



# **BRENCLEY AND MATFIELD PARISH NEIGHBOURHOOD DEVELOPMENT PLAN BASIC CONDITIONS STATEMENT OCTOBER 2021**

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



## **Table of Contents**

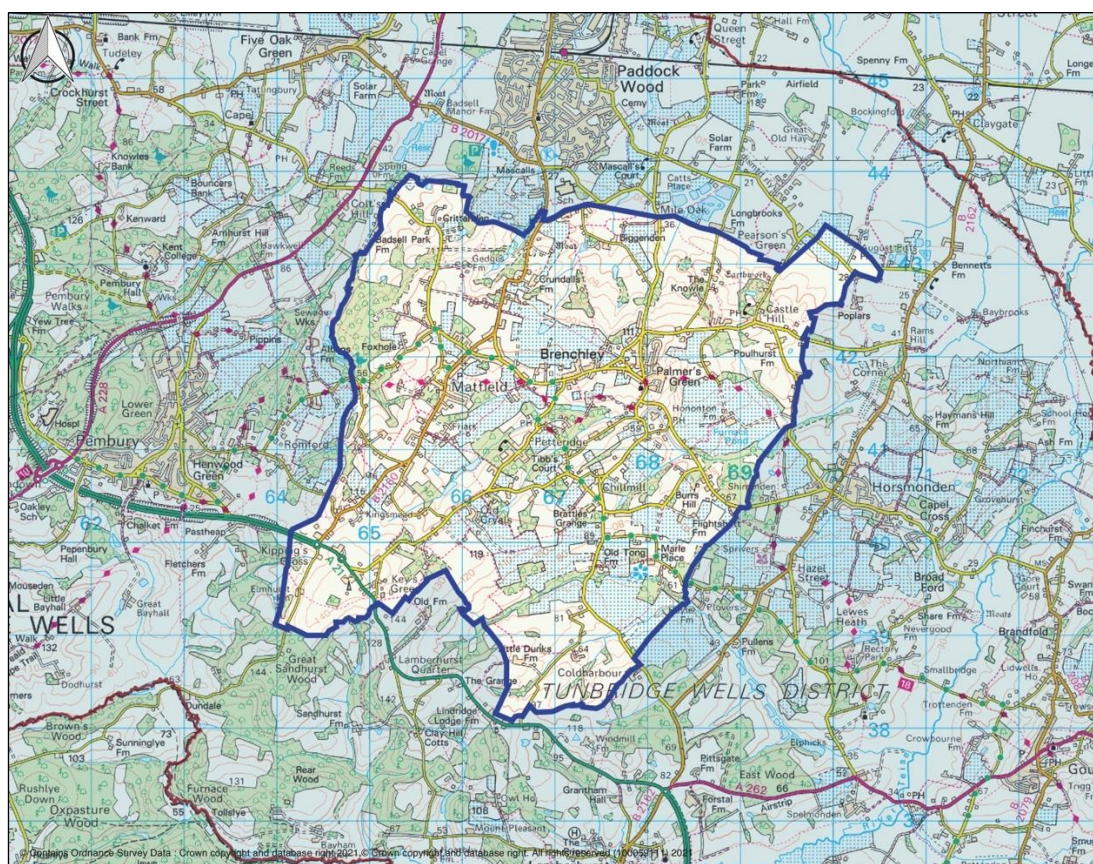
<b><u>Chapter 1</u> - Introduction</b>	<b>3</b>
<b><u>Chapter 2</u> - Background</b>	<b>5</b>
<b><u>Chapter 3</u> – Conformity with National Planning Policies</b>	<b>13</b>
<u>The relationship between the Neighbourhood Plan and NPPF</u>	14
<b><u>Chapter 4</u> – Achieving Sustainable Development</b>	<b>20</b>
<b><u>Chapter 5</u> – General conformity with strategic policies of the Local Planning authority (Tunbridge Wells Borough Council)</b>	<b>23</b>
<u>The relationship between the Neighbourhood Plan policies and the PSLP</u>	23
<u>The relationship between the Neighbourhood Plan and the TWBC Local Plan 2006 “saved policies”</u>	25
<u>The relationship between the Neighbourhood Plan and the TWBC Core Strategy 2010</u>	29
<u>The relationship between the Neighbourhood Plan and Tunbridge Wells Borough Site Allocations Local Plan (SALP) (2016)</u>	32
<u>The relationship between the Neighbourhood Plan and the TWBC Pre-Submission draft of the Local Plan</u>	32
<b><u>Chapter 6</u> – Compatibility with European Union regulations</b>	<b>36</b>
<b><u>Appendix A</u></b>	<b>38</b>
Brenchley and Matfield Parish Plan Survey 2017: Principal Findings	
<b><u>Appendix B</u></b>	<b>41</b>
Approval letter for the Brenchley and Matfield Neighbourhood Plan Area Designation	



## Chapter 1 - Introduction

1.1 This Statement has been prepared by Brenchley and Matfield Parish Council (“the Parish Council”) to accompany the submission of the Brenchley and Matfield Neighbourhood Development Plan (“the Neighbourhood Plan”) under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (“the Regulations”).

1.2 The Neighbourhood Plan has been prepared by the Parish Council, a qualifying body, for the whole of the parish of Brenchley and Matfield, following approval by the Tunbridge Wells Borough Council (TWBC) on 30 November 2017. In its work on the Neighbourhood Plan the Parish Council has been advised and assisted by its Neighbourhood Plan Steering Group. The extent of the plan area is shown in Figure 1 below. The plan period looks forward to 2038. A draft Neighbourhood Plan was the subject of public consultation in May and June 2021.



*Figure 1: The designated Neighbourhood Plan Area*

1.3 The planning policies in the Neighbourhood Plan relate to the development and use of land in the plan area. The plan also includes some proposals for community action, outside the planning system, which are not covered by the legislative requirements for neighbourhood plans: these are clearly differentiated in the plan.

1.4 This Statement addresses each of the four “basic conditions” required in the Regulations and explains how the submitted Neighbourhood Plan meets the requirements of paragraph 8(2) of Schedule 4B to the 1990 Town & Country Planning Act, as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.

1.5 The Regulations state that a Neighbourhood Plan will be considered to have met the basic conditions if:

- **having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan,**
- **the making of the neighbourhood development plan contributes to the achievement of sustainable development,**
- **the making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),**
- **the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations.** (These obligations remain despite UK departure from EU, unless specifically revised or removed by the UK Parliament.)

**There are additional basic conditions requirements concerning the statutory protection of listed buildings and conservation areas which apply only to Neighbourhood Development Orders.** The Brenchley and Matfield Neighbourhood Development Plan does not include any proposed Development Orders.

1.6 The structure of this statement closely follows the above legislative requirements. Following some brief background information in section 2, the remaining sections (3-6 inclusive) cover how the Parish Council has sought to meet each in turn of the four “basic conditions” in preparing the plan.

## Chapter 2 - Background

2.1 In 2015, at Brenchley and Matfield's Annual Parish Meeting, a project to produce a Parish Plan was announced. Seven working groups were established: Business & Local Economy; Child, Youth & Adult Education; Transport, highways & Byways; Sustainability & Environment; Planning & Development; Recreation, Social & Culture; Health, Care & Well-being. In 2016 a Parish Plan Survey was circulated to all residents. Although the Parish Council did not proceed to adopt a Parish Plan, since it was largely overtaken by the proposal to produce a Neighbourhood Plan, the work done for it in the working groups, and particularly the survey results published in March 2017 (Summary at Appendix A), formed the basis for later work on the Neighbourhood Plan.

2.2 On 4 September 2017, Brenchley Parish Council (which later officially changed its name to Brenchley and Matfield Parish Council) resolved to make a formal application to TWBC for the designation of a neighbourhood plan area covering the entire civil parish of Brenchley (to include Matfield). TWBC approved the application on 30 November 2017 and a copy of the approval letter is attached as Appendix B.

2.3 The motivation for preparing the plan was two-fold: firstly, to respond positively to the challenge of neighbourhood planning offered by the Government's Localism Act 2011 and, secondly, the desire of the local community to shape the future of the special area they live in, which they want to conserve and enhance for the benefit of existing residents and future generations.

2.4 The Parish Council then set up a Steering Group to oversee the preparation of the plan, comprising parish councillors and volunteers, and meeting at regular intervals. The Steering Group established links with planning officers at TWBC and has kept in regular contact with them as the plan has progressed. The Group has worked throughout the process to gather an evidence base to support the Neighbourhood Plan and has carried out several rounds of consultation in the local community, which are detailed in the accompanying Consultation Statement. In November 2017, the Parish Council engaged FERIA Urbanism to provide advice and assistance with the neighbourhood plan, and later also took advice from Lindsay Frost Consulting Ltd who had been engaged to provide professional planning assistance with the Parish Council's work.

