

**Q1 How do you think the Council should engage in preparation of the Local Plan?
Are there any other methods of communication or engagement that you think we
should be using that we haven't already included in the table below?**

Engage proactively with young people, through specific engagement with local schools,
youth clubs etc.

**Q2 Do you have any suggestions on how the Council can ensure that the
consultation is inclusive of different groups/individuals in our borough
communities?**

Engagement with young people around transport is particularly important. See answers
to Q1 and Q14.

Q3 Do you agree with the SWOT analysis for Housing Yes/No

No

Q4 If No, what other issues should be included and why?

Strengths

BMPC questions whether there is in fact a strong housing market as, even in our
relatively wealthy parish, houses permitted in new market housing developments are
taking a long time to sell at present, for example the housing development permitted
under 22/02640/FULL at Tong Farm. Demand does not appear to be high at present,
except for social housing and possibly for smaller units.

BMPC suggests that much of the housing “need” in the borough is an artificial concept
created by the Government’s algorithm and that the requirement to fulfil it is the only
reason for allocating sites for such a high number of dwellings. The new housing target
of 1,110 per annum (quietly raised, it seems, from the 1,083 previously quoted) is self-
evidently excessive when compared to TWBC’s own estimate for population growth
between now and 2043 of less than 12,000. The requirement being for 1,110 homes
compared with 700 additional population per annum, while making no allowance for
many of those households being of more than a single person. Small wonder the
developers are presently having trouble selling houses and housing sites, and are
accordingly slowing down building rates.

Weaknesses

The phrasing about under-occupation is unfortunate as it implies that older people should not be living in larger homes, whereas many of our residents may in fact wish and be able to afford to remain in their larger homes. Stamp duty, selling and moving costs are also major constraints on downsizing. We suggest rephrasing this as “There is a lack of smaller housing suitable for older people wishing to downsize from their family-sized homes” and the title changed to “Lack of downsizing opportunities”.

BMPC has recently commissioned a housing needs survey which should provide detailed and up to date information for the parish.

It is not clear whether there are sufficient skilled building craftspeople in the Borough to achieve building new housing at the rates prescribed, as well as maintaining the existing housing stock.

**Q5 Do you agree with the SWOT analysis for the Built and Historic Environment
Yes/No**

No

Q6 If no, what other issues should be included and why?

It is not clear why Built and historic environment and the effective use of land are bundled together in this section.

Threats

Development can damage the historic routeways of the HWNL through the additional traffic it creates. Additional traffic passing very close to historic buildings can also threaten them and their settings.

Weaknesses

Insufficient density in many of the major new developments that have been allocated and permitted has been an ineffective use of land, necessitating further development of greenfield land.

Q7 Do you agree with the SWOT analysis for the Natural Environment Yes/No

No

Q8 If No, what other issues should be included and why?

Threats

It is important also to consider the cumulative degradation that numerous small developments outside the Limits to Built development in the HWNL area, each of which on its own is not particularly damaging, can inflict on the landscape.

Weaknesses

The National Landscape and its setting should not be viewed as weaknesses or constraints. They are important assets for the Borough that need to be conserved. The percentage information should be moved into the Strengths section.

Weaknesses are the pressures on farm incomes and the pressures for new development (including the Government-imposed housing numbers and NPPF revisions) that could lead to unsustainable development being permitted in these areas.

Opportunities

The suggested opportunities for net gains for nature in or borough and parish may well not materialise, given the many exemptions now granted by the Government together with the new option for developers simply to pay into a fund which could be used in other parts of the country.

Q9 Do you agree with the SWOT analysis for Climate Change Yes/No

No

Q10 If No, what other issues should be included and why?

Threats

Existing households already suffer from water supply failures, hosepipe bans and flooding episodes.

Government restrictions and viability concerns can limit the powers of local authorities to require water saving, energy saving, energy generating and heat reduction measures in new development.

National Grid may be unable to supply sufficient electricity for heat pumps, EV chargers and new industries. BMPC notes that the energy statement for the development under planning permission 20/03306/REM in Matfield stated that “research has found that the local electrical grid would not have the capacity to support the level of electrical demand that heat pumps would require” and therefore TWBC allowed the 45 houses to be built with heating boilers that use LPG.

