

Edenbridge Character Area Assessment Supplementary Planning Document (SPD) Consultation Statement

Introduction

1. This document sets out Sevenoaks District Council's approach to consultation and engagement in preparing the Edenbridge Character Area Assessment SPD. It covers:
 - (i) the names of any persons whom the authority consulted in connection with the preparation of the SPD;
 - (ii) how those persons were consulted;
 - (iii) a summary of the main issues raised in those consultations and;
 - (iv) how those issues have been addressed in the SPD.

Whom the authority consulted (i) and how those persons were consulted (ii)

2. There has been close stakeholder involvement in preparing the draft SPD in order to develop a shared vision with the local community.
 - A briefing session was held for members of the Edenbridge Neighbourhood Plan (ENP) team and the wider public, at the outset of the project in April 2015. A team of volunteers, the Neighbourhood Plan Steering Group, members of the Ward and Town Council undertook an initial appraisal. A series of facilitated walkabouts for the local community was publicised, and took place during June 2015. The surveys were led by an architect who was commissioned by the Edenbridge Neighbourhood Plan (ENP) Steering Group. Following completion of the draft document, further briefings were held in October 2015 for Edenbridge Town Councillors, and the ENP Steering Group and Task Group members. Each individual character area was then submitted to Sevenoaks District Council for review.
 - The draft document was then reviewed, collated and updated in the summer of 2019 to incorporate mapping, include any further development that had occurred since the original survey and bring in more references related to the streets and public realm that contribute to the character of Edenbridge. The working document was circulated to Ward and Town Councillors and a meeting to discuss the updated document was held in September 2019. Local Representative groups, Edenbridge Town Council and elected Members of the District Council have assisted in each stage of this work.
3. Following the preparation of the draft SPD, the Council undertook a six week formal consultation period between 12th August 2020 to 23rd September 2020, in line with the District Council's adopted Statement of Community

Involvement (SCI, 2019 – June COVID-19 Review). The document was subject to a formal public consultation including:

- the draft Edenbridge Character Area Assessment SPD published on the Sevenoaks District Council website
- the document was available for inspection at the Council's main office in Sevenoaks, Edenbridge Town Council offices (by appointment only) and Bridges Community Centre
- the advertisement of the document and consultation event on the Council's corporate Facebook page
- leaflets and posters were sent to Edenbridge Town Council and Bridges Community Centre to publicise the consultation around Edenbridge
- approximately 3500 emails and letters were sent to statutory consultees, Sevenoaks District Town and Council Parish Councils and neighbouring authorities as well as members of the Public, Companies and Interest Groups registered on the Sevenoaks District Council database who had indicated an interest in hearing more information about Edenbridge in line with GDPR. See Appendix A of this document for the list of consultees
- held four interactive drop-in sessions over Zoom
- planning officers were contactable by phone and email throughout the consultation period to discuss in more detail

Summary of the main issues raised (iii) and how they have been addressed (iv)

4. There were 23 respondents with a total of 35 comments from local residents and businesses alongside local and national stakeholders. Comments received were generally supportive of the aims of the document and the content. Appendix B provides an overview on the comments and how they were addressed. A summary of the main issues and how they have been addressed are stated below:
 - some minor updates which include up-to date photographs, mapping layouts and amendments related to wording to provide more clarity
 - representations were made to include the Town Station Cottages as their own character area. These have been surveyed and have been included in this assessment, because they border the town boundary with no extended separation to the existing built up area of Edenbridge and would not be considered a separate settlement.
 - a number of objections were raised regarding the industrial estate. Concerns were raised in regards to planning burdens that this document might cause with a cost to the business owners, a focus on the economic viability of the area and some concerns over gentrification. The purpose of this document is not to make additional requirements or demands to business owners. The economic requirements of businesses in Edenbridge are supported in

Sevenoaks District Council Core Strategy. The supplementary planning document aims to determine what the characteristics are that contribute towards making Edenbridge distinctive. To address this, a small residential area from the industrial character area has been removed and re-characterised within a more appropriate grouping. The design guidance has been amended to provide clarity and reassurance.

- representations were made to include Marsh Green within the assessment. Marsh Green is a separate settlement within the settlement hierarchy and lies outside the town confines of Edenbridge, which is the focus of this document. However, Marsh Green is within Green Belt land and is protected by national and local policy. Marsh Green will not be included in this assessment.
- representations were made within the Ashcombe Drive character area regarding connectivity and proposed development. To address this concern and provide clarity, a statement has been removed from the design guidance.

Appendix A – Consultees**Statutory Consultees**

Company
<i>The Environment Agency</i>
<i>English Heritage</i>
<i>Natural England</i>
<i>The Mayor of London</i>
<i>The Civil Aviation Authority</i>
<i>Homes and Communities Agency</i>
<i>Primary Care Trust</i>
<i>Office of Rail Regulation</i>
<i>Transport of London</i>
<i>Integrated Transport Authority</i>
<i>Kent County Councils Highways (as the Highways Authority)</i>
<i>Marine Management Organisation</i>

Town and Parish Councils

Council
<i>Ash-cum-Ridley Parish Council</i>
<i>Badgers Mount Parish Council</i>
<i>Brasted Parish Council</i>
<i>Chevening Parish Council</i>
<i>Chiddingstone Parish Council</i>
<i>Cowden Parish Council</i>
<i>Crockenhill Parish Council</i>
<i>Dunton Green Parish Council</i>
<i>Edenbridge Town Council</i>
<i>Eynsford Parish Council</i>
<i>Farningham Parish Council</i>
<i>Fawkham Parish Council</i>
<i>Halstead Parish Council</i>
<i>Hartley Parish Council</i>
<i>Hever Parish Council</i>
<i>Hextable Parish Council</i>
<i>Horton Kirby & South Darenth Parish Council</i>
<i>Kemsing Parish Council</i>
<i>Knockholt Parish Council</i>
<i>Leigh Parish Council</i>
<i>Otford Parish Council</i>
<i>Penshurst Parish Council</i>
<i>Riverhead Parish Council</i>
<i>Seal Parish Council</i>
<i>Sevenoaks Town Council</i>
<i>Sevenoaks Weald Parish Council</i>

