

Brenchley & Matfield Neighbourhood Development Plan: Regulation 16 Consultation Response Report

Comment Number	Name/ Organisation	Which part of Plan does response refer to?	Response	Do you wish to attend examination hearing?	Would you like to be notified of the Council's decision regarding the outcome of the Brenchley & Matfield Neighbourhood Plan?	Supporting Documents
BM_1	TWBC test	TWBC test	TWBC test (ensuring consultation portal is working)			
BM_2	Environment Agency	General comments on whole Plan.	<p>Neighbourhood Plan Advice Note Updated: February 2021</p> <p>Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the environment. This document sets out the key environmental issues, within our remit, which should be considered.</p> <p>Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: https://neighbourhoodplanning.org/wp-content/uploads/Environment-Toolkit-20181220.pdf</p> <p>We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies (https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies), and the South East River Basin Management Plan (https://www.gov.uk/government/publications/south-east-river-basin-management-plan/) Thames River Basin Management Plan (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/geth0910bswa-e-e.pdf) as appropriate.</p> <p>The information below explains the key issues we would consider in reviewing your Plan. We aim to reduce flood risk, while protecting and enhancing the water environment.</p> <p>Flood risk</p> <p>Development must be safe and should not increase the risk of flooding.</p> <p>Neighbourhood Plans should conform to national and local policies on flood risk:</p> <p>If a Neighbourhood Plan is proposing sites for development please check whether there are any areas of Flood Zones 2 or 3 within the proposed site allocations.</p> <p>You can view a site's flood zone on the Flood Map for Planning on our website: https://flood-map-for-planning.service.gov.uk/</p> <p>If the proposed allocation is located within Flood Zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG): http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/</p> <p>Here you can determine whether the flood risk vulnerability of the proposed development and the flood zone are compatible. In accordance with national planning policy the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk. This should be informed by the Environment Agency's floodmap for planning and the Local Planning Authority's Strategic Flood Risk Assessment (SFRA), if they have one. We recommend you contact the Local Planning Authority to discuss this requirement further.</p> <p>We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken.</p> <p>It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.</p>			

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			<p>We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at ksle@environment-agency.gov.uk for further details.</p> <p>In addition to the above you should also check with the Local Planning Authority's Neighbourhood Planning team with regards to other sources of flooding (such as surface water, groundwater, sewers and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). The Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.</p> <p>Climate Change Allowances</p> <p>The Local Authority's Strategic Flood Risk Assessment should indicate the extent of flood zones with likely climate change.</p> <p>On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances .</p> <p>Flood Defences</p> <p>Areas of your Neighbourhood Plan area, or proposed sites, may be given protection by a flood defence/alleviation scheme. Where this is the case the Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.</p> <p>Thames Estuary 2100 (Tidal Defences)</p> <p>In line with requirements set out in the Thames Estuary 2100 (TE2100) plan, developments in this location will need to demonstrate how the flood defence could be raised in the future to meet the demands of climate change.</p> <p>No activities on site should preclude access to the flood defence from maintenance or prevent the future raising of flood defences. In some cases we hold technical drawings of flood defence structures which may be of use. To request these you should contact our Customers and Engagement Team at ksle@environment-agency.gov.uk</p> <p>Ecology</p> <p>Proximity to watercourse/ Ecology</p> <p>Main rivers can be viewed on the Environment Agency's map: https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc524433980cc333726a56386</p> <p>We normally require a buffer zone of 8 metres (fluvial) and 16 metres (tidal) between any new development and the top of the bank of the main river. The permanent retention of a continuous unobstructed area is an essential requirement for emergency access to the river for repairs to the bank and for future maintenance and/or improvement works. A buffer between new development and the river wall is also required to ensure no adverse loading which could impact the stability of the channel wall. This buffer zone will help provide more space for flood waters, provide improved habitat for local biodiversity and allows access for any maintenance requirements.</p>			

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			<p>Where development is proposed next to the river we recommend that it includes a green buffer strip alongside the watercourse. Where such a buffer strip does not currently exist, we normally seek that it is established. This is a key way in which we carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.</p> <p>The provision of green infrastructure, particularly along rivers, and the inclusion of sustainable drainage techniques can help reduce the risk of flooding. This can also provide recreational and wildlife benefits. Opportunities to incorporate biodiversity in the Plan will be encouraged. In accordance with national policy, any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it; delivering biodiversity net gain. We would not support development proposals if there was shown to be a likely detrimental impact on the water environment.</p> <p>Water Management and Groundwater Protection</p> <p>Local level actions and decision making can help secure improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive (WFD). It seeks to:</p> <ul style="list-style-type: none"> • deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and • encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment. <p>Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the water environment. Local WFD catchment data can be obtained from: http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/</p> <p>Overall deterioration in water quality and promoting improvement in the ecological status of any water body. Actions to achieve this are listed in the Thames River Basin Management Plan (RBMP) and the South East River Basin Management Plan https://www.gov.uk/search?q=River+Basin+Management+Plans</p> <p>Where appropriate, a WFD Assessment (http://planningguidance.communities.gov.uk/blog/guidance/water-supply-wastewater-and-water-quality/water-supply-wastewater-and-water-quality-considerations-for-planning-applications/) should assess any potential impacts on the watercourse and demonstrate that the required enhancements will be delivered. Any development that has the potential to cause deterioration in classification under WFD or that precludes the recommended actions from being delivered in the future is likely to be considered unacceptable to us.</p> <p>Groundwater Quality</p> <p>Development must not cause pollution to the water environment.</p> <p>Aquifers and Source Protection Zones</p> <p>Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance:</p> <p>https://www.gov.uk/government/collections/groundwater-protection</p>			