2.5 National planning policy was streamlined and refocused with the publication of the National Planning Policy Framework (NPPF) in March 2012, and subsequently revised and updated in July 2018, February 2019 and July 2021. The NPPF was followed up with the National Planning Practice Guidance (NPPG) in March 2014, giving more detailed guidance on how to apply the policies set out in the NPPF. The NPPG is an online document which is updated regularly and was updated most recently in July 2021. These documents set the framework for planning work at the local level, including preparation of local plans and neighbourhood plans

2.6 The local planning authorities for Brenchley and Matfield parish are TWBC (for most forms of development) and Kent County Council (KCC) (for minerals and waste-related development and some KCC operational development). The planning policy documents covering Brenchley and Matfield are set out in Table 1 and briefly described in paragraphs 2.7 to 2.13 below:

*Table 1: Local Plans affecting Brenchley and Matfield Parish*

- Tunbridge Wells Borough Local Plan (2006) – “saved policies” only
- Tunbridge Wells Borough Core Strategy (2010)
- Tunbridge Wells Borough Site Allocations Plan (2016)
- Tunbridge Wells Borough Local Plan (2021) – pre-submission consultation draft
- Tunbridge Wells Borough Council – Supplementary Planning Documents and Guidance
- Kent County Council- Waste and Minerals Plan (2016) (modified 2020)
- Kent County Council- Minerals Sites Plan (2020)

2.7. The **Tunbridge Wells Borough Local Plan (2006)** was produced under old legislation superseded by the Planning and Compulsory Purchase Act 2004 and later legislation. However, some detailed policies in the plan were saved by approval of the Secretary of State in March 2009. Others were rendered obsolete by the adoption of newer planning policies in 2010 and 2016 (see below). However, some “saved” policies are still used today in determining planning applications, although the weight attached to them is diminished by time and newer national and local planning policies.

These “saved policies” include policies relating to development in villages and the surrounding countryside, particularly policy LBD1 which defines built confines for Brenchley and Matfield.

**2.8. The Tunbridge Wells Borough Core Strategy (2010)** comprises a long-term spatial vision and objectives for the Tunbridge Wells Borough area for the period 2006 to 2026, and a set of core planning policies by which they will be delivered. It is used in the determination of planning applications, along with some of the more detailed planning policies in the 2006 document above. The following Core Strategy policies are of particular relevance in Brenchley and Matfield parish:

- Core Policy 1: Delivery of Development
- Core Policy 3: Transport Infrastructure
- Core Policy 4: Environment
- Core Policy 5: Sustainable Design and Construction
- Core Policy 6: Housing Provision

- Core Policy 7: Employment Provision
- Core Policy 8: Retail, Leisure and Community Facilities Provision
- Core Policy 14: Development in the Villages and Rural Areas

**2.9. The Tunbridge Wells Borough Site Allocations Plan (2016)** allocates land for housing, employment, retail and other land uses to meet the identified needs of the communities within Tunbridge Wells Borough to 2026 and beyond. The plan follows the strategic objectives and sustainable development objectives set out within the Core Strategy. The document also identifies safeguarded land and areas requiring continued protection from development. The plan's allocated development sites are in the larger towns and villages of the borough.

**2.10. The pre-submission Tunbridge Wells Borough Local Plan 2020-2038** seeks to apply the latest national planning policy to the Borough, including provision of a higher level of future housing development. This draft plan was published for public consultation in March/May 2021. It proposes to allocate two sites in Brenchley and Matfield for housing development, to provide approximately 56-60 new dwellings, including affordable housing:

- **AL/BM 1, Land between Brenchley Road, Coppers Lane and Maidstone Road<sub>2</sub>** is allocated for a mixed-use scheme, including approximately 45 dwellings, of which 40 per cent shall be affordable housing, and play space. (Outline and Reserved Matters planning permission has now been granted for up to 45 dwellings on this site and construction is underway, so the neighbourhood plan policy concerning this site which was included in the regulation 14 consultation has been removed from the regulation 15 plan).
- **AL/BM 2, Land at Maidstone Road**, is allocated for residential development, providing approximately 11-15 dwellings, a fully equipped children's play space and additional car parking provision for the village hall.

Following public consultation on the new Local Plan, it will be submitted for formal examination towards the end of 2021. The new plan will attract increasing weight in planning decisions as it proceeds towards examination by an independent inspector and formal adoption. When adopted, the new Local Plan will supersede the policies contained within the Tunbridge Wells Core Strategy 2010, the Site Allocations Plan 2016, and the "saved" policies of the Local Plan (2006) and the associated supplementary planning documents. The Inset Maps for Brenchley and Matfield from the Pre-Submission Local Plan (PSLP) are shown as Figures 3 and 4.



