



Strategic Environmental Assessment for the Benenden Neighbourhood Plan

Environmental Report to accompany the submission version of
the Neighbourhood Plan

Benenden Neighbourhood Plan Steering Group

June 2020

September 2020

Quality information

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Revision History

Revision	Revision date	Details	Authorized	Name	Position
V1.0	1 st June 2020	Submission version	1 st June 2020	Nick Chisholm-Batten	Associate Director

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Non-Technical Summary

What is Strategic Environmental Assessment?

A strategic environmental assessment (SEA) has been undertaken to inform the Benenden Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Benenden Neighbourhood Plan?

The Benenden Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the existing and emerging Tunbridge Wells Local Plan. It is anticipated that the Neighbourhood Plan will be submitted to Tunbridge Wells Borough Council for subsequent independent examination in summer 2020.

Purpose of this Environmental Report

This Environmental Report, which accompanies the Neighbourhood Plan for submission, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (April 2019), which includes information about the Neighbourhood Plan area's environment and community. The second document was the Environmental Report which accompanied the Neighbourhood Plan for 'Regulation 14' consultation in August 2019.

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the Benenden Neighbourhood Plan and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the Benenden Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the Benenden Neighbourhood Plan has been assessed;
- The appraisal of alternative approaches for the Benenden Neighbourhood Plan;
- The likely significant environmental effects of the Benenden Neighbourhood Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Benenden Neighbourhood Plan; and
- The next steps for the Benenden Neighbourhood Plan and accompanying SEA process.

Assessment of alternative approaches for the Benenden Neighbourhood Plan

Housing numbers

In 2015 a Housing Needs Survey was undertaken by Action for Communities in Rural Kent.¹ This identified a need for 13 homes for older people and for up to 21 general needs affordable homes. It also identified a need for 24 housing association rented properties (18 general needs, six for older people) and three shared ownership properties. A further Housing Needs Study undertaken by Tunbridge Wells Borough Council identified a need of 15 homes in Benenden.²

As part of the development of the new Tunbridge Wells Local Plan, Tunbridge Wells Borough Council has been seeking to set each parish in the borough a housing number for delivery in the period to 2033. Following discussions and workshops undertaken with the Neighbourhood Plan Steering Group, Tunbridge Wells Borough Council have specified that the Benenden Neighbourhood Plan should seek to deliver in the region of 100 homes in the parish to 2033, in addition to the 36 homes which have already gained planning permission.

Assessment of a greenfield vs a brownfield first approach to Neighbourhood Plan allocations

A key element which the Neighbourhood Plan Steering Group wished to explore was the extent to which a brownfield-first approach should be taken to allocations in the Neighbourhood Plan. On this basis, and to further support the intention of the Neighbourhood Plan to shape new development within the Neighbourhood Plan area, two potential options were considered, namely whether to 1) enable development to take place on previously undeveloped 'greenfield' sites in the Neighbourhood Plan area or 2) focus allocations on existing previously developed 'brownfield' sites in Benenden.

- Option 1: Facilitate the development of greenfield sites in the Neighbourhood Plan area; and
- Option 2: Focus development on previously developed sites in the Neighbourhood Plan area.

Table 4.1 in this Environmental Report presents the findings of the appraisal of Option 1 and Option 2 outlined above.

Assessment of potential sites for housing allocations

To further support the development of a strategy to deliver the 100 dwellings proposed in Benenden for the Neighbourhood Plan, the Benenden Neighbourhood Plan Steering Group has considered alternative locations for delivering housing in the parish.

To support this process, the Neighbourhood Plan Steering Group has considered potential sites for allocation through the Neighbourhood Plan for housing. This has considered the sites proposed by landowners through the Call for Sites process undertaken by Tunbridge Wells Borough Council since 2016.

As a result of the Call for Sites, 20 sites were initially proposed by landowners. Following this process, the sites underwent an initial sieve by the Neighbourhood Plan Steering Group against a number of criteria. This included relating to whether the site could be delivered. In addition those sites which delivered less than five homes were discounted, given that they would be covered by the borough-wide windfall policy in the Local Plan, and those that had gained planning permission did not undergo additional consideration. Following this process, eight sites underwent a further site assessment.

To support the consideration of the suitability of these eight sites for potential allocation in the Neighbourhood Plan, the SEA process has undertaken a separate appraisal of the key environmental constraints present at each of the sites and potential effects that may arise as a result of housing development at these locations.

The sites, the locations of which are presented in Figure 4.1 in the main body of the Environmental Report, are as below:

- Site reference 158, Greenacres/The Orchard Site
- Site reference 222, Green Meadow, Land west of Iden Green Road
- Site reference 277, Land adjacent to Feoffee Cottages

¹ Action for Communities in Rural Kent (2015) Benenden Housing Needs Survey

² arc4 (July 2018) Borough of Tunbridge Wells Housing Needs Study 2018

- Site reference 424, Hospital Site South
- Site reference 8, Next to Iden Green Recreation Ground
- Site reference LS16, Uphill, New Pond Road
- Site reference 21, Little Weavers, Iden Green
- Site reference 41, Hospital Site North East Quadrant

Tables 4.2 to 4.9 in the main body of the Environmental Report present the findings of the appraisals. A summary of the appraisal findings is presented below:

Table NTS 1: Summary of SEA site appraisal findings

Site	Biodiversity and Geodiversity	Climate change	Landscape	Historic Environment	Land, soil and water resources	Population and Community	Health and Wellbeing	Transport
158, Greenacres / The Orchard Site								
222, Green Meadow, Land west of Iden Green Road								
277, Land adjacent to Feoffee Cottages								
424, Hospital Site South								
8, Next to Iden Green Recreation Ground								
16, Uphill, New Pond Road								
21, Little Weavers, Iden Green								
41, Hospital Site North East Quadrant								
Key								
Likely adverse effect (without mitigation measures)					Likely positive effect			
Neutral/no effect					Uncertain effects			

Preferred development strategy for the Neighbourhood Plan

In light of consultation undertaken to date through the Neighbourhood Plan's development process, consideration of the findings of the various site assessments undertaken for the Neighbourhood Plan, and with regard to the SEA appraisal findings, the Neighbourhood Plan Steering Group took the decision to allocate four sites in the parish. These are as follows:

- Ref LS16, Uphill: 18-20 units

- Ref 277, Feoffee: 22-25 units
- Ref 424, Hospital South: 22-25 units
- Ref LS41, Hospital North: 23-25 units

The choice of these sites reflects an aim to prioritise the development of previously developed land while seeking to conserve and enhance the natural beauty of the AONB. This was combined with a desire amongst local people to maintain the rural nature of the parish while providing a range of types and tenures of housing, including affordable housing.

In this context three of the four site allocations are proposed on previously developed land, whilst the fourth allocation (Feoffee), will deliver almshouses and affordable homes on a greenfield site.

Assessment of the current version of the Benenden Neighbourhood Plan

The submission version of the Benenden Neighbourhood Plan presents 42 planning policies for guiding development in the Neighbourhood Plan area.

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the Neighbourhood Plan. The Environmental Report has presented the findings of the assessment under the following SEA Themes:

- Biodiversity;
- Climate Change;
- Landscape;
- Historic Environment;
- Land, Soil and Water Resources;
- Population and Community;
- Health and Wellbeing; and
- Transportation.

The assessment has concluded that the current version of the Benenden Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community', 'Health and Wellbeing' and 'Transportation' SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on enhancing community vitality, providing housing of a range of type and tenures to meet local needs, promoting accessibility by sustainable modes of transport and protecting and enhancing the quality of the public realm and neighbourhood distinctiveness.

In terms of 'Land, Soil and Water Resources', three of the four Neighbourhood Plan allocations will take place on previously developed land. Whilst there will be some loss of greenfield land through allocations, including at the Feoffee site, the overall focus of the Neighbourhood Plan's development strategy is on the redevelopment of brownfield land. This will bring overall positive effects in relation to this theme through promoting the efficient use of land.

