes and PRowS risks suburbanising these areas through the infrastructure required for safety such as surface treatments for routes crossing open green spaces, lighting and roadway traffic calming measures. Vauxhall Lane, nominated to provide an alternative for part of the A26 route, is a designated Rural Lane in the AONB, adjacent to a local wildlife site and bordered by agricultural fields for most of its length. This area benefits from dark skies and installation of street lighting would be contrary to Paragraph 180(c) of the NPPF, which requires plans to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

#### Southborough Sites not allocated.

CPRE Kent strongly supports the Council's decision not to allocate sites 10, 45, 335 and 445, which are in sensitive locations in terms of landscape, biodiversity AONB and/or Green Belt.

### Question 6

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As noted above.

Please note that visibility of information on the map needs to be improved e.g. by an increase in scale; it is very ‘busy’ with a number of designations overlaying each other.

### Question 7

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**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:**

CPRE Kent would wish to participate at the examination hearings to explore these issues further. In particular, development at sites 10, 45, 335 and 445 would have an impact on landscape, biodiversity

and/or the green belt we would wish to participate at the Examination Hearings to counter any representations which may be made at the hearing sessions on behalf of promoters of the sites.

#### **Question 8**

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

Please see our comments under policy AL/SO 2

#### **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_2188
Response Date	04/06/21 16:56
Consultation Point	Policy STR/SO 1 The Strategy for Southborough ( <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 STR/SO 1 The Strategy for Southborough

[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

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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 development contributions to be made as appropriate towards improvements to the PRoW network to provide Active Travel opportunities in the area.

#### Question 6

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**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

## Comment

Consultee	Michael Dunn [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Southborough Society
Address	[REDACTED] Southborough Tunbridge Wells [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Southborough Society ( Michael Dunn - [REDACTED] )
Comment ID	PSLP_332
Response Date	24/05/21 08:05
Consultation Point	Policy STR/SO 1 The Strategy for Southborough ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.4
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Southborough Society
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 STR/SO 1: The Strategy for Southborough

**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.

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The Society has no comments on the general development strategy, which it regards as comprehensively covering future social and economic development of the Town.

Nor does it have any further comment on Policies AL/S01 (Speldhurst Road former allotments) and AL/S03 (Baldwins Lane), both of which have current planning permissions.

**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**

<b>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:</b>	Yes, I wish to be notified of future stages of the Local Plan
--	---



## Comment

Consultee	Sir/Madam [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Southborough Town Council
Address	Council Offices 137 London Road ROYAL TUNBRIDGE WELLS TN4 0ND
Event Name	Pre-Submission Local Plan
Comment by	Southborough Town Council [REDACTED]
Comment ID	PSLP_1358
Response Date	03/06/21 16:28
Consultation Point	Policy STR/SO 1 The Strategy for Southborough ( <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	Southborough Town 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.**

Policy STR/SO 1 The Strategy for Southborough

*[TWBC: relevant parts of this representation have been input against Policies STR/SO 1, AL/SO 2 and AL/RTW 5 - please see Comment Numbers PSLP\_3158, PSLP\_1375 and PSLP\_3168]*

**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.

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#### **TUNBRIDGE WELLS BOROUGH COUNCIL –LOCAL PLAN COMMENTS**

Please find below the comments raised by STC Chairman of Planning and Transportation Councillor Alain Lewis:

The way the Local Plan is organised it appears that the town of Southborough has become an unparished area of RTW. This therefore diminishes the status of Southborough as being a separate entity to RTW.

- In the introduction to Place Shaping Policies para 5.1. "This section is arranged by non-parished and parished areas..." and list in para 5.3 has Southborough immediately after RTW, before strategic sites, not with the parished areas

- Not clear what areas of Southborough are included in the 'the town' and which are 'parished' and therefore what the policy covers.

We question why the plan designates the 'town of Southborough (as being) mainly urban in character and forms what is referred to as the Main Urban Area of the borough alongside RTW'. Also, the Southborough Common Conservation Area is described as being 'to the north of the parished area' and High Brooms is 'within the parished area' and High Brooms Station is 'just outside the parished area'

Therefore, as a result a perspective for Southborough and High Brooms is missing from the Policy as a result in relation to;

- Point 2: Providing additional housing (windfall developments)
- Point 3: making the best use of previously developed land
- Point 5: Retention of Key Employment Area – specifically for Southborough/High Brooms Industrial Area
- Point 8: Support active travel (for the mass of walking and cycling improvements in Southborough set out in the LCWIP).
- Point 9: Support improvements to local bus network and infrastructure
- Point 10: Deliver measures to reduce congestion on A26 – through Southborough
- Point 11: Plan for the expansion of electric vehicle charging points

In the existing policy for the non-urban Southborough as well, we make the following comments.