# Tunbridge Wells Borough Council Draft Local Plan Policies Map Legend



Figure 2: TWBC Draft Local Plan Policies Map Legend



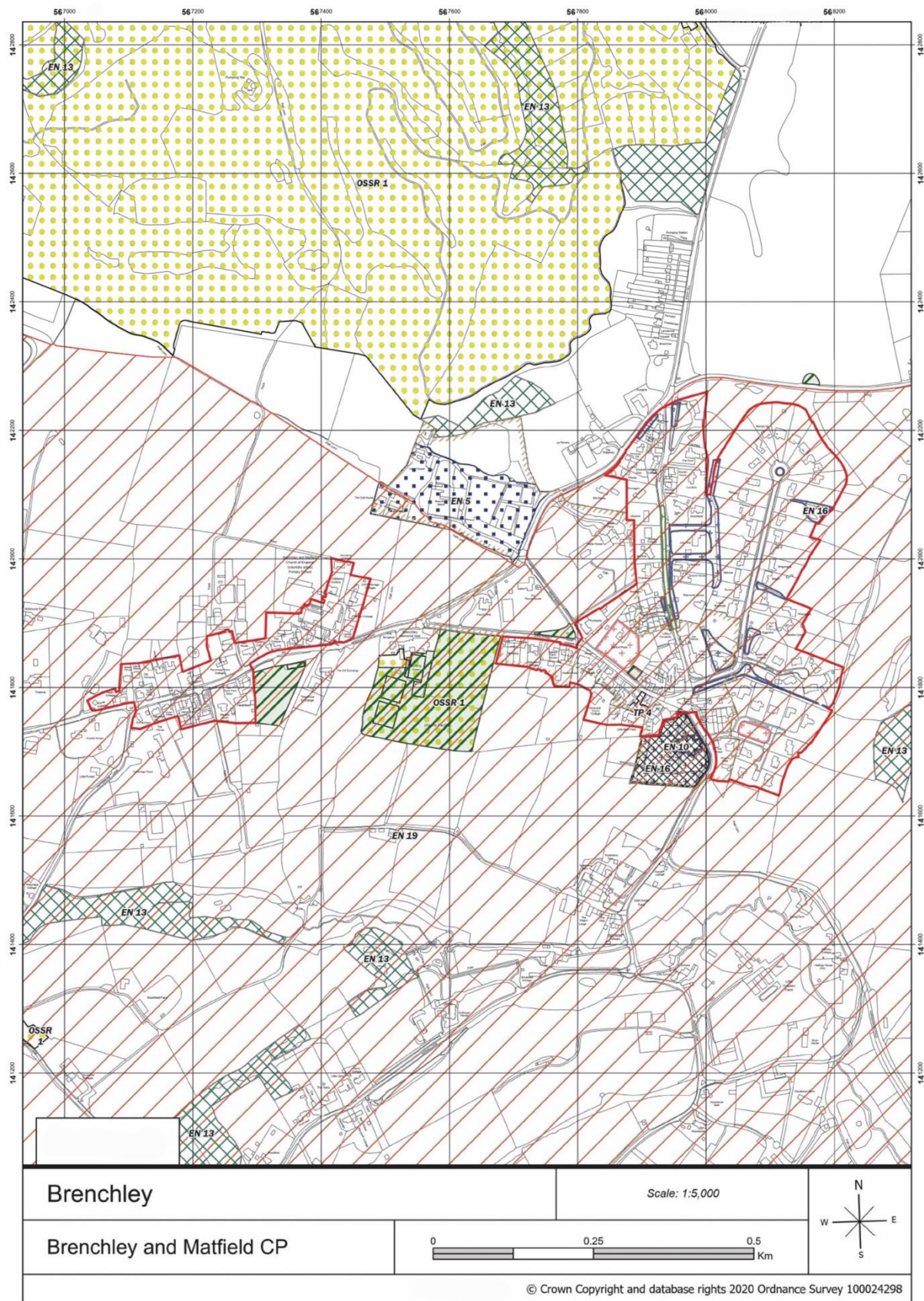


Figure 3: TWBC PSLP Brenchley Policies Map



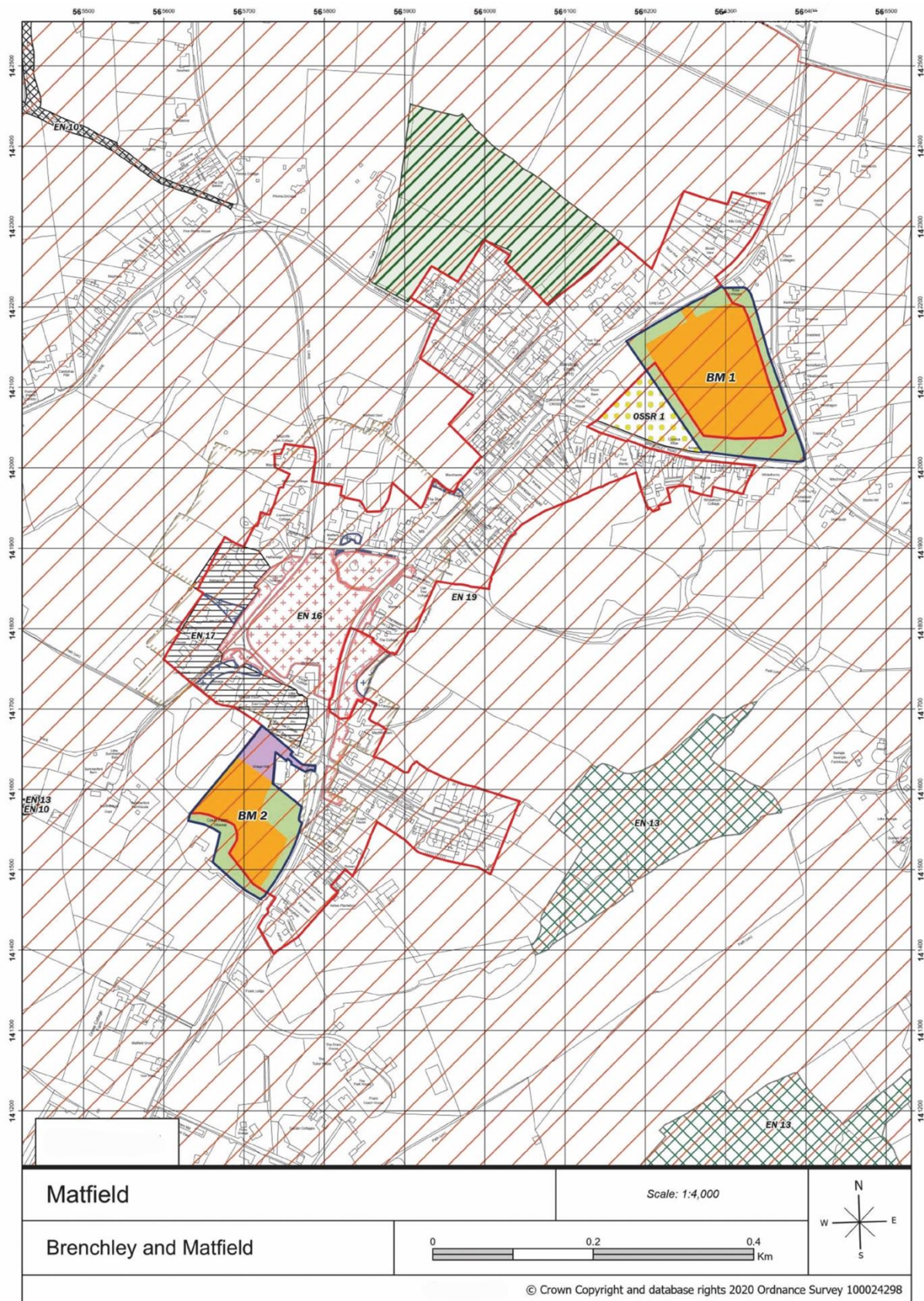


Figure 4: TWBC PSLP Matfield Policies Map

## **2.10 Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance**

**(SPGs)** are non-statutory documents that are used to supplement policies and strategies set out in other statutorily produced documents, such as the above Local Plans. The Borough Council has produced a wide range of such documents, which are relevant to Brenchley and Matfield parish, which include the following:

- Affordable Housing SPD (October 2007)
- Alterations and Extensions SPD (June 2006)
- Contaminated Land SPD (September 2016)
- Farmsteads Assessment SPD (February 2016)
- Green Infrastructure SPD (August 2014)
- Tunbridge Wells Borough Landscape Character Assessment (December 2017)
- Noise and Vibration SPD (November 2014)
- Recreation and Open Space SPD (July 2006)
- Renewable Energy SPD (April 2007, updated 2019)
- Rural Lanes SPD (January 1998)
- Planning Obligations Good Practice Guide (undated)

As these are supplementary planning documents, which elaborate or explain the application of, planning policies in the statutory plans above, they are not assessed in detail in this Basic Conditions Statement.

**2.12 The Kent Waste and Minerals Plan (2016):** The County Council is the local planning authority for development associated with waste disposal and processing, and with the extraction, processing and transportation of minerals in Kent. The plan, which was adopted in 2016 and modified in 2020, sets the overall planning strategy for these types of development up to 2030. The resource of Tunbridge Wells sand, which underlies most of the parish, is broadly safeguarded under the Plan but no sites in Brenchley and Matfield parish are specifically allocated or safeguarded under it.



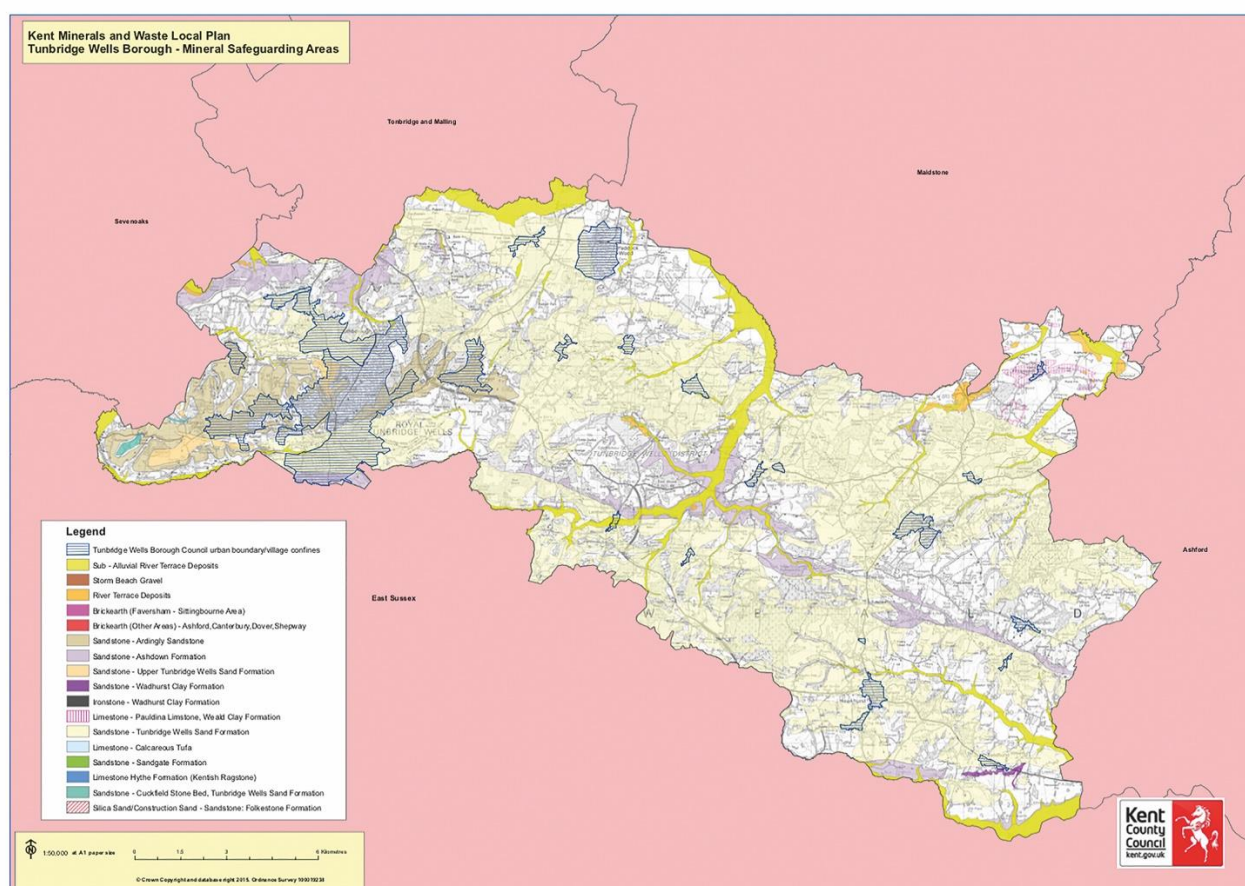


Figure 5: Kent Minerals and Waste Local Plan for Tunbridge Wells Borough

2.13 A **Minerals Sites Local Plan**, identifying sites to give effect to the strategy, was adopted by KCC in September 2020. No sites in Brenchley and Matfield parish are allocated in the plan (Figure 5).

2.14 It is possible that the Brenchley and Matfield Neighbourhood Development Plan might be formally adopted in advance of the new Tunbridge Wells Borough Local Plan. The National Planning Practice Guidance (Neighbourhood Planning paragraph 009) states that it is possible to bring into force a neighbourhood plan in advance of an emerging local plan. It states:

*Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area. They can be developed before or at the same time as the local planning authority is producing its local plan.*

*A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the Basic Conditions. Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing evidence is relevant to the question of whether a housing*

*supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.*

*Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:*

- the emerging neighbourhood plan*
- the emerging local plan (or spatial development strategy)*
- the adopted development plan with appropriate regard to national policy and guidance.*

*The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.*

*The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning & Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.*

2.15 Brenchley and Matfield Parish Council has worked closely with officers from TWBC throughout the preparation of this Plan with the aim of developing a clear and coherent relationship between the older adopted plans and the newly emerging planning policy documents.

### **COVID-19 pandemic**

2.16 The pandemic arrived in the UK early in 2020, leading to stringent lockdown measures affecting all areas of life from March onwards. These measures have been regularly adjusted by the Government since that time, as it seeks to strike a balance between preventing the spread of the virus and allowing a safe return to normal life. Legislation has been passed to allow local authorities (including parish councils) to make decisions on planning matters in online meetings. Government guidance on progressing neighbourhood plans during the pandemic was published in May 2020, which affected how public consultation was carried out.

## **Chapter 3 – Conformity with National Planning Policies**

3.1 The NPPF is the national planning policy framework for England. It was published by the Secretary of State for Communities and Local Government in 2012 and updated in 2018, 2019 and July 2021. All local plans and neighbourhood plans are expected to have regard to it. At its core, the NPPF has a presumption in favour of sustainable development. One



definition of sustainable development is “meeting today’s social and economic needs without narrowing the choices open to future generations”. The national policy is that this will be achieved in rural areas by:

- building a strong, competitive, and prosperous rural economy
- promoting sustainable transport
- supporting high quality communications infrastructure
- delivering a wide choice of high-quality homes
- requiring good design
- promoting healthy communities
- meeting the challenge of climate change
- conserving and enhancing the natural environment
- conserving and enhancing the historic environment

3.2 The Brenchley and Matfield Neighbourhood Development Plan has had regard to all these aspects of the NPPF throughout its preparation.

Table 2 below shows how each of the planning policies in the Plan relates to the NPPF.