A central focus of the Neighbourhood Plan is on conserving and enhancing landscape and villagescape character in the parish, with a view to protecting the integrity of the High Weald AONB. This will also support the conservation of the fabric and setting of the historic environment. In this regard the Neighbourhood Plan will bring positive effects in relation to the 'Landscape' and 'Historic Environment' themes. The Benenden Neighbourhood Plan will also initiate a number of beneficial approaches regarding the 'Biodiversity' theme through protecting and enhancing habitats and supporting parish-wide ecological networks. Finally, in terms of the 'Climate Change' SEA theme, the Neighbourhood Plan sets out a range of provisions for limiting emissions from built development and transport, supporting climate change mitigation, and introducing provisions which will support climate change adaptation.

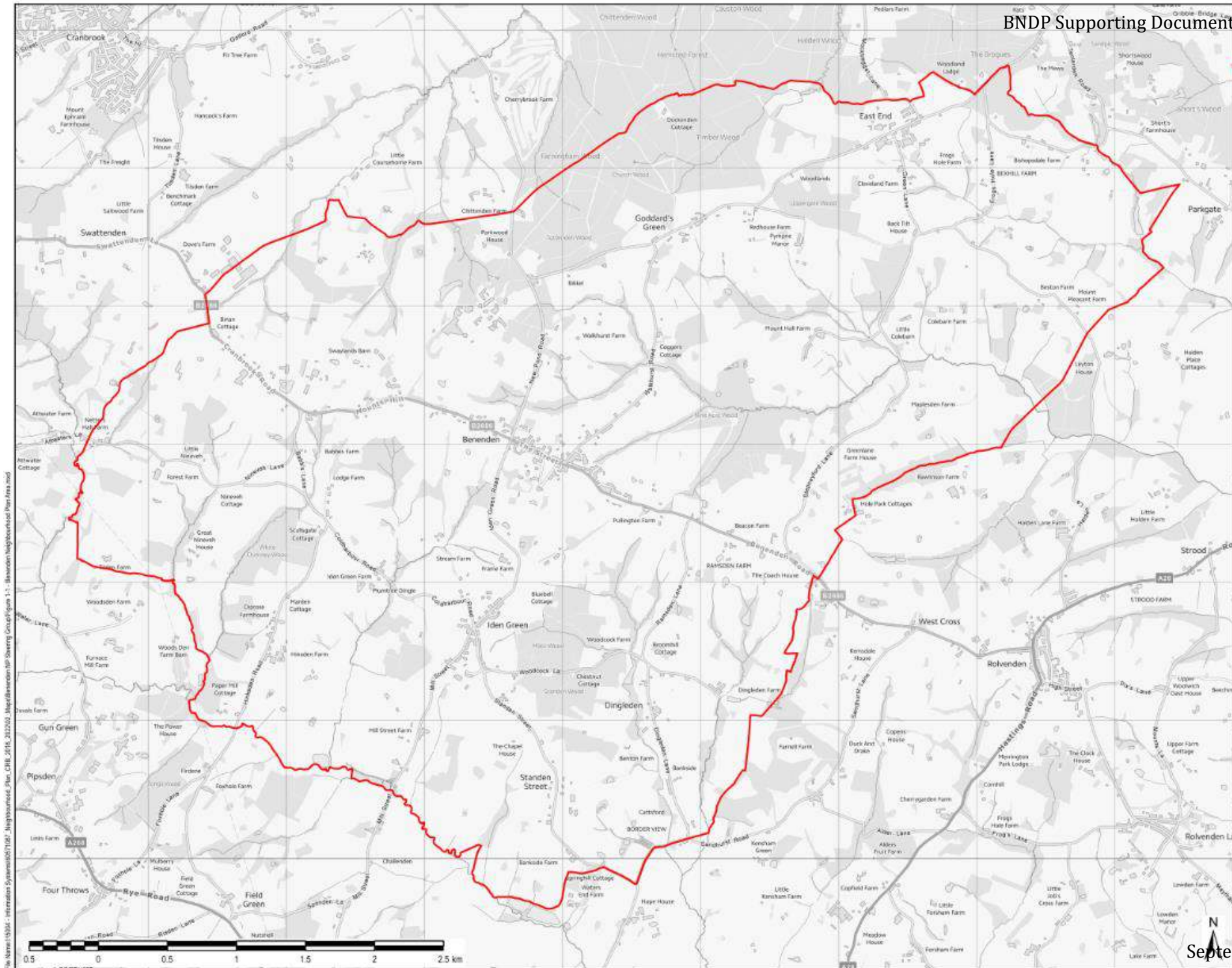
Next Steps

This Environmental Report accompanies the Benenden Neighbourhood Plan for submission to the Local Planning Authority, Tunbridge Wells Borough Council, for subsequent independent examination.

At independent examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Tunbridge Wells Local Plan.

If independent examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by Tunbridge Wells Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Benenden Neighbourhood Plan will become part of the development plan for Benenden Parish.

LEGEND			
 Benenden Neighbourhood Plan Area			



September 2020

File Name: I:\0304 - Information Systems\03041007_Maps\Benenden_Plan_Area_2019_2020.dwg; Map Information: Steering Group Figure 1 - Benenden Neighbourhood Plan Area 2019

1. Introduction

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Benenden's emerging Neighbourhood Plan.
- 1.2 The Benenden Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Benenden Neighbourhood Plan is being prepared to be in conformity with the Tunbridge Wells Local Plan.
- 1.3 It is currently anticipated that the Benenden Neighbourhood Plan will be submitted to Tunbridge Wells Borough Council later in summer 2020, and undergo a referendum in May 2021.
- 1.4 Key information relating to the Benenden Neighbourhood Plan is presented in Table 1.1.

Table 1.1: Key facts relating to the Benenden Neighbourhood Plan

Name of Qualifying Body	Benenden Parish Council
Title of Plan	Benenden Neighbourhood Plan
Subject	Neighbourhood Planning
Purpose	<p>The Benenden Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with Tunbridge Wells Borough Council's Local Plan.</p> <p>The Benenden Neighbourhood Plan will be used to guide and shape development within the Benenden Neighbourhood Plan area.</p>
Timescale	To 2033
Area covered by the plan	The Benenden Neighbourhood Plan area applies to the area that is under the jurisdiction of Benenden Parish Council (Figure 1.1)
Summary of content	The Benenden Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Paul Tolhurst, Chairman, Benenden Neighbourhood Plan Steering Group Email: benenden.n.p@btinternet.com

SEA explained

- 1.5 Strategic Environmental Assessment (SEA) is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SEA for the Benenden Neighbourhood Plan seeks to maximise the developing plan's contribution to sustainable development.
- 1.6 SEA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive³. It also widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues.
- 1.7 The Benenden Neighbourhood Plan has been screened in by Tunbridge Wells Borough Council as requiring an SEA. To meet this requirement, the Neighbourhood Plan is undergoing an SEA process which incorporates the requirements of the SEA Directive.
- 1.8 The SEA will be undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.9 Two key procedural requirements of the SEA Regulations are that:
 1. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 2. A report (the 'Environmental Report') is published for consultation alongside the Draft Plan (i.e. the draft Benenden Neighbourhood Plan) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

Structure of this SEA Environmental Report

- 1.10 This document is the SEA Environmental Report for the Benenden Neighbourhood Plan and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations.
- 1.11 Each of the four questions is answered in turn within this report, as follows:

³ Directive 2001/42/EC

Table 1.2: Questions that must be answered by the SEA Environmental Report in order to meet the regulatory⁴ requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁵
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
What is the sustainability 'context'?	<ul style="list-style-type: none"> The relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What is the sustainability 'baseline'?	
What are the key issues & objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the submission version of the plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan
What happens next?	<ul style="list-style-type: none"> The next steps for plan making/SEA process.

