



**BREUNCHLEY AND MATFIELD PARISH
NEIGHBOURHOOD DEVELOPMENT PLAN
CONSULTATION STATEMENT: ANNEX 2
OCTOBER 2021**

Prepared in accordance with the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012-2017



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Annex 2: Detailed comments and responses from Reg 14 consultation

This table shows the comments received from statutory and other consultees along with comments made in responses to the community survey. For each chapter and policy in the Plan, it provides a response to the comments and shows where changes have resulted. Survey comments were anonymous and are identified by the question on which they were made, but they are included in the table under the section or policy to which they most relate.

Source	Comments (not necessarily verbatim)	Response	Resultant changes
General			
TWBC	Neighbourhood Plan runs to 2038 - In line with TWBC Pre-Submission Local Plan (PSLP)	Comment noted	-
TWBC	Refers to saved TWBC Local Plan 2006 Policies; should also refer to saved policies: Core Strategy & SALP	Noted but already in the Strategic Planning Context paragraph on p18 (Ch. 3).	-
TWBC	Document needs to be in 'Accessible Format' and images of cars etc in document – should number plates be redacted?	Agreed	Plan and supporting documents amended
TWBC	Paragraph numbering and better cross referencing between text and figures is needed to guide the reader and the Inspector at examination. And for use as a development plan document when 'made'.	Noted	Cross-referencing improved
Community email	Agree most, especially on CC, biodiversity; L&E	Noted; climate change and biodiversity issues are central to the NP, see especially – but not only - policies D6 and LE6.	-
Community email	Plant more trees rather than find land for development	The requirement for some development is set by Government but agree on the importance of trees; see eg Policy LE7.	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Community email	More emphasis on protecting AONB (Intro and LE)	The Plan expresses strong support for protecting the AONB as well as its setting.	-
Chapter 2			
TWBC	Local Transport Links: Consideration should be given to other active transport links – add something about cycle routes/other linkages for example	Active transport is mainly covered in the supporting text to Policy AM1.	Add 'The parish benefits from an extensive network of well-used footpaths, but bridle ways are extremely limited and many of the narrow roads in the parish are dangerous for cyclists or pedestrians.'
HWJAC	Excellent understanding of landscape history and character	Comment noted	-
HWJAC	Suggest more maps of farming systems and farmsteads in Chapter 2.	This might be of some interest but not included given the length of this chapter.	-
KCC	Chapter 1 disjointed on landscape and heritage; suggest should redraft	Assume this relates to Chapter 2, as Chapter 1 is the Introduction. Comment noted but there are varying views on what is an issue of presentation rather than substance.	-
KCC	Welcome references to PRow (rather than footpaths) and want to work together	Noted	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
KCC	Need more on heritage assets	Link with comments on LE3	More examples added to LE3 supporting text.

Chapter 3

TWBC	References in NP to TWBC Policy documents/topic papers that supported the TWBC Draft Local Plan (Reg 18); Will need to be updated to reflect Reg 19 supporting documents that may supersede those at Reg 18	Noted	-
TWBC	Chapter 3; The Housing Register & Development Manager would agree that the Government housebuilding numbers does offer an opportunity to tackle the housing needs of the parish and in particular offers an opportunity to ensure that affordable housing is built reflecting local need.	Noted and welcomed	-
TWBC	Housing (Strategic Challenges); This paragraph mentions the needs of younger households requiring starter homes and older downsizing households. The Housing Register & Development Manager would add that there are other types of affordable housing which will also support the wellbeing and economic prosperity of the area including and in particular social rented and shared ownership. This is shown in the Housing Needs Survey that was commissioned by ACRK whereby only 7 out of 22 households in need could actually even afford shared ownership. However, the Housing Register & Development Manager notes that under Housing Objectives Page 21 point 7 the aim is to deliver a range of affordable housing types to meet need.	The text refers to 'affordability, starter homes and down-sizing'; the first of these covers all forms of affordable housing. This is covered in detail under policies H6 and H7. Noted	-

Chapter 4

KCC	Support A&M objective but need more on active travel and sustainable transport	Active and sustainable transport is covered in Policies AM1 and AM2.	Minor addition here to say 'To encourage active travel and provide sustainable transport options.....' at the
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Source	Comments (not necessarily verbatim)	Response	Resultant changes
			start of Access and Movement paragraph.
KCC	Need more on public health issues linked to Kent analysis and plans.	Health issues, like education, are of vital importance to the community, but the Neighbourhood Plan is not the place for reviewing them.	-
Survey V/1	I agree with the sentiment of the vision statement but not its fundamental assumption that it is possible to 'enhance the special qualities of the parish's landscape and built heritage' by agreeing further development projects. I agree that we should embrace sustainable change along the lines presented but I have little confidence that proposals agreed by TWBC will meet these criteria, despite the laudable efforts of the Neighbourhood Plan	The aim is to enhance etc while accommodating required levels of development.	-
Chapter 5			
TWBC	P21: Housing – point 2; This implies that sites within the LBD are not in the AONB. This should be clarified.	Noted	Wording amended to 'encroachment in the rest of the AONB'.
Chapter 6			
TWBC	P23. Status of NDP following referendum; Worth adding that the NDP will form part of the Development Plan for the borough, which also includes the TWBC plans and the KCC Minerals & Waste LP	Noted	Add 'form part of the Development Plan for the Borough and' after 'these policies will' in the first line of

Source	Comments (not necessarily verbatim)	Response	Resultant changes
			the second paragraph on p23.
531 TWBC	P23: Table of policies; This could be made more user friendly by having the page numbers for the policies set as links to the policies themselves	Noted	Done
KCC	Chapter 6: refer to safeguarded minerals	This is referred to under Strategic Planning Context (Ch.3 p18).	-
General Policy			
TWBC	P24: Policy G1; This should be caveated along the lines of ‘unless material considerations indicate otherwise’. Could be too restrictive as it is.	Such a caveat is implicit in all policies. Under normal circumstances we would expect all policies to be complied with.	No need to change
Housing Housing Introduction			
TWBC	P25: Reference to brownfield and windfalls. Suggest they simply use the NPPF definitions and note that windfall sites do include small scale brownfield sites – they currently read as separate things	Noted, text amended	Delete “, brownfield and infill”
Policy H1 Scale of Development			
TWBC	H1: Scale of development; Delete the word ‘Exceptional’ at start of policy. It appears to equate 10 units as being major within the AONB, it is not as clear cut as that.	Noted, text amended	Amend beginning of 1 st sentence to “Major housing developments will only be permitted within the HWAONB...”
TWBC	The Housing Register & Development Manager agrees with 6.1 that small developments appropriate to the character of the area is most appropriate.	Noted	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Historic England	Support H1; some drafting suggestions on the policy and supporting text	Accepted	Drafting change to final sentence of policy also accepted, adding "provided that infill development does not compromise the character of the area where gaps between the buildings are important to this".
HWJAC	H1 appreciated but unlikely to be acceptable re major development; why are developments of under 10 units more appropriate?		Largely accepted, see above
JAC	Support H1; could be clearer on small-scale; welcomes approach to infill	Noted	-
Survey H1/1	At present TWBC do not appear to be respecting the HWAONB which they have laid down.	Noted	-
Survey H/1/2	The policy does not consider the cumulative effect of several developments within the local area, but not necessarily within the BandM parish, on matters such as increased traffic and extra load on infrastructure.	Agreed that the impact of the scale of potential development in surrounding areas is a concern; this is reflected in the Plan and will continue to be raised by the PC, but the Plan is limited to development within the parish .	-
Survey H1/3	But the horse has bolted with the oversized development in Matfield, but hopefully future developments will be constrained.	The purpose of the Plan is to influence future development.	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Survey H1/4	In some cases no development is the most appropriate response, development as a default is the wrong starting point.	'No development' is not an option given Government policy.	-
Survey H1/5	Where is the control over the overall number of developments (including those of under 10 units)? Infrastructure concerns about very large developments in surrounding area: impact on schools, health, station, supermarkets, roads.	Agree lack of limits for small developments is an issue but we hope the policies in the Plan will help; on infrastructure see S/H1/2.	-
Survey H1/6	Respecting the HWAONB design guide is crucial to preserving the parish's character.	Agreed	-
Survey H1/7	No mention appears to have been made of the 22 Rydon homes on the Maidstone Road to the east of the Standing Cross junction.	Already under construction when Plan drafted.	-
Survey H1/8	I agree with the objective but not the associated policy which opens the door to development of an inappropriate scale.	Noted	-
Survey H9/1	It is important that 'infill' in particular is considered by TWBC as in my view it is detrimental to the area.	Infill is subject to the policies in the Plan.	-
Survey H9/6	So called windfall developments should contribute towards the housing need targets. No reason not to include them as they meet need in exactly the same way as new build but with less environmental impact.	They do count towards overall TWBC housing targets, but the Local Plan does not specify where windfall development should be.	-
Policy H2 Location of Housing Development			
TWBC	P28 LBDs: Location of Housing Development. Noted that LBD maps on P28 correlate with those of the PSLP. Would suggest including a reference to figure 13 in the text about LBDs on page 27. Not sure why Listed Buildings are included on	Accepted	Change to supporting text to reference Fig 13.