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			<p>To see if a proposed development is located within a Source Protection Zone, please use our online map: https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs</p> <p>Land Contamination</p> <p>You must consider land contamination when preparing your plan. Managing it during development is key to addressing past contamination and preventing further impacts during development.</p> <p>You can establish if a site may be contaminated in several ways. Your Local Authority may hold a register of sites it knows to be contaminated. A list of potentially contaminated sites can be accessed on the following link:</p> <p>https://www.claire.co.uk/useful-government-legislation-and-guidance-by-country/76-key-documents/198-doe-industry-profiles</p> <p>We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.</p> <p>Further information can be accessed on the following links:</p> <p>Guiding principles for the Land Contamination</p> <p>https://www.claire.co.uk/useful-government-legislation-and-guidance-by-country/192-guiding-principles-for-land-contamination-gplc</p> <p>Model Procedures for the Management of Land Contamination:</p> <p>https://webarchive.nationalarchives.gov.uk/20140328160926/http://cdn.environment-agency.gov.uk/scho0804bibr-e-e.pdf</p> <p>Approach to Groundwater Protection:</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf</p> <p>Water supply and foul drainage</p> <p>When allocating sites in you Plan, you will need to consider if the water supply and foul drainage infrastructure can accommodate the development. Your local water company can provide further information about water supply and sewerage capacity.</p> <p>Surface water drainage</p> <p>The inclusion of Sustainable Drainage Systems (SUDS) should always be a consideration within any development to reduce the risk of surface water flooding on and off site. The Lead Local Flood Authority, is the main contact for SUDS issues. However, we have interest in SUDS from a groundwater protection perspective and those area of critical drainage.</p> <p>The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential</p>			

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			<p>to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to Controlled Waters.</p> <p>We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices. This can be found at: https://www.gov.uk/government/collections/groundwater-protection</p> <p>The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements: https://www.gov.uk/government/publications/groundwater-protection-position-statements</p> <p>Infrastructure Delivery</p> <p>We would recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account if the Plan looks to fund local infrastructure.</p> <p>Environmental Permitting Regulations</p> <p>To see if a proposed development requires an Environmental Permit under the Environment Permitting Regulations please refer to our website:</p> <p>https://www.gov.uk/guidance/check-if-you-need-an-environmental-permit</p> <p>Under the Environmental Permitting (England and Wales) Regulations 2016, a flood risk activity permit (FRAP) may be required for work:</p> <ul style="list-style-type: none"> • in, over or under a main river; • within 8m of the bank of a main river, or 16m if it is a tidal main river; • within 8m of any flood defence structure or culvert on a main river, or 16m on a tidal main river. <p>Flood risk activities can be classified as: exclusions, exemptions, standard rules or bespoke. These are associated with the level of risk the proposed works may pose to people, property and the environment. Local Authorities should advise developers to refer to the flood risk activity permit section of gov.uk for further information.</p> <p>Please note</p> <p>This document is a response to a Neighbourhood Plan consultation and does not represent our final view in relation to any future planning application made in relation to any site.</p> <p>You should seek your own expert advice in relation to technical matters relevant to any planning application before submission.</p> <p>If you have any questions please contact the Kent and South London Sustainable Places team: kslplanning@environment-agency.gov.uk</p>			
BM_3	Southern Water	Whole Plan	<p>Thank you for your email below inviting Southern Water to comment on the Brenchley and Matfield Neighbourhood Development Plan. I confirm we have reviewed the Plan with interest, and given the comprehensive range of policies included we have no comments to make at this submission stage.</p> <p>We look forward to being kept informed of the Plan's progress.</p>		Yes	

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BM_4	Avison Young for National Grid		<p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>National Grid provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ <p>Please also see attached information outlining guidance on development close to National Grid infrastructure.</p> <p>Distribution Networks</p> <p>Information regarding the electricity distribution network is available at the website below:</p> <p>www.energynetworks.org.uk</p> <p>Information regarding the gas distribution network is available by contacting:</p> <p>plantprotection@cadentgas.com</p> <p>Further Advice</p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:</p> <p><i>[TWBC: contact details supplied]</i></p> <p>If you require any further information in respect of this letter, then please contact us.</p>			
BM_5	Karen Langston	This response relates to the	Below are my comments in response to the Brenchley and Matfield Neighbourhood Plan (submission version), as part of the Regulation 16 consultation process. I am a resident of the parish.	No	Yes	