(The “Community Action” items in the plan are not included here, as they will be delivered outside the planning system, and are not required to be in compliance with national and strategic planning policy)

### The relationship between the Neighbourhood Plan and NPPF

*Table 2: How the Neighbourhood Development Plan’s Policies relate to the NPPF*

Neighbourhood Plan policy	NPPF relevant paragraphs	Comments
<b>H1 Scale of Housing Development</b>	11,61,67,69,70,71, 105,119,176,177	In general conformity with NPPF, supports new residential development sufficient to meet objectively assessed need identified by TWBC, in a sustainable way.
<b>H2 Location of Housing Development</b>	11, 28, 29, 68,69,78-80, 105,119,174-177	Supports development where it is most sustainable, conserving the AONB and its setting and preserving separate character of settlements.
<b>H3 Density of Housing</b>	124,125	Maintains prevailing character and setting, while requiring efficient use of land.
<b>H4 Housing Mix</b>	62,78	Aims to meet local needs assessed through Parish Housing Needs Survey, and to

Neighbourhood Plan policy	NPPF relevant paragraphs	Comments
		restore balance in the mix of housing available in the parish
<b>H5 Housing for Older Residents and People with Disabilities</b>	62, 78, 105, 176	Aims to meet local need assessed through Parish Housing Needs Survey.
<b>H6 Affordable Housing</b>	61-64	Borough has a high disparity between house prices and local earnings. Parish is a designated rural area where a low threshold for affordable provision is permitted by NPPF.
<b>H7 Rural Exception Sites</b>	78, 79	Supports new sites to meet parish needs for affordable housing.
<b>H8 Housing for Rural Workers</b>	80, 177	Provides housing for farm workers where this is essential, and for retired farm workers, while protecting the AONB countryside and ensuring the stock of such dwellings is not unnecessarily diminished by removal of occupancy conditions.
<b>H9 Residential Extensions etc. and Replacement Buildings outside LBD</b>	124, 130, 132, 134, 177	Protects character of parish while supporting good new development.
<b>H10 Development Contributions</b>	34	Policy concerning contributions from development in the parish to support priorities within the parish.
<b>H11, Site specific policy for TWBC's allocated site</b>	34, 56, 92, 93, 98, 104, 106, 107, 127, 130-132, 152-155, 157, 174, 176	Policy applies objectives and local requirements identified in this Neighbourhood Plan to the sites selected by TWBC for allocation.
<b>H12 Good Practice in Construction</b>	185	Limits pollution and loss of amenity during construction.
<b>D1 High Weald AONB and Design Standards</b>	124, 125-130, 134, 174, 176	High Weald AONB design guidance meets the requirements of the NPPF and other national guidance, was

Neighbourhood Plan policy	NPPF relevant paragraphs	Comments
		extensively consulted upon and will protect special character of the parish.
<b>D2 Local Architectural Style</b>	128-132, 134	Policy supports imaginative contemporary architecture that respects traditional style and materials.
<b>D3 Agricultural and Rural Buildings</b>	84, 85, 176	Ensures new agricultural buildings are compatible with AONB.
<b>D4 Accessibility and Flexibility</b>	62, 65, 130	Ensures new development will be designed to meet the needs of the elderly residents in the parish and their visitors.
<b>D5 Providing an Inclusive, Safe &amp; Secure Environment</b>	130, 176	Addresses community safety in new developments while protecting the character of the parish, which is not a high crime area.
<b>D6 Climate Change, Environmental Sustainability and Resilience</b>	134, 153, 154, 157	Parish aims for a high standard of environmental sustainability, in accordance with NPPF chapters 9, 11, 12, 14, 15. Gives effect to TWBC's target of net zero emissions by 2030.
<b>D7 Flood Risk Management</b>	159-169	Policy will reduce, manage and mitigate flood risk, as required by NPPF.
<b>D8 Surface Water Management</b>	153, 154, 159, 161, 166-9	Policy required because geology in much of the parish makes surface water management difficult.
<b>D9 Utility Infrastructure</b>	82, 114-118	Policy aimed at ensuring necessary new and improved utility infrastructure will be provided.
<b>BE1 Retention or redevelopment of agricultural buildings and commercial sites for residential use</b>	81-85, 93	Policy aims to retain local employment sites and facilities, in accordance with NPPF chapters 6 and 8.

<b>Neighbourhood Plan policy</b>	<b>NPPF relevant paragraphs</b>	<b>Comments</b>
<b>BE2 Additional Employment &amp; New Ways of Working</b>	82, 84, 85	Policy supports new small-scale sustainable businesses, to support a prosperous rural economy (NPPF chapter 6) while protecting character of the parish and AONB (NPPF chapter 15).
<b>BE3 Infrastructure for Business</b>	82, 85, 104-106, 110, 112, 114	Policy supports improvements to sustainable infrastructure that will assist businesses (NPPF chapters 9, 10).
<b>BE4 Agricultural Diversification</b>	84, 85	Policy supports agriculture and agricultural diversification (NPPF chapter 6) while protecting the AONB (NPPF chapter 15).
<b>BE5 Small-Scale Tourism</b>	84, 85, 176	Policy supports small-scale tourism (NPPF chapter 6) in keeping with the AONB (NPPF chapter 15).
<b>BE6 Energy Efficiency in non-Residential Buildings</b>	107, 152-158	Policy supports environmental sustainability of non-residential buildings (NPPF chapter 9, 12, 14, 15).
<b>BE7 Renewable Energy Generation</b>	156, 158	Supports small-scale renewable energy projects (NPPF chapter 14).
<b>LE1 Conserving and enhancing the AONB</b>	128-130, 174-177	Most of the parish is within the High Weald AONB, including both villages. This policy fulfils the requirements of NPPF para 176.
<b>LE2 Development affecting the AONB and its setting</b>	128-130, 134, 174, 176	The northern part of the parish falls within the High Weald National Character Area and forms the setting of the AONB, protected by this policy. This policy accords with paragraph 175 of the proposed revised NPPF concerning the setting of AONBs.

<b>Neighbourhood Plan policy</b>	<b>NPPF relevant paragraphs</b>	<b>Comments</b>
<b>LE3 Historic Landscapes and Heritage Assets</b>	189-208	The policy protects and enhances the rich historic environment of the parish, as required by NPPF chapter 16.
<b>LE4 Valued Views</b>	174, 176	Protects public views over and from the AONB, and of historic assets, identified as important by residents. This identifies valued landscapes (NPPF 170a) and conserves scenic beauty (NPPF 172) within the parish.
<b>LE5 Local Green Spaces</b>	101-103	Sites complying with national policy on Local Greenspaces have been identified through consultation with local residents.
<b>LE6 Biodiversity</b>	179, 180	Policy supports a joined-up approach to biodiversity, as required by NPPF.
<b>LE 7 Trees and Hedges</b>	131, 153, 154,176, 179, 186	Policy protects and enhances landscape in keeping with local tradition, increases biodiversity, reduces pollution and flood risk, mitigates climate change.
<b>LE8 Dark Skies</b>	185	Consultation events highlighted importance of dark skies in the parish. Implements NPPF para 185c.
<b>LE9 Advertising</b>	136	Policy supports advertising while protecting landscape and village character, road and pedestrian safety, in accordance with NPPF 136.
<b>AM1 Sustainable and Active Travel</b>	92, 100, 104-106, 110-112	Ensures that new development provides for sustainable and active travel, in accordance with NPPF chapter 9.
<b>AM2 A non-motorised route between Brenchley and Matfield</b>	92, 100, 104, 106, 110, 112	Supports active, safe and sustainable travel between the two villages, improving access to facilities (NPPF chapters 8, 9).



Neighbourhood Plan policy	NPPF relevant paragraphs	Comments
<b>AM3 Enhancing the Local Highway Network</b>	92, 104-106, 110-113, 127	Accords with NPPF chapter 9. Measures to reduce traffic speeds and enable safe road crossings were a top priority identified in consultations with residents.
<b>AM4 Parking</b>	107-109	Accords with NPPF. The parish is poorly supplied with public transport, there is no all-weather foot or cycle path between the villages to enable access to facilities and services, and dependence on private cars is high. Parking standards previously applied, aimed at reducing car use, have instead resulted in inconsiderate on-street and on-footway parking and in road congestion. The policy aims to address this while protecting the environment and mitigating climate change.
<b>CLR1 Education, Health and Care Services</b>	83, 91, 92, 94, 127f	In accordance with NPPF chapter 8, the policy supports enhancement of these community services.
<b>CLR2 Sports and Leisure</b>	84, 92, 93, 98	In accordance with NPPF chapter 8, policy supports provision and enhancement of facilities.
<b>CLR3 Natural and Amenity Greenspaces, Play Areas and Playground Facilities</b>	84, 92, 93, 98, 130	NPPF chapter 8 requires access to a network of high- quality open spaces and opportunities for sport and recreation. Given the relatively infrequent bus services and the current lack of an all-weather walking and cycle route between the villages or to Paddock Wood, equality considerations mean that opportunities for sport and recreation need to be available

Neighbourhood Plan policy	NPPF relevant paragraphs	Comments
		for each village. The provision of new amenity greenspaces will also help to preserve the historic character of the villages. Therefore, the Policy supports the Fields in Trust recommendations. Consultation with residents highlighted the lack of an equipped playground in Matfield.
<b>CLR4 Facilities for Young People and Teenagers</b>	92, 93, 98	Policy responds to concerns expressed by young people in the parish during consultations. While not specifically covered by the NPPF, this policy is important for equality and to encourage a more balanced community.
<b>CLR5 Open Spaces in the Parish</b>	92, 93, 98, 99	Policy designates and retains open spaces, and land in the parish currently used for sport and recreation, in accordance with NPPF para 99.