Source	Comments (not necessarily verbatim)	Response	Resultant changes
	the LBD maps at Figure 13 as they are shown earlier under Historical Context on page 11.		
TWBC	H2: Location of Housing; 'proposals will only be supported for developments which are within the Limits to Built Development (LBDs) as defined by the maps in Figure 13.' LBDs are those in the TWBC PSLP Reg 19 March 2021	Noted	At end of 1 st sentence of 2 nd para of supporting text add "as shown in Figure 13".
HWJAC	H2: welcome separation but need to include farmsteads	Accepted	Policy wording amended: in 1 st line of 2 nd para of policy, deleted "and settlements" and inserted ", hamlets and farmsteads" .
KCC	H2: welcome commitment to maintaining historic character; development between settlements and among farm buildings often consistent with this; refs. to guidance	Noted	See policy and supporting text amendments above.
JAC	H2: limiting development to LBD with limited exceptions too constraining	Noted	No change to policy: NPPF says development should be limited within AONBs and there is sufficient scope for such limited development within the LBDs.

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Survey H2/1	The boundary limits for Brenchley could be adapted to include the land to the northeast of Holly Bank and East of Brenchley Road and to the south of Glebe House.	Noted	No change: Parish Council has accepted TWBC's proposed LBDs.
Survey H2/2	It is very important that this Plan recognises the ability of the School to use the play area and the (Northern) grassed playing field/sports activity area for possible building, although doubtless it would always wish to retain plenty of room for recreational use. The School should be allowed flexibility to build at least for educational purposes.	The Plan does not preclude proposals for educational improvements.	No change
Survey H2/3	I think the limits should be re drawn to include the whole school site.	See S/H2/1	-
Survey H2/4	Essential to safeguard the countryside in the High Weald.	Noted	-
Survey H2/5	Identical to S/H2/2		-
Survey H2/6	Any further housing development should, in my opinion, be into the Brenchley village as that is where all the infrastructure currently besides (Doctors, dentists, post office, shops and cafes). The proposed LBD is too small for Brenchley. All other objectives are excellent.	Noted	-
Survey H2/7	We need houses so some might need building on AONB	There is strong community support for protecting the AONB.	-
Survey H2/8	However, development on 'The Triangle' which in essence was a borderline planning application, has started and we should be concerned that the aspect of AONB is being ignored.	This development was not supported by the Parish Council.	-
Survey H2/9	Have you considered development on the old golf course to the west of Pixot Hill which is outside the AONB? Whilst it may act as a buffer between the parish and the edge of Paddock Wood it might be a less sensitive area for development if developed in accordance with the design and sustainability policies outlined elsewhere in the plan.	Maintaining the buffer is likely to be of increasing importance given the scale of development in Paddock Wood.	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Survey H2/10	Identical to S/H2/9	See above	-
Survey H2/11	The boundaries of the LBD may well need further attention given the developments taking place	See S/H2/1	-
Survey H3/1	Character is a subjective concept. It is important that this approach is flexible enough to include features that will help support the village to evolve in ways that make it fit for the future, particularly with regards to sustainability and the green agenda.	The Plan supports sustainability and the green agenda eg in D6.	
Survey H3/2	More distinctive seriously zero carbon buildings would enhance and give a distinctive 21st century character to the villages. Let's not root character in the past.	See S/H3/1	
Survey H4/1	For reasons given above the village boundary of Brenchley could be adapted to include the specific site detailed	See S/H2/1	
Survey H4/2	Agree, in part, though this parish council (B&M) indicates that we should be joined up.	We should be joined up as a community but that does not mean physically joining settlements.	
Policy H3 Density of Housing			
JAC	Density should be as high as possible without harming character	Noted	No change. Policy is compliant with NPPF. Moreover some of the existing density within the LBDs is high.
Policy H4 Housing mix			
TWBC	H4: Housing Mix Residential development; 'proposals will be permitted where an appropriate housing mix is maintained. Proposals, on sites of more than six	Noted support for policy and evidence to support it.	Policy amended to "6 or more" to correct drafting error.

Source	Comments (not necessarily verbatim)	Response	Resultant changes
	<p>dwellings, should provide 1 bed, 2 bed or 3 bed units in at least 70% of the new homes, unless otherwise specified in an Allocated Site-Specific Policy.'</p> <p>TWBC Policy H1 Housing Mix: Not proscriptive and refers to relevant policy in a 'made' NP</p> <p>NP Policy should be supported by local evidence base. It is noted that this policy is based on the B&M HNS 2020 and cross references to the TWBC HNS 2018 (borough wide)</p>		
JAC	H4 should apply only to greenfield sites	Noted	No change: evidence of need for smaller housing is clear.
Survey H5/1	Each site should be considered on its own merits and the meet the character of its surroundings. A broad mix of housing should be included for all requirements within the Parish.	Noted	-
Survey H5/2	Would depend on site and context but broadly agree	Noted	-
Survey H5/3	Housing for key workers, young people and renters is hard to come by in the villages currently.	Agreed	-
Survey H5/4	This policy needs to be applied to windfall site applications too.	This is part of the Plan for developments of 6 or more units	-
Survey H5/6	The parish's demographics are heavily skewed to the retired. For the village to be sustainable, younger families need to be encouraged. 1-3 bed houses may encourage this: 4+ bed housing won't.	Agreed	-
Survey H5/7	Over time household size and make up can change	Noted	-
Survey H5/8	Making village or hamlet housing more accessible should not be the primary objective. Often towns are more appropriate to accommodate this size of dwelling. Increasing density can only lead to harm. Eg increased traffic.	We think a balance is needed that enables small and lower income households to live in the parish.	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Survey H5/9	However, there is a case to be made for multi-generational properties where more elderly or disabled residents can be accommodated in downstairs facilities.	Agreed	-
Survey H5/10	We need big houses as well	Agreed a balance is needed but evidence shows the greatest need is smaller houses.	-
Policy H5 Housing for older Residents and people with disabilities			
TWBC	P31: Housing Needs Survey – affordable housing. The statistics in the Housing Needs Survey 2020 and Parish Survey 2017 support the need for downsizing accommodation such as bungalows, the affordable housing needs statistics for the Parish support this. Downsizing market accommodation, (particularly bungalows), can also be useful to cross subsidise general needs affordable housing.	<p>TWBC – said “Gov Policy means only housing TW are responsible for allocating can be wheelchair accessible” – to Check if can be adopted for housing other than affordable.</p> <p>☒ Refer to TWBC comments for further action</p>	<p>Building Reg M 4 (3) includes both wheelchair adaptable and wheelchair accessible. Govt policy is that wheelchair <u>accessible</u> can only be required by housing authority for housing it is responsible for allocating (i.e. affordable housing), but this does not prevent NDP requiring M4(3) wheelchair <u>adaptable</u> for market housing. Policy redrafted.</p>