<i>Shoreham Parish Council</i>
<i>Sundridge with Ide Hill Parish Council</i>
<i>Swanley Town Council</i>
<i>Westerham Town Council</i>
<i>West Kingsdown Parish Council</i>

Neighbouring Authorities

Local Authority
<i>Dartford Borough Council</i>
<i>Gravesham Borough Council</i>
<i>London Borough of Bexley</i>
<i>London Borough of Bromley</i>
<i>Tandridge District Council</i>
<i>Tonbridge and Malling Borough Council</i>
<i>Tunbridge Wells Borough Council</i>
<i>Wealden District Council</i>

Appendix B – Consultation responses			
	Name and Date	Area and Comment	Sevenoaks District Council Response
1	Miss J Ebrey 12 Aug 2020	Comment Withdrawal	N/A
2	#840598 15 Aug 2020	N/A	N/A
3	Margaret Yaldren 15 Aug 2020	<p>D1.1 Ashcombe Drive Ashcombe Drive is quite a narrow road and particularly in the section between Hilders lane and Lynmead Close it is used for street parking. This effectively makes it single track and therefore it would not be appropriate to increase traffic by making connectivity with the new development.</p> <p>Hilders Lane is also quite narrow -just a country road and the junction with the main road is quite dangerous. There was a serious accident there recently.</p>	<p>Comment noted. The document helps determine what the characteristics are that contribute towards making Edenbridge distinctive. The document does not determine where development should happen. For clarity we recommend the following change:</p> <p>Recommended change: Remove following statement from design guidance: 'This character area has a clear relationship with the open fields to the west. All new development should enhance that relationship and ensure connectivity between the existing and proposed development.'</p>

Appendix B – Consultation responses			
4	John Isherwood 16 Aug 2020	<p>E1.2</p> <p>I consider the content of the Assessment regarding Area E1.2 (where I reside) to be accurate.</p> <p>However if this exercise is ultimately designed so that still further development is carried out in Edenbridge-then I , and most Residents are completely against it.</p> <p>Edenbridge is, in the opinion of many Residents used as a "Dumping Ground " by Sevenoaks Council to satisfy Government requirements and numbers .The majority of Borough Councillors seem to live in Sevenoaks Town and there is a strong feeling in Edenbridge that they limit as far as possible further development in Sevenoaks Town at the expense of Edenbridge. It would be very interesting to see the amount of Residential Development in Sevenoaks Town against a comparable figure for Edenbridge Town over the past 7 years.</p> <p>I write as a Retired Chartered Surveyor with extensive experience in Property Development.</p>	<p>Comment noted on the accuracy of the character area E1.2.</p> <p>One of the aims of this document is to identify the locally distinctive features that contribute to the character to ensure development is responding to the distinctive local character that can be found in Edenbridge. The document does not determine where development should happen.</p>
5	James Morgan 19 Aug 2020	<p>1) The Character Area is not set wide enough. It does cover part of Crouch House Road and Hilders Lane. But Little Browns Lane, Honey Pot Lane and Hilders Lane should have been included as we are part of Edenbridge as well. It is important that any developments to this area are in keeping with the rural nature of the area and the existing housing stock. This includes any infill towards our roads and in particular changes to the Golf Club which will have an impact on the approach to Little Browns Lane and the Burial Ground next to it.</p>	<p>The character area scope of assessment was decided by the Edenbridge Neighbourhood Plan (ENP) Steering Group. The assessment covers the built up areas of Edenbridge town (excluding the Conservation Area which is covered by the Edenbridge Conservation Area Appraisal). The areas mentioned lie within the Green Belt, which is protected by national and local policies. Should any development come forward in these areas, the distinctive features that contribute to the special character of its</p>

Appendix B – Consultation responses			
		<p>2) There is no information on who carried out the survey. It would be good to know this, taking account of Data Protection. Were they residents of the areas concerned? Were they members of any local organisation? How many took part? Who gave permission for the photos to be used? Were any developers involved?</p>	<p>landscape and its biodiversity will be protected and enhanced, where possible.</p> <p>The information on methodology and community involvement is stated within the introduction of the document under heading four and five. The surveys were undertaken by an architect who was commissioned by the ENP Steering Group and a series of facilitated walkabouts with the local community were undertaken during June 2015. Sevenoaks District Council Officers reviewed and updated the findings in May 2019. All photographs were taken from public highways. No developers were involved.</p> <p>Recommended changes: Further detail has been added to the ‘methodology’ and ‘community involvement’ section by adding the following statements:</p> <p>Initial appraisal undertaken across Edenbridge Town to identify and document specific characteristics. <i>‘This involved a review of historic maps, photographs and written material’</i></p> <p><i>The surveys were undertaken by an architect who was commissioned by the Edenbridge Neighbourhood Plan (ENP) Steering Group.</i></p>

Appendix B – Consultation responses			
			<p><i>A briefing session was held for members of the ENP team and the wider public, at the outset of the project in April 2015.</i></p> <p><i>A series of facilitated walkabouts for the local community was publicised, and took place during June 2015.</i></p> <p><i>Following completion of the draft document, further briefings were held in October 2015 for Edenbridge Town Councillors, and the ENP Steering Group and Task Group members.</i></p> <p><i>The working document was circulated to Ward and Town Councillors and a meeting to discuss to updated document was held in September 2019. The draft document went out to public consultation in 12th August – 23rd September 2020. Feedback from the public consultation has been incorporated into the final version of this document.</i></p>
6	<p>Terence Day</p> <p>28 Aug 2020</p>	<p>Edenbridge Stop Gatwick constantly flying low loud concentrated aircraft. That would improve the area no end.</p> <p>Additionally the Town is in the green belt and the continued planning rules need to protect and be enforced to stop</p>	<p>Comment noted. The document helps determine what these characteristics are that contribute towards making Edenbridge distinctive. By understanding the existing characteristics, the document can be used as a tool to enhance and promote positive</p>