- Point 1: Set LBD for Southborough - Inset map 3 does not show an LBD boundary between Southborough and adjoining unparished areas of RTW.

- Point 2: Developments: No mention of AL/SO 2 Mabledon House (although the allocation policy is included in the Southborough Policies section) – the only hotel development in the whole plan and meets the identified need for a luxury hotel in the borough (see Hotel Capacity Study).

- Point 3: Identify Southborough hub as a local sports hub recreation – the policy should include words about future enhancements that are in RTW 1 point 15. Also, should this not be designated as a sport and recreation area?
- Point 4: Protect and retain public car parks as shown on Policies Map. Yew Tree Road car park is marked on map (TP4) but Pennington Road does not appear.
- Point 5: Appropriate mix of uses within town centre – maybe this could cover neighbourhood centres (Southborough North Parade, High Brooms) also?
- Point 6: We believe that any developer contributions from Southborough and High Brooms should go to Southborough and High Brooms facilities

In the Overview:

- . AQMA should be mentioned in relation to Southborough and the A26.
- . Our Conservation Area is more than Southborough Common and covers other green spaces such as Barnetts and Brokes Woods as well as ancient woodland and local wildlife sites. These are hugely valued by our local community which should attract developer contributions to pay for enhancements.
- . Southborough North Parade gets a mention in preamble to policy EN6 Shop Fronts and as a neighbourhood centre in ED8, but not in the Southborough Overview.
- Rural diversification – Mabledon and Honnington farms both offer alternative leisure and tourism activities.
- There are a number of listed buildings and sites of significant interest including the Railway Viaduct and Salomons Estate.

We do object also to the proposals AL/RTW 5 – removal of Caenwood Farm from the Green Belt providing for the development of 100 homes.

We do not see how and why the removal of Green Belt boundaries, especially as they 'should only be altered in exceptional circumstances and should be fully evidenced and justified'. Improving the remaining Green Belt does not justify this. Especially as there is no detail as to how this will be improved and where. We only see it being detrimental when placed alongside the blurring of lines between Southborough and RTW.

Speldhurst Road would not, as well, be able to cope with car traffic from an extra 100 homes on it. And the A26 junction and Yew Tree Road would not as well, with the current addition of 67 dwellings alongside the Southborough Civic Centre.

## Question 7

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**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

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

**Comments on Section 5: Place  
Shaping Policies: Southborough:  
Policy AL/SO 1: Speldhurst Road  
former allotments (land between  
Bright Ridge and Speldhurst Road)**

# 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_2190
Response Date	04/06/21 16:56
Consultation Point	Policy AL/SO 1 Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road) ( <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/SO 1 Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road)

[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

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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 Public Footpath WS19A and links to WS22. Improvements to these Footpaths would ensure urban connectivity in the area.

#### Question 6

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#### **Question 7**

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

#### **Question 7a**

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#### **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: Southborough:  
Policy AL/SO 2: Land at Mabledon  
House**



## Comment

Consultee	Ms Margaret Borland ( [REDACTED] )
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] Southborough TN4 [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Ms Margaret Borland ( [REDACTED] )
Comment ID	PSLP_1302
Response Date	04/06/21 15:14
Consultation Point	Policy AL/SO 2 Land at Mabledon House ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.4
Question 1	
Respondent's Name and/or Organisation	M Borland
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/SO 2	
Question 4	
Do you consider that the Local Plan:	
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

#### Question 5

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**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 principle of this policy is fine and restoration of a heritage asset that is in a poor state of repair and continuing to deteriorate, the development of a luxury hotel up to a maximum of 200 rooms and leisure development with spa and conference facilities is simply too big. It will damage the historic nature of the site, which is also within the AONB and the Green Belt.