Source	Comments (not necessarily verbatim)	Response	Resultant changes
TWBC	Where does the definition of Older People as over 65 come from? Is it an interpretation of 'people over and approaching retirement age' as in the NPPF? PPG refers to Age restricted housing as being 55 and over.	Noted	Policy amended
TWBC	Is 'and those' needed before people with disabilities? Does not add anything; also, remove 'exceptional' as with H1 and H6; should the 'will only be considered where' be more positively worded?	Noted	Policy amended
TWBC	Where the policy states 'at least 5% should be suitable to support people with physical disabilities' is this a reference to the TWBC policy H6 that states 'at least five percent of the affordable housing element will be expected to meet the optional technical standard M4(3) for wheelchair user dwellings, to support people with physical disabilities, where a need has been identified in the parish or ward (by the Housing Authority);'? It might be worth clarifying what is considered to be 'suitable to support the need for people with physical disabilities' as TWBC policy requires M4(2) technical standards (accessible and adaptable dwellings) on all new homes and M4(3) – homes suitable for wheelchair users only on 5% of the affordable housing element of a scheme where there is a proven need, which is in line with the PPG. M4(3) should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.	Noted	Policy amended
TWBC	The Housing Register & Development Manager agrees that homes need to be built to meet the needs of older and disabled households. You will note from the affordable housing statistics that, across all household sizes, there is a need for housing built to meet these needs. As a guide the mobility statistics quoted relate to the following: Level 1 Mobility – Wheelchair user inside and out Level 2 Mobility – People who cannot manage steps or stairs and may occasionally use a wheelchair Level 3 Mobility - Level access required as only able to manage a few steps.	Noted	-
TWBC	Age restriction – Generally there are a range of age groups represented in the data above. However many will be in the older age groups and there is a need for	Noted	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
	housing built to a higher building regulations requirement – Part M4 (2) and Part M4 (3).		
TWBC	This type of housing will also assist in meeting the needs of disabled households. The Housing Register & Development Manager therefore support the aim of 10% of homes being required to meet the needs of older and disabled households	Noted	-
JAC	Welcome emphasis on development for ageing population but no sites; role for bungalows	Noted	-
Survey H6/1	Yes, but unless you provide housing for younger people and families this is not a choice -	The Plan recognises the need for housing that can be afforded by younger people and families.	-
Survey H6/2	Important to keep older residents integrated into the parish and not isolate them in a separate designated site	Agreed as a general principle without precluding developments for older people.	-
Survey H6/3	People downsizing should be priority to build on land	Reflected in policies H4 and H6.	-
Survey H6/4	Older residents have a majority of the housing stock. New houses need to be available to and affordable for the young.	Agreed, see S/H6/1	-
Survey H6/5	The parish suffers from house "blocking" where the elderly are unable to find suitable properties in the area in order to downsize. This is an incredibly inefficient use of property. This policy could help open up family homes to "younger" families, although affordability would still be an issue.	See policy H4	-
Policy H6 Affordable Housing			
TWBC	P29: Affordable Housing; The need for affordable housing, as demonstrated by those waiting for social housing on the Housing Register is detailed below. Whilst there are only 8 households with the required local connection to the Parish for rural exceptions housing, there is a much larger number expressing an interest in living in the Parish in social housing, (148 for Brenchley and 173 for Matfield – data provided on breakdown by bedrooms and mobility requirements). Experience shows that, particularly where rural exceptions housing is concerned,	Additional evidence noted	Additions made to supporting text

Source	Comments (not necessarily verbatim)	Response	Resultant changes
	many more households come forward as being in need of affordable housing once a site has been identified. Whilst the Housing Register & Development Manager would not be advocating for anything like these numbers detailed above, they would suggest that the need for affordable housing and particularly for social rented housing remains very high).		
TWBC	The statistics do back up the need for smaller dwellings and family housing to be 2 and 3 bedrooms.	Noted	-
TWBC	Page 25 – The ‘Island Site’ is delivering 40% affordable housing through Town & Country Housing including the following affordable housing mix: five 2 bed houses, five 3 bed houses and one 4 bed house. There will be two 2 bed houses and five three bed houses under shared ownership	Noted	-
TWBC	Comparison with TWBC PSLP Policy H3 Affordable housing: (a) Same / delete word ‘exceptional’ – doesn’t add anything to the policy and is a vague word (b) 6 – 9 dwellings in AONB provide financial contribution. This approach should be supported by a local evidence base (c) mix & tenure of affordable to reflect local needs	Noted	Policy and supporting text amended
TWBC	Not clear whether the 40% relates to greenfield sites – looks like it does but this should be clarified.	Wording states 40% for new development and 30% for brownfield.	-
TWBC	The Housing Register & Development Manager agrees with a and b of the Policy H6. First Homes may need to be discounted further than 30% in order for them to be affordable in a high value area. My understanding is that First Homes will be directly sold by developers. This could have a negative effect on Registered Providers providing shared ownership homes as part of an affordable housing offer as First Homes are also a discounted sale product. English Rural Housing has expressed concern that First Homes in rural areas may push up the value of land that may have otherwise been available for rural exceptions housing.	Noted	Plan amended to cover First Homes
TWBC	The 2020 Housing Needs Survey suggested a need for 22 affordable homes. Experience suggests that more households are likely to complete local housing	Agreed, especially on the need for social rent	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
	needs surveys than be registered for social housing with the Council and therefore the Housing Register & Development Manager would expect this to be higher than the 8 households we have with a local connection. Indeed many downsizer households would not be eligible to join the Housing register as they may have capital or savings that exceed our limits for affordable housing. Whilst 22 of these households expressed an interest in shared ownership or discounted market sale, it should be noted that only 7 were assessed as actually being able to afford these tenures and therefore schemes that include social rent are needed.		
TWBC	TWBC is currently reviewing our Housing Allocations Policy and the Housing Register & Development Manager would welcome further discussion with the Parish on whether the income and saving restrictions need to be reviewed as part of this. Whilst First Homes may be able to fill this gap, as previously noted higher discounts may need to be considered.	Dialogue welcome	-
TWBC	The Housing Register & Development Manager agrees with the residency/local connection criteria.	Noted	-
TWBC	See Lamberhurst IE Report	Noted	-
JAC	Is there evidence of need on 4-9 unit developments? Should have policy aiming for 100% affordable outside LBD; Entry Level Sites rather than Rural Exception Sites	Noted but no action to take	Housing needs clearly evidenced.
Survey H5/5	The First Homes scheme seems like it might fill a gap and it's good to see that the houses would have restrictions to keep them in the affordable housing market, but will this be administered by the borough council, and will the local parish council have any say on who gets the options? I found it a little unclear between the Housing register and the First Homes scheme and when I looked on the TWBC site, I didn't find a place where you could register to be considered for buying through the first homes scheme. Is this going to happen in our area or is it just a hope?	The Parish Council supports the First Homes Scheme.	H6 amended to cover First Homes.
Survey H7/1	It is crucial that local people are supplied with affordable housing.	Agreed	-
Survey H7/2	I agree provided the priority for local people is strictly adhered to, which has not previously been the case in our general area.	Noted	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Survey H7/3	Percentages you indicate may well be sensible now but if there are a number of developments leading to the provision of these sorts of numbers need flexibility to lower these percentages or the provision of “affordable houses” could become disproportionate.	Policy requires there to be a clearly identified local need.	-
Survey H7/4	This is essential	Noted	-
Survey H7/5	The local connection should be set in stone and retained so that when the houses are sold or leased to new tenants they also should have a local family or work connection.	Government policy and legislation prevent local connection being “set in stone” but priority for local connection is stated.	-
Survey H7/6	There needs to be a system whereby rented properties are available within a development; and part-buy/rent need to be maintained in perpetuity for the community, otherwise the whole concept of 'affordable' is lost/undermined.	Noted	-
Survey H7/7	Must be for people with family or work connections to the village and not just those who have got to the top of the HA waiting list because they have enough points.	See H/7/5	-
Policy H7 Rural Exception Sites			
TWBC	H7: Rural Exception Sites; TWBC Policy H5 B&M policy contains no mention that sites outside LBDs will be permitted only where there is no alternative site to meet the local need within the LBD. Given the need identified in the 2020 Housing Needs Survey the Housing Register & Development Manager is in support of this policy. They agree that the availability of appropriately discounted land is the most difficult obstacle to overcome. The Parish may benefit from a discussion with English rural Housing who are keen to develop rural exception housing in the Borough.	Noted	Policy amended
Survey H7/3	(Adds to comment on H6) I also think that the rural exception site policy may need to be more flexible and reflect the overall pattern of new developments in the area or by implication you may have affordable housing on sites least suitable for people who can't afford to run two cars.	Amended policy should help to address this.	See above