Appendix B – Consultation responses			
		<p>developers building on green field sites, the location within the green belt is fundamental to the town's character.</p>	<p>development, which is responsive and suited to the local character. The characteristics assessed in this document respond to the built form and open spaces within Edenbridge and therefore Gatwick's aircraft flightpath is out of scope for this document.</p> <p>The town of Edenbridge is surrounded by Green Belt, which is protected by national and local policies. Should any development come forward in these areas the distinctive features that contribute to the special character of its landscape and its biodiversity will be protected and enhanced, where possible. This document aims to establish the existing characteristics to ensure new development is responsive and suited to the local character.</p>
7	<p>Louise Parker</p> <p>30 Aug 2020</p>	<p>An area that has been missed out of the Character Area Assessment.</p> <p>Town Station Cottages lie to the north east of the London-Uckfield railway line, accessed off Forge Croft. There are 6 cottages which were built in the 19th Century. Including these in the Character Area Assessment is important to represent the totality of Edenbridge.</p> <p>It is further important to include these Cottages due to the original Local Plan proposing to develop the land immediately adjacent to these properties. Including and recording the design characteristics will be important and relevant to such</p>	<p>Comment noted. Following a site visit, the Town Station cottages lie immediately adjacent to the town boundary which runs along the railway track. There is no extended separation to the existing built up area and town boundaries of Edenbridge and the grouping of six Victorian cottages would not be considered a separate settlement. We have included the Town Station Cottages into this assessment.</p> <p>Recommend change:</p>

Appendix B – Consultation responses			
		<p>development.</p> <p>A Google map image of the location is attached.</p> <p>Skinner's Lane dwellings have similarly been missed.</p>	To include the Town Station Cottages as a character area.
8	<p>Chris George</p> <p>30th Aug 2020</p>	<p>You have NOT included the 6 Town Station Cottages. Survey the 6 cottages that have been there for the past 100 years and include them on all future activity. 1-6 Town Station Cottages, Off Forge Croft, TN8 5LR.</p>	<p>Comment noted. Following a site visit, the Town Station cottages lie immediately adjacent to the town boundary which runs along the railway track. There is no extended separation to the existing built up area and town boundaries of Edenbridge and the grouping of six Victorian cottages would not be considered a separate settlement. We have included the Town Station Cottages into this assessment.</p> <p>Recommend change: To include the Town Station Cottages as a character area.</p>
9	<p>Andrew Duguid</p> <p>31st Aug 2020</p>	<p><u>Ashcombe Drive - Area D1.1</u></p> <p>Ashcombe Drive is effectively a single lane road due to the residential parked cars, with small passing places only where there are driveway entrances. Any additional residential traffic would struggle to pass through the road, particularly at the usual peak times of people leaving for and returning from work.</p> <p>The stretch of Hilders Lane between Ashcombe Drive and the Main Road is always parked the whole way along at all times of day and so there is only room for single lane traffic with one</p>	<p>Comment noted. One of the aims of this document is to identify the locally distinctive features that contribute to the character in order to make an assessment to ensure development is responding to the distinctive local character that can be found in Edenbridge. The document does not determine where development should happen. For clarity we recommend the following change:</p> <p>Recommend change:</p>

Appendix B – Consultation responses			
		<p>passing opportunity at the end of Hilders Close.</p> <p>Where Ashcombe Drive meets Hilders Lane, the majority of traffic would turn right towards the Main Road B2026. This junction is already dangerous at the current levels of traffic, with two near fatal accidents in the last two months alone. It is not suitable for any higher levels of crossing traffic. The other direction of Hilders Lane is indeed just that, a country lane, and again not suitable for two way heavy use.</p> <p>The open green belt areas of the Ashcombe Drive area are very much a part of the character of this part of Edenbridge, any development would be detrimental to the existing housing and infrastructure.</p>	<p>Remove following statement from design guidance: ‘This character area has a clear relationship with the open fields to the west. All new development should enhance that relationship and ensure connectivity between the existing and proposed development.’</p>
10	<p>Lisa McPherson</p> <p>2nd Sep 2020</p>	<p><u>Area omitted from Character Area Assessment, ie Town Station Cottages, off Forge Croft</u></p> <p>The six cottages, known as Town Station Cottages, NE to the London-Uckfield railway line, accessible via Forge Croft are outside the boundary of the Character Area Assessment. These cottages were built for railway workers at the end of the 19th century. The character and position of the cottages is unique in Edenbridge and they should be included in the Character Area Assessment.</p> <p>The cottages are also immediately adjacent to land proposed for development in the Sevenoaks Local Plan submitted in 2019, site ST2-33 , Land South of Four Elms Road (now at judicial review).</p>	<p>Comment noted. Following a site visit, the Town Station cottages lie immediately adjacent to the town boundary which runs along the railway track. There is no extended separation to the existing built up area and town boundaries of Edenbridge and the grouping of six Victorian cottages would not be considered a separate settlement. We have included the Town Station Cottages into this assessment.</p> <p>Recommend change: To include the Town Station Cottages as a character area.</p>

Appendix B – Consultation responses			
11	Patrick Moore 3 rd Sep 2020	<p>D.1.1 Ashcombe Drive.</p> <p>The design guidance states ‘This development has a clear relationship with the open fields to the west. All new development should enhance that relationship and ensure connectivity between the existing and proposed development’.</p> <ol style="list-style-type: none"> 1. Meadow Lane C.3.1 and Hilders Lane E.1.3 also border these open fields but there is no reference to connectivity from either of these two roads. This indicates a lack of appreciation as to the traffic situation in Ashcombe Drive and what this road can cope with going forward. Current levels of road parking brought about by multi car ownership and by yellow lining restrictions in Hilders Lane have resulted in Ashcombe Drive becoming a general parking lot for the area. This effectively reduces much of the road to a single lane for long periods of the day and night which presents a hazard for vehicles entering and exiting from/to Hilders Lane. 2. There is no reference to the impact of traffic using and parking in Hilders Lane, at the Ashcombe Drive to the main road stretch. This adversely affects vehicles leaving Ashcombe Drive. Also, no reference is made to the Hilders Lane/Main Road cross-roads, probably the most dangerous in the Edenbridge area and the scene of many accidents over the years. Despite efforts to improve sight lines at this 	<p>Comment noted. One of the aims of this document is to identify the locally distinctive features that contribute to the character in order to make an assessment to ensure development is responding to the distinctive local character that can be found in Edenbridge. The document does not determine where development should happen. The arrows on the map indicate ‘key views’, so while views may be experienced from numerous locations this is summarising the location of, in this case, the longer views across the fields to the west. The character of the street type for this area comprises of Ashcombe Drive, Lynmead Close and Marlhurst. Hilders Lane is out of scope for this character area. The consultation for this document was publicised in line with the Statement of Community Involvement and the approach to this consultation has been set out in the beginning of this Consultation Statement.</p> <p>Recommend change: Remove following statement from design guidance: <i>‘This character area has a clear relationship with the open fields to the west. All new development should enhance that relationship and ensure</i></p>