1.12 An earlier version of this Environmental Report accompanied the Benenden Neighbourhood Plan for Regulation 14 consultation in August 2019.

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

⁵ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the Benenden Neighbourhood Plan

Local Plan context for the Neighbourhood Plan

- 2.1 The Benenden Neighbourhood Plan is being prepared in the context of the Tunbridge Wells Local Plan. Neighbourhood plans will form part of the development plan for the Borough, alongside but not as a replacement for the Local Plan. The Local Plan seeks to give communities a solid framework within which appropriate community-led planning policy documents, including neighbourhood plans, can be brought forward. Neighbourhood plans are required to be in general conformity with the strategic policies of the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Tunbridge Wells Borough, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.2 The current Local Plan consists of the saved policies from the Tunbridge Wells Borough Local Plan (adopted 2006)⁶, the Core Strategy (adopted 2010)⁷ and the Site Allocations Local Plan (adopted 2016)⁸.
- 2.3 Tunbridge Wells Borough Council is currently working on preparing a new Local Plan that will guide future development in the Borough up to 2033. Once adopted, the new Local Plan will replace the existing Local Plan documents referred to above. The Tunbridge Wells Draft Local Plan will be published for consultation from 20th September to 1st November 2019.
- 2.4 Benenden is currently identified as one of 17 villages within the Core Strategy settlement hierarchy. Core Policy 14: Development in the Villages and Rural Areas of the Core Strategy identifies that approximately 360 net additional dwellings will be delivered in villages and rural areas. However, this number is likely to change as a result of the emerging new Local Plan.
- 2.5 In light of these potential changes, Tunbridge Wells Borough Council have determined that the Benenden Neighbourhood Plan should seek to deliver in the region of 100 homes, in addition to the 36 homes already granted planning permission in the plan period.

⁶ Tunbridge Wells Borough Council (2006): 'Tunbridge Wells Borough Local Plan' [online] available at: <
<http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/local-plan/local-plan-chapters>> [accessed 02/04/19]

⁷ Tunbridge Wells Borough Council (2010): 'Core Strategy Development Plan Document' [online] available at: <
http://www.tunbridgewells.gov.uk/data/assets/pdf_file/0009/138636/Core-Strategy-adopted-June-2010.compressed.pdf>
[accessed 02/04/19]

⁸ Tunbridge Wells Borough Council (2016): 'Site Allocations Local Plan' [online] available at: <
<http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/development-plan-documents/site-allocations>> [accessed 02/04/19]

Vision, aims and objectives for the Benenden Neighbourhood Plan

- 2.6 The vision for the Benenden Neighbourhood Plan, which was developed during earlier stages of plan development, is as follows:

“

“The Parish of Benenden in 2035 will be a thriving, peaceful and rural place to live, work and rest. Its village feel and historic beauty will have been preserved through sympathetic and managed growth. We will have retained our existing major employers. Farming and other small businesses will be encouraged. We will offer everyone the chance to be part of an inclusive and vibrant community.

We will support:

Locally led development with a mix of well-designed, high quality, sustainable and affordable housing alongside other homes that enhance the existing built and natural environment.

Infrastructure enhancements; managing traffic growth, improving connectivity, and enhancing community facilities for health & recreation.

A balanced community; with small businesses and home working providing employment; pubs, clubs and shops providing an active social scene, and quality of life retained through existing green spaces, footpaths and dark skies.”

Vision Statement for the Benenden Neighbourhood Plan

”

- 2.7 The objectives of the Benenden Neighbourhood Plan, which were developed during earlier stages of plan development, are as follows:

1. To protect valued environmental assets and support our peaceful, rural, way of life. Recognising that the parish of Benenden is one of the most unspoilt parts of the High Weald AONB, our policies will enable villagers and visitors to continue to enjoy important local green spaces, footpaths, views and dark skies.
2. To support development, wherever possible locally-led, to meet local needs with a mix of well-designed, high quality, sustainable and affordable housing that enhances the existing built and natural environment.
3. New dwellings should be of good quality construction, using local materials and designed to be sympathetic to the character of existing landscape and buildings, with scale, form and density to be of similar proportions to the existing; the principal aim is to protect and enhance the beauty of the parish.
4. To support existing businesses and enterprises within the parish and to encourage new areas of economic activity to nurture the parish's economic stability in the future, the aim being to sustain a thriving and integrated group of settlements.
5. To prioritise infrastructure improvements, mitigate the impact of traffic growth, enhance connectivity within the Parish while embracing a low-carbon future with green technologies underpinning a strong rural economy and thriving communities.

3. What is the scope of the SEA?

SEA Scoping Report

- 3.1 The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁹ These authorities were consulted on the scope of the Benenden Neighbourhood Plan SEA in April 2019.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
 - Baseline data against which the Neighbourhood Plan can be assessed;
 - The key sustainability issues for the Neighbourhood Plan; and
 - An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Historic England No comments received.	
Natural England Ana-Maria Iscru: Support Advisor- Consultations Team– comments received via email on Thursday 23rd May 2019	
Natural England has no specific comments to make on this neighbourhood plan SEA scoping. However, we refer you to the advice in the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.	Comment noted, and guidance considered.
Environment Agency Karolina: Planning Advisor, Kent, South London and East Sussex Area - comments received via email on Thursday 9 th May 2019	
We recommend an objective is included to protect and enhance the environment. Indicators should relate to the environmental constraints in your local area. This may include flood risk, water quality, biodiversity.	A range of environmental themes have been considered through the SEA process, and the SEA Framework has been designed to reflect the key environmental issues in the area, as identified through the policy and plan review and the development of the baseline for the SEA process.
We also recommend your SA takes account of relevant policies, plans and strategies including your local 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).	No significant flood risk issues were identified in the Neighbourhood Plan area.
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: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf	Comment noted.

⁹ In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme’.

- 3.4 Baseline information (including the context review and baseline data) is presented in **Appendix A**. The key sustainability issues and SEA Framework are presented below.

Key Sustainability Issues

Air Quality

- Traffic and congestion arising from planned new development within and surrounding the area have the potential to increase emissions.
- However there are no exceedances or anticipated exceedances of national air quality objectives.
- Due to the absence of air quality issues within the Neighbourhood Plan area, the air quality theme has been scoped out for the purposes of the SEA process.

Biodiversity and Geodiversity

- Parsonage Wood Site of Special Scientific Interest (SSSI) is located within the Neighbourhood Plan area.
- Some of the built up areas within the Neighbourhood Plan area are located within a SSSI Impact Risk Zone for residential development of 50 units or more and rural-residential development of 10 or more houses outside existing settlements/ urban areas.
- There are numerous Biodiversity Action Plan priority habitats present in the Neighbourhood Plan area.

Climate Change

- Any increases in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in the Parish. However, this is unlikely to be significant either as a result of the Neighbourhood Plan alone or in combination with other plans and programmes.
- The total CO₂ emissions per capita within Tunbridge Wells are less than the regional and national totals and the overall percentage reduction of emissions within the Neighbourhood Plan area between 2005 and 2016 was slightly greater than regional and national totals.
- The majority of the Neighbourhood Plan area is located within Flood Zone 1, showing that there is a <0.1% chance (1 in 1,000) of river flooding in any given year.
- The Benenden Neighbourhood Plan should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies.
- Due to the absence of flood risk issues within and surrounding the Neighbourhood Plan area and given that that the Neighbourhood Plan is unlikely to have a significant impact in terms of contributing to climate change (either alone or cumulatively) the climate change theme has been scoped out for the purposes of the SEA process.

Landscape

- The Neighbourhood Plan area lies within High Weald Area of Outstanding Natural Beauty (AONB) which is recognised as a national asset.
- The Neighbourhood Plan area lies within the High Weald NCA which is identified as an area of ancient countryside and one of the best surviving medieval landscapes in northern Europe.
- The landscape character area for Benenden Woodland Farmland is described as a peaceful rural landscape of rolling hills with scattered farmsteads and rural dwellings.
- The potential effects of development proposed through the Benenden Neighbourhood Plan may have implications for the overall character and appearance of Benenden in the future.