## Chapter 4 – Achieving Sustainable Development

4.1 Throughout preparation of the Neighbourhood Development Plan (NDP), the Parish Council and Steering Group have been mindful of the NPPF's requirement in its paragraphs 8-10 that: *The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

**a) an economic objective** – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

**b) a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

**c) an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

*Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.*

**4.2 The planning policies of the Neighbourhood Development Plan (along with the related community action) aim to deliver sustainable development for Brencley and Matfield over the next 15 years or so. This is the basis of the Vision which underpins the Plan:**

### **Vision Statement**

**Brencley and Matfield parish will embrace sustainable change and development that conserves and enhances the special qualities of the parish's landscape and built heritage, promotes the economic and social welfare of the community, encourages demographic balance and recognises the need for action on climate change.**

**4.3 Six strategic objectives** support this Vision and provide a framework for Neighbourhood Plan policies:

#### **Housing**

To ensure that housing development encourages a sustainable demographic mix by meeting the needs of families and older residents, including Affordable Housing to enable young people to get a starter home to remain in the parish, and making provision for elderly households wishing to downsize. To preserve the essential rural character of the parish by respecting conservation areas and avoiding ribbon development and large-scale estates.

#### **Design**

To ensure that development respects design traditions of the area and AONB design criteria, while being open to sympathetic but innovative design. To take action on climate change and other environmental challenges by ensuring the highest standards of sustainability in any new build or alterations.

### **Business and Employment**

To encourage existing and new businesses and employment in the parish, by supporting continued availability of sites and improved infrastructure and by being responsive to the changing needs of new ways of working.

### **Landscape and Environment**

To conserve and enhance the special natural environment of the AONB and neighbouring areas and the parish's rich historic built environment.

### **Access and Movement**

To encourage active travel and provide sustainable transport options, supportive infrastructure and alternative modes of transport to the private car. To improve pedestrian and road safety by mitigating the effects of increased traffic volumes created by new development within the parish and in adjacent parishes.

### **Community, Leisure and Recreation**

To encourage a local sustainable community by maintaining and improving the availability and quality of community services within the parish. To address loneliness and isolation within the community. To preserve Open Spaces and provide additional play facilities and activities for young people.

**4.4 The accompanying Sustainability Appraisal assesses the policies in relation to sustainability objectives. All the policies have positive or neutral scores.**

## Chapter 5 – General conformity with strategic policies of the Local Planning authority (Tunbridge Wells Borough Council)

5.1 This is analysed in Tables 3, 4 and 5 below. The status of the various local planning policies is described in section 2 above.

5.2 Most of these plans comprise planning policies to be applied across the whole of Tunbridge Wells Borough, but the pre-submission Local Plan (2021) also includes an overarching planning strategy for Brenchley and Matfield (policy PSTR/BM1). Whilst this policy as yet carries limited weight, as part of an untested draft plan, it is likely – as the new local plan progresses to formal adoption - to become a key policy against which the NDP needs to be assessed.

5.3 The current draft policy PSTR/BM1 and how it relates to the draft NDP policies is set out in Table 3 below. This analysis demonstrates that NDP policies are in general conformity with the new planning strategy for the parish that is being promoted by TWBC.

### The relationship between the Neighbourhood Plan policies and the PSLP

*Table 3: Draft Policy PSTR/BM1 of the Pre-Submission draft Tunbridge Wells Local Plan (2021) (PSLP) and how it relates to the policies of the draft Brenchley and Matfield Neighbourhood Development Plan.*

<b>TWBC Pre-Submission Draft Local Plan 2020-38 (PSLP) PSTR/ BM1</b>	<b>Neighbourhood Plan (NDP) policies</b>
1. Set Limits to Built Development for Brenchley village and Matfield village	The NDP accepts the LBDs proposed in the PSLP.
2. Build approximately 56-60 new dwellings, including affordable housing, as allocated under the subsequent site allocation policies; (two sites at Matfield allocated, Policies AL/BM 1 and 2).	The NDP does not allocate sites for housing and leaves the allocation to TWBC's PSLP. However, the LBDs include the sites allocated in the PSLP and NDP Policy H11 applies the principles and policies in the NDP to the specific site selected by TWBC for allocation where planning permission has not yet been granted.
3. Retain the public car park in High Street, Brenchley	The NDP does not specifically refer to this car park, but parking policy AM3 deals with parking for new developments and supports:  a. provision of easily accessible but well landscaped parking areas that allow streets to be safe for all and operate as good social spaces;



TWBC Pre-Submission Draft Local Plan 2020-38 (PSLP) PSTR/ BM1	Neighbourhood Plan (NDP) policies
	<p>b. measures to deter on-street parking and on-pavement parking;</p> <p>c. parking solutions which minimise the impact on the AONB; and</p> <p>d. facilitating safer traffic movement and relieving parking problems in neighbouring roads</p>
<p>4. Provide information boards (or similar) and installation of public art along the Hop Pickers Line. Other locally significant historical features, events, and personalities could be recognised as part of this approach</p>	<p>The NDP does not cover this. A small section of the Hop Pickers Line runs along a very short length of the boundary of the parish, well away from the villages. Providing public art or information boards along the line or elsewhere in the parish has not been identified as a priority by parish residents.</p>
<p>5. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of:</p> <p>a. medical facilities that cover Brenchley and Matfield parish (to be used towards improvements/reconfiguration of existing medical facilities or towards new premises providing medical facilities);</p> <p>b. improvements to changing rooms at the Brenchley War Memorial Ground, and/or potentially to new recreation/sports provision at Paddock Wood, as referred to in Policy STR/SS1;</p> <p>c. provision of a range of play facilities, including at Policy AL/BM 1 Land between Brenchley Road, Coppers Lane and Maidstone Road and Policy AL/BM 2 Land at Maidstone Road, suitable for a range of ages including children's and youth provision;</p> <p>d. provision of amenity green space and additional allotments;</p> <p>e. secondary education provision;</p> <p>f. library provision;</p>	<p>Some of the items in this list lie outside the scope of the NDP as they involve development outside the parish. However, NDP Policies H10, H11, AM1-AM3 and CLR2 to CLR4 concern developer contributions to facilities within the parish.</p>

<b>TWBC Pre-Submission Draft Local Plan 2020-38 (PSLP) PSTR/ BM1</b>	<b>Neighbourhood Plan (NDP) policies</b>
g. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.	

5.4 Since the adoption of the Local Plan 2006 some changes have been made to the Local Plan as a result of the 'saving' (and the not saving) of policies in March 2009, the adoption of the Core Strategy in June 2010 and the adoption of the Site Allocations Local Plan in July 2016. As a result, some policies were removed from the Local Plan. However, the abolition of County Structure Plans and Regional Spatial Strategies, which contained some of the policies that were not saved, has left some gaps in policy coverage, which the PSLP will fill once it is adopted. In the interim, the NDP will to some extent fill these gaps if it is adopted before the new Local Plan. The NDP is designed to be additional to the Local Plan and it is anticipated that some NDP policies will be superseded by the new Local Plan policies once adopted.

**The relationship between the Neighbourhood Plan and the TWBC Local Plan 2006 “saved policies”**

*Table 4: How the Neighbourhood Plan relates to  
Tunbridge Wells Borough Local Plan (2006) - saved policies*

<b>Neighbourhood Plan Policy</b>	<b>Relevant plans and policies</b>	<b>Comments on broad conformity with strategic planning policies</b>
<b>H1 Scale of Housing Development</b>	LBD1, H5, EN25	Conforms with H5 (infilling within LBD) but in conformity with NPPF also envisages some development that would not be allowed under LBD1 and EN25.
<b>H2 Location of Housing Development</b>	LBD1, H5, H8, H9, H10, H11, H13	Generally, conforms but adopts LBD of PSLP; in conformity with NPPF envisages some development that would not be allowed under LP2006.
<b>H3 Density of Housing</b>	H5	Generally, conforms
<b>H4 Housing Mix</b>	H2	Generally, conforms
<b>H5 Housing for Older Residents and People with Disabilities</b>	No policy	No conflict
<b>H6 Affordable Housing</b>	No policy (replaced by Core Strategy)	not applicable

<b>Neighbourhood Plan Policy</b>	<b>Relevant plans and policies</b>	<b>Comments on broad conformity with strategic planning policies</b>
<b>H7 Rural Exception Sites</b>	H8	Generally, conforms
<b>H8 Housing for Rural Workers</b>	H9	Generally, conforms. Additional requirements not to harm character of countryside, and for rural worker occupancy conditions not to be removed unless unsuccessfully marketed to other rural workers in parish for 18 months.
<b>H9 Residential Extensions etc. and Replacement Buildings outside LBD</b>	H10, H11	Generally, conforms
<b>H10 Developer Contributions</b>	EN1	Broadly conforms. Mainly reflects later policies
<b>H11 Site Specific Policy for Allocated Site AL/BM2</b>	not applicable (site not allocated in LP 2006)	not applicable (site not allocated).
<b>H12 Good Practice in Construction</b>	No policy	not applicable
<b>D1 High Weald AONB and Design Standards</b>	No policy	not applicable
<b>D2 Local Architectural Style</b>	EN25	Generally, conforms
<b>D3 Agricultural and Rural Buildings</b>	EN25	Generally, conforms but more detail.
<b>D4 Accessibility and Flexibility</b>	No policy	not applicable
<b>D5 Providing an Inclusive, Safe &amp; Secure Environment</b>	EN1	Generally, conforms; more detailed
<b>D6 Climate Change, environmental Sustainability and Resilience</b>	EN16	EN16 only concerns water. Policy D6 is wider ranging, reflecting NPPF
<b>D7 Flood Risk Management</b>	EN18	Stronger and more detailed, reflecting NPPF
<b>D8 Surface Water Management</b>	EN18	Stronger and more detailed, reflecting NPPF.
<b>D9 Utility Infrastructure</b>	EN20	EN20 only concerns telecommunications infrastructure. Policy generally conforms with EN20