<p>Appendix B – Consultation responses</p>		
	<p>junction there are ongoing near misses, minor accidents and serious accidents. Elsewhere in the document reference is made to a busy road section as it applies so why not here?</p> <p>3. The interactive map indicates that the views for Ashcombe Drive are limited to the end of the road east and west. The reality is that the whole of Ashcombe Drive, both sides, benefits from the views westwards over the green belt land and indeed adjacent housing in Hilders Lane and Meadow Lane also benefit from this same view. It is noted that for other areas described in the document a sentence is frequently included to the effect that ‘views should be retained’. I would question why a similar statement does not appear for this area especially as the design guidance recognises the Ashcombe Drive/open fields relationship and states that any new development should ‘enhance that relationship’. Clearly any new development on those fields would only serve to remove this relationship.</p> <p>4. It should also be noted that in the past proposals to develop this land adjacent to Ashcombe Drive and Hilders Lane were put forward and rejected by Sevenoaks DC for a number of very sound reasons which are now more relevant than ever.</p>	<p><i>connectivity between the existing and proposed development.’</i></p>

Appendix B – Consultation responses			
		<p>5. The rejection of the SDC proposed local plan by the National Planning Officer (overriding local wishes) is a sad reflection on the planning system but the outcome must not be yet more development utilising an already fragile and unsafe road system.</p> <p>General comment. There appears to have been no publicity or communication to residents regarding the existence of this document.</p>	
12	<p>Natural England</p> <p>11th Sep 2020</p>	<p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Green Infrastructure This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. The National Planning Policy Framework states that local planning authorities should ‘ take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; ’. The Planning Practice Guidance on Green Infrastructure provides more detail on this. Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI</p>	<p>Comments noted. The natural environment has been considered as part of this character area assessment in order to identify the locally distinctive features that contribute to the distinctive local character that can be found in Edenbridge, in both the natural and built environment.</p>

Appendix B – Consultation responses

	<p>is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through: • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. Further information on GI is include within The Town and Country Planning Association’s "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity". Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit. Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built</p>	
--	--	--

Appendix B – Consultation responses		
	<p>environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die. Other design considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180). Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Should the plan be amended in a</p>	

Appendix B – Consultation responses			
		way which significantly affects its impact on the natural environment, then, please consult Natural England again	
13	Edward Cookson 11 th Sep 2020	<p>A2.1 SUNNYSIDE Please check your Description of this area.</p> <p>Tree cover along the railway embankment has been removed or greatly reduced over past year by Network Rail.</p> <p>Reference to open views into countryside no longer apply as affected by current housing development in D3.4.</p>	<p>Comments noted.</p> <p>The tree and hedge belts were inspected on a recent site visit and they have recently been cut back. However these are likely to grow back so we have retained this characteristic in the assessment.</p> <p>Recommend changes: Pictures and text have been updated to incorporate the recent development.</p>
14	Edward Cookson 12 th Sep 2020	<p>GENERAL I thoroughly support this SPD and commend those who drafted it and appreciate that it can be used in future planning application guidance. However, once a development is completed then there seems little to guide future residents who may wish to make changes where planning permission is not required.</p> <p>However the online version causes problems for respondents ; it is unclear how to comment upon different sections. Sometimes a second response deletes the first.</p> <p>The postal response method allows the user to send in separate responses to each section of the document. It is more complicated to do so ONLINE and this may deter responders.</p>	<p>Support noted. The document helps determine what these characteristics are that contribute towards making Edenbridge distinctive. By understanding the existing characteristics, the document can be used as a tool to enhance and promote positive development, which is responsive and suited to the local character.</p> <p>Comments noted on the problems incurred using the online response.</p> <p>Duplication noted and removed for final version.</p>

Appendix B – Consultation responses			
		<p>DUPLICATION The online version of the SPD duplicates pages 2 to 11.</p> <p>CONFUSING I was confused by this statement. “Traditional brick walls/ hedged boundaries, together with mature trees which contribute to the character of the area, should be retained or reinstated BUT ONLY where they would impact on the boundaries of a property.” Also, similar statement in section C2.1 Forge Croft</p> <p>Seems to be a mixed message. Should they be retained or not?-</p>	<p>Recommended change: Update statement for clarity: Traditional brick walls/ hedged boundaries, together with mature trees which contribute to the character of the area, should be retained or reinstated but only where they would not impact on the boundaries of another property</p>
15	Edward Cookson 12 th Sep 2020	<p>C3.1 Meadow Lane and C3.2 Ridgeway</p> <p>HEDGES Design Guidance for several streets refer to the importance of hedges and suitable boundary walls. For example Meadow Lane C3.1, Ridgeway C3.2 However, once a site is developed, there seems little to deter future occupiers from removing hedges for extra parking etc, for which I understand they would not need planning permission (unless kerb dropped). Also to discourage current residents of these streets from making changes.</p> <p>Perhaps SDC and ETC could promote retention of hedges through council newsletters eg In-Shape. Maybe there is</p>	<p>Comment noted. This document can be used as a tool to enhance and promote positive development, which is responsive and suited to the local character, which includes the use of boundary treatments. This document can also raise awareness on the importance and value of local context and character. While this is a planning document, we hope it will be a useful document to support an understanding on the value of local context and character. Your comments have been circulated to both STC and ETC in regards to the retaining hedges.</p>