Historic Environment

- There are a variety of heritage assets within or adjacent to the Neighbourhood Plan area, including eight Grade II* and 144 Grade II listed buildings, as well as Benenden Registered Park and Garden.
- The Neighbourhood Plan area contains one scheduled monument which is designated as the '*Paved ford crossing the line of the Roman road at Iden Green*' located to the south west of Benenden village.

- The Benenden and Iden Green Conservation Area Appraisal highlights the historic importance of both parts of the conservation area.
- Following a high-level review of the HER for Kent, there are 105 records within Benenden Parish including a variety of archaeological sites, historic buildings and landscapes dating from the palaeolithic period to the present day.
- Development has the potential to affect the significance of heritage assets and their settings, both positively and negatively.

Land, Soil and Water Resources

- There is a lack of evidence to ascertain agricultural land quality within the Neighbourhood Plan area. National provisional quality datasets indicate that the majority of land within the Neighbourhood Plan area is Grade 3 and as part of a precautionary approach it is noted that there is the potential for loss of high quality (Grade 3a 'best and most versatile') agricultural land.
- The Neighbourhood Plan area lies within a Nitrate Vulnerable Zone.
- The Neighbourhood Plan is unlikely to have a significant impact, either alone or cumulatively, in terms of waste. As a result, this issue has been scoped out for the purposes of the SEA process.

Population and Community

- The population of Benenden increased at a lower rate between 2001 and 2011 than Kent, the South East of England and England averages.
- Generally, there is a similar proportion of residents within the 60+ age category within the Neighbourhood Plan area (22.3%) in comparison to the totals for Kent (24.5%), the South East of England (23.3%) and England (22.3%).
- The proportion of residents with the 60+ age category is likely to continue to increase.
- There are low levels of deprivation within the Neighbourhood Plan area.

Health and Wellbeing

- 88.5% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', greater than the totals for Kent (81.5%), the South East of England (83.7%) and England (81.4%).
- A smaller proportion of residents within the Neighbourhood Plan area report that their activities are limited in some way compared to regional and national averages.

Transport

- The nearest railway stations to the Neighbourhood Plan area are in Etchingham and Staplehurst, approximately 8.6km and 9.6km away from the Neighbourhood Plan area boundary.
- Bus services from Benenden village provide residents with access to surrounding villages and towns.
- The Neighbourhood Plan area is relatively well linked to the strategic road network, with access to the A229.

SEA Framework

- 3.5 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the emerging Benenden Neighbourhood Plan will be assessed consistently using the framework.

SEA Objective	Assessment questions
Biodiversity and Geodiversity	
Protect and enhance all biodiversity and geological features.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the status of the nationally designated sites of significance within and/or adjacent to the Neighbourhood Plan area boundary, including Parsonage Wood SSSI? • Protect and enhance semi-natural habitats? • Protect and enhance locally designated sites? • Achieve a net gain in biodiversity? • Support enhancements to ecological networks, including through improvements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate change	
Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the number of journeys made? • Reduce the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that inappropriate development does not take place in areas at higher risk of flooding, taking into account the likely future effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
Landscape	
Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the quality and integrity of the High Weald AONB and its setting? • Support landscape character of the landscape character areas covering the Neighbourhood Plan area? • Conserve and enhance landscape and villagescape features?
Historic Environment	
Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve, enhance and support the integrity of buildings and structures of architectural or historic interest? • Conserve and enhance the archaeology and scheduled monument within Benenden? • Conserve and enhance local diversity and character? • Support access to, interpretation and understanding of the historic environment?

SEA Objective	Assessment questions
Land, Soil and Water Resources	
Ensure the efficient and effective use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Promote the use of previously developed land? Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 1 to 3a agricultural land? Protect the integrity of mineral safeguarding areas?
Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Support improvements to water quality? Minimise water consumption? Protect surface water resources?
Population and Community	
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Promote the development of a range of high quality, accessible community facilities? Encourage and promote social cohesion and encourage active involvement of local people in community activities? Minimise fuel poverty? Maintain or enhance the quality of life of existing local residents?
Reduce deprivation and promote a more inclusive and self-contained community.	<ul style="list-style-type: none"> Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? Support the provision of land for allotments and cemeteries?
Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Support the provision of a range of house types and sizes? Support enhancements to the current housing stock? Meet the needs of all sectors of the community? Provide quality and flexible homes that meet people's needs? Promote the use of sustainable building techniques, including use of sustainable building materials in construction? Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
Health and Wellbeing	
Improve the health and wellbeing residents within the Neighbourhood Plan area.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Promote accessibility to a range of leisure, health and community facilities, for all age groups? Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? Promote the use of healthier modes of travel? Improve access to the countryside for recreational use?
Transport	
Promote sustainable transport use and reduce the need to travel.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> Encourage modal shift to more sustainable forms of travel? Facilitate working from home and remote working? Improve road safety? Reduce the impact on residents from the road network?

4. What has plan making / SEA involved up to this point?

Introduction

- 4.1 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report.
- 4.2 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the Benenden Neighbourhood Plan. The SEA Regulations¹⁰ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.
- 4.3 In accordance with the SEA Regulations the Environmental Report must include...
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.4 The following sections therefore describe how the SEA process to date has informed the development of the Neighbourhood Plan through the consideration of reasonable alternatives.

Overview of plan making / SEA work undertaken since 2017

- 4.5 The Neighbourhood Plan area was designated in 2017. Throughout plan development, the Neighbourhood Plan Steering Group has sought to encourage discussion and debate within the community about the key issues and opportunities for the Neighbourhood Plan area. The key methods which the Neighbourhood Plan Steering Group have used to engage with the community included as follows:
- Public exhibitions, meetings and events;
 - Presentations and workshops;
 - Consultation 'windows' during which comments have been invited on draft documents.
- 4.6 The outcomes of these consultation events have informed and influenced the Neighbourhood Plan development process to date.

Assessment of reasonable alternatives for the Neighbourhood Plan

- 4.7 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the Benenden Neighbourhood Plan. The SEA Regulations¹¹ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.
- 4.8 The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for housing. Specifically, this chapter explains how the Benenden's Neighbourhood Plan's development strategy has been shaped through considering alternative approaches for the location of non-strategic scale housing development in the Neighbourhood Plan area.

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

¹¹ Environmental Assessment of Plans and Programmes Regulations 2004

Housing numbers to deliver through the Neighbourhood Plan

- 4.9 In 2015 a Housing Needs Survey was undertaken by Action for Communities in Rural Kent.¹² This identified a need for 13 homes for older people and for up to 21 general needs affordable homes. It also identified a need for 24 housing association rented properties (18 general needs, six for older people) and three shared ownership properties. A further Housing Needs Study undertaken by Tunbridge Wells Borough Council identified a need of 15 homes in Benenden.¹³
- 4.10 As part of the development of the new Tunbridge Wells Local Plan, Tunbridge Wells Borough Council has been seeking to set each parish in the borough a housing number for delivery in the period to 2033. Following discussions and workshops undertaken with the Neighbourhood Plan Steering Group, Tunbridge Wells Borough Council have specified that the Benenden Neighbourhood Plan should seek to deliver in the region of 100 homes in the parish to 2033, in addition to the 36 homes which have already gained planning permission.