Mabledon House is a Grade II Listed Building and of important historical interest to the Tunbridge Wells area, as it is the childhood home of Decimus Burton who designed many buildings in and around Tunbridge Wells (most famously the Calverley Estate) in addition to buildings at Regents Park & Kew Gardens. Mabledon was built in 1804 by his father John Burton. Having been his childhood home Decimus Burton went on to make substantial alterations to Mabledon House and drastically changed the appearance of the building. Decimus Burton is locally acclaimed as the man who effectively transformed Tunbridge Wells architecturally into the town that it is today. With this in mind great care must be taken in developing the site.

For example, with 200 bedrooms, a restaurant and kitchen plus spa and conference facilities, there is likely to be the need for a extra wing to be added to the building or a whole new block built. There doesn't really seem to be a restriction on building close to Mabledon House itself, the policy only requiring that it is "... concentrated within those areas that already contain built form and not in the areas shown to be retained as parkland landscape on the site layout plan" and "be subservient to the main house and respectful of its setting..." (Policy point 3a and 3b)

#### Duty to Co-operate

It's not clear how much buy-in to the proposal has been received from Tunbridge and Malling. As this formed part of the Draft Local Plan that was consulted on 2019, it's surprising that nothing more definite can now be said. There is no evidence in the Duty to Co-operate Statement whether this development has even been discussed with TMBC.

#### Transport

The impact on the A26 appears to have been grossly underestimated in the Transport Evidence Base. An operation such as this will need a very large number of staff - to clean rooms, to prepare and serve meals from early morning to late at night (restaurant and room service), for reception and concierge duties, to manage the conference facilities (with services such as cleaning again being early morning/late evening. ), for spa treatments and for upkeep of the park and gardens. This isn't located in the centre of a town where these staff can walk to work or hop on a bus at any time of day or night. The potential for this to create a significant increase in car journeys on the A26 needs further investigation, as does how safe access to/from the A26 will be provided for this.

There doesn't seem to be any provision for parking (cars and bicycles) or for charging electric vehicles

## Question 6

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For example, with 200 bedrooms, a restaurant and kitchen plus spa and conference facilities, there is likely to be the need for an extra wing to be added to the building or a whole new block built. There doesn't really seem to be a restriction on building close to Mabledon House itself, the policy only requiring that it is "... concentrated within those areas that already contain built form and not in the areas shown to be retained as parkland landscape on the site layout plan" and "be subservient to the main house and respectful of its setting..." (Policy point 3a and 3b)

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## Question 7

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

## Comment

Consultee	Michael Dunn [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Southborough Society
Address	[REDACTED] Southborough Tunbridge Wells [REDACTED]
Event Name	Pre-Submission Local Plan
Comment by	Southborough Society ( Michael Dunn - [REDACTED] )
Comment ID	PSLP_333
Response Date	24/05/21 08:05
Consultation Point	Policy AL/SO 2 Land at Mabledon House ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.6
Data inputter to enter their initials here	KJ
Question 1	
Respondent's Name and/or Organisation	Southborough Society
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/SO 2: land at Mabledon House

**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.

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The concept of a luxury hotel with up to 200 rooms and spa/conference facilities would require substantial alteration to the listed Grade II mansion. There have been previous proposals for conversion to an hotel, none of which came to fruition. The viability of such significant private investment therefore must be debatable despite the opportunities for additional local jobs.

**Question 7**

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**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	Sir/Madam [REDACTED]
Email Address	[REDACTED]
Company / Organisation	Southborough Town Council
Address	Council Offices 137 London Road ROYAL TUNBRIDGE WELLS TN4 0ND
Event Name	Pre-Submission Local Plan
Comment by	Southborough Town Council [REDACTED]
Comment ID	PSLP_1375
Response Date	03/06/21 16:28
Consultation Point	Policy AL/SO 2 Land at Mabledon House ( <a href="#">View</a> )
Status	Processed
Submission Type	Email
Version	0.3

Data inputter to enter their initials here HB

### Question 1

Respondent's Name and/or Organisation Southborough Town 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.

Policy AL/SO 2 Land at Mabledon House

*[TWBC: relevant parts of this representation have been input against Policies STR/SO 1, AL/SO 2 and AL/RTW 5 - please see Comment Numbers PSLP\_3158, PSLP\_1375 and PSLP\_3168]*

### 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**

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**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.**

**TUNBRIDGE WELLS BOROUGH COUNCIL –LOCAL PLAN COMMENTS**

Please find below the comments raised by STC Chairman of Planning and Transportation Councillor Alain Lewis:

The way the Local Plan is organised it appears that the town of Southborough has become an unparished area of RTW. This therefore diminishes the status of Southborough as being a separate entity to RTW.