Appendix B – Consultation responses			
		research to show effect on property values of hedge-lined streets.	
16	Edward Cookson 12 th Sep 2020	<p>DETRACTORS Several Locally Distinctive Conceptual Features mention DETRACTORS.</p> <p>DETRACTORS Several Locally Distinctive Conceptual Features mention DETRACTORS. Unless the owner in future makes a planning application, can anything be done to address these?</p>	Comment noted. One of the aims of this document is to identify the locally distinctive features that contribute or detract, from the character in order to make an assessment to ensure development is responding to the distinctive local character that can be found in Edenbridge. The document does not determine where development should happen.
17	Edward Cookson 12 th Sep 2020	<p>D2.3 Bray Road D2.3 Bray Road Views “There are views across the fields to the east, and the distinctive clock tower to the Eden Centre creates a focal point as a landmark building both within the character area itself and the surrounding areas”.</p> <p>The views across adjacent fields will be affected by proposals in the Reg 19 Local Plan to alter Green Belt boundaries along Four Elms Road.</p>	<p>Comment noted. There is no legal right to a view. However, if development happens in or within the setting of a Conservation Area or Listed Building, we would make an assessment on the conserving the setting of the Conservation Area and Listed Building, which includes the views in and out of the heritage asset.</p> <p>In this case, the views are a characteristic of the area at the time of assessment and should be considered to ensure development is responding to the distinctive local character that can be found.</p>
18	Edward Cookson	<p>D1.2 Greshams Way. The views from Greshams Way may be compromised by proposals to develop fields around/on the golf course.</p>	Comment noted. As stated above, there is no legal right to a view. However, if development happens in a Conservation Area or adjacent to

Appendix B – Consultation responses			
	12 th Sep 2020		<p>Listed Building, we would make an assessment on the conserving the setting of the Conservation Area and Listed Building, which includes the views in and out of the heritage asset.</p> <p>In this case, the views are a characteristic of the area at the time of assessment and should be considered to ensure development is responding to the distinctive local character that can be found.</p>
19	Edward Cookson 12 th Sep 2020	<p>C 1.2 Stangrove Estate</p> <p>Design Guidance states “Hedged boundaries, together with mature trees which contribute to the character of the area, should be retained or reinstated.”</p> <p>I agree with this guideline however it may be compromised by housing proposals in Reg 19 Local Plan.</p>	<p>Comment noted. The document identifies the locally distinctive features that contribute to the character of an area. The design guidance offers recommendations to support high quality design which responds to the distinctive local character. It does not determine where development should happen.</p>
20	Edward Cookson 12 th Sep 2020	<p>RAILWAY EMBANKMENTS</p> <p>Several maps show desired tree cover ('green clouds') along rail embankments, many of which have been reduced in the past year by Network Rail, eg D 2.4 Wellingtonia Way.</p>	<p>Comment noted. The tree and hedge belts were inspected on a recent site visit and they have recently been cut back. However these are likely to grow back so we have retained this characteristic in the assessment.</p>
21	Edward Cookson	<p>B 1.3 Church Street refers to "The views of the fields and river, and of the Church and its</p>	<p>There is no legal right to a view. However, if development happens in a Conservation Area</p>

Appendix B – Consultation responses			
	12 th Sep 2020	<p>associated areas, should be retained "</p> <p>Also</p> <p>C 3.4 Hever Road North</p> <p>“The views across Town Fields should be enhanced.”</p> <p>Recent division of this site into small fenced lots for sale compromise this statement. (I understand SDC are taking action to address this).</p>	<p>or adjacent to Listed Building, we would make an assessment on the conserving the setting of the Conservation Area and Listed Building, which includes the views in and out of the heritage asset.</p> <p>In this case, the views are a characteristic of the area at the time of assessment and should be considered to ensure development is responding to the distinctive local character that can be found.</p>
22	Edward Cookson 12 th Sep 2020	<p>F 2.3 Leather Market</p> <p>Perhaps the Town Council could apply for funding to uplift ‘depressed areas’ eg former Budgens/Tom Bell block which is adjacent to key feature of town, namely Leather Market/Town Square/Triangle within conservation area.</p>	<p>Comment noted. Comment has been forwarded on to Edenbridge Town Council.</p>
23	Caroline Burgess- Pike 15 th Sep 2020	<p>C1.2 Stangrove Estate</p> <p>Open spaces within this area should be preserved, and any new housing developments strongly opposed. The study states the open areas have been ruined by cars parking on them, but this is simply not true of the vast majority of open spaces across the estate. There are one or two which have muddy tracks in particularly densely populated areas where parking is a particular problem, but on the whole the open spaces are well maintained. The open spaces at Park View Close and Cedar Drive in particular should be preserved as vital recreational areas for all age groups, as well as being</p>	<p>Comment noted. One of the aims of this document is to identify the locally distinctive features that contribute to the character in order to make an assessment to ensure development is responding to the distinctive local character that can be found in Edenbridge. The document does not determine where development should happen.</p>