According to Water Resources South East, nearly two thirds of the forecast water resources shortfall is set to be delivered through demand management measures. This appears highly optimistic. “Eco” appliances may in fact fail to save water or electricity. How many people actually use the eco setting on their washing machines or dishwashers rather than the quicker cycles? Do “water saving” taps, showers or toilets actually save water or do people find they just have to run/flush them for longer/more frequently?

Existing households may resist being required to use less water. Wealthier households may prefer to pay extra for water rather than moderate their usage.

Existing residents will deeply resent new housing if it further reduces their already unreliable water supply or further increases flood risk. This could lead to serious unrest.

Opportunities

While small scale green energy generation should be encouraged, the proposal for larger scale green energy generation such as solar farms is unacceptable, especially in the HWNL. They would substantially damage the landscape and sterilise good quality agricultural land. Solar panels should not be on green fields, they should be mounted on rooftops and to provide shade over car parks. Provision of solar panels and batteries should be mandatory in new developments. There should be far greater emphasis on green energy, including wind turbines and battery storage, in employment sites.

Q11 Do you agree with the SWOT analysis for Economics and Viability Yes/No

No. The question is incorrect. It should refer to Employment, commercial and retail, which is the subject of this section.

Q12 If No, what other issues should be included and why?

Threats

Some businesses (such as data centres) are high energy and water users. They are not suitable for this area where energy and water resources are already insufficient.

Opportunities

Green energy: solar panels mounted on roofs and over car parks of warehouses, offices, factories, retail sites, entertainment venues and farm buildings, combined with battery storage and possibly wind turbines, could make a substantial contribution. Likewise grey water recycling and rainwater saving.

Q13 Do you agree with the SWOT analysis for Transport and Movement Yes/No

No

Q14 If No, what other issues should be included and why?

Threats

Network congestion also leads to rat running on rural lanes and through villages, severely impacting the quality of life and the environment in rural areas, including degrading the historic routeways of the HWNL.

Based on past performance on planned improvements to Colt's Hill, the Badsell roundabout and the Badsell Road/B2160/Mascalls Court Road junction, failure to implement highway improvements in time to mitigate the effects of development should be listed as a threat.

Weaknesses

Under Car dependency, particularly in rural areas, mention should also be made that narrow lanes and streets with narrow or no footways and high volumes of traffic limit opportunities for walking and cycling. Our roads are so busy and badly maintained that residents in villages have no desire to be knocked off a bike. Therefore cycling is not an option.

Narrow streets in villages can also mean that villages are denied formal pedestrian and cycle crossings, or even pedestrian islands, because the sites do not meet the national standards, and this lack of safe road crossings has a serious effect on quality of life in those villages.

Landowner resistance to, and Council reluctance to use their powers for improvement of, Public Rights of Way to accommodate cycling also limit opportunities to increase sustainable travel options in the rural area.

National Cycle Route 18 in our parish is entirely on roads, most of which are narrow lanes used as rat runs by vehicles avoiding congestion on the A21 or the B2016. Consequently it is rarely used and is not fit for purpose.

Car dependency in the rural area and villages will not reduce without a much improved bus service.

The lack of a decent rural bus service prevents non-driving residents of our parish from obtaining local employment with larger employers such as Tunbridge Wells Hospital. Young people use local buses a lot to get around locally, but also for longer journeys. They find it frustrating that Sunday services within Brenchley and Matfield parish are either non-existent or even less frequent than our already poor weekday service, when it's at the weekends that they need the buses the most.

The cost of buses can be prohibitive, particularly for a family.

Opportunities

Investment in infrastructure and connectivity: Development contributions could be used to unlock improvements to the Public Rights of Way network for walking and cycling, and to provide improved bus services including in the rural area.

The traffic implications of developments **must** be considered and **mitigated** for B, C and unclassified roads further afield than the development's immediate locality.

Q15 Do you agree with the SWOT analysis for Infrastructure and Communities

Yes/No

No

Q16 If No, what other issues should be included and why?

Threats

The ever-increasing demand for electricity should also be mentioned.

Weaknesses

Under infrastructure capacity pressures, existing water supply, sewage disposal, electricity supply and transport capacity pressures should be listed.

Infrastructure improvements lagging behind the developments they are intended to mitigate should also be listed.

Road safety is not considered as fully as it should be in planning for housing developments – rural roads often don't meet the criteria for traffic calming measures (width of pavements, lines of sight, lighting etc) as they have developed organically over time. It is not acceptable to expect rural communities to just put up with increased traffic and increasingly dangerous roads, without traffic calming measures in place. The criteria and balance of risk needs review for rural locations and if road safety cannot be improved, further housing development should not be permitted.