Assessment of a greenfield vs brownfield first approach

- 4.11 In light of the need to deliver 100 homes in the parish in the plan period, a key element which the Neighbourhood Plan Steering Group wished to explore was the extent to which a brownfield-first approach should be taken to potential allocations for development in the Neighbourhood Plan. On this basis, and to further support the intention of the Neighbourhood Plan to shape new development within the Neighbourhood Plan area, two potential options were considered, namely whether 1) enable development to take place on previously undeveloped 'greenfield' sites in the Neighbourhood Plan area or 2) focus allocations on existing previously developed 'brownfield' sites in Benenden.
- 4.12 To support decision making on this element of the Neighbourhood Plan, two options were therefore considered as reasonable alternatives through the SEA process, as follows:
- Option 1: Facilitate the allocation of greenfield sites in the Neighbourhood Plan area; and
 - Option 2: Focus allocations on previously developed sites in the Neighbourhood Plan area.
- 4.13 Table 4.1 presents the findings of the appraisal of Option 1 and Option 2 outlined above. To support the assessment findings, the options have been ranked in terms of their sustainability performance against the relevant theme. It is anticipated that this will provide the reader with a likely indication of the comparative sustainability performance of the two options in relation to each theme considered.

Table 4.1: Appraisal findings: options for broad locations of development

Option 1: Facilitate the allocation of greenfield sites
Option 2: Focus allocations on previously developed sites

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Biodiversity and Geodiversity	<p>Potential effects on biodiversity have the potential to take place on both previously developed and greenfield land. Whilst greenfield development has the potential to lead to the loss of key landscape features of biodiversity value and impact on ecological corridors, previously developed land can support a rich biological diversity. In this context previously developed land can provide habitat for UKBAP Priority Species and contribute to wider ecological networks, as well as the provision of ecosystem services such as pollination.</p> <p>All allocations have the potential to have impacts on biodiversity assets if located inappropriately and have poor design and layout. Likewise all allocations have the potential to promote net gains in biodiversity value. In this context, for all sites, potential effects on biodiversity depend on elements such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features.</p>	=	=

¹² Action for Communities in Rural Kent (2015) Benenden Housing Needs Survey

¹³ arc⁴ (July 2018) Borough of Tunbridge Wells Housing Needs Study 2018

Option 1: Facilitate the allocation of greenfield sites

Option 2: Focus allocations on previously developed sites

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Climate change	<p>In terms of greenhouse gas emissions, road transport is a significant contributor to emissions in the area. The extent to which the two options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element.</p> <p>In this context, Option 2, through promoting the development of previously developed land has increased potential to promote development in locations which are more integrated with Benenden village. This has the potential to allow at some locations easier access to services and facilities by non-car modes, as well as key bus routes. This has the potential to support a limitation of greenhouse gas emissions from transport. However, it should be noted that there are significant brownfield sites available in less accessible locations in the parish, including at Benenden Hospital.</p> <p>In terms of climate change adaptation, the redevelopment of previously developed land provides opportunities for enhancing the resilience of brownfield sites and surrounding area to the effects of climate change. This includes through green infrastructure enhancements and design and layout which helps regulate the effects of extreme weather events in the village, including through regulating surface water run-off. In this context, whilst the direct provision of green infrastructure improvements to accompany new development areas should be achievable through both options, including through mechanisms such as the community infrastructure levy, the redevelopment of brownfield land increases scope for direct improvements to climate change resilience.</p>	2	1
Landscape	<p>Option 1, through facilitating greenfield development in the Neighbourhood Plan area, increases the scope for impacts on landscape character, including from visual impact and impacts on noise quality. This is significant given the presence of the High Weald AONB across the majority of the parish</p> <p>The redevelopment of underutilised previously developed land offers significant potential at some locations in the parish for enhancing the quality of the villagescape. As such Option 2 offers opportunities for enhancements to the quality of the public realm and local distinctiveness.</p>	2	1
Historic Environment	<p>Whilst Option 2 has the potential to have direct impacts on historic environment assets located on brownfield sites, high quality development sensitive to the historic environment resource has the potential to support enhancements to villagescape character and the rejuvenation of disused or underutilised historic environment assets. Given the opportunities for supporting the reuse and rejuvenation of existing heritage assets in parts of the village, this will support the Neighbourhood Plan area's historic environment resource, if high quality design and layout is incorporated within new provision. Similarly Option 2 provides opportunities for enhancing local character and distinctiveness if high quality design is incorporated within new provision. Option 2 therefore increases opportunities to rejuvenate existing underutilised heritage assets whilst offering opportunities to enhance visual amenity and the setting of the historic environment.</p>	2	1

Option 1: Facilitate the allocation of greenfield sites

Option 2: Focus allocations on previously developed sites

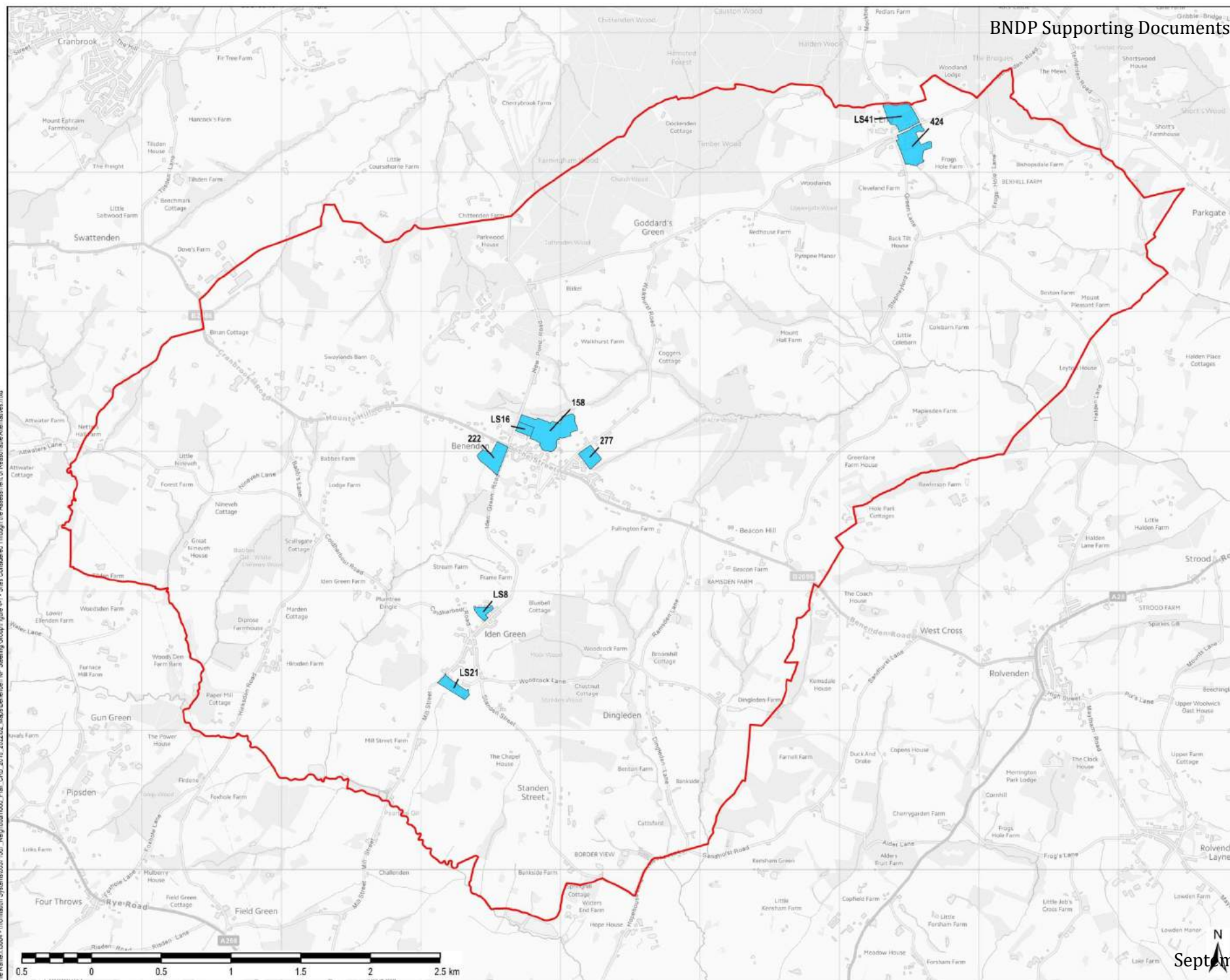
SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Land, Soil and Water Resources	<p>In terms of soil resources, Option 1 will lead to the loss of greenfield land in the Neighbourhood Plan area. The option also has increased potential to lead to the loss of areas of the best and most versatile agricultural land (incorporating, potentially, Grade 3a land present in the Neighbourhood Plan area- this is uncertain though as recent detailed agricultural land classification has not been undertaken in most of the Neighbourhood Plan area). Option 2 however has increased potential to support the efficient use of land through the reuse of existing structures and rejuvenating previously developed land.</p> <p>In terms of water quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example sustainable drainage systems – SuDS – are an effective means of minimising surface water runoff and hence pollution. However, given the potential for development on previously developed land to reduce land contamination, Option 2 has the potential to lead to medium and long term improvements to water quality.</p>	2	1
Population and Community	<p>Option 2, through promoting development on previously developed land, has increased potential to facilitate the development of new housing at locations which are more integrated within the village. This has the potential to support community cohesion, and allow at some locations easier access to village centre services and facilities by sustainable modes of transport such as walking and cycling, as well as enhance access to public transport networks. However, it should be noted that there are significant brownfield sites available in less accessible locations in the parish, including at Benenden Hospital.</p> <p>Option 2 also has the potential to support health and wellbeing and the quality of neighbourhoods through enhancements to the quality of the built environment in certain locations in Benenden.</p>	2	1
Health and Wellbeing	<p>The delivery of housing provision through larger scale allocations potentially enabled by Option 1 has the potential to concentrate effects on road safety and noise quality from increased traffic flows at certain locations. This may have effects on the health and wellbeing of residents. Effects however depend on the location of new development areas and the integration of elements such as sustainable transport linkages and green infrastructure provision.</p> <p>Option 2 has the potential for supporting health and wellbeing through improvements to the quality of the built environment in certain locations in the parish. This includes through enhancing the quality of the public realm and improving the satisfaction of residents with their neighbourhoods as a place to live. It also increases opportunities for delivering development in village centre locations more easily accessible to services, facilities and amenities, although it should be noted that the option does not preclude brownfield development in less accessible locations in the countryside. In this context it should be noted that there are significant brownfield sites available in less accessible locations in the parish, including at Benenden Hospital.</p>	2	1
Transportation	<p>Option 2, through promoting development on previously developed land, has increased potential to facilitate the development of new housing at locations which are more integrated within the village. This will support development at locations with easier access to village centre services and facilities by sustainable modes of transport such as walking and cycling. It also has the potential to lead to development with better access to the village's bus networks. However, it should be noted that there are significant brownfield sites available in less accessible locations in the parish, including at Benenden Hospital.</p>	?	?

