



Horsmonden NDP
Planning Policy
Planning Services
Tunbridge Wells Borough Council
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Growth and Communities

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BY EMAIL ONLY

26 August 2022

Dear Sir / Madam,

Re: Horsmonden Neighbourhood Plan - Regulation 16 Consultation

Thank you for consulting Kent County Council (KCC) on the Horsmonden Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the document.

Chapter 1: Overall Strategy

Heritage Conservation: Although the Neighbourhood Plan discusses the rich heritage of the parish, the discussion is currently being presented in a number of different places. The result is that the reader does not get an accurate overall view of the heritage of the parish with some key heritage assets being omitted. KCC recommends that for such a historic area, an introductory section titled 'Landscape History and Heritage' should be included within the Neighbourhood Plan. This could present not only the history of the parish, but also review the range and quality of the surviving heritage assets. This would in turn make it easier to relate this heritage to the themes that are developed later in the Plan. Additional information could be provided on the history of iron-working in Horsmonden, including reference to the site at Horsmonden Furnace, the designed landscapes at Sprivers, Rectory Park and Scotney Castle, the range of agricultural buildings in the parish, the moated sites including the scheduled monument at Share Farm and the historic farmsteads (at least 48).

Objectives

Landscape and Environment

Objective: To retain the distinctive agricultural heritage of the parish, protect views, enhance biodiversity, protect ancient woodland and green spaces and retain dark night skies

Heritage Conservation: The County Council is supportive of this objective but would suggest the term 'agricultural heritage' is amended as there are many aspects of Horsmonden's landscape that are not agricultural in origin. For example, natural woodlands, streams and gills form key elements in the parish's landscape.

Chapter 6: Housing development

Heritage Conservation: Historic England (together with the County Council and the Kent Downs AONB Unit) has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside¹. This guidance should be referred to within the Neighbourhood Plan.

Chapter 7: Landscape & environment

Introduction

The introductory text provides a reasonable review of the quality of the landscape, however, it should be noted that there is potential for the discovery of archaeological sites of earlier periods than the medieval. Although Horsmonden was unlikely to have been extensively settled in earlier periods, the lack of such sites in the parish may also be as a result of a lack of investigation.

The text rightly identifies the Tunbridge Wells Borough Council Landscape Character Assessment 2017 as a key information resource for consideration of landscape issues. However, it is recommended that the Neighbourhood Plan should also refer to the Historic Landscape characterisation for the Borough², and specifically that for Horsmonden. The characterisation is designed to help developers, planners, decision-makers and the public assess the historic importance of Horsmonden's landscape and its component elements.

Policy 7.11 Flooding

The County Council would reiterate commentary raised within its Regulation 14 consultation dated 9 November 2021 (Appendix A) in respect of the direct and indirect impacts that Sustainable Drainage Schemes (SuDS) may have on the historic environment, and the associated guidance on the matter.

¹ <http://www.kentdowns.org.uk/publications/kent-downs-aonb-farmstead-guidance>

² https://tunbridgewells.gov.uk/_data/assets/pdf_file/0008/387665/i-HLC_Horsmonden.pdfs

Additional comments:

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, notes that much of the Plan's area is coincident with the safeguarded Tunbridge Wells Sand Formation (Sandstone) (a landwon mineral). The Neighbourhood Plan should acknowledge the existence of a safeguarded mineral in the area and the safeguarding policy provisions within the [Kent Minerals and Waste Local Plan \(2013-2030\)](#), including the need for Mineral Assessments³ to be carried out as part of any planning application in the locality.

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,



Stephanie Holt-Castle
Director for Growth and Communities

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Appendix A: Kent County Council response to Regulation 14 Consultation – 9 November 2021

³ The Mineral Assessment should assess whether an exemption criterion of Policy DM 7 Land-won Mineral Safeguarding of the Kent Minerals and Waste Local Plan is applicable.