Appendix B – Consultation responses			
		wildlife corridors and providing key views into Stangrove Park and other green areas. As an estate which is based on a post-war infrastructure, it cannot support further development. Access is already an issue at times, with cars having to park on both sides of the road and emergency vehicles struggling to gain access. In addition, any further development of residential properties or otherwise throughout the estate will compound parking problems – the issue would simply be moved from one area of the estate to another.	
24	Nexus Planning (Adrian Keal) 15 th Sep 2020	<p>F1 Industrial</p> <p>Please see attached cover letter that concludes as follows: Proposed amendments to the Draft ECAA The above policies have been ignored within the Draft ECAA and for the reasons set out in the attached letter we request that the document be amended as follows: Page 4 of the ECAA National Planning Policies - should make reference to paras 8 and 80 of the NPPF. Page 5 of the ECAA Local Planning Policies - should make reference to Policy SP8 of the Sevenoaks Core Strategy Development Plan Document Page 204 of the ECAA - Design Guidance All the proposed text should be deleted, and replaced with: “New development must be appropriately designed for an Industrial estate. It must allow for: - HGV turning and unloading. Van and car parking. - Storage of materials. - Building forms that respect existing building lines and allow for the functional requirements of the building. Adjoining residential properties need to allow for these economic requirements. Existing trees and landscaping can be retained and enhanced where they do not undermine</p>	<p>Comment noted. The economic development of businesses in Edenbridge are supported through national and local policy. This document sets out the characteristics that contribute towards making Edenbridge distinctive. By understanding the existing characteristics, the document can be used as a tool to enhance and promote positive development, which is responsive and suited to the local character, including the character of the industrial area. All developments will be assessed against national policy, and therefore it is out of the scope to include both national and local policies related to economic objectives within this character area assessment.</p> <p>Recommend changes:</p>

Appendix B – Consultation responses			
		economic requirements.” Page 204 of the ECAA – Area Characteristics after boundary Treatment) add: “This industrial estate makes a significant contribution to a strong, responsive and competitive economy and new development and investment will be supported”.	To address concerns raised in regards to the design guidance, we have removed the residential area (Caxton Close) from the Industrial Character Area (F1.1) and amended the design guidance to respond more sensitively to the industrial character.
25	Westerham Town Council (Deborah Coen) 21 st Sep 2020	I joined the consultation by zoom on 9 September and had a very productive discussion about the new buildings in the Industrial Area. I was a little concerned that the houses and flats did not reflect or incorporate the distinctive features of Edenbridge in design or colour and that the road and pathway surfaces - being black tarmac - were again rather heavy on the eye. After a positive discussion I accept that the dwellings are in an area of industrial activity and therefore they had been designed to fit in with that style. The new development had to be viewed against the criteria of being "within context."	Comment noted.
26	Penny Brook 21st Sep 2020	F2.3 Leathermarket I am pleased to see that the Character Assessment recommends that the setting adjacent to the conservation area should be enhanced and also that landscaping should be enhanced. The Leathermarket area lets down the otherwise attractive High Street. Edenbridge has generally kept the look and feel of a country town and this should be respected by developments anywhere in the town. In the Leathermarket	Support noted. Comments regarding Leathermarket have been passed on to Edenbridge Town Council.

Appendix B – Consultation responses			
		area and throughout Edenbridge, I support Natural England's suggestion that enhancing green infrastructure, biodiversity and the landscape should be considered.	
27	Valerie Parry 22nd Sep 2020	<p>Section D.1.1 relating to green belt land to rear of Ashcombe Drive</p> <p>Edenbridge Character Area Assessment (Supplementary Planning Document) takes no account of intense recent large scale house building which has occurred in the town, has a significant effect on both the amount of traffic passing through the town. SDC will be aware that there is one main route through the town to East Grinstead, Tunbridge Wells. There is significant pressure on local schools and Medical Services. Though there are two train stations the lower station is not disabled accessible. The upper station relies on connections with either Tonbridge or Redhill. Buses services cease at 6.00.</p> <p>The access to Ashcombe Drive from the main road is hazardous and is subject to a lobbying campaign with Kent County Council Highways in response to numerous accidents. The area behind Ashcombe Drive is green belt and home to slow worms and a bat colony.</p> <p>Green belt land needs to be protected, it is protection against traffic and aircraft pollution.</p> <p>Has SDC commissioned a study to ascertain how many social housing family properties are occupied by a single occupant. Maybe SDC should start considering this first</p>	<p>Comment noted. One of the aims of this document is to identify the locally distinctive features that contribute to the character in order to make an assessment to ensure development is responding to the distinctive local character that can be found in Edenbridge. The document does not determine where development should happen. Traffic and transport issues are dealt with by Kent County Council who would be consulted in the case of any major development. However, these issues do not impact the character area and therefore have not been considered as part of this document. Green belt land is protected by national and local policies. Should any development come forward in these areas the distinctive features that contribute to the special character will be protected and enhanced, where possible.</p>

Appendix B – Consultation responses			
28	<p>Kent County Council (Lis Dyson)</p> <p>21st Sep 2020</p>	<p>P9 How to use the document</p> <p>The text states that the purpose of the document is “to support development that strengthens diversity rather than erodes character and local distinctiveness. Design Guidance based on the identified locally distinctive features is included for each Character Area. This along with other relevant planning policy documents and guidance will form the basis for decision making on development proposals”.</p> <p>While we support this objective in principle, it should be noted that within any character area there will always be buildings or features that differ from the observed pattern. These might, for example, include agricultural, industrial, commercial, religious or military buildings. Some of these may nonetheless have heritage value in themselves, either as survivals from earlier periods or as later structures of historic significance. It is important that deviation from surrounding character is not in itself used as a justification for the demolition of heritage assets. It would be helpful if this could be clearly stated in the text.</p> <p>We would suggest that the text should be amended to : “to support development that strengthens diversity rather than erodes character and local distinctiveness. Design Guidance based on the identified locally distinctive features is included for each Character Area. This along with other relevant planning policy documents and guidance will form the basis</p>	<p>Comment noted.</p> <p>Recommend change: As per KCC’s comment we will include the proposed amendment to clarify that heritage assets with be taken into consideration during decision making. “to support development that strengthens rather than erodes character and local distinctiveness. Design Guidance based on the identified locally distinctive features is included for each Character Area. This along with other relevant planning policy documents and guidance will form the basis for decision making on development proposals. <i>It should be noted, however, that buildings and features that do not conform to local character may nonetheless have heritage significance and this will also be taken into account during decision making.</i>”</p>