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Policy H8 Housing for Rural Workers			
TWBC	Policy H8: Housing for rural workers; TWBC policy H7 doesn't contain criterion for removing agricultural condition from PP. Is there evidence for the 18 months marketing required before removal in B&M policy?	Noted	Policy and supporting text slightly reworded to explain.
Survey H8/1	Considerable numbers of agricultural workers are housed in caravans which are unsightly and can be sited in inappropriate positions, even though they are effectively permanent housing	Amended policy should help to address this.	See above
Survey H8/2	Not sure what this means given much migrant labour. Travellers have never been given much welcome in the parish.	Noted	-
Survey H8/3	Yes, this is essential	Noted	-
Policy H9 Residential Extensions, alterations, outbuildings and annexes in the Parish and Replacement Buildings outside the LBD			
TWBC	Policy H9: Residential extensions, alterations, outbuildings and annexes in the Parish and Replacement Buildings outside the LBD; No mention of size limit for extensions (normally more restricted outside the LBD)	TWBC – No mention of size limit. Add size limit or mention TW policy PSLP.	Policy amended
Survey H9/2	There has been a considerable increase in conversion of older agricultural buildings recently to generate revenue. These old buildings are then replaced with much larger prefabricated structures leading to an increase in overall area of development rather than siting the new buildings close to or on the same site as the old ones.	This issue is addressed in policy BE1.	-
Survey H9/3	Very much so. Burford Place is an example of where this hasn't really worked despite good intentions	Noted	
Survey H9/4	I think it should be on architectural merit	Design is important but developments should also satisfy other policies in the Plan.	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Survey H9/5	It's to diverse anything should be allowed	Noted but not agreed	-
Policy H10 Developer Contributions			
TWBC	Policy H10: Developer Contributions; Suggest they delete the text about 'A good developer.....' and clarify that contributions can only be sought where the necessary planning tests are met. The wording as is could not be enforced.	Noted	Policy and supporting text amended as suggested by TWBC.
KCC	Add wording on using contributions to conserve and enhance PRoW network	Agreed this is one option	Supporting text amended
Survey H10/1	It is very important that developers are obliged to contribute, especially where drainage and road maintenance is concerned.	Noted, but national policy and legislation limit what can be achieved. NP policies D7 and 8 on flooding and drainage are relevant.	-
Survey H10/2	As long as this is not used as a way to "buy" approval for developments that would not otherwise be permissible	Agreed; national policy tests prevent "buying" of approval.	-
Survey H10/3	However, care must be taken with generous mitigation measures from developers with deep pockets	Agreed	
Survey H10/6	And it would be hoped that developers might also contribute in other ways for the community benefit.	Agreed	-
Policy H11			
TWBC	General point re site allocations; Consideration should be given to removing these from the plan – as these could change as PSLP progresses/wording changes perhaps. No need to repeat what could be in the PSLP unless NDP wants to allocate them anyway.	Noted but considered important to set out local views on individual developments.	Policy H11a removed from Plan as development is under way.

Source	Comments (not necessarily verbatim)	Response	Resultant changes
			Policy 11b renumbered as Policy 11 and slightly amended. Supporting text revised accordingly.
Policy H11A Site-specific policies for the Island site			Policy deleted (see above)
TWBC	H11A: Site specific policy relating to TWBC PSLP Policy AL/BM1 Land between Brenchley Road, Coppers Lane and Maidstone Road; Outline planning consent 19/01099/O for up to 45 dwellings granted 29 th May 2020. Reserved matters 20/03306 approved 12 th February 2021		Policy deleted
TWBC	As noted before, the 'Island Site' is providing affordable housing at the required 40%. Town & Country Housing are in contract with Fernham Homes. The 60% rented housing will be provided at a social rent which meets with our new affordable housing policy in the emerging Local Plan.		Policy deleted
KCC	Drafting comments on PRow		Policy deleted
Policy H11B Site-specific policies for the Matfield Village Hall Site			
TWBC	H11B: Site specific policy relating to TWBC PSLP Policy AL/BM2 Land at Maidstone Road; Need to monitor any promotion of site through TWBC planning	Noted	
TWBC	The Housing Register & Development Manager note that there is a submitted site also at AL/BM1. At the maximum this will only provide 6 affordable homes. As this may prove difficult for the developer to find a Registered Provider, fewer homes are difficult to find a partner for, then perhaps consideration could be given to an all-affordable housing scheme/rural exception site in this location.	Covenants on the site may preclude an all-affordable scheme. In the unlikely event that a registered provider cannot be found, then another form of affordable housing, such as First Homes, should be provided, and/or an	No change.

Source	Comments (not necessarily verbatim)	Response	Resultant changes
		affordable housing contribution or a contribution to village facilities should be made.	
Historic England	Support H11B especially on winter view assessment	Noted	This aspect of the policy is retained
KCC	H11B; include ref. to link to PRoW network	Noted	Policy amended
JAC	H11B: detailed, critical comments on affordable housing, biodiversity, existing and new trees and hedges and development contributions	Noted	Policy substantially amended
KCC	Appendix 5: support pedestrian link to WT286/286B to avoid access through car park.	Noted	Policy included
Policy H12 Good Practice in Construction			
TWBC	As this is subject to approval by TWBC this policy does not need to be in the NDP – should be deleted. Would question whether a policy is really necessary for this given that such requirements are normally imposed by condition (generally for larger developments) and dealt with under the Environmental Protection Act; and that there are only 2 site allocations proposed across the parish? If retained, needs to be defined what is meant by ‘where necessary’.	Poor behaviour by contractors on small development sites can also have a very detrimental effect on local amenity. This is a matter which local residents feel strongly about.	Policy retained but slightly amended.
KCC	Refer to impact on PRoW	Noted	Policy and supporting text amended.
Survey H11/1	Increased inspection required to ensure quality. There are far too many problems with new homes being built in many cases to minimum specifications. Building control needs to be strengthened to help maintain developers to an acceptable standard and quality.	Noted Enforcement (or lack of it) is not a matter that this Plan can deal with, but the Parish Council may raise the issue separately.	Policy and supporting text slightly amended (see above).
Survey H11/2	How will this be enforced?	As S/H11/1	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Survey H11/3	But good luck with getting that respected. I suggest you start lobbying now for a dedicated planning officer for developments in the parish. After all the portfolio holder lives in the Parish.	As S/H11/1	-
Survey H11/4	Will this also apply to sites of <10 units? there was continual noise and dust from the Tibbs Court site during the demolition process.	It would apply.	-
Design			
Policy D1 High Weald AONB and Design Standards			
HWJAC	Support refs. To HWAONB Management Plan and HW Housing Design Guide	Support noted	
Survey D1/1	So far, Standings Close is an 'eyesore' to the rest of the village.	Noted It is hoped this Plan may encourage better design in future.	-
Survey D1/3	This is to be subject to exceptions, such as where it is desirable to build within the AONB, balancing all other relevant factors.	The policy would apply to all developments.	-
Survey D1/8	Again, development at The Triangle rather undermines this aim.	As S/D1/1	-
Policy D2 Local Architectural Style			
TWBC	D2: Respecting the local architectural style; No mention of siting, layout, orientation - this can affect the setting of existing adjacent properties/buildings	Photos need to be in a different place, into beginning of section.	Accepted. Position of photos was a formatting error.
TWBC	Design section: Would suggest incorporating the typical design features photos on page 42 into the design section	Accepted	Photos to be moved (this is a formatting issue).
Survey H9/7	Good design is more than a pastiche of the past. There should be scope for and acceptance of high-quality contemporary design that reflects on and uses the development of current and future sustainable designs and the best of new technologies. A listed 400-year-old house will undoubtedly have had extensions and additions over time, each using then-current latest developments. If change	Noted and Agreed Policy D2 supports imaginative contemporary architecture that respects local styles.	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
	had not embraced, we would all still be living in mud huts with no running water or electricity.		
Survey D1/2	Nothing is mentioned of the source and future recyclability of building materials. There have been a number of examples in the area of large agricultural buildings being erected without planning permission due to the agricultural exemption which would not have been permitted in that position if they had required full planning. The agricultural exemption should not preclude siting of such buildings conforming to the plan	D1/2. The High Weald Design Guide has a section on sustainable building; see also policy D6.	-
Survey D1/4	Again architecturally innovative projects should be considered	See S/H9/7 above	-
Survey D1/5	but encouraging innovative zero carbon design and build.	Agreed; see above	-
Survey D1/6	Who cares what it looks like if someone wants it	Not agreed; good design is important.	-
Survey D1/7	Identical to S/H9/7	See above	-
Survey D1/9	I agree with the principles for Connectivity and Permeability, Green character, density etc. However, if we say that we want design and colour to match/fit in with what is already here, are we allowing for enough diversity to encourage innovation, new designs and ecologically suitable housing? I don't consider lots of mock Tudor housing for example as a plus.	See above	-
Policy D3 Agricultural and Rural Buildings			
TWBC	D3 Permitted Agricultural and Rural Buildings; Would suggest changing this to just Agricultural and Rural Buildings (as the word Permitted is misleading) Would also suggest wording is added to supporting text: Permitted development rights under the Town and Country Planning (General Permitted Development) (England) Order 2015, allow certain building works and changes of use to be carried out to agricultural/rural buildings without having to make a planning application.	Noted	Text and title amended.