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		whole of the Brenchley and Matfield Neighbourhood Plan (submission version).	<p>I welcome and wholly support the Vision Statement (Chapter 4). It presents a clear, bold agenda for the parish that highlights appropriate priorities. In particular, I welcome the commitment to conserving and enhancing the AONB, encouraging demographic balance, promoting the social welfare of the community and taking action on climate change.</p> <p>I also welcome and fully support the strategic and detailed objectives (Chapters 4 and 5). They are clearly articulated and, together, represent an effective framework for achieving the plan's Vision. The policies that sit beneath these (Chapter 6) are appropriate and align with national and local planning policy in the NPPF and the PSLP. The Neighbourhood Plan policies are a vital contribution to the Development Plan for the Borough as they will enable planning decisions to take into account the needs, interests and priorities of the parish and the people who live and work here.</p> <p>I strongly support the Neighbourhood Plan's requirement for development proposals to comply with the High Weald AONB Management Plan and be in accordance with the High Weald AONB Design Guide. It is essential that both documents are at the forefront of any planning decisions for development within the High Weald AONB, in which the parish sits. Their prominence in the Neighbourhood Plan ensures a joining up of policy-led protection and provision designed to ensure that the AONB is conserved and enhanced, as required by the NPPF.</p> <p>This version of the Neighbourhood Plan is the culmination of extensive consultation with relevant stakeholders, partners and the people who live in the parish. Having participated in previous rounds of consultation, I can see how the Plan has evolved to ensure it best meets the needs of the parish, in terms of place, people, businesses and the environment. I have confidence in the Plan because of the degree of community involvement and transparent consultation. It is an essential framework that must carry great weight in a plan-led approach to development and the consideration of planning applications in the parish.</p> <p>One of the key strengths of this Neighbourhood Plan, which gives it the required authority, is the up-to-date and robust evidence included in the explanations and justification for each policy. For example, policy H6 Affordable Housing is greatly strengthened by relevant data that creates a very clear picture of what 'affordable' means in the context of Matfield and Brenchley, which have some of the highest house prices in the borough. The evidence included in the paragraphs 6.27 through to 6.35 clearly demonstrate the challenge of – and the essential need to – ensure availability of genuinely affordable housing for the people who have an established local connection to the parish and who need or choose to live here.</p> <p>In conclusion, I believe this Neighbourhood Plan has the required clarity and integrity to make a robust, evidence-based and locally-informed contribution to the Development Plan for the Borough. I believe Neighbourhood Plans are a vital piece of the local policy landscape. I fully support this Plan for the parish of Brenchley and Matfield, as it provides clear, valid, and value-added policies, shaped in the local context, to inform the consideration and determination of planning applications in my local community.</p>			
BM_7	Matfield Village Hall Committee	<p>H11 (Site Specific Policies for the Site AL/BM2)</p> <p>CLR3 (Natural and Amenity Green Spaces, Play Areas and Playground Facilities)</p>	<p>Policy H11</p> <p>Matfield Village Hall Management Committee (MVHMC) support the policies set out in Policy H11 under Heading "Design Policies," insofar as they preserve the setting of the Village Hall, and Heading "Development Contribution Policies), particularly paragraph (a), the provision of playground facilities for community use and the allocation of an open space behind the Village Hall, which open space should be for the use of users of the Village Hall only, to protect the security and facilities of the Hall. In addition to the eight parking spaces associated with playground use, which should include at least one Disabled space, MVHMC wish to see 6 additional parking spaces for the exclusive use of the Hall, at the Hall's southern end, with the necessary space for the safe turning of vehicles. A revised plan, showing the parking spaces and area of the proposed playground and the Hall amenity space, is attached. This has been discussed with representatives of the Parish Council and of the Neighbourhood Plan Steering Group and agreed in principle. It would be necessary to reserve rights over the land adjoining the Hall to give access for maintenance and repair of the Hall and the adjacent land, including access to the green open space for mowing machinery / tractor and other appropriate maintenance equipment, and for the passage of services.</p> <p>Policy CLR3</p>	No	Yes	See revised plan below