Assessment of reasonable alternatives for site allocations

- 4.14 To further support the development of a spatial strategy to deliver the 100 dwellings proposed in Benenden for the Neighbourhood Plan, the Benenden Neighbourhood Plan Steering Group has considered alternative locations for delivering housing in the parish.
- 4.15 To support this process, the Neighbourhood Plan Steering Group has considered potential sites for allocation through the Neighbourhood Plan for housing. This has considered the sites proposed by landowners through the Call for Sites process undertaken by Tunbridge Wells Borough Council since 2016.
- 4.16 As a result of the Call for Sites, 20 sites were initially proposed by landowners. Following this process, the sites underwent an initial sieve by the Neighbourhood Plan Steering Group against a number of criteria. This included relating to deliverability and viability. In addition those sites which delivered less than five homes were discounted, given that they would be covered by the borough-wide windfall policy in the Local Plan, and those that had gained planning permission did not undergo additional consideration. Following this process, eight sites underwent a further site assessment.
- 4.17 To support the consideration of the suitability of these eight sites for potential allocation in the Neighbourhood Plan, the SEA process has undertaken a separate appraisal of the key environmental constraints present at each of the sites and potential effects that may arise as a result of housing development at these locations. In this context the sites have been considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping (Chapter 3) and the baseline information. This SEA site assessment was undertaken separately to the site assessment undertaken by the Benenden Neighbourhood Plan Steering Group.
- 4.18 The locations of the eight sites assessed through the SEA process are presented in the figure below. The tables which follow present a summary of this appraisal, and provide an indication of each site's sustainability performance in relation to the seven SEA themes.

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- LEGEND**
- Benenden Neighbourhood Plan Area
 - Sites Considered Through the Assessment of Reasonable Alternatives



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Purpose of Issue **DRAFT**

Client **BENEDEN NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title
BENEDEN NEIGHBOURHOOD PLAN

Drawing Title
SITES CONSIDERED THROUGH THE ASSESSMENT OF REASONABLE ALTERNATIVES

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FIGURE 4.1

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Table 4.2: Site reference 158, Greenacres/The Orchard Site

SEA theme	Commentary, Greenacres/The Orchard Site	
Biodiversity and Geodiversity	<p>There are no European or nationally designated biodiversity or geodiversity sites within, adjacent or close to the boundary of the site. The site is within an SSSI impact risk zone relating to the Parsonage Wood SSSI for “residential development of 100 units or more”. Given likely densities of less than 30dpa, development of the site for housing is unlikely to exceed this threshold.</p> <p>The site contains areas of deciduous woodland BAP Priority Habitat, and an area of ancient woodland is present to the north of the site. Whilst direct impacts on the woodland from landtake and fragmentation can be readily avoided, disturbance may take place from noise, light pollution or trampling from enhanced access.</p>	
Climate change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant. The site is located in good proximity to the services and facilities in the village centre, helping to limit the need to travel to local facilities (and associated greenhouse gas emissions).</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding. Limited parts of the site are at ‘medium’ risk of surface water flooding, denoting that each year this area has a chance of flooding of between 1% and 3.3%. These are not a significant constraint on development however.</p>	
Landscape	<p>The site is located within the High Weald AONB. An assessment of the site undertaken by the High Weald AONB Management Unit¹⁴ in late 2018 highlighted that development would lead to “<i>High impact on AONB due to loss of medieval fields and proximity of gill and ancient woodland. Would reduce to moderate impact if development restricted to western field adjacent to New Pond Road.</i>”</p>	
Historic Environment	<p>The site is located at its closest approximately 30m north of the Benenden Conservation Area. Development on the western part of the site is unlikely, due to distance, topography and screening to affect the setting of the conservation area. Whilst somewhat screened by the existing row of houses located north of The Street, the eastern part of the site is however visible from the conservation area. As such, development on this part of the site would be likely to affect the setting of the conservation area, particularly given the large size of the site.</p> <p>The site is screened from the closest listed building, the Grade II listed Clevelands. Hemsted Park (Benenden School), a Registered Park and Garden, is located on the opposite side of New Pond Road from the site. However, given existing tree cover on the far side of the road, development at the site is unlikely to significantly affect the setting of the park.</p> <p>No features on or in the immediate vicinity of the site are listed on the Kent Historic Environment Record.</p> <p>In terms of historic landscape character, the Kent Historic Landscape Characterisation classifies the site as within the following type: “<i>Small regular with straight boundaries (parliamentary type enclosure)</i>”. An assessment of the site undertaken by the High Weald AONB Management Unit in late 2018 highlighted that most of the site is part of a medieval field system, however the western field adjacent to New Pond Road is not medieval due to nineteenth century field divisions.</p>	
Land, Soil and Water Resources	<p>The site comprises a greenfield site. Development on the site will lead to the loss of Grade 3 agricultural land. However recent agricultural land classification has not been undertaken at this location; as such it is uncertain whether land at the site is classified as the best and most versatile land (i.e. Grade 3a land) or not classified as such (i.e. Grade 3b land). The site is not located within a Groundwater Source Protection Zone.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs.</p> <p>The site is located in good proximity to the services and facilities located in Benenden village centre (c.300m) which will limit the need for residents to travel for some day-to-day services and facilities.</p>	
Health and wellbeing	<p>The site is accessible to the village’s public rights of way and green infrastructure networks.</p> <p>The nearest GP facilities are in Cranbrook.</p>	