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Policy D4 Accessibility and Flexibility		No additional comments	
Policy D5 Providing an Inclusive, Safe and Secure Environment		No additional comments	
Policy D6 Climate Change, Environmental Sustainability and Resilience			
KCC	D6: Welcome reference to sound waste management	Noted	-
Southeast Water	D6: Suggest more on water efficiency including a target for households.	Agreed	Added to supporting text.
Southern Water	Suggest additional policy on utility infrastructure	Accepted	New policy D9 and text added.
Survey D3/1	There now appears a conflict between addressing climate change with better insulation and reduced heating costs often results in small houses and apartments being very hot in summer and the now increasing problem of covid 19 type diseases where ventilation is vital.	Agreed needs clarification	Point d added to policy.
Survey D3/2	What climate change. Look up little ice age 1850s	Noted but not agreed	-
Survey D3/3	Where possible subject to cost and technology boundaries	Agreed	
Survey D3/4	All new & extended properties, whether residential or industrial, must encompass aspects of renewable energy.	Agreed	-
Policy D7 Flood Risk Management			
TWBC	D7 Flood Risk Management; Is this policy really required bearing in mind national policy and Local Plan policy –EN25? Does it actually say anything extra/locally specific?	KCC as the lead local flood authority welcomes the policy, which may come into effect before the PSLP. Also the supporting text provides local information.	No change

Source	Comments (not necessarily verbatim)	Response	Resultant changes
KCC	Welcome ref. to surface water and flood risk; add ref. to developments including design features with multi-functional benefits and assessing impact on historic environment.	Add into supporting text that surface water draining has been recommended by KCC.	Supporting text amended as suggested by KCC .
Policy D8 Surface Water Management			
TWBC	D8 Surface Water Management: Policy EN26 in the Pre-Submission Local Plan covers this issue	See above	See above
Business and Employment Policy BE1 Retention of agricultural buildings and commercial sites for redevelopment for residential use			
TWBC	<p>As for agricultural buildings above, may want to mention new PD rights in supporting text which come into effect on 1 August 2021 (points below are for information/guidance):</p> <ul style="list-style-type: none"> • Will allow unused commercial buildings (up to 1, 500 sq.m.) to be granted permission for residential use via a fast- track prior approval process. • The PD rights apply to all uses within new Use Class E - covers a range of uses including retail, restaurants, professional services, offices, gyms, surgeries, nurseries. • Councils will only be able to assess prior approval applications on specific considerations including: flooding, noise from commercial premises and adequate light to habitable rooms. Other site-specific issues that Councils can take into consideration include: the impact of the loss of a health service and in conservation areas the impact of the loss of a ground floor Class E use. 	Noted that the Plan needs updating	Add 'From August 2021, this policy will need to take into account new permitted development rights introduced by Government for converting certain unused commercial properties, though these will not apply in the AONB other than in conservation areas.'

Source	Comments (not necessarily verbatim)	Response	Resultant changes
	The PD rights will apply in Conservation Areas but not on other protected land designated as Article 2(3) such as Listed Buildings, National Parks or Areas Of Outstanding Natural Beauty (especially applicable to/good for Brenchley and Matfield given high percentage of AONB designation and Listed Buildings and therefore their new policy will be more applicable).		
TWBC	BE1: Retention or redevelopment of agricultural buildings; Is this consistent with Local Plan/National policies?	Consistent with PSLP policies ED2 and ED 5 on wanting to retain commercial uses where possible and criteria for conversions.	-
TWBC	Page 53 - Supporting text to BE1: <i>'A restriction on change of use away from commercial within 10 years of construction is intended to minimise the risk that such buildings are constructed in areas where housing is not appropriate, on sustainability or other grounds, with the intention, shortly thereafter, of seeking approval to convert to residential use. This is in line with the approach set out in the Town and Country Planning (General Permitted Development [England] Order 2015: SI 2015 No. 596 section Q1).'</i> Would suggest further explanation is needed of what this is and how it will be applied. If 'A restriction' means restricted by a planning condition – then need to bear in mind it will need to meet the 6-point test: Necessary; Relevant to planning; Relevant to the development to be permitted; Enforceable; Precise; Reasonable in all other respects	As explained in the NP (p53), this is intended to discourage developments which seek to create a brownfield site as a way of bypassing planning policies. Where a commercial development had been allowed, any application within ten years to convert to residential would be disallowed. This is considered to meet the 6-point test.	
TWBC	Policy wording about brownfield sites – land contamination would be dealt with by other policies. The wording should be more positive as the NDP should encourage redevelopment of brownfield sites to reduce reliance on greenfield sites	This wording only relates to the contamination issue, which is not otherwise covered in the NP. Otherwise, the policy is about trying to retain	Wording of the last para of BE1 revised to 'Proposals for converting brownfield sites that meet the

Source	Comments (not necessarily verbatim)	Response	Resultant changes
		commercial activity before considering residential alternatives. This is consistent with the PSLP.	above conditions will normally be encouraged in preference to greenfield sites, provided that it is demonstrated that any historic contamination....'
Survey B1/1	If a scheme proposes the conversion of an "amenity" business to yet more residential accommodation there should be a mandatory requirement to try to retain the amenity by some alternative scheme, if need be by means of a locally funded community interest group that would run the amenity as a social enterprise and not necessarily for profit. Examples would be local pubs, Post offices and shops.	There is a requirement to market in existing use before allowing conversion, which provides opportunities for community initiatives, but we can't mandate that this will be feasible.	-
Survey B1/2	Yes, but how do we address the problem of transport in rural area being serviced by ever larger vehicles.	We can't control the size of vehicles but can try to minimise HGV use of minor roads, as the Parish Council are now doing.	
Survey B1/3	Yes, in principle, depending on the nature of the businesses.	Noted	
Survey B1/4	If a site becomes no longer commercially viable it should become residential	The Plan is not intended to preclude conversion where there is no commercial alternative, subject to compliance with Plan policies on development.	

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Survey B1/5	Agree in principle, although development of redundant farm & industrial buildings has meant an increase in windfall sites coming forward. However, aspects of flooding/highways etc. must be observed when this type of application is made.	Agreed; see above	-
Policy BE2 Supporting additional employment and new ways of working			
KCC	Developments need to consider proximity to active travel links and PRoW.	This is unlikely to be central to business location decisions.	Add, at the end of the supporting text (p54), 'Where otherwise feasible, it would be beneficial if location of businesses offering employment took account of proximity of non-vehicular access.
Survey B2/2	Broadly, although still in keeping with character of the area	Proposals need to comply with Plan policies on development .	-
Survey B2/4	Within reason	Noted	-
Policy BE3 Infrastructure for Business			
TWBC	BE3: Infrastructure for Business; This is a bit vague and there is concern that it could be misconstrued and used in the wrong way. It needs a caveat that proposals will be supported subject to other policies in the plan etc – see wording included in Policy BE5 or CLR1. There needs to be consistency between these policies when referring to other policies in the plan.	Agreed	Reference to other policies in the Plan added.