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			<p>MVHMC supports the provision of a playground. Green spaces and amenities will be particularly important on this site being in the High Weald AONB, next to the Conservation Area on the open southern approach to the village and thus preserving the rural setting of the Village Hall.</p> <p>NB MVHC's support for the provision of a green space for the Village Hall's use and the provision of playground facilities and additional parking is not dependent on the housing development proceeding on the remainder of Site AL/BM2</p>																																	
BM_8	Tunbridge Wells Borough Council (TWBC)	All of the plan	<p>BRENCHLEY & MATFIELD NEIGHBOURHOOD PLAN</p> <p>TWBC Officer comments to the Regulation 16 consultation</p> <table border="1"> <thead> <tr> <th>Policy Number/Para/Page</th> <th>TWBC Comment^[1]</th> <th>Proposed change (if relevant)</th> </tr> </thead> <tbody> <tr> <td>All of plan</td> <td>References to TWBC PSLP</td> <td>Should now read 'SLP' (submission local plan)</td> </tr> <tr> <td>All Maps</td> <td>Copyright referenced needed.</td> <td>Maps should be sourced when used from other sources and/or copyrighted for Ordnance Survey licensing purposes.</td> </tr> <tr> <td>Page 4 Para 1.3</td> <td>References to Development Plan – to include the TWBC Core Strategy as well as saved policies of the 2006 Local Plan, and to Site Allocations Local Plan</td> <td>Need to make reference to TWBC Core Strategy adopted 2010 ^[2] and Site Allocations Local Plan (SALP) adopted 2016^[3]</td> </tr> <tr> <td>Page 6 Para 1.9</td> <td>References to number of sites submitted to TWBC</td> <td>Suggest it is checked that the figures stated are up to date, against Main SHELAA, January 2021 and SHELAA addendum October 2021</td> </tr> <tr> <td>Page 7 3rd bullet</td> <td>The Regulation 14 public consultation was held from 17 May to 27 June.</td> <td>Need to add year: 2020</td> </tr> <tr> <td>Page 8 Para 2.2</td> <td>In 2011 the population was 2863 in 1164 households, with an average age of 43 years.</td> <td>Need to add the word persons. In 2011 the population was 2863 persons in 1164 households, with an average age of 43 years.</td> </tr> <tr> <td>Page 11/12 Para 2.14</td> <td>In the north-west lies the century renaissance archway</td> <td>Need to add which century</td> </tr> <tr> <td>Page 18 para 3.1</td> <td>..... and the Kent Waste and Minerals Plan (2016).</td> <td>The Kent Minerals and Waste Local Plan (KMWLP) 2013-2030 was originally adopted by Kent County Council in July 2016 and has been subject to an Early Partial Review of certain waste management capacity requirement and mineral and waste safeguarding policies. The Plan was adopted in its modified form in September 2020.</td> </tr> <tr> <td>Page 24 Para 6.6</td> <td>The TWBC PSLP identifies specific sites of 10 or more dwellings in each parish. This excludes small-scale windfall sites, which can include brownfield and infill sites</td> <td>In this context, the Submission Local Plan doesn't use the term infill.</td> </tr> </tbody> </table>	Policy Number/Para/Page	TWBC Comment ^[1]	Proposed change (if relevant)	All of plan	References to TWBC PSLP	Should now read 'SLP' (submission local plan)	All Maps	Copyright referenced needed.	Maps should be sourced when used from other sources and/or copyrighted for Ordnance Survey licensing purposes.	Page 4 Para 1.3	References to Development Plan – to include the TWBC Core Strategy as well as saved policies of the 2006 Local Plan, and to Site Allocations Local Plan	Need to make reference to TWBC Core Strategy adopted 2010 ^[2] and Site Allocations Local Plan (SALP) adopted 2016 ^[3]	Page 6 Para 1.9	References to number of sites submitted to TWBC	Suggest it is checked that the figures stated are up to date, against Main SHELAA, January 2021 and SHELAA addendum October 2021	Page 7 3 rd bullet	The Regulation 14 public consultation was held from 17 May to 27 June.	Need to add year: 2020	Page 8 Para 2.2	In 2011 the population was 2863 in 1164 households, with an average age of 43 years.	Need to add the word persons. In 2011 the population was 2863 persons in 1164 households, with an average age of 43 years.	Page 11/12 Para 2.14	In the north-west lies the century renaissance archway	Need to add which century	Page 18 para 3.1 and the Kent Waste and Minerals Plan (2016).	The Kent Minerals and Waste Local Plan (KMWLP) 2013-2030 was originally adopted by Kent County Council in July 2016 and has been subject to an Early Partial Review of certain waste management capacity requirement and mineral and waste safeguarding policies. The Plan was adopted in its modified form in September 2020.	Page 24 Para 6.6	The TWBC PSLP identifies specific sites of 10 or more dwellings in each parish. This excludes small-scale windfall sites, which can include brownfield and infill sites	In this context, the Submission Local Plan doesn't use the term infill.	Yes	Yes	For clarity see table below
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			<p>Page 24 Para 6.9</p> <p>Page 24 Para 6.9</p> <p>Page 25, Policy H1 Scale of Housing Development</p> <p>Page 25, Policy H1 Scale of Housing Development</p> <p>Page 25, Policy H1 Scale of Housing Development</p> <p>Page 26 Policy H2 Location of Housing Development</p> <p>Page 26 Policy H2 Location of Housing Development</p> <p>Page 26 Para 6.14</p>	<p>Specific Policies for this Allocated site can be found in Policy H11</p> <p>Where it states "The PSLP recommends (pages 233 -236) two sites...." Check page numbers in the Submission Local Plan have not changed</p> <p>Is the 10 unit threshold net 10 or a total of 10 (a net increase of nine units)?</p> <p>Concern about the criterion listed by the policy as such schemes of ten units + may not necessarily be major development. The major development test is for decision making not plan-making.</p> <p>Note, this is a policy approach for areas within the AONB and the AONB National Character Area. There is some concern as to the appropriateness of the policy covered the NCA outside of the High Weald AONB.</p> <p>Advise that mention of LBDs are first made earlier in the document, rather than under H2 (Location of Housing) as new development inside/outside the LBD doesn't just apply to housing.</p> <p>Note: LBDs in Figure 14 are in agreement with TWBC SLP</p> <p>Change tense from past to current/present tense</p>	<p>Add Policy H11 <u>of this Neighbourhood Plan</u> (for clarity as previously referring to the TWBC PSLP)</p> <p>Clarity is required to define whether the 10 unit threshold is net.</p> <p>Would more appropriate to reference AONB Management Plan/general AONB policy and state that where schemes are considered major the criterion apply.</p> <p>Suggest removal of references to the NCA in the absence of detailed evidence relating to the value of the area in the NCA which is not covered by the HWAONB.</p> <p>Section on LBDs should appear before the Housing section</p> <p>No change suggested.</p> <p><i>Limits to Built Development (LBDs) were are designated to prevent the unrestricted sprawl of towns, villages and hamlets into the surrounding countryside. They are were intended to preserve the separateness of communities and character of settlements, to provide opportunities for housing development within established communities and to encourage</i></p>		

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			Page 31 Policy H6 Affordable Housing (a)	Criterion a) is the 40% affordable housing on greenfield sites?	Appears to be relating to greenfield sites, but is not specifically referenced and needs to be for the sake of clarity			
			Page 31 Policy H6 Affordable Housing (b)	H6b – The requirement for sites in the AONB delivering a financial contribution is 6-9	<p>Criterion b) it is noted that the threshold of 4-9 units differs to the TWBC threshold of 6-9.</p> <p>The NP should ensure there is a local evidence to support this policy approach</p> <p>Uncertainty whether the developer can be required to pay the financial contribution upon commencement of development</p>			
			Page 31 Policy H6 Affordable Housing (c)	A discount of 50% on the price of first homes can be applied, however there is currently work ongoing regarding this and initial conversations indicate that 40% and higher may start to impact on the viability of schemes so this may not be possible and impact on the delivery of new dwellings.	Comprehensive evidence is needed to support this policy approach including viability impacts.			
			H6 – Local connection (criteria I to iv)	<p>Criteria for local connection.</p> <p>Inspectors' Reports for other NPs being examined recently in the borough (for example both Lamberhurst, and Goudhurst) conclude that a specific, parish based, local connection allocation policy does not fall within the definition of a policy for the use and development of land, but is rather proposing a housing allocation policy.</p>	This is part of the councils allocations policy and is not within the remit of planning to include. Suggest removal of this part of the policy.			