¹⁴ High Weald AONB Unit (December 2018) High Weald AONB Advice on Benenden Neighbourhood Plan Sites

SEA theme	Commentary, Greenacres/The Orchard Site		
Transportation	The site is located at relative proximity to services and facilities in Benenden village centre (c.300m) which will limit the need for residents to travel for some day-to-day services and facilities. The site is approximately 250m from the nearest bus stop with hourly services.		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effects	

Table 4.3: Site reference 222, Green Meadow, Land west of Iden Green Road

SEA theme	Commentary, Green Meadow, Land west of Iden Green Road	
Biodiversity and Geodiversity	<p>There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is within an SSSI impact risk zone relating to the Parsonage Wood SSSI for “residential development of 100 units or more”. Given the size of the site (3ha, with a likely smaller developable area), development of the site for housing is unlikely to exceed this threshold.</p> <p>The woodland which extends from the southern boundary is a deciduous woodland BAP Priority Habitat. Further south, this woodland comprises ancient woodland and a Local Wildlife Site. Whilst direct impacts on the woodland from landtake and fragmentation is unlikely, disturbance may take place from noise, light pollution or trampling from enhanced access. However effects may be limited from the relative distance of the main part of the woodland from the site.</p> <p>There are no BAP Priority Habitats on or in the immediate vicinity of the site.</p>	
Climate change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant. The site is located in good proximity to the services and facilities in the village centre, helping to limit the need to travel to local facilities and associated greenhouse gas emissions.</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding. Very limited parts of the site are at ‘low’ risk of surface water flooding, denoting that each year this area has a chance of flooding of between 0.1% and 1%. These are not a significant constraint on development however.</p>	
Landscape	<p>The site is located within the High Weald AONB. An assessment of the site undertaken by the High Weald AONB Management Unit¹⁵ in late 2018 highlighted that development would lead to “<i>High impact on AONB due to loss of medieval fields, potential impact on Local Wildlife Site and visual prominence.</i>”</p>	
Historic Environment	<p>Development of the site has significant potential to have impacts on the fabric and setting of the historic environment.</p> <p>The northern part of the site is within the Benenden Conservation Area. Loss of open land at this location is therefore likely to have significant effects on the setting of the conservation area.</p> <p>The site is located directly opposite to three nationally listed structures, including the Grade II listed Old Manor House, the Grade II listed Gateway to the Old Manor House and the Grade II listed Queen's Well.</p> <p>One further feature listed on the Kent HER is located close to the western boundary of the site: “Remains of picturesque designed landscape part of Hemsted Park, Benenden”.</p> <p>The Grange (Benenden), a Registered Park and Garden, is located on the opposite side of Iden Green Road from the site, although it is screened by existing hedgerows.</p> <p>In terms of historic landscape character, the Kent Historic Landscape Characterisation classifies the site as within the following type “<i>Small rectilinear with wavy boundaries and ponds</i>”. An assessment of the site undertaken by the High Weald AONB Management Unit in late 2018 highlighted that the southern two fields are part of a medieval field system.</p>	
Land, Soil and Water Resources	<p>The site comprises a greenfield site. Development on the site will lead to the loss of Grade 3 agricultural land. However recent agricultural land classification has not been undertaken on this site; as such it is uncertain whether land at the site is classified as the best and most versatile land (i.e. Grade 3a land) or not classified as such (i.e. Grade 3b land). The site is not located within a Groundwater Source Protection Zone.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs.</p> <p>The site is located in good proximity to the services and facilities located in Benenden village centre (c.100m) which will limit the need for residents to travel for some day-to-day services and facilities.</p>	
Health and wellbeing	<p>The site is accessible to the village's public rights of way and green infrastructure networks.</p> <p>The nearest GP facilities are in Cranbrook.</p>	

¹⁵ High Weald AONB Unit (December 2018) High Weald AONB Advice on Benenden Neighbourhood Plan Sites

SEA theme	Commentary, Green Meadow, Land west of Iden Green Road		
Transportation	The site is located in good proximity to services and facilities in Benenden village centre (c.100m) which will limit the need for residents to travel for some day-to-day services and facilities. The site is adjacent to the bus stops at the crossroads, which has frequent services.		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effects	

Table 4.4: Site reference 277, Land adjacent to Feoffee Cottages

SEA theme	Commentary, Land adjacent to Feoffee Cottages	
Biodiversity and Geodiversity	<p>There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is not within an SSSI impact risk zone for residential development.</p> <p>An area of deciduous woodland BAP Priority Habitat, which has also been categorised as ancient woodland, is located directly adjacent to the site to the south east. Whilst direct impacts on the woodland from landtake and fragmentation are not likely as a result of development on the site, disturbance may take place from noise, light pollution or trampling from enhanced access.</p>	
Climate change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant. The site is located in relatively good proximity to the services and facilities in the village centre, helping to limit the need to travel to local facilities and associated greenhouse gas emissions.</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding. Limited parts of the site are at 'low' risk of surface water flooding, denoting that each year this area has a chance of flooding of between 0.1% and 1%. These are not a significant constraint on development however.</p>	
Landscape	<p>The site is located within the High Weald AONB. An assessment of the site undertaken by the High Weald AONB Management Unit in late 2018 highlighted that development would lead to <i>"Moderate impact on AONB due to proximity of gill and ancient woodland and potential impact on historic routeway."</i></p>	
Historic Environment	<p>The site is within the setting of the Grade II listed Feoffee Cottages (which is also listed on the HER as an archaeological site as a workhouse). The southern edge of the site is approximately 60-70m from the edge of the Benenden Conservation Area. However most of the site is not visible from the conservation area given the existence of properties on Rothermore Close and woodland.</p> <p>In terms of historic landscape character, the Kent Historic Landscape Characterisation classifies the site as within the following type: <i>"Small regular with straight boundaries (parliamentary type enclosure)"</i>. An assessment of the site undertaken by the High Weald AONB Management Unit in late 2018 highlighted that the site is part of a medieval field system.</p>	
Land, Soil and Water Resources	<p>The site comprises a greenfield site. Development on the site will lead to the loss of Grade 3 agricultural land. However recent agricultural land classification has not been undertaken on this site; as such it is uncertain whether land at the site is classified as the best and most versatile land (i.e. Grade 3a land) or not classified as such (i.e. Grade 3b land). The site is not located within a Groundwater Source Protection Zone.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs.</p> <p>The site is located in good proximity to the services and facilities located in Benenden village centre (c.500m to the village shop) which will limit the need for residents to travel for some day-to-day services and facilities.</p>	
Health and wellbeing	<p>The site is accessible to the village's public rights of way and green infrastructure networks.</p> <p>The nearest GP facilities are in Cranbrook.</p>	
Transportation	<p>The site is located in relatively good proximity to services and facilities in Benenden village centre (c.500m to the village shop) which will limit the need for residents to travel for some day-to-day services and facilities. The site is approximately 200m from the nearest bus stop with hourly services.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.5: Site reference 424, Hospital Site South