Appendix B – Consultation responses			
		<p>for decision making on development proposals. It should be noted, however, that buildings and features that do not conform to local character may nonetheless have heritage significance and this will also be taken into account during decision making.”</p> <p>We would be happy to discuss any of the above further.</p>	
29	<p>John Surtees Ltd. (Jane Surtess)</p> <p>21st Sep 2020</p>	<p>Industrial Estate</p> <p><i>Scanned Letter. In summary:</i></p> <p>objection to the ECAA as it does not acknowledge the economic requirements of the businesses of Edenbridge. It’s an industrial area not a retail park. Redevelopment will be costly and this will be reflected in the rents charged. It is inappropriate to expect businesses in Edenbridge to foot the bill for cosmetic changes, this is after all a functional area with functional architecture.</p> <p>Photographs are out of date, photograph on page 204 was demolished to make way for the new Lidl store.</p>	<p>Comment noted. The economic development of businesses in Edenbridge are supported through national and local policy. The purpose of this document is not to make additional requirements or demands to business owners. All developments will be assessed against national policy. This document sets out the characteristics that contribute towards making Edenbridge distinctive. By understanding the existing characteristics, the document can be used as a tool to enhance and promote positive development, which is responsive and suited to the local character, including the functional character of the industrial area.</p> <p>Recommend change:</p> <p>Photographs have been updated. To address concerns raised in regards to the design guidance, we have removed the residential area (Caxton Close) from the Industrial Character Area (F1.1) and amended</p>

Appendix B – Consultation responses			
			the design guidance to respond more sensitively to the industrial character.
30	Rich Martell 22 nd Sep 2020	<p>Industrial Estate</p> <p>I have recently been made aware of details regarding the draft ECAA. I am a resident of Edenbridge but also take an interest in matters of planning in the local area. Edenbridge is evolving and although I have read the analysis you have carried out it's missing an important aspect in that there is a strong economic requirement for business in Edenbridge. This is crucial given the circumstances many businesses find themselves in and is vital that it is considered for Edenbridge to thrive. Without doing so you will deter further investment in the area.</p> <p>The design guide as it stands is not appropriate for an industrial estate.</p> <p>I am writing to OBJECT to the Draft ECAA in the current form.</p>	<p>Comment noted. The economic development of businesses in Edenbridge are supported through national and local policy. The purpose of this document is not to make additional requirements or demands to business owners. All developments will be assessed against national policy. This document sets out the characteristics that contribute towards making Edenbridge distinctive. By understanding the existing characteristics, the document can be used as a tool to enhance and promote positive development, which is responsive and suited to the local character, including the functional character of the industrial area.</p> <p>Recommend change: To address concerns raised in regards to the design guidance, we have removed the residential area (Caxton Close) from the Industrial Character Area (F1.1) and amended the design guidance to respond more sensitively to the industrial character.</p>

Appendix B – Consultation responses			
31	Historic England (Isabelle Ryan) 22 nd Sep 2020	<p>General</p> <p>Thank you for consulting us on the Edenbridge Character Area Assessment SPD. We do not wish to offer detailed comments on this occasion but are pleased that your Council have undertaken this work which will feed into future planning decisions locally. We find the chronological categorisation of sub-areas an easy to use and clear approach.</p> <p>It is not necessary for us to be consulted on this SPD, unless there are changes which have an impact on the historic environment, and especially designated heritage assets. However, if you would like detailed advice from us, please contact us to explain your request</p>	Support noted.
32	Sarah Amigoni 23 rd Sep 2020	<p>A1.2 - Mill Hill South</p> <ul style="list-style-type: none"> • The entire document fails to give a character assessment of the type of buildings, design + details within the conservation areas. Current planning policy + applications would use this as a benchmark. How can 'the setting of the adjacent Conservation Area should be preserved or enhanced' if there is no information related to this. Should the Governments future planning policy be introduced the truly historical and influential design within a town / village would be compromised. <p>https://www.gov.uk/government/consultations/planning-for-the-future</p> <ul style="list-style-type: none"> • A Character Area Assessment has not been submitted for the Parish of Marsh Green. MG is the gateway to Kent + Edenbridge when traveling from Dormansland via Marsh Green Road. In an attempt to preserve the architectural 	<p>Comments noted.</p> <p>The document states on p1 that the Edenbridge Conservation Area Appraisal (2001) can be found in a separate document located on Sevenoaks District Council website. Should a development come forward which impacts the setting of the Conservation Area, the Conservation Area Appraisal will be used to make this assessment.</p> <p>Marsh Green is out of scope of assessment that was established by the Edenbridge Neighbourhood Plan Steering Group. The scope of this study comprises of the built up areas of the town confines of Edenbridge (excluding the Conservation Area). Marsh</p>

<p>Appendix B – Consultation responses</p>		
	<p>integrity of Edenbridge it is imperative that guidelines be created for this area.</p> <p>Mill Hill South A1.2:</p> <ul style="list-style-type: none"> • The Character details are totally lacking any depth and no photographic evidence to support eg: <ol style="list-style-type: none"> 1. Character rendered Victorian terraced houses (conservation area) 2. Tile hung properties 3. Bay windows 4. Gable roofs 5. Chimney pots see attached photos • The photographic evidence for A1.2 compared to evidence accompanying Stangrove and Crouch House Road (A.1) assessment is dismal. • As above, there is very little information of the property types within the conservation area on A1.2 eg: <ol style="list-style-type: none"> 1. Eden Villas – character rendered / red brick / tile hung terraced houses with bay windows, porches, gables 2. The white rendered Georgian style properties / sash windows / some tile hung • Gabriel’s Lodge has been omitted from the document – a character Arts + Craft house on Mill Hill South • The emphasis on the road, traffic & garage; which according to the document 'impacts negatively on the area', does not make the properties less characterful. This document has been created as a design tool for any prospective build / development and this sort of comment is immaterial. 	<p>Green lies outside the town confines and is washed over by the Green Belt, which is protected by national and local policies. Should any development come forward in these areas the distinctive features that contribute to the special character will be protected and enhanced, where possible.</p> <p>Mill Hill South A1.2: The properties that lie within the Conservation Area are out of scope of this document and therefore the characteristics and pictures submitted that include these houses are not included within this character area. Information such as the building type is mentioned in the table which describes the contextual features.</p> <p>Recommended changes: Further pictures have been included to provide further photographic evidence and reference to Gabriels Lodge has been made under 'area characteristics'.</p>