Q17: Please rank the list of priorities below in what you think is the priority order with 1 being the most important and 10 being the least important. Why do you think your top priorities are the most important?

BMPC does not consider that it should be required to rank these in order of importance, since many of them should be of equal and high priority. However, given that if we don't answer the question our opinion may not be counted, we have attempted to rank them in the order of their importance to our parish.

1. Infrastructure
2. Natural environment
3. Traffic
4. Historic environment
5. Housing
6. Climate
7. Economy
8. Car parking
9. Transport

10. Community and cultural

Housing - Build enough homes of different sizes and types and to meet the needs of our residents – including affordable housing and housing for older people.

5. The housing needs assessment we have recently commissioned will provide information on housing need within the parish. Our previous housing needs assessment suggested that our local housing need was very moderate, consisting mainly of affordable housing and housing suitable for older people. Since then there have been several developments in Matfield that have included affordable housing.

Historic Environment - Protect and enhance our historic assets and ensure all development is of a high design standard that contributes to local character.

4. Our historic environment is a defining feature of our parish and conserving it is very important to our residents.

Economy - Strengthen the borough's economy by promoting commercial development in the right locations and provide local jobs; and to regenerate and support town centres in providing a range of uses for all age groups.

7. Maintaining employment in our parish is important if our communities are not to become merely dormitories.

Natural Environment - Protect our landscape and natural environment, improving biodiversity and air quality and reducing the risk of flooding.

2. Our natural environment is critical to our survival and wellbeing and our High Weald Landscape is one of the main reasons people choose to live here. In this section about priorities, the words “and pollution” should be added after “flooding”.

Climate - Embed low-carbon design and renewable energy into all new development. Reduce carbon emissions by promoting sustainable forms of transport and exploring options for renewable energy provision.

6. The wording of this priority is too weak. Provision should be the aim, not promoting and exploring. Climate change adaptation should also be mentioned here.

Traffic - Reduce traffic congestion and constraints on the network through carefully planned investment into highways improvements which is supported by evidence (e.g. junction improvements).

3. Concern about volume and speed of traffic is the issue most often raised with the Parish Council by our residents.

Infrastructure - Ensure all development is supported by sufficient infrastructure (including healthcare and education facilities and water supplies) to meet local needs.

1. The infrastructure must be provided upfront, especially where existing infrastructure is deficient.

Transport - Upgrade public transport and improve active travel options such as walking and cycling.

9. Bus services in our parish are insufficiently frequent to provide a realistic alternative to the private car. The hamlets of Petteridge and Castle Hill have no bus service at all.

Car Parking - Recognise the importance of providing adequate car parking facilities for residents, businesses and visitors across the borough.

8. Car parking causes problems in several parts of our parish, as shown in Figure 31 of the Neighbourhood Development Plan

Community and Cultural - Provide enough community facilities including sports facilities, culture and leisure, parks and gardens and recreation open spaces.

10. Our parish is reasonably well served with community facilities and recreation open spaces, though more activities for teenagers would be welcome, unless better public transport to local towns can be provided.

Q18: Are there any other priorities not listed that should be included?

Where existing infrastructure is already deficient, it must be improved before further major new development is permitted.

The supporting text for several of these priorities should be redrafted to reflect our comments made in answer to previous questions.

On Climate, the words “promoting” and “exploring” are too weak. “Providing for” should be the wording used. Adaptation to the effects of climate change (increased heat, drought and flooding) should also be mentioned.

Q19 Do you think the Vision identifies the right issues to be taken forward within the Local Plan Review Vision?

Yes but see Q20

Q20 Are there any other topic areas that you think we should be including within the Local Plan Review Vision? Please tell us about them and give reasons why.

In the bullet point about countryside, “dark skies, tranquillity” should be added after “landscape”, as these are important features of much of our countryside.

After “in line with community needs” add “Planned growth will not precede necessary infrastructure improvements or cause deterioration in neighbouring settlements or the rural area”.

Q21 Are there any issues that you think should be removed from the Local Plan Review Vision?

No

Q22. Please let us know if there are there any other issues not already covered, which you think the new Local Plan Review should contain and why.

Please see our answers to previous questions.