<b>Neighbourhood Plan Policy</b>	<b>Relevant plans and policies</b>	<b>Comments on broad conformity with strategic planning policies</b>
		but also covers other utility infrastructure
<b>BE1 Retention or Redevelopment of agricultural buildings and commercial sites for residential use</b>	CR13, H13, ED5	Generally, conforms
<b>BE2 Additional Employment &amp; New Ways of Working</b>	ED2	More detailed and may allow development outside LBD, in line with NPPF paras 83 and 84.
<b>BE3 Infrastructure for Business</b>	TP2, EN20	More supportive of business in the parish, in line with NPPF
<b>BE4 Agricultural Diversification</b>	No specific policy but EN25 applies	More supportive of agricultural diversification, in line with NPPF
<b>BE5 Small-Scale Tourism</b>	T1, T2, T3	More supportive of small-scale rural tourism in line with NPPF
<b>BE6 Energy Efficiency in Non-Residential Buildings</b>	No specific policy but EN1(3) applies	Generally, conforms
<b>BE7 Renewable Energy Generation</b>	No policy	not applicable
<b>LE1 Conserving and enhancing the AONB</b>	No policy (policy not saved)	not applicable
<b>LE2 Development affecting the AONB and its setting</b>	EN25	Generally, conforms
<b>LE3 Historic Landscapes and Heritage Assets</b>	EN4, EN5, EN6, EN10, EN11, EN23, EN25. (Policies concerning listed buildings and scheduled monuments not saved).	Generally, conforms
<b>LE4 Valued Views</b>	No specific policy (those that might have covered it mostly not saved)	not applicable
<b>LE5 Local Green Spaces</b>	No policy (Local Greenspaces designation introduced in later legislation)	not applicable

<b>Neighbourhood Plan Policy</b>	<b>Relevant plans and policies</b>	<b>Comments on broad conformity with strategic planning policies</b>
<b>LE6 Biodiversity</b>	EN1, EN15, EN16, EN25	Generally, conforms
<b>LE 7 Trees and hedges</b>	EN1, EN13, EN25	Generally, conforms but reflects NPPF by adding new tree planting and protection for more trees than EN13.
<b>LE8 Dark Skies</b>	EN8	Generally, conforms but also includes light spillage from windows
<b>LE9 Advertising</b>	Policy not saved	not applicable
<b>AM1 Sustainable and Active Travel</b>	TP1, 2, 3, 4	Generally, conforms but applies to all development in the parish, without the thresholds in the LP2006
<b>AM2 A non-motorised route between Brenchley and Matfield</b>	TP2, TP3	Could apply to smaller developments than those in TP2 and 3
<b>AM3 Enhancing the Local Highway Network</b>	TP1, TP2, TP3, TP4	Generally, conforms but applies to all development in the parish, without the thresholds in the LP2006
<b>AM4 Parking</b>	TP5	Generally, conforms. However, in view of NPPF and parking problems in parish, mostly allows more parking than KCC's standard required by TP5. (Note, KCC's current standard is now a minimum, whereas at the time of the LP 2006 it was a maximum)
<b>CLR1 Education, Health and Care Services</b>	CS4. (CS6 not really relevant as more concerned with limiting change of use of sites; other CS policies not saved)	Generally, conforms
<b>CLR2 Sports and Leisure</b>	R2	Generally, conforms
<b>CLR3 Natural and Amenity Greenspaces, Play Areas and Playground Facilities</b>	R2	Supports more provision in the parish than the minimum requirements in the LP2006, to avoid need for car travel to larger settlements.



Neighbourhood Plan Policy	Relevant plans and policies	Comments on broad conformity with strategic planning policies
<b>CLR4 Facilities for Young People and Teenagers</b>	R2	Broader than R2. Requires more provision in the parish than the minimum requirements in the LP2006, to avoid need for car travel to larger settlements.
<b>CLR5 Open Spaces in the Parish</b>	R1, EN21	Some but not all sites designated under this policy are covered by R1 or EN21.

### The relationship between the Neighbourhood Plan and the TWBC Core Strategy 2010

*Table 5: How the Neighbourhood Plan relates to Tunbridge Wells Borough Core Strategy (2010)*

Neighbourhood Plan Policy	Relevant plans and policies	Comments on broad conformity with strategic planning policies
<b>H1 Scale of Housing Development</b>	CP1, CP14	Generally, conforms but in conformity with NPPF and PSLP, enlarges LBDs and envisages development on some sites that would not be permitted under Core Strategy.
<b>H2 Location of Housing Development</b>	SD2, SD3, CP1	Generally, conforms
<b>H3 Density of Housing</b>	SO1, CP4, CP6	Generally, conforms
<b>H4 Housing Mix</b>	CP6	Generally, conforms
<b>H5 Housing for Older Residents and People with Disabilities</b>	CP6	Conforms
<b>H6 Affordable Housing</b>	CP6	Generally, conforms.
<b>H7 Rural Exception Sites</b>	CP1(2), CP6	Generally, conforms
<b>H8 Housing for Rural Workers</b>	No policy	not applicable
<b>H9 Residential Extensions etc. and Replacement Buildings outside LBD</b>	Not mentioned	not applicable

<b>Neighbourhood Plan Policy</b>	<b>Relevant plans and policies</b>	<b>Comments on broad conformity with strategic planning policies</b>
<b>H10 Developer Contributions</b>	CP1, CP3, CP4, CP5, CP6	Broadly conforms with policies and requires contributions in line with them.
<b>H11 Site Specific Policy for Allocated Site AL/BM2</b>	not applicable (site not allocated in Core Strategy)	Policy designed to comply with NPPF and PSLP. Site lies outside Matfield's Core Strategy/LP2006 LBD
<b>H12 Good Practice in Construction</b>	CP5	Generally, conforms
<b>D1 High Weald AONB and Design Standards</b>	CP4	Generally, conforms.
<b>D2 Local Architectural Style</b>	CP4, CP14	Generally, conforms while being more detailed
<b>D3 Agricultural and Rural Buildings</b>	CP14(7)	Generally, conforms but more detail.
<b>D4 Accessibility and Flexibility</b>	CP5	Conforms with more detail
<b>D5 Providing an Inclusive, Safe &amp; Secure Environment</b>	no policy	not applicable
<b>D6 Climate Change, Environmental Sustainability and Resilience</b>	CP5	Generally, conforms but requires higher standards, in line with current NPPF
<b>D7 Flood Risk Management</b>	CP5	Stronger and more detailed, as NPPF requires.
<b>D8 Surface Water Management</b>	CP5	Stronger and more detailed, as NPPF requires.
<b>D9 Utility Infrastructure</b>	CP1	While policy D9 supports new and improved utility infrastructure to meet identified needs, policy CP1 only refers to development contributions for utility infrastructure.
<b>BE1 Retention or Redevelopment of agricultural buildings and commercial sites for residential use</b>	CP7, CP14	Generally, conforms

<b>Neighbourhood Plan Policy</b>	<b>Relevant plans and policies</b>	<b>Comments on broad conformity with strategic planning policies</b>
<b>BE2 Additional Employment &amp; New Ways of Working</b>	CP1, CP14	Generally, conforms but may allow more economic development, in line with NPPF
<b>BE3 Infrastructure for Business</b>	CP14(8)	Conforms but includes more than non-vehicular routes; more supportive of business in the parish, in line with NPPF paras 83 and 84
<b>BE4 Agricultural Diversification</b>	CP7, CP14	Generally, conforms
<b>BE5 Tourism</b>	CP14	Broadly conforms
<b>BE6 Energy Efficiency in Non-Residential Buildings</b>	CP5	Generally, conforms
<b>BE7 Renewable Energy Generation</b>	CP5	Generally, conforms
<b>LE1 Conserving and enhancing the AONB</b>	CP4	Generally, conforms. More detailed
<b>LE2 Development affecting the AONB and its setting</b>	CP4	Generally, conforms
<b>LE3 Historic Landscapes and Heritage Assets</b>	CP5	Generally, conforms
<b>LE4 Valued Views</b>	No specific policy but CP4 generally covers it	Generally, conforms
<b>LE5 Local Green Spaces</b>	No policy (Local Greenspaces designation introduced in later legislation)	not applicable
<b>LE6 Biodiversity</b>	CP4, CP14	Generally, conforms
<b>LE 7 Trees and hedges</b>	CP4	Generally, conforms but more reflective of NPPF
<b>LE8 Dark Skies</b>	No policy	not applicable
<b>LE9 Advertising</b>	No policy	not applicable
<b>AM1 Sustainable and Active Travel</b>	CP3	Generally, conforms but more detailed
<b>AM2 A non-motorised route between Brenchley and Matfield</b>	CP3	Conforms
<b>AM3 Enhancing the Local Highway Network</b>	CP3	Generally, conforms

Neighbourhood Plan Policy	Relevant plans and policies	Comments on broad conformity with strategic planning policies
AM4 Parking	No policy	not applicable
CLR1 Education, Health and Care Services	CP8	Generally, conforms
CLR2 Sports and Leisure	CP8	Generally, conforms
CLR3 Natural and Amenity Greenspaces, Play Areas and Playground Facilities	CP8	Generally. Conforms
CLR4 Facilities for Young People and Teenagers	CP8	Generally, conforms
CLR5 Open Spaces in the Parish	CP4, CP5, CP8	Generally, conforms

### **The relationship between the Neighbourhood Plan and Tunbridge Wells Borough Site Allocations Local Plan (SALP) (2016)**

5.5 No specific new housing, employment or sport, recreational and open space allocations were made in Brenchley and Matfield parish under the SALP. Policies AL/STR1 and AL/STR2 confirmed the LP2006/Core Strategy LBDs and sport, recreational and open space allocations (see Tables 4 and 5).