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			H7 – Rural exception sites	Specificity of the policy	The supporting paragraphs indicate that these sites should be small but this isn't set out in the policy. What is meant by small proportion?			
			H8 Housing for rural workers	Significant lower test to pass that the Submission Local Plan equivalent policy.	<p>Advise to tighten policy criteria (a) and (c) as the justification for the dwelling should be an essential need for a particular agricultural enterprise.</p> <p>(a) 'reasonably be located within or close to any existing settlement' could perhaps reflect the need for the dwelling for that particular agricultural enterprise, being within it or within the immediate area, rather than generally not close to an existing settlement.</p> <p>(a) proposed rewording:</p> <p>A proven need to accommodate outside the LBD workers essential for the proper functioning of the rural enterprise, including agricultural, forestry, equestrian or similar land-based enterprises who could not reasonably be located within or close to any existing settlement</p> <p>(c) could probably say 'persons employed by the agricultural enterprise for which the dwelling is essentially required'</p> <p>(c) unclear about the implications related to 'last employed, Could this include some one who no longer works on the agricultural holding (and is working in a different employment type) can still live there indefinitely?</p> <p>Final paragraph on the removal of agricultural occupancy conditions, note that there is no policy that includes this in the TWBC SLP (although it is mentioned in the supporting text at para 6.373 as something that will not be supported).</p>			

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			<p>Page 34 Policy H9 Residential extensions, alterations, outbuildings and annexes in the parish and replacement buildings outside the LBD</p>	<p>It may be more appropriate for this para to be included in the supporting text.</p> <p>policy refers to residential extensions etc <u>and</u> replacement buildings</p> <p>Clarity required: the supporting text does not refer to replacement buildings outside the LBD</p>			
			<p>H10 Developer Contributions</p>	<p>Reads more like an objective/direction rather than a policy.</p> <p>Suggest its removal.</p>			
			<p>Page 36 H11 Site specific policies for site AL/BM2</p>	<p>Site allocations are outside the scope of this NDP, as this was not scoped into the remit of the plan at the time when B&MPC requested their SEA screening. Therefore, the NP cannot now be including site specific policies. In addition, there is no SA/SEA to support the NDP in this regard.</p> <p>Notwithstanding the above, there is also some concern as to whether the proposed policy elements have been viability tested and what their impact could be on development.</p> <p>However, it is suggested that some of the elements identified within the proposed policy could be included within a generic design policy which could equally apply to any other windfall development which may come forward within the parish, subject to wording amendments which refer to 'subject to viability' .</p>	<p>Policy should be amended to apply as a generic design policy and include references to subject to viability, or for the policy to be deleted.</p>		
			<p>Page 39 Policy H12 Good practice in construction</p>	<p>TWBC question the enforceability/reasonableness of this policy – it doesn't really fall under the planning remit.</p> <p>Consider this may be better dealt with as an advisory paragraph rather than a policy?</p>			

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			Page 40 onwards Design Policies	There appears to be no mention of impact on residential amenity in relation to housing/residential extensions etc. (only later under BE2(b) for non-residential uses)	Add impact on residential amenity: may require additional policy; or may be an opportunity to include within Policy D4. If so, the title of Policy D4 would need to be amended	
			Page 41 Policy D2 Local architectural style	The policy does not refer to the consideration of siting, layout, density which are also key considerations in architectural style.	The policy would benefit from the inclusion of additional aspects such as, also respecting – siting, layout, density	
			D3 Agricultural and rural buildings	The first part of the policy would be a planning applications requirement, where it is considered development. So unclear as to what this policy adds. The second part of the policy relating to landscape could apply to any development in the parish, not just agricultural buildings.	Remove first part of the policy and include second part of the policy in a design policy.	
			D4 Accessibility and flexibility	Residential alterations and extensions will not be subject to Part M4 of the Building Regulations. Lifetime homes standards are replaced by the optional building regulations standards M4 (2).	Amend policy in respect of extensions and alterations being subject to M4 standards. Lifetime homes standards are replaced by the optional building regulations standards M4 (2) and therefore references to the standard should be removed, including those in supporting text.	
			Page 45 Policy D7 Flood risk management	The policy is broadly consistent with the approach in the TWBC SLP	criteria (b) could be reworded for clarity Advise that Policy EN25 Flood Risk in SLP is looked at for guidance to wording	
			Page 46 Para 6.75	The Strategic Flood Risk Assessment Level 1 & Level 2 in July 2019 was carried out for the Borough Council by specialist consultants	Note: SFRA was not carried out in July 2019 but was rather published then	

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			Page 47 D8 Surface water management	Policy is similar in scope to the Local Plan policy EN26 Sustainable Drainage	n/a			
			Page 49 Policy D9 Utility infrastructure	This policy could be strengthened so ensure it seeks infrastructure necessary to make development acceptable	Add additional wording to this policy to ensure it seeks infrastructure necessary to make development acceptable			
			Business & Employment	Note that the business and employment objectives are broadly consistent with those of TWBC SLP	n/a			
			Page 51 BE2 Additional employment	would be better termed 'new employment'	Proposed change to policy title			
			Page 54 BE5 Small-scale tourism	Should say 'subject to compliance with other <u>Neighbourhood Plan</u> policies'. So as to be consistent with wording of other policies.	Add 'Neighbourhood Plan', for consistency			
			Page 54 BE6 Energy efficiency in non-residential buildings	<p>The requirements to achieve the BREEAM rating in the range Very Good to Excellent Standard for energy efficiency; and providing e-charging points in staff and visitor car parks have not been viability tested.</p> <p>However, viability testing for the addition of EV charge points in visitor/staff car parks is highly unlikely to be necessary. The chargers are cheap to install (even for smaller developers) and the policy does not prescribe how many. The TWBC DM process would pick up on this anyway</p>	<p>Achieving the BREEAM ratings is going beyond what the TWBC SLP policy requires by enforcing this on all development (TWBC SLP policy only applies to larger developments). BREEAM Excellent is very taxing and difficult for small developers. There is no viability assessment included in the evidence base to support this policy.</p> <p>It is advised that a better approach would be to add the following sentence onto the end of (a) as follows:</p> <p>a. Achieving the BREEAM rating in the range Very Good to Excellent for energy efficiency <u>or an equivalent standard appropriate to development size</u>; and ... (onto b)</p> <p>This would open the concept up for negotiation but hopefully without reducing ambition.</p>			