Source	Comments (not necessarily verbatim)	Response	Resultant changes
KCC	Add ref. to PRoW and support for upgrading public footpaths to bridleways.	PRoW are not a major issue for this policy; they are covered in AM1 and AM2. The need for more bridle ways is covered in the last para of the supporting text.	-
Survey B2/1	If you are hoping for more business investment, more infrastructure is needed eg roads etc.	Agreed	-
Survey B2/3	I strongly agree with this policy but do not think there is enough emphasis on ensuring availability of electronic infrastructure for both businesses and housing.	Noted; this is a major part of Policy BE3	-
Survey B2/5	Local sites with decent broadband would be great	Noted	-
Policy BE4 Agricultural Diversification			
Policy BE5 Small-Scale Tourism			
Survey B3/1	What agriculture? Matfield appears devoid of places to be considered. Brenchley is more 'blessed' with agriculture.	There are still farms in the Matfield area.	-
Survey B3/2	Provided due consideration is given to noise and transport implications	This is covered in the Plan.	-
Survey B3/3	Broadly, but depends on type of agriculture and tourism - specialist organic fruit farming may be in keeping with character of area but the previously proposed large scale chicken farming in nearby Horsmonden would not be appropriate	Agreed that proposals need to be looked at individually to ensure, within the limits of planning, that they are suitable .	-
Survey B3/4	Whilst I agree with this objective, I also believe that the existing freedoms for development of new agricultural buildings need to ensure they do not affect badly the policies you are promoting in this document and that erection of such buildings cannot be a back door to avoiding planning controls.	Agreed; this is covered in point c of Policy BE1 and the last paragraph of the supporting text .	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Survey B3/5	Essential for agribusinesses to survive, but will often increase travel of all types	All development generates traffic; the Plan aims to ensure this is managed as much as possible (see Policy AM3).	
Policy BE6 Energy efficiency in non-residential buildings			
Survey B4/1	AND residential buildings!	See Policy D6	-
Survey B4/2	All industrial buildings should now be required to adapt by installing solar roof panels, vertical wind turbines (rather than windmills), rainwater retention, etc.	Agreed that action on climate change and other environmental issues is relevant to existing buildings, but retroactive requirements would need to be the subject of national legislation rather than local planning.	
Policy BE7 Renewable Energy Generation			
Survey B5/1	Yes - but not private wind turbines in gardens.	The draft NP contains a condition that ' There is no significant impact on local residents'.	-
Survey B5/2	must be considered in context	Noted	-
Landscape and Environment Policy LE1 Conserving and Enhancing the AONB			

Source	Comments (not necessarily verbatim)	Response	Resultant changes
TWBC	LE1: Protecting the AONB; Would suggest adding in – ‘only’ to make the policy more restrictive in the AONB: <i>Proposals for development in the High Weald AONB will only be permitted if they satisfy...</i>	Noted	Wording revised for equivalent effect.
TWBC	LE1 and LE2 could be merged into a single policy.	See no advantage in this.	-
TWBC	The High Weald AONB Management Plan is 2019 to 2024.	Noted	Amended
TWBC	The policy appears to suggest that all development must satisfy all objectives which is unlikely to ever happen and indeed some otherwise acceptable development may by its very nature be unable to satisfy any. It is unclear what ‘satisfy’ means and many of the objectives are complex with indicative indicators of success. In the supporting text it does quote the PSLP policy – “it should be demonstrated that the proposal will make a positive contribution towards achieving the objectives” which is more appropriate wording and should perhaps be followed.	Noted	Wording revised
Historic England	LE1 too permissive compared to H1; drafting suggestions	Noted	Policy reworded
HWJAC	Support LE1 emphasis on AONB Management Plan; should be ‘conserving and enhancing’ not just ‘protecting’ and should include local characteristics	Agreed	Policy amended
Survey LE1/1	This is my main concern! Fernham have not adhered to the AONB or Village Limit in their development of the Island site.	Noted	-
Survey LE1/2	This is to be subject to exceptions, such as where it is desirable to build within the AONB, balancing all other relevant factors.	LE1 applies to all developments .	-
Survey LE1/3	But subject to such a policy not being used to stand in the way of building and using the various sustainable energy schemes envisioned elsewhere within this plan.	High Weald guidance supports sustainability.	-
Survey LE1/5	But already undermined by development at The Triangle.	Noted	-
Policy LE2 Development Affecting the AONB and its setting			
HWJAC	Support LE2; wording suggestions including from revised NPPF	Noted	Amended using revised NPPF .

Source	Comments (not necessarily verbatim)	Response	Resultant changes
KCC	LE2: refer to borough Historic Landscape Characterisation, specifically re Brenchley.	Agreed	Added
Survey LE2/1	But subject to such a policy not being used blindly to stand in the way of worthwhile developments such as building and using the various sustainable energy schemes envisioned elsewhere within this plan.	As above	
Policy LE3 Historic Landscapes and Heritage Assets			
TWBC	LE3: Historic Landscapes and Heritage Assets; Whilst there is reference to locally distinctive heritage in the Parish, which is welcome, the NPG may wish to take the opportunity to identify particular buildings of local interest that are not designated and could be considered non-designated heritage assets, and identify any opportunities for enhancement of these, as well as identifying any potential heritage assets at risk (designated or non-designated).	Noted	Examples added
Historic England	Support idea of LE3 but needs tighter wording	Noted	Wording strengthened
KCC	LE3: Support but should show how historic environment could contribute more widely to parish life, eg education, community and health.	Noted	Sentence added in supporting text
Policy LE4 Valued Views			
KCC	LE4: Support on refs. to views from PRoW network.	Noted	-
KCC	Appendix 3: Welcome inclusion of specific PRoW and recognition of importance of visual quality from PRoW.	Noted	-
Survey LE1/4 and LE2/2	yes and no- LE4 fig 21 contains significant omissions. No recognition of the typical drovers' route with characteristic sunken lane and woodland verges along Petteridge Lane, High Tilt Lane, Hatmill Lane and Cryals Road. These and the ghylls should have locations specified and mapped within the policies as they are vulnerable to opportunistic developer proposals pending the finalisation of the TWBC Local Plan.	Noted; see amendment to AM3	
Policy LE5 Local Green Spaces			
TWBC	Protection of Green Spaces; Policy wording is unfinished	Formatting error	Corrected

Source	Comments (not necessarily verbatim)	Response	Resultant changes
TWBC	All Local Green Spaces currently proposed in Tunbridge Wells Borough Council's (the Council's) Pre-Submission Local Plan are also proposed in Brenchley and Matfield's Reg.14 NDP. However, it is noted that 8 additional sites are proposed in the NDP which have not been submitted to and considered by the Council (these are sites 4, 6, 7, 9, 11, 12, 14, and 16). It is also noted that the "Brenchley South" map on page 63 should instead be titled "Brenchley North".	Additional proposals based on greater local knowledge and community proposals.	No change except map corrected.
TWBC	Landscape Biodiversity Officer has no comment.	Noted	-
KCC	LE5: Support	Noted	-
Historic England	Welcome consideration of historic interest in assessing green spaces	Noted	-
Southern Water	Concerned LE5 might preclude essential infrastructure; drafting suggestion	Noted	New policy D9 added on infrastructure.
Community email	Add Furnace Pond to Green Spaces (as in Horsmonden NP)	Too remote from settlements to be a Green Space but worthy of recognition.	Added to Valued Views in LE4 and as a heritage asset in LE3.
Survey LE4/2	This is to be subject to exceptions, such as where it is desirable to build within the green spaces, balancing all other relevant factors.	The purpose of this policy is to protect specially designated areas from development.	-
Survey LE4/3	But subject to such a policy not being used blindly to stand in the way of worthwhile developments such as building and using the various sustainable energy schemes envisioned elsewhere within this plan.	See above	-
Survey LE4/4	Including public footpaths	Noted	-
Policy LE6 Biodiversity			