5.6 AL/STR3 safeguarded the former railway line between Paddock Wood and Hawkhurst (the Hop Pickers' Line) as a green infrastructure corridor providing a walking/cycleway trail. A short section of this line runs along the boundary of the parish. The Neighbourhood Plan does not contain any provisions specifically concerning this, though policy AM1 generally supports it.

5.7 In all other respects the SALP 2016 is not applicable to this parish.

### **The relationship between the Neighbourhood Plan and the TWBC Pre-Submission draft of the Local Plan**

*Table 5: How the Neighbourhood Plan relates to Tunbridge Wells Borough Local Plan(2021) – Pre-Submission consultation draft, Strategic policies*

Neighbourhood Plan Policy	Relevant plans and policies	Comments on broad conformity with strategic planning policies
H1 Scale of Housing Development	STR1, STR3, PSTR/BM1	Generally, conforms
H2 Location of Housing Development	STR1, PSTR/BM1,	Generally, Conforms
H3 Density of Housing	STR1, STR2, STR8	Generally, conforms

<b>Neighbourhood Plan Policy</b>	<b>Relevant plans and policies</b>	<b>Comments on broad conformity with strategic planning policies</b>
<b>H4 Housing Mix</b>	No strategic policy.	Conforms. Supported by Housing Needs Survey
<b>H5 Housing for Older Residents and People with Disabilities</b>	STR2	Generally, conforms (PSLP H6)
<b>H6 Affordable Housing</b>	PSTR/BM1	Generally, conforms with PSLP (H3 and PSTR/BM1).
<b>H7 Rural Exception Sites</b>	STR1	Generally, conforms (PSLP H5)
<b>H8 Housing for Rural Workers</b>	STR1	Generally, conforms (PSLP H7).
<b>H9 Residential Extensions etc. and Replacement Buildings outside LBD</b>	STR 2	Generally, conforms but less detailed than PSLP H10, H11
<b>H10 Developer Contributions</b>	STR 2, STR 5, STR 6, STR7, PSTR/BM1	Generally, conforms.
<b>H11 Site Specific Policy for Allocated Site AL/BM2</b>	STR 2, STR 5, STR6, STR7, PSTR/BM1	Generally, conform, though they differ from PSTR BM/1 in some details
<b>H12 Good Practice in Construction</b>	No strategic policy	Generally, conforms with PSLP EN1
<b>D1 High Weald AONB and Design Standards</b>	STR1, STR2, STR8	Generally, conforms, although PSLP in its non-strategic policies references a lot of other design guidance.
<b>D2 Local Architectural Style</b>	STR2, STR 8	Generally, conforms
<b>D3 Agricultural and Rural Buildings</b>	STR8	Broadly conforms
<b>D4 Accessibility and Flexibility</b>	STR2	Conforms but because of demographic of parish residents and evidence from parish housing needs survey it supports some provision of housing meeting the M4(3) adaptable standard in market housing as well as M4(3) accessible in affordable housing.
<b>D5 Providing an Inclusive, Safe &amp; Secure Environment</b>	STR2	Broadly conforms

<b>Neighbourhood Plan Policy</b>	<b>Relevant plans and policies</b>	<b>Comments on broad conformity with strategic planning policies</b>
<b>D6 Climate Change, Environmental, Sustainability and Resilience</b>	STR 2, STR7	Generally, conforms
<b>D7 Flood Risk Management</b>	STR2, STR5	Generally, conforms
<b>D8 Surface Water Management</b>	STR2, STR5	Generally, conforms
<b>D9 Utility Infrastructure</b>	STR5	Generally, conforms
<b>BE1 Retention or Redevelopment of agricultural buildings and commercial sites for residential use</b>	STR 3	Generally, conforms
<b>BE2 Additional Employment &amp; New Ways of Working</b>	STR5, STR6	Generally, conforms
<b>BE3 Infrastructure for Business</b>	STR5, STR6	Generally, conforms
<b>BE4 Agricultural Diversification</b>	STR2, STR3, STR8	Generally, conforms
<b>BE5 Small-Scale Tourism</b>	STR2, STR8	Generally, conforms
<b>BE6 Energy Efficiency in Non-Residential Buildings</b>	STR2, STR7	Generally, conforms. Less detailed but more demanding than PSLP detailed policies as it supports BREEAM excellent on all new or altered non-residential buildings.
<b>BE7 Renewable Energy Generation</b>	STR7	Generally, conforms
<b>LE1 Conserving and Enhancing the AONB</b>	STR8	Generally, conforms. Less detailed.
<b>LE2 Development affecting the AONB and its setting</b>	STR8	Generally, conforms
<b>LE3 Historic Landscapes and Heritage Assets</b>	STR1, STR2, STR8	Generally, conforms
<b>LE4 Valued Views</b>	STR8, STR10	Generally, conforms but this is a specific local policy, to ensure that the views which are particularly valued features of the parish are



<b>Neighbourhood Plan Policy</b>	<b>Relevant plans and policies</b>	<b>Comments on broad conformity with strategic planning policies</b>
		preserved if there is development within the parish that could affect them.
<b>LE5 Local Green Spaces</b>	STR5 (EN15, Appx 2)	Generally, conforms. Some additions to sites in PSLP Appx 2 following local consultations
<b>LE6 Biodiversity</b>	STR2, STR8	Generally, conforms.
<b>LE7 Trees and hedges</b>	STR5, STR7, STR8	Generally, conforms but more reflective of NPPF.
<b>LE8 Dark Skies</b>	STR1, STR2, STR8	Generally, conforms
<b>LE9 Advertising</b>	STR2, STR8	Generally, conforms.
<b>AM1 Sustainable and Active Travel</b>	STR6	Generally, conforms
<b>AM2 Provision of a non-motorised route between Brenchley and Matfield</b>	STR5, STR6	Conforms; implements STR6a3.
<b>AM3 Enhancing the Local Highway Network</b>	STR6	Generally, conforms
<b>AM4 Parking</b>	STR2, STR6 (TP3), STR8, PSTR/BM1	Generally, conforms.
<b>CLR1 Education, Health and Care Services</b>	STR2, STR5, STR8, PSTR/BM1	Generally, conforms
<b>CLR2 Sports and Leisure</b>	STR5, (OSSR1 and 2) PSTR/BM1	Generally, conforms
<b>CLR3 Natural and Amenity Greenspaces, Play Areas and Playground Facilities</b>	STR5 (OSSR2) PSTR/BM1	Generally, conforms but, in line with the Fields in Trust guidelines, requires more provision in the parish than the minimum requirements in the PSLP, to avoid need for car travel to larger settlements.
<b>CLR4 Facilities for Young People and Teenagers</b>	STR5, PSTR/BM1, ED6, OSSR2	Generally, conforms
<b>CLR5 Open Spaces in the Parish</b>	TR2, STR5 (OSSR1)	Generally, conforms but includes some differences from those in PSLP. The large area which was previously a golf course and which was shown as OSSR1 in the PSLP is

Neighbourhood Plan Policy	Relevant plans and policies	Comments on broad conformity with strategic planning policies
		not included in this policy as it has not been open to the public or in use as a golf club for many years. The buildings which supported its use as a golf club have all been converted to other uses.

## Chapter 6 – Compatibility with European Union regulations

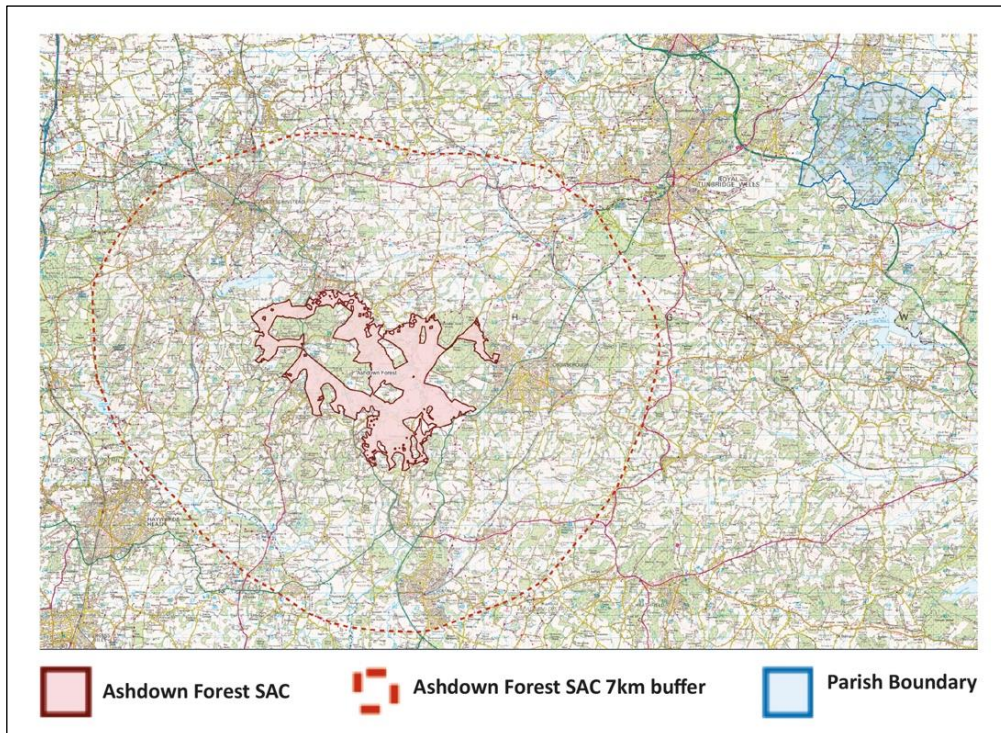
6.1 The Neighbourhood Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights. It complies with the UK Human Rights Act 1998.