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					Also, revise initial policy wording, to include subject to viability and remove 'must be demonstrably designed' to 'strongly encouraged to'.			
			Page 56 Policy LE1 Conserving and enhancing the AONB	Policy LE1 appears to suggest that all development must satisfy <u>all</u> 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 TWBC SLP policy EN19 –“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.			
			Page 61 LE5 - Local Green Spaces	It is noted that TWBC propose 8 sites in Brenchley and Matfield as Local Green Space, all of which are also proposed in the NDP. However, the NDP also proposes 8 additional Local Green Space sites (all of which have not been submitted to and/or assessed by TWBC in its own assessments). These sites (proposed within the NDP, not assessed by TWBC) are: LGS4, LGS6, LGS7, LGS9, LGS11, LGS12, LGS14, and LGS16.	No change proposed			
			LE8 Dark skies	The policy refers to 'All development' but some development may not result changes which impact on dark skies. Criterion A appears to be starting sentence with points b-e following underneath.	Amend wording to have regard to qualifying development and amend policy formatting structure between points a-e.			
			Page 70 Policy AM2 A non-motorised route between Brenchley and Matfield	This appears to be an idea which is currently being explored (it is mentioned that permission from landowners	Proposal needs to be more concrete/certain before asking for developer contributions in a policy.			

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			<p>along the route is required). It needs to be more concrete/certain before asking for developer contributions in a policy. In addition, how will such contributions be sought?</p>	<p>Additionally, how will such contributions be sought?</p> <p>Delivery of route needs more certainty which if established should have stronger policy wording and developer contributions sought by S106, with a known costing for this</p>		
		Page 71 AM3 Enhancing the local highway network		would suggest that highway ' <u>safety</u> ' needs to be included somewhere in the policy wording		
		Page 74 Figure 32: Table of TWBC PSLP minimum parking standards	The standards in Figure 32 (to reflect TWBC's SLP) are incorrect. There are two "1 bed house" rows, and the 4 bed flat standard should be 2, with 4 bed house 2.5 (which is missing from the table).	<p>Corrections needed to Figure 32: ref TWBC SLP Policy TP3</p> <p>Parking standards in SLP (not PSLP)</p>		
		Page 75 Policy CLR1 Education, health and care services		Recommend that this says these will be supported, rather than permitted		
		Community, Leisure & Recreation	Note the Community, Leisure & Recreation objectives are broadly consistent with those in the SLP	n/a		
		Page 76 CLR2 Sports and leisure	<p>Welcome the reference to particular priority to be given to facilities for children,</p> <p>teenagers and older residents as this picks up findings of the Open Space Study.</p>	No change		
		Page 76 Policy CLR3 Natural and amenity greenspaces, play areas and playground facilities and subsequent paragraphs	<p>Policy CLR3 refers to Fields in Trust guidelines</p> <p>The Parish have made comments at both the Reg 18 and Reg 19 stage of the TWBC Local Plan on the issue of the Fields in Trust guidelines and</p>	The NP is setting different standards to those included in the TWBC SLP. The Open Space Study (OSS) [4] (TWBC SLP evidence base) at paragraph 6.5.1 refers to the Fields in Trust guidance and the OSS recommendation for using a different approach.		

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BM_9	Historic England	Whole Plan	<p>Thank you for consulting Historic England on the submission version of the Brencley and Matfield Neighbourhood Plan. Historic England is the government's advisor on planning for the historic environment including advising on the conservation of heritage assets and champion good design in historic places. As such, our review of the plan is limited to those areas that fall within our remit and silence on other matters should not be treated as agreement or consent.</p> <p>I am happy to confirm that, having reviewed the plan, we do not have any objections to submit to the examiner.</p> <p>We hope these brief comments are of help to the examiner but would be pleased to answer any queries relating to them.</p>																		

BM_8 Tunbridge Wells Borough Council

BRENCHLEY & MATFIELD NEIGHBOURHOOD PLAN

Policy Number/Para/Page	TWBC Comment ¹	Proposed change (if relevant)
All of plan	References to TWBC PSLP	Should now read 'SLP' (submission local plan)
All Maps	Copyright referenced needed.	Maps should be sourced when used from other sources and/or copyrighted for Ordnance Survey licensing purposes.
Page 4 Para 1.3	References to Development Plan – to include the TWBC Core Strategy as well as saved policies of the 2006 Local Plan, and to Site Allocations Local Plan	Need to make reference to TWBC Core Strategy adopted 2010 ² and Site Allocations Local Plan (SALP) adopted 2016 ³
Page 6 Para 1.9	References to number of sites submitted to TWBC	Suggest it is checked that the figures stated are up to date, against Main SHELAA, January 2021 and SHELAA addendum October 2021
Page 7 3 rd bullet	The Regulation 14 public consultation was held from 17 May to 27 June.	Need to add year: 2020
Page 8 Para 2.2	In 2011 the population was 2863 in 1164 households, with an average age of 43 years.	Need to add the word persons. In 2011 the population was 2863 persons in 1164 households, with an average age of 43 years.
Page 11/12 Para 2.14	In the north-west lies the century renaissance archway	Need to add which century
Page 18 para 3.1 and the Kent Waste and Minerals Plan (2016).	The Kent Minerals and Waste Local Plan (KMWLP) 2013-2030 was originally adopted by Kent County Council in July 2016 and has been subject to an Early Partial Review of certain waste management capacity requirement and mineral and waste safeguarding policies. The Plan was adopted in its modified form in September 2020.
Page 24 Para 6.6	The TWBC PSLP identifies specific sites of 10 or more dwellings in each parish. This excludes small-scale windfall sites, which can include brownfield and infill sites	In this context, the Submission Local Plan doesn't use the term infill.
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¹ TWBC SLP refers to the Tunbridge Wells Borough Council Submission Local Plan 2021