Source	Comments (not necessarily verbatim)	Response	Resultant changes
KCC	LE6: supportive; refs. to ancient woodland, verges, wildlife corridors, coppiced land and grassland/heathland; support 10% minimum biodiversity gain; suggest map important habitats and corridors.	Should be done but not as part of this Plan. There is already reference for developers to undertake.	-
Survey LE6/1	S/LE6/1 Dormice, which reputedly live in the hedge adjoining Coppers Lane need a wildlife corridor to move to other areas. They only come to the ground for hibernation. They do not like to move at ground level' - extracted from Natural England org, dormice conservation - so what use, for dormice, is the short length of hedge on Coppers Lane?	Noted as an example of the need for careful planning .	-
Survey LE6/2	Very much so.	Noted	-
Survey LE6/3	Yes please!!!!	Noted	-
Survey LE6/4	Where possible	Noted	-
Policy LE7 Trees and Hedges			
KCC	LE7; support policy; suggests policy on ancient woodlands, eg on corridors and enhanced buffer zones.	Included in existing policy wording. So, no further action to take.	-
Policy LE8 Dark Skies			
HWJAC	Support LE8 on dark skies but no ref. to evidence; can lend equipment to do	Support noted	-
Survey LE7/1	These decisions need to be taken on a case-by-case basis. Where increased light will improve safety, such as with road crossings, there should be flexibility.	Noted, but the presumption is in favour of dark skies unless there is a strong special case.	-
Survey LE7/2	Difficult in the UK being small with a high density of population.	Noted	-
Survey LE7/3	Where possible. But not if it stands in the way of road safety improvements for example.	See above	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Policy LE9 Advertising			
Survey LE8/1	Roadside advertising of upcoming events can be very annoying and also endangering road safety. The use of agents' boards to advertise events gives the entirely wrong impression to road users and ought to be discouraged.	Noted	-
Access and Movement Policy AM1 Sustainable and active travel			
KCC	AM1: Support; should consider improvements to PRow network and new off-road routes for all mobilities.	This is covered in the policy and supporting text as well as in Policy AM2.	-
Survey AM1/1	I agree especially with the need to create new, and improve old, no-motorised routes. Please see comments below.	Noted	-
Survey AM1/2	A safe motor vehicle free route linking all the local villages and Paddock Wood is ESSENTIAL to the future of the area as the main roads are too narrow, there is too much traffic to safely use a bike and road surfaces are dangerously bad. I support the principle that "Developments that do not enable easy access to a choice of safe, sustainable travel (including walking, cycling and public transport) will not be supported" but this can ONLY be applied once adequate public transport and safe walking and cycling routes are in place.	Agreed this is an important issue; policy AM2 aims to make a start with this.	-
Survey AM1/3	I agree with all of your comments. I am keen to cycle more and use my car less. This is constrained by the quality of the road surfaces and the level of risk to life with cycling on certain roads due to high speeds. Need a non-motorised links not only Brenchley-Matfield but also to Paddock Wood, Horsmonden and other villages.	See response to previous comment; agree that there are other desirable routes, but we concluded that Brenchley-Matfield and linking to Paddock Wood are the highest priorities.	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Survey AM1/4	Elsewhere active travel is proving to consist cutting settlements in two and restricting access for residents to adjacent areas.	Not understood in relation to Brenchley and Matfield.	-
Survey AM1/5	PROW yes, why is it conflated with the others?	PROW, other footpaths and cycle paths and bridle paths are all important .	-
Survey AM1/6	However, from Matfield to Paddock Wood is not for the faint-hearted on a cycle or considering walking!	This is the rationale for AM2.	-
Survey AM1/7	In improving public rights of way can something also be added about stopping certain dog walkers letting their dogs foul the public footpaths without clearing up after them. More people would be encouraged to use the FPs with their children if dogs mess was not encountered on a regular basis.	This is an issue for the Parish Council and the community outside the Neighbourhood Plan.	-
Survey AM2/1	Urgent need to improve pedestrian safety.	Agreed	-
Survey AM2/2	The public buses, which pass my door, are never full, about 5 - 6 people on a double-decker bus.	Noted; the reasons for this may need further study but are likely to include the infrequency of services.	-
Survey AM2/3	S/AM2/3 Safety, particularly of children	Agreed this is of the highest importance, hence the proposals for off-road routes.	-
Survey AM2/4	But the car will be essential in rural areas.	The Plan recognises this, eg note Policy AM4 on parking but it would be helpful to reduce the need for local journeys by car.	-
Survey AM2/5	S/AM2/5 Public transport is really tricky to navigate	Noted	-
Survey H4/3	Essential to help with more transport services for the future.	Agree availability of public transport is essential to provide alternative to cars.	

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Policy AM2 Non-motorised route between Brenchley and Matfield			
KCC	AM2: Support; suggest early study with KCC on issues identified.	Noted The parish will be happy to work with KCC on developing this proposal.	-
TWBC	The policy implies that any development proposal which contributes to this will be supported/get approval. Suggested it is therefore re-worded to be more specific and less permissive. Is there an identified route for this? And with landowner agreement? It would need to be a costed scheme in order to establish what development contributions would be required.	Accepted Noted	Policy reworded to make clear has to satisfy other policies. The proposal is at an early stage of development.
Policy AM3 Enhancing the local highway network			
TWBC	AM3: Enhancing the local highway network; Suggest they make reference to the terminology used in the NPPF – so reference to avoiding ‘severe’ impact.	The NP is not inconsistent with the NPPF, which says developments should only be rejected on highways grounds if the impact after mitigating measures would be severe. The NP policy concerns requiring mitigation measures to make proposals more acceptable.	-
Highways England	Our main focus is A21; comments already given for TWBC Local Plan	No further action to take	-
HWJAC	Should highlight risk to fabric and character of historic routeways	Agreed	Add an additional paragraph at the end of the supporting text: ‘Any developments

Source	Comments (not necessarily verbatim)	Response	Resultant changes
			affecting roads need to respect the historic character of the area. This particularly applies to any impact on the fabric and character of historic routeways in the parish.' Routeways map added in Appendix 3.
Survey AM2/6	Improving pedestrian safety should include more enforcement of the speed limits, particularly on the Brenchley Rd between the villages and on the Maidstone Rd between Matfield and the A21. Cameras and speed ramps don't work. More regular involvement of the police with the issuing of speeding tickets and licence points would help to cut the issue if it becomes known that there are regular police speed traps in the villages, especially during rush hours.	Agree speed and road safety are key issues for the parish. The PC regularly engages with the police and KCC over these issues on issues such as speed limits and HGVs. The Neighbourhood Plan only deals with the impact of new developments .	-
Survey AM2/7	Need to have 30 mph limits in smaller settled areas such as Petteridge Lane where despite many young families and no pavements national speed limit applies. Also applies along Cryals Road which like Petteridge Lane is often a short cut when A21 congested. No appetite for street lighting but speed is a read danger to life for pedestrians, horse riders and cyclists. Children are driven to school in Brenchley from this area despite it being walkable for this reason.	See above	-
Survey AM3/1	I strongly agree with this; the proposed reduction in speed limit from 50 mph to 30 mph along the B2160 north from the village outskirts to a spot close to Invictas	See above	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
	does not go far enough. The lower speed limit should extend at least as far as Prall's Lane and then become a 40-mph limit to beyond the garage, preferably down to Mascalls school. The road has little or no pavements and verges, and those that there are being eroded by heavy traffic. It is dangerous for pedestrians and for residents trying to get into and out of their drives.		
Survey AM3/2	Traffic going along B2160 through the village does not adhere to 30mph limit, especially gravel lorries and other large vehicles.	See above	-
Survey AM3/3	Very much so	Noted	
Survey AM3/4	Thank you! The absence of limits on some rural roads renders them unsafe for cyclists, riders and pedestrians. I strongly support "sensible" limits. Why do you have a 20mph limit in roads in TW which have easily enough room for cars to pass in different direction with good visibility and no limits on some of our lanes and even major routes such as the Horsmonden road.	See above	-
Survey AM3/5	Specifically, any area of 40 mph speed limit, should be dropped to 30 mph. The junction of Pixot Hill and Brenchley Road/ Crook Road, is particularly fast, noisy and dangerous. Brenchley village should be 20 mph. Traffic calming measures should be implemented wherever possible. For example: electronic light warning signs and sleeping policemen.	See above	-
Survey AM3/6	Please this should be enforcing not encouraging. The speed limit is the law and it should be followed. Encouraging suggests breaking the law is OK.	The Plan does not encourage breaking the speed limit.	-
Survey AM3/7	Definitely something more permanent needs to be done on the B2160 through Matfield. If there was ever a good reason for the installation of speed cameras, this is it. A pedestrian crossing at either the Standing Cross or the Village Hall points is long overdue	See above	-
Survey AM3/8	Need to have 30 mph limits in smaller settled areas such as Petteridge Lane where despite many young families and no pavements national speed limit applies. Also applies along Cryals Road which like Petteridge Lane is often a short cut when A21 congested. No appetite for street lighting	See above	-
Survey AM3/9	But not trying to simplify the issue by blanket reduction of speed limits.	See above	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Survey AM3/10	The flow of traffic through Matfield on the Maidstone Road needs to be looked at on a wider scale. I would suggest many cars and vans travel from well over 5 miles away simply to join the A21 at Kippings cross the north to M25 and Surrey / south and west London etc.	See above	-
Policy AM4 Parking			
TWBC	It is noted that the parking standards are the same as being proposed in the TWBC PSLP, which TWBC support. It is also noted that “The parish may need a higher level of parking than recommended in TWBC ‘Residential Parking Standards Topic Paper 2019’”. This would need to be supported by a robust local evidence base – see Lamberhurst IE Report	The draft NP only says should satisfy TWBC minimum standards and then, in the supporting text, that ‘The parish may need a higher level’. So there is no specific policy proposal for a higher level of parking, but higher levels might be called for in particular cases where there is supporting evidence.	The last sentence above the table on p72 replaced with "Development proposals which would provide new access points or would generate increased traffic should demonstrate that the number of parking spaces to be provided will be sufficient to ensure the development will not further inhibit the free flow of traffic or exacerbate conditions of parking stress, particularly in the areas listed in the bullet points above. In some