6.2 European directives, incorporated into UK law, may apply to a draft neighbourhood plan. Where they do, a qualifying body must make sure that it also complies with any specific publicity and consultation requirements set out in the relevant legislation. The legislation that may be of particular relevance to neighbourhood planning is:

- the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)
- the Conservation of Habitats and Species Regulations 2017 (as amended)
- the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended))

6.3 A formal screening request regarding the need for a Strategic Environmental Assessment (SEA) of the draft Neighbourhood Plan was made to the local planning authority, TWBC. TWBC prepared a draft SEA Screening Report and this was the subject of consultation with Natural England, the Environment Agency and Historic England. All three consultees concurred with the conclusion of the draft screening report that a full SEA was not required. A copy of the final screening report issued in January 2021 is at Appendix C.

6.4 The Neighbourhood Plan is not proposing to allocate any land for new development (leaving development allocations to the new Local Plan), and it expects only a small amount of other new development. In addition, the plan area is not in close proximity to any European designated nature sites. The nearest such sites are parts of the Ashdown Forest Special Area for Conservation (SACs) (Figure 6), Special Protection Area (SPAs) and Natura 2000 sites, which are more than 14 km to the south-west of Brenchley and Matfield parish (see Figure 6). Normally, compensation and mitigation measures to safeguard the protected habitats and fauna in Ashdown Forest (particularly ground nesting birds on lowland heath) are required within a 7km buffer zone.



*Figure 6: The Proximity of the Parish to Ashdown Forest SAC*

6.5 TWBC has carried out a Habitat Regulations Screening Assessment and, following consultation with Natural England, has concluded that an Appropriate Assessment under the Habitat Regulations is not required.

Use the following links to the reports:

[TWBC SEA Screening Report](#)

[TWBC HRA Screening Report](#)

6.6 The Equality Act 2010 places a duty on all public authorities in the exercise of their functions to have regard to the need to eliminate discrimination, to advance equality of opportunity and to foster good relations between persons who have a “protected characteristic” and those who do not. “Protected characteristics” are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

6.7 The Branchley and Matfield Neighbourhood Development Plan provides a strategy for the development of the parish and a range of policies and proposals which will be neutral or will result in positive benefits for people with protected characteristics: older people, young people and young children, disabled people and those with limited mobility, pregnant women and the parents of young children. Whilst not explicitly addressing the needs of racial or religious groups, transgender, homosexual groups or women, the Branchley and Matfield Neighbourhood Plan aims to provide an improved range of housing, and improvements to employment, social, community and leisure facilities, which will benefit these groups equally. It also seeks to provide a safe environment, where people with protected characteristics can feel secure.

## Appendix A

### Brenchley and Matfield Parish Plan Survey 2017: Principal Findings

#### Overall Response

- The Survey was answered by around a quarter of those aged over 24 in the Parish but by only 2% (13 people) in the age group 14-24.
- The number of responses is sufficient to make results statistically significant overall, but care is needed in drawing conclusions from sub-sets of the responses, eg by age or location.

#### Recreation, Social and Culture

- There was widespread satisfaction with existing community buildings.
- Brenchley Memorial Hall was most often mentioned as needing updating, though still attracting majority satisfaction.
- The Brenchley playground was also suggested to require Improvement by 17% of respondents while 58% *Agreed* or *Strongly Agreed* with a new playground in Matfield.
- The need for better communication of information in the Parish was seen as an important, particularly on social events and volunteering issues.

#### Health, Care and Wellbeing

- The doctors' surgery, dispensary and dental surgery are all seen as *Good* or *Very Good* by over three-quarters of those who use them.
- Brenchley and Matfield Ready Calls are highly rated by the 39% familiar with the services.
- Awareness of Caring Services, Home Care, Chiropody and Alternative Health Care was too low (under 20%) to rely on the views expressed.
- Physical fitness facilities were rated *Good* or *Very Good* by half of those with a view. 28 respondents made suggestions, including a gym, a swimming pool, more fitness classes and better conditions for runners.

#### Business and Local Economy

- Post offices, pubs and restaurants and the butchers are used at least occasionally by most residents but cafés are much less used and the hairdresser by only 13% of the respondents.
- High speed internet is seen as much more important than any other factor in encouraging businesses, followed by public transport, better parking and a choice of premises.
- Comments suggested that better information on local businesses would be helpful.
- 64% of respondents are dissatisfied with their mobile reception, while 35% were dissatisfied with their broadband. Only 3% said this question did not apply to them.
- Areas of poor mobile signal and slow broadband speed are found throughout the parish, even in the village centres.

### **Transport, Highways and Byways**

- More than 80% of the respondents want a 30mph limit at the Pixot Hill junction, a 20mph zone past the School and restrictions on HGVs.
- 30mph limits in Castle Hill and for more of Maidstone Road in Matfield had significant majority support, as did 20mph through the centre of Brenchley and speed indicators.
- Speed cameras were supported by a majority of those with an opinion, while table tops and chicanes were rejected.
- The most popular measures for pedestrian safety were a crossing outside the School and a continuous pavement between Brenchley and Matfield.
- Improved maintenance and control of vegetation were seen as the most important measures for footpaths and bridleways, followed by upgrading and replacing stiles to improve access.
- Although there was a lot of concern about parking, the only proposal with strong support was improving parking at the back of Matfield Green.
- Two thirds of respondents said bus services were adequate; it cannot be said to what extent this is because services are seen as good or because most people do not use them.
- Only 19% of respondents *Agreed* or *Strongly Agreed* with a community bus service.

### **Environment and Sustainability**

- Respondents were very much in favour of maintaining the rural village character of the parish with open public spaces.
- Around half of respondents support a community energy project, with a preference for solar energy. 20% of respondents expressed a willingness to invest.
- There was strong support for advice on energy conservation in the home for all residents.
- Action on addressing litter problem was strongly endorsed.
- There was substantial demand for doorstep glass collection and a weekly amenity vehicle. 4

### **Planning and Development**

- A significant majority opposed allowing ribbon development that joined Brenchley and Matfield.
- There was a strong preference for building small rather than large houses, with majority support also, of those with an opinion, for low-cost housing and warden-assisted housing but a clear majority against low-rise flats.
- Most respondents are prepared to see some new development, with only 7% saying they wanted no new houses. But they want it on a modest scale.
- There was a clear preference for small-scale developments and very little support for larger developments or estates.

### **Formal Education**

- Those with a view on playgroups thought them *Good* or *Satisfactory* but the majority had no view.
- There is very strong support (85%) for having a primary school in the parish.
- While more respondents supported rebuilding the school than opposed it (42% to 30% with a further 15% who might support but only on certain conditions), there were strongly divergent views. Resistance to the associated housing was the biggest reason for objecting, with some scepticism about need; supporters emphasised getting an up-to-date school and resolving parking issues.
- Respondents with an opinion want to see stronger community links, especially more community use out of school hours and childcare. 80% thought that prioritisation of children from the Parish would improve links with the community.
- Adult classes in the use of smart phones, computers and tablets were supported.
- More research was thought to be needed on activities for young people; more clubs for youth activities were also frequently suggested.

### **Respondents' Priorities**

- The most frequently raised priority was ensuring that any development protects the character of the villages and the local environment. There was also concern to meet the needs of young families, first-time buyers and those wanting to downsize.
- The second most frequent priority was addressing traffic problems, most of all speeding but also parking and better pedestrian routes.
- There were broadly similar numbers of comments for and against rebuilding the School.
- Business issues were the fourth most frequently raised priority, notably mobile and broadband services.

### **Other Issues Raised**

- The most frequent issue mentioned was again planning and development.
- Several comments referred to the need to promote stronger community spirit.

The majority of comments on the survey itself were positive but often with concern at its length.



## Appendix B

### Approval letter for the Brenchley and Matfield Neighbourhood Plan Area Designation



**TUNBRIDGE WELLS BOROUGH COUNCIL**

**NOTICE OF DECISION OF THE PORTFOLIO HOLDER  
FOR PLANNING AND TRANSPORTATION**

Pursuant to the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012, Regulation 13(1)

**Decision Taken:** Thursday 30 November 2017

**Brenchley and Matfield Neighbourhood Plan  
Area Designation**

**DETAILS OF DECISION MADE**

Decision:	<b>RESOLVED</b> – That the designation of a neighbourhood plan area for the purposes of producing a Neighbourhood Development Plan for Brenchley and Matfield, as set out in the report, be approved.
Reason for decision:	The proposed Neighbourhood Area exactly follows the boundary of the Parish of Brenchley. This is the most appropriate definition for an area and accords with best practice. Consultation responses supported the designation of the Neighbourhood Area and approval will enable Brenchley Parish Council to commence the process of producing a Neighbourhood Plan.
Possible alternatives considered and rejected:	1. Not to approve the Neighbourhood Area as submitted and seek an amendment. 2. Not to approve a Neighbourhood Area.
Conflicts of interest and any dispensations granted:	No conflicts of interest were declared by any Member who was consulted in respect of this decision.

**APPROVAL**

I have read and approve the above decision for the reasons (including possible alternative actions rejected) set out above and in the report:



Signed: **Councillor Alan McDermott**      Dated: **Thursday 30 November 2017**

*Figure 7: TWBC decision notice for the Neighbourhood Plan Area Designation*