- In the introduction to Place Shaping Policies para 5.1. "This section is arranged by non-parished and parished areas..." and list in para 5.3 has Southborough immediately after RTW, before strategic sites, not with the parished areas

- Not clear what areas of Southborough are included in the 'the town' and which are 'parished' and therefore what the policy covers.

We question why the plan designates the 'town of Southborough (as being) mainly urban in character and forms what is referred to as the Main Urban Area of the borough alongside RTW'. Also, the Southborough Common Conservation Area is described as being 'to the north of the parished area' and High Brooms is 'within the parished area' and High Brooms Station is 'just outside the parished area'

Therefore, as a result a perspective for Southborough and High Brooms is missing from the Policy as a result in relation to;

- Point 2: Providing additional housing (windfall developments)
- Point 3: making the best use of previously developed land
- Point 5: Retention of Key Employment Area – specifically for Southborough/High Brooms Industrial Area
- Point 8: Support active travel (for the mass of walking and cycling improvements in Southborough set out in the LCWIP).
- Point 9: Support improvements to local bus network and infrastructure
- Point 10: Deliver measures to reduce congestion on A26 – through Southborough
- Point 11: Plan for the expansion of electric vehicle charging points

In the existing policy for the non-urban Southborough as well, we make the following comments.

- Point 1: Set LBD for Southborough - Inset map 3 does not show an LBD boundary between Southborough and adjoining unparished areas of RTW.

- Point 2: Developments: No mention of AL/SO 2 Mabledon House (although the allocation policy is included in the Southborough Policies section) – the only hotel development in the whole plan and meets the identified need for a luxury hotel in the borough (see Hotel Capacity Study).



- Point 3: Identify Southborough hub as a local sports hub recreation – the policy should include words about future enhancements that are in RTW 1 point 15. Also, should this not be designated as a sport and recreation area?
- Point 4: Protect and retain public car parks as shown on Policies Map. Yew Tree Road car park is marked on map (TP4) but Pennington Road does not appear.
- Point 5: Appropriate mix of uses within town centre – maybe this could cover neighbourhood centres (Southborough North Parade, High Brooms) also?
- Point 6: We believe that any developer contributions from Southborough and High Brooms should go to Southborough and High Brooms facilities

In the Overview:

- . AQMA should be mentioned in relation to Southborough and the A26.
- . Our Conservation Area is more than Southborough Common and covers other green spaces such as Barnetts and Brokes Woods as well as ancient woodland and local wildlife sites. These are hugely valued by our local community which should attract developer contributions to pay for enhancements.
- . Southborough North Parade gets a mention in preamble to policy EN6 Shop Fronts and as a neighbourhood centre in ED8, but not in the Southborough Overview.
- Rural diversification – Mabledon and Honnington farms both offer alternative leisure and tourism activities.
- There are a number of listed buildings and sites of significant interest including the Railway Viaduct and Salomons Estate.

We do object also to the proposals AL/RTW 5 – removal of Caenwood Farm from the Green Belt providing for the development of 100 homes.

We do not see how and why the removal of Green Belt boundaries, especially as they 'should only be altered in exceptional circumstances and should be fully evidenced and justified'. Improving the remaining Green Belt does not justify this. Especially as there is no detail as to how this will be improved and where. We only see it being detrimental when placed alongside the blurring of lines between Southborough and RTW.

Speldhurst Road would not, as well, be able to cope with car traffic from an extra 100 homes on it. And the A26 junction and Yew Tree Road would not as well, with the current addition of 67 dwellings alongside the Southborough Civic Centre.

## 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

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

**Comments on Section 5: Place  
Shaping Policies: Southborough:  
Policy AL/SO 3: Land at Baldwins  
Lane, North Farm Road**

## 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_1223
Response Date	03/06/21 15:31
Consultation Point	Policy AL/SO 3 Land at Baldwins Lane, North Farm Road ( <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	
Please state which paragraph number(s), Policy Number, or Policies Map (Inset Map number(s)) this representation relates to.	
Policy AL/SO 3 Land at Baldwins Lane, North Farm Road	
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 wastewater undertaker for Southborough. 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/SO 3

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