Appendix B – Consultation responses			
		<ul style="list-style-type: none"> • For the record the road on Mill Hill South is not 'wide', it has pavement on one side only + struggles with larger vehicles passing at the same time. • No mention in Design Guidance of build type: detached, semi detached, bungalow, terrace <p>I think it is appalling the lack of detail + depth in this document. Any developer could build a red brick house behind a boundary on A1.2 if using the unsubstantiated Design Guidance:</p> <p>Quote: 'New development must exhibit high quality design and respond to distinctive local character as well as context.' 'The harmonious palette of painted render on the late 19th century terraces and red brick throughout the character area should be respected'</p> <p>It does make one think whether there is motivation behind the dubious and ambiguous content of the Design Guidance in light of the Governments white paper + the application to remove green belt status at the bottom of Mill Hill for development purposes</p>	
33	Edenbridge Town Council (Deborah Bond) 22 nd Sep 2020	<p>Map – Character Areas Edenbridge</p> <p>Two areas are missing from the map:</p> <p>A) Marsh Green – A residential area to the south end of Edenbridge</p> <p>B) Edenbridge Town Railways Cottages - six semi-detached cottages on the other side of the railway from Map Reference C3.3</p> <p>Item 4. Methodology</p>	Comments noted. The original scope of the document was established by the Edenbridge Neighbourhood Steering Group and comprises of the built up areas of the town confines of Edenbridge (excluding the Conservation Area which are detailed in the Conservation Area Appraisal). Following a site survey and as stated in the Sevenoaks District's Settlement Hierarchy, Marsh Green is shown as a separate

<p>Appendix B – Consultation responses</p>	
	<p>The last paragraph of this section should read: Local Representative groups, Edenbridge Town Council and elected Members of the District Council assisted in each stage of the work.</p> <p>Item 5 – Community Involvement The second line of the second paragraph here should read: A team of volunteers, the Neighbourhood Plan Steering Group, members of the Ward and Town Council undertook an initial appraisal.</p> <p>Item 6 – How to use the document Map Does the direction of the house numbers indicate the orientation of the properties? If so, this should be explained in this section.</p> <p>A2.1 – Sunnyside Take out Hamsell Mead Farm from the Map as this land has now been built on. (or add a statement in item 6 – Maps that all maps are correct as at 2019 and some details may have now changed). Views - Remove the photograph of Hamsell Mead Farm as this is now the Bellway Estate.</p> <p>Section A2.2 – Frantfield In the box ‘Street Type’ please add that:southern lane is accessed along a pedestrian pathway (also a privately owned driveway) The bottom of the Map shows an area of Open Spaces. These are Cemeteries.</p>

settlement to Edenbridge and therefore has not been considered as part of this assessment.

Marsh Green lies outside the town confines and is washed over by the Green Belt, which is protected by national and local policy. Should any development come forward in these areas the distinctive features that contribute to the special character will be protected and enhanced, where possible.

Following a site visit, the Town Station cottages lie immediately adjacent to the town boundary which runs along the railway track. There is no extended separation to the existing built up area and town boundaries of Edenbridge and the grouping of six Victorian cottages would not be considered a separate settlement. Therefore, we have included the Town Station Cottages into this assessment.

Item 6. The orientation of the properties is not related to house numbers. Further changes to Character Areas are recommended below.
Section A2.2. Frantfield - cemeteries are classified as ‘open spaces’.

Recommend changes:

Appendix B – Consultation responses			
		<p>E1.5 – Station Road North The map of Four Elms Road shows Orchard Bungalow which has now been altered. Alter the map (or add a statement in item 6 – Maps that all maps are correct as at 2019 and some details may have now changed).</p> <p>F1.1 – Industrial Area This section does not mention Lidl and Home Bargains so the map should be updated.</p> <p>F2. Community/Educational First paragraph under this heading: Should NOT make reference to a supermarket. So should read (i.e. primary school or sports centre).</p> <p>* The Amended Guide to Changes to the Use Classes Order in England – these changes need to be reflected throughout the Edenbridge Character Area Assessment document.</p>	<p>To include the Town Station Cottages as a character area.</p> <p>Items 4, 5, 6 have been updated.</p>
34	<p>CPRE Kent (Nigel Britten)</p> <p>23rd September 2020</p>	<p>Thank you for inviting us to comment on the draft SPD. Our main concern is the protection of the countryside and that, of course, involves its relationship with the built environment. We therefore welcome references to retaining views over countryside, such as Key Views, and note that recent and/or current proposals such as those below would be relevant in this context:</p> <p>A2.1 Sunnyside (Oakley Park under construction)</p>	<p>Support noted.</p>

Appendix B – Consultation responses			
		<p>B 1.3 Church Street (division of Town Field into small plots) C 3.4 Hever Road North (Town Field) D1.2 Greshams Way (golf course proposals) D2.3 Bray Road (Regulation 19 Local Plan, Green Belt boundary alterations)</p> <p>With this in mind, the adoption of this SPD will make it an important reference in future planning determinations.</p>	
35	Ivor Bramley	<p>Industrial Area – pdf attached to consultation platform.</p> <p>In summary, proposals seem relevant to residential areas, not industrial and a request that industrial area is not included. Landscaping has its place but properly functional yards and buildings need to be prioritised. There should have been wider publicity about the Draft ECAA.</p>	<p>Comments noted. The economic development of businesses in Edenbridge are supported through national and local policy. This document sets out the characteristics that contribute towards making Edenbridge distinctive. By understanding the existing characteristics, the document can be used as a tool to enhance and promote positive development, which is responsive and suited to the local character, including the character of the industrial area. The consultation for this document was publicised in line with the Statement of Community Involvement and details out our approach in the beginning of this statement.</p> <p>Recommend changes: To remove the residential area (Caxton Close) from the Industrial Character Area (F1.1). The</p>

<u>Appendix B – Consultation responses</u>			
			design guidance should be amended to respond more sensitively to the industrial character.