Source	Comments (not necessarily verbatim)	Response	Resultant changes
			cases a number of parking spaces exceeding the minimum standard may be necessary". Parking stress map added and parking bullet points reordered, with additional reference to problems in Petteridge.
Survey AM4/1	Thoughtless parking causes major inconvenience in many areas of the villages, including Petteridge. Some retrospective action also needs to be taken with eg Permanent residents/locals parking only in some areas. Users of businesses such as the Bull conversion and The Poet in Matfield need off-road parking. Should discourage use of roads such as Broad Oak for day long parking for eg groups of walkers or cyclists which means that locals cannot park to access the village shops. Disabled parking places needed in the centre of both villages close to shops	Provision of adequate parking in new developments should avoid them contributing to these problems.	-
Survey AM4/2	The provision of charging points for electric vehicles is going to be very important. I would hope we could include such points in the centre of Brenchley and Matfield and in addition possibly use the Memorial/village hall car parks?	Agreed; action already being taken by the PC.	-
Survey AM4/3	Cycle lanes too would be great and a proper route to link b and m to allow walking and cycling safely between the villages	See AM1 and AM2	-
Survey AM4/4	E charging points are a waste of time, but good cycle routes are important	Noted, but we consider both are important.	-
Survey AM4/5	No. Insufficient power available on the grid to power vehicles as envisaged by government policy. We will all be reading by candlelight at this rate.	Noted but the provision of sufficient electricity generation is beyond the scope of a Neighbourhood	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
	Policy not matched by development of sustainable energy sources to replace fossil fuelled vehicles and residential heating. Wood burners and oil-fired heating is essential to many homes on the periphery of the two settlements.	Plan. New technologies such as heat pumps are being developed that could provide a more sustainable alternative .	
Survey AM4/6	However, the KCC guide on 'Noddy's Guide to Parking Spaces' is inadequate! Very few households, apart from possibly the elderly, do not have a vehicle or two or three. Most developments have a lack of visitor parking, which only results in roadside parking in other areas thus causing much annoyance to all concerned.	Noted The Plan contains minimum standards that reflect TWBC and national guidelines.	-
Survey AM4/7	The table on parking spaces for new developments does not provide adequate parking spaces. A one-bedroom property does not mean one car; two parking spaces are required. Also at the other end of the scale, 2.5 parking spaces for a 4-bed house is simply inadequate. Also what about parking for existing developments where there was originally no provision for parking simply because of the age of the properties. Is something to be done about this? e.g. Porters Wood in Petteridge.	See above	
<p>Community, Leisure and Recreation Policy CLR1 Education, Health and Care Services</p>			
Survey CLR1/1	This should include supporting the local school to provide first class facilities, to encourage local families to choose the village school instead of transporting children out to private schools. This would help improve community cohesion as well as reduce traffic.	The Plan supports continued provision and enhancement of quality primary education in Brenchley.	- Primary Education sub para amended to say'...Primary School is rated 'Good' by Ofsted and has the capacity....'
Survey CLR1/2	Not sure how you could cater for this in Matfield. No surgery (and Brenchley is full), no dentist, no school either primary or secondary. Much more thought needs to be given locally and nationally to infrastructure being in place before residents.	The Plan anticipates Matfield continuing to utilise services in Brenchley; the population	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
		is too small to have separate services.	
Policy CLR2 Sports and Leisure			
TWBC	6.6 Community, Leisure and Recreation: Although there is a specific policy relating to the retention of open space, no mention is made about the retention of existing community and other sporting/recreational built facilities	Agree that retention of existing facilities is important.	Add, at the end of the first para of supporting text: 'It is therefore essential that existing sports and leisure facilities and that opportunities for further improvement, to enhance the range and accessibility of facilities are taken.
KCC	CLR: Welcome inclusion of services, sport and recreation; should consider accessibility and encouragement of active travel: KCC keen to engage on encouraging physical activities.	Noted The Plan promotes both accessibility (see above) and active travel.	-
KCC	CLR1-5: Should refer to KCC's RoWIP; reference to village greens needs correction on wording and process.	Noted Policy AM1 discusses the RoWIP; now agreed with KCC no correction needed.	-
Survey CLR2/2	Perhaps install outdoor fitness equipment in public spaces.	Included as a Community Action Project in Chapter 7 (Sports, Fitness and Leisure Facilities).	-
Policy CLR3 Natural and Amenity Greenspaces, Play Areas and Playground Facilities		No Comments	

Source	Comments (not necessarily verbatim)	Response	Resultant changes
Policy CLR4 Facilities for young people and teenagers			
TWBC	<p>Noted that the NP uses Fields in Trust Guidelines which do not correlate with the requirements set out in PSLP Policy OSSR2 and seem somewhat unrealistic and unreasonable in terms of play space provision.</p> <p>(Was questioned at Reg.18 consultation on TWBC draft Local Plan why apply FIT standards were not applied– this is explained on page 222 of TWBC Consultation Statement: https://tunbridgewells.gov.uk/_data/assets/pdf_file/0005/388022/Consultation-Statement-for-Pre-Submission-Local-Plan-Part-1-and-Part-2.pdf, but does imply there may be more flexibility for NDPs)</p>	Higher standards reflect the fact that PSLP standards relate to larger developments than envisaged for the parish. Limitations of public transport and poor non-vehicular links warrant more local play facilities.	Add, at the end of supporting text to CLR3: 'These standards exceed those proposed for the borough as a whole in the PSLP. They are needed because the relatively small scale of developments would not otherwise trigger any provision. The limitations of public transport and non-vehicular links also justify more localised play facilities.'
Survey LE4/1	I understand the 'Island Site' was scheduled to have a 'play area'; is there any other play area scheduled instead?	Included in site-specific policies for Matfield Village Hall scheme (see policy H11)	-
Survey H10/4	Priority for a playground in Matfield	Supported by the Plan (Policy H11B and Chapter 7)	-
Survey H10/5	No mention of any identified need in settlement of Petteridge. As a resident I met with a parish councillor and outlined the need for proper play area provision for	Agree that improvements at Petteridge are needed.	-

Source	Comments (not necessarily verbatim)	Response	Resultant changes
	Porters field play area which currently just has a few bits of derelict wooden play equipment that was installed many years ago by the high weald partnership. There is an increasing number of families with young children in Petteridge as older people move away and no provision for either primary or secondary age children and young people.	This is referred to at the end of CLR3 supporting text (p76) and is included in Children's Playgrounds section of Chapter 7 on Community Action Projects.	
Survey CLR3/1	Ongoing provision of finance needs to be made for maintenance of these spaces	Agree that in considering such investments, the affordability and financing of maintenance will need to be considered.	-
Survey CLR3/2	Provided they are managed to not provide an antisocial environment.	Noted	-
Survey CLR3/3	Developer contributions should also be sought towards cost of maintenance of such play areas going forwards as for a small parish with limited precept these can be an unmanageable burden.	Noted, but this is difficult as contributions are one-off rather than ongoing.	
Policy CLR5 Open Spaces in the Parish			
TWBC	It is unclear what the policy is requiring. The Open Space study produced for the TWBC Local Plan took these standards and applied local information to provide the standards used in the OSSR policies in the TWBC Local Plan and so B&M NPG may want to check for consistency in approach etc.	Policy aims to protect Open Spaces from development .	-
Chapter 7 Community Action Projects			
KCC	In non-vehicular access, should refer to 'Public Rights of Way Network	Noted	Add ', including the Public Rights of way network,' after 'non-vehicular movement' in the

Source	Comments (not necessarily verbatim)	Response	Resultant changes
			first line of Non-Vehicular Access on p81.
Survey H10/7	Should also include the maintenance of existing off road public footpaths.	Noted	Add 'alongside landowners fulfilling their responsibilities for maintenance' after 'parish' in Non-Vehicular Access.'
	Overview		
Survey O/1	Thank you to the Steering Committee for all their hard work. But has TWBC listened to any of their comments at all? - I fear not!	Noted	