² TWBC Core Strategy https://tunbridgewells.gov.uk/_data/assets/pdf_file/0003/343353/Core-Strategy-adopted-June-2010.compressed.pdf

³ TWBC SALP https://tunbridgewells.gov.uk/_data/assets/pdf_file/0006/343788/Site-Allocations-Local-Plan_July-2016.pdf

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	development. The major development test is for decision making not plan-making.	
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Page 27 Figure 14: LBDs proposed in the TWBC PSLP	Title of Figure 14	Update labelling at Figure 14 (both in map and its title): LBDs shown in the Submission LP
Page 28 Policy H3	Depending on the context of the site, it is the case that sometimes an appropriate density will be low. This very much depends on the circumstances and site context.	Suggest some re-wording to relate more to seeking an appropriate density for the site, taking account of site context and characteristics and constraints
Page 28 Para 6.20	Individuals on the TWBC Housing Register who have expressed an interest in living in the parish, <i>favour 1 or 3 bedroomed homes</i> over larger properties, with 2 bedroomed properties being most popular.	Should this read 'favour 1 <u>to</u> 3 bedroomed homes'?
Page 28 Policy H4 Housing Mix	Reference to the six unit threshold	Clarify whether this is six in total or a net increase of six
Page 28 Policy H4 Housing Mix	what is considered to be an appropriate housing mix? Is this the 70% of new homes as 1, 2 and 3 beds? In which case does it need to be repeated?	may also wish to make reference to local up to date evidence as is done in H1 (Housing Mix) of the Local Plan in case circumstances do change over the NDP period and the desired mix needs to be adjusted.
Page 29 Policy H5 Housing for older residents and people with disabilities	Refers to 'over 55'	TWBC PLP refers in para 6.351 (preamble to Policy H6 Housing for older people and people with disabilities) to '55 and over'
Page 29 Policy H5 Housing for older residents and people with disabilities	There is a conflict with the Submission Local Plan as this only requests M4(3) both adaptable and accessible on the affordable housing requirement of new development as TWBC didn't consider there was evidence to do more than this at the current time.	Unclear of the evidence to support this policy in respect of homes for people with disabilities, as the policy appears to be for general needs housing rather than affordable housing, and it is not clear on the subsequent impact on viability. Does not appear to be supported by appropriate viability evidence. In any event, the policy should refer to optional technical standard M4(3) for wheelchair user dwellings

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Policy Number/Para/Page	TWBC Comment ¹	Proposed change (if relevant)
Page 40 onwards Design Policies	There appears to be no mention of impact on residential amenity in relation to housing/residential extensions etc. (only later under BE2(b) for non- residential uses)	Add impact on residential amenity: may require additional policy; or may be an opportunity to include within Policy D4. If so, the title of Policy D4 would need to be amended
Page 41 Policy D2 Local architectural style	The policy does not refer to the consideration of siting, layout, density which are also key considerations in architectural style.	The policy would benefit from the inclusion of additional aspects such as, also respecting – siting, layout, density
D3 Agricultural and rural buildings	The first part of the policy would be a planning applications requirement, where it is considered development. So unclear as to what this policy adds. The second part of the policy relating to landscape could apply to any development in the parish, not just agricultural buildings.	Remove first part of the policy and include second part of the policy in a design policy.
D4 Accessibility and flexibility	Residential alterations and extensions will not be subject to Part M4 of the Building Regulations. Lifetime homes standards are replaced by the optional building regulations standards M4 (2).	Amend policy in respect of extensions and alterations being subject to M4 standards. Lifetime homes standards are replaced by the optional building regulations standards M4 (2) and therefore references to the standard should be removed, including those in supporting text.
Page 45 Policy D7 Flood risk management	The policy is broadly consistent with the approach in the TWBC SLP	criteria (b) could be reworded for clarity Advise that Policy EN25 Flood Risk in SLP is looked at for guidance to wording
Page 46 Para 6.75	The Strategic Flood Risk Assessment Level 1 & Level 2 in July 2019 was carried out for the Borough Council by specialist consultants	Note: SFRA was not carried out in July 2019 but was rather published then
Page 47 D8 Surface water management	Policy is similar in scope to the Local Plan policy EN26 Sustainable Drainage	n/a
Page 49 Policy D9 Utility infrastructure	This policy could be strengthened so ensure it seeks infrastructure necessary to make development acceptable	Add additional wording to this policy to ensure it seeks infrastructure necessary to make development acceptable
Business & Employment	Note that the business and employment objectives are broadly consistent with those of TWBC SLP	n/a
Page 51 BE2 Additional employment	would be better termed 'new employment'	Proposed change to policy title
Page 54 BE5 Small-scale tourism	Should say 'subject to compliance with other <u>Neighbourhood Plan</u> policies'. So as to be consistent with wording of other policies.	Add 'Neighbourhood Plan', for consistency
Page 54 BE6 Energy efficiency in non-residential buildings	The requirements to achieve the BREEAM rating in the range Very Good to Excellent Standard for energy efficiency; and providing e-charging points in staff and visitor car parks have not been viability tested. However, viability testing for the addition of EV charge points in visitor/staff car parks is highly unlikely to be necessary. The chargers are cheap to install (even for smaller developers) and the policy does not prescribe how	Achieving the BREEAM ratings is going beyond what the TWBC SLP policy requires by enforcing this on all development (TWBC SLP policy only applies to larger developments). BREEAM Excellent is very taxing and difficult for small developers. There is no viability assessment included in the evidence base to support this policy. It is advised that a better approach would be to add the following sentence onto the end of (a) as follows:

Policy Number/Para/Page	TWBC Comment ¹	Proposed change (if relevant)
	<p>many. The TWBC DM process would pick up on this anyway</p>	<p>a. Achieving the BREEAM rating in the range Very Good to Excellent for energy efficiency <u>or an equivalent standard appropriate to development size</u>; and ... (onto b)</p> <p>This would open the concept up for negotiation but hopefully without reducing ambition.</p> <p>Also, revise initial policy wording, to include subject to viability and remove 'must be demonstrably designed' to 'strongly encouraged to'.</p>
<p>Page 56 Policy LE1 Conserving and enhancing the AONB</p>	<p>Policy LE1 appears to suggest that all development must satisfy <u>all</u> objectives which is unlikely to ever happen and indeed some otherwise acceptable development may by its very nature be unable to satisfy any.</p> <p>It is unclear what 'satisfy' means and many of the objectives are complex with indicative indicators of success.</p>	<p>In the supporting text it does quote the TWBC SLP policy EN19 – "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.</p>
<p>Page 61 LE5 - Local Green Spaces</p>	<p>It is noted that TWBC propose 8 sites in Brenchley and Matfield as Local Green Space, all of which are also proposed in the NDP. However, the NDP also proposes 8 additional Local Green Space sites (all of which have not been submitted to and/or assessed by TWBC in its own assessments). These sites (proposed within the NDP, not assessed by TWBC) are: LGS4, LGS6, LGS7, LGS9, LGS11, LGS12, LGS14, and LGS16.</p>	<p>No change proposed</p>
<p>LE8 Dark skies</p>	<p>The policy refers to 'All development' but some development may not result changes which impact on dark skies.</p> <p>Criterion A appears to be starting sentence with points b-e following underneath.</p>	<p>Amend wording to have regard to qualifying development and amend policy formatting structure between points a-e.</p>
<p>Page 70 Policy AM2 A non-motorised route between Brenchley and Matfield</p>	<p>This appears to be an idea which is currently being explored (it is mentioned that permission from landowners along the route is required). It needs to be more concrete/certain before asking for developer contributions in a policy. In addition, how will such contributions be sought?</p>	<p>Proposal needs to be more concrete/certain before asking for developer contributions in a policy.</p> <p>Additionally, how will such contributions be sought?</p> <p>Delivery of route needs more certainty which if established should have stronger policy wording and developer contributions sought by S106, with a known costing for this</p>
<p>Page 71 AM3 Enhancing the local highway network</p>		<p>would suggest that highway '<u>safety</u>' needs to be included somewhere in the policy wording</p>

Policy Number/Para/Page	TWBC Comment ¹	Proposed change (if relevant)
Page 74 Figure 32: Table of TWBC PSLP minimum parking standards	The standards in Figure 32 (to reflect TWBC's SLP) are incorrect. There are two "1 bed house" rows, and the 4 bed flat standard should be 2, with 4 bed house 2.5 (which is missing from the table).	Corrections needed to Figure 32: ref TWBC SLP Policy TP3 Parking standards in SLP (not PSLP)
Page 75 Policy CLR1 Education, health and care services		Recommend that this says these will be supported, rather than permitted
Community, Leisure & Recreation	Note the Community, Leisure & Recreation objectives are broadly consistent with those in the SLP	n/a
Page 76 CLR2 Sports and leisure	Welcome the reference to particular priority to be given to facilities for children, teenagers and older residents as this picks up findings of the Open Space Study.	No change
Page 76 Policy CLR3 Natural and amenity greenspaces, play areas and playground facilities and subsequent paragraphs	Policy CLR3 refers to Fields in Trust guidelines The Parish have made comments at both the Reg 18 and Reg 19 stage of the TWBC Local Plan on the issue of the Fields in Trust guidelines and that TWBC are not applying them. TWBC have justified this and used their own guidelines taken from the Open Space Study	The NP is setting different standards to those included in the TWBC SLP. The Open Space Study (OSS) ⁴ (TWBC SLP evidence base) at paragraph 6.5.1 refers to the Fields in Trust guidance and the OSS recommendation for using a different approach.
Page 76 CLR3 Natural and amenity greenspaces, play areas and playground facilities		Reference to Fields in Trust guidelines: see above for approach taken in the TWBC SLP
Page 78 Policy CLR4 Facilities for young people and teenagers		Recommends it says should consider rather than must consider
Page 88 Para 9.10	When adopted the new Local Plan will supersede the 'saved' policies of the Local Plan (1998)	This should read Local Plan 2006
Page 92 Figure 37: AONB Routeways	High Weald AOBK map of Ancient Routeways	Should read AONB

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⁴ Link to the TWBC Open Space Study June 2018 https://tunbridgewells.gov.uk/__data/assets/pdf_file/0008/343790/7312851EC5D25144E0531401A8C03897_The_Open_Space_Study.pdf