SEA theme	Commentary, Hospital Site South	
Biodiversity and Geodiversity	There are no European or nationally designated biodiversity or geodiversity sites within, adjacent or close to the boundary of the site. The site is not within an SSSI impact risk zone for the type of development likely to be proposed. The south eastern part of the site has been designated as a Local Wildlife Site and comprises deciduous woodland BAP Priority Habitat.	
Climate change	Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the hospital site and an intensification of uses at this location, although these are unlikely to be significant. The hospital site has few existing amenities and is poorly connected by public transport. As such, residents would be most likely to travel by motorised transport to access amenities, with implications for greenhouse gas emissions from transport. In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding.	
Landscape	The site is not within the High Weald AONB. The site commands views from the south and east and any development would be visible from a distance. Given the existing built up nature of much of the site, development however has the potential to enhance local distinctiveness if high quality design is incorporated into new development.	
Historic Environment	The site is not located in the vicinity of a conservation area, and development of the site is unlikely to impact significantly on the setting of the closest listed building, the Grade II listed Benenden Chest Hospital Lister Wing. No further features listed on the HER are present. In terms of historic landscape character, the Kent Historic Landscape Characterisation classifies the site as within the following type: <i>"Post 1810 settlement (general)."</i>	
Land, Soil and Water Resources	The site largely comprises previously developed land, occupied by redundant hospital buildings and Peak Lodge, the hospital's previous hotel. In this context development at this location has the potential to support the intensification of uses, which will support the efficient use of land. The site is not located within a Groundwater Source Protection Zone.	
Population and Community	Allocation of the site will contribute positively towards meeting local housing needs. Benenden Hospital / East End has limited amenities, and public transport links are infrequent. As such, the location has poor accessibility to day-to-day services and facilities. However, Kent County Council is proposing to introduce a 'Hopper' Bus service that will run twice a day between Iden Green, Benenden, East End and Tenterden. Development at this location however has the potential to support the vitality of the area.	
Health and wellbeing	The site is accessible to the area's public rights of way and green infrastructure networks. The nearest GP facilities are in Cranbrook and Tenterden.	
Transportation	The site is located at Benenden Hospital / East End, which has few amenities. As such, the location has poor accessibility to day-to-day services and facilities, and residents would need to travel some distance via private car for such amenities. In terms of public transport links, services are limited to a twice weekly bus service. However, Kent County Council is proposing to introduce a 'Hopper' Bus service that will run twice a day between Iden Green, Benenden, East End and Tenterden.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.6: Site reference 8, Next to Iden Green Recreation Ground

SEA theme	Commentary, Next to Iden Green Recreation Ground	
Biodiversity and Geodiversity	<p>There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is however within an SSSI impact risk zone relating to the Parsonage Wood SSSI for “residential development of 100 units or more”. Given its size, development of the site for housing is unlikely to exceed this threshold.</p> <p>There are no BAP Priority Habitats on or in the immediate vicinity of the site. However a small pond is located on the site which has biodiversity value.</p>	
Climate change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of Iden Green and an intensification of uses at this location, although these are unlikely to be significant. Iden Green has no amenities (with the exception of the nursery school). As such, residents would be most likely to travel by motorised transport to access amenities, with implications for greenhouse gas emissions from transport.</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding. A very limited part of the northern section of the site is at ‘low’ risk of surface water flooding, denoting that each year this area has a chance of flooding of between 0.1% and 1%. This is not a significant constraint on development however.</p>	
Landscape	An assessment of the site undertaken by the High Weald AONB Management Unit in late 2018 highlighted that “ <i>any development on this site will remove open area and will be ‘in depth’ development out of character with the settlement pattern</i> ” and that development would lead to “ <i>High impact on AONB due to impact on historic settlement pattern</i> ”.	
Historic Environment	<p>The site is located within the Iden Green Conservation Area. The loss of a large area of open space in the conservation area is likely to have significant effects its setting and integrity.</p> <p>The site is also in the setting of the Grade II listed Cotton Cottage, the Grade II listed Lilac Cottage and the Grade II listed Coveney Cottages.</p> <p>In terms of other sites listed on the HER, the “Site of former Congregational Chapel, Chapel Lane, Iden Green, Benenden” is located close to the northern boundary of the site.</p> <p>In terms of historic landscape character, the Kent Historic Landscape Characterisation classifies the site as within the following type: “<i>Post 1810 settlement (general)</i>.”</p>	
Land, Soil and Water Resources	<p>Recent agricultural land classification has been undertaken on the site. The site is a mixture of Grade 2 and Grade 3b agricultural land. This is land classified as the best and most versatile agricultural land. As such development of the site has the potential to lead to the loss of productive agricultural land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs.</p> <p>The site is located in Iden Green, which has no amenities (with the exception of the nursery school). As such, the location has poor accessibility to day-to-day services and facilities.</p>	
Health and wellbeing	<p>The site is accessible to the settlement’s public rights of way and green infrastructure networks.</p> <p>The nearest GP facilities are in Cranbrook.</p>	
Transportation	The site is located in Iden Green, which has no amenities (with the exception of the nursery school). As such, the location has poor accessibility to day-to-day services and facilities. However, the site is located adjacent to a bus stop, with relatively frequent services to a range of destinations.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.7: Site reference LS16, Uphill, New Pond Road

SEA theme	Commentary, Uphill, New Pond Road	
Biodiversity and Geodiversity	<p>There are no European or nationally designated biodiversity or geodiversity sites within, adjacent or close to the boundary of the site. The site is within an SSSI impact risk zone relating to the Parsonage Wood SSSI for “residential development of 100 units or more”. Given the size of the site, development of the site for housing is unlikely to exceed this threshold.</p> <p>A significant section of the eastern part of the site contains an area of traditional orchard BAP Priority Habitat, and further area of deciduous woodland BAP Priority Habitat is present to east of the site. The traditional orchard BAP priority habitat has the potential to be lost through new development. Whilst direct impacts on the deciduous woodland from landtake and fragmentation is unlikely, disturbance may take place from noise, light pollution or trampling from enhanced access.</p>	
Climate change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant. The site is located in good proximity to the services and facilities in the village centre, helping to limit the need to travel to local facilities and associated greenhouse gas emissions.</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding. A very limited part of the eastern part of the site is at ‘low’ risk of surface water flooding, denoting that each year this area has a chance of flooding of between 0.1% and 1%. This is not a significant constraint on development however.</p>	
Landscape	The site is located within the High Weald AONB. An assessment of the site undertaken by the High Weald AONB Management Unit in late 2018 highlighted that development would lead to “ <i>Moderate impact on AONB due to loss of open undeveloped land.</i> ”	
Historic Environment	<p>The site is located at its closest approximately 30m north of the Benenden Conservation Area. However, due to the presence of existing development on Hortons Close, and screening from woodland to the south west, development at this location is unlikely to significantly affect the setting of the conservation area.</p> <p>The site is not in the setting of any listed buildings.</p> <p>Hemsted Park (Benenden School), a Registered Park and Garden, is located on the opposite side of New Pond Road from the site. However, given existing tree cover on the far side of the road, development at the site is unlikely to significantly affect the setting of the park.</p> <p>No sites on or in the immediate vicinity of the site are listed on the Kent Historic Environment Record.</p> <p>In terms of historic landscape character, the Kent Historic Landscape Characterisation classifies the site as within the following type: “<i>Post 1810 settlement (general).</i>”</p>	
Land, Soil and Water Resources	The site comprises a previously developed garden site. The site is not located within a Groundwater Source Protection Zone.	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs.</p> <p>The site is located in good proximity to the services and facilities located in Benenden village centre (c.250m) which will limit the need for residents to travel for some day-to-day services and facilities.</p>	
Health and wellbeing	<p>The site is accessible to the village’s public rights of way and green infrastructure networks.</p> <p>The nearest GP facilities are in Cranbrook.</p>	
Transportation	The site is located at relative proximity to services and facilities in Benenden village centre (c.250m) which will limit the need for residents to travel for some day-to-day services and facilities. The site is approximately 200m from the nearest bus stop with hourly services (for six hours a day).	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.8: Site reference 21, Little Weavers, Iden Green

SEA theme	Commentary, Little Weavers, Iden Green	
Biodiversity and Geodiversity	There are no European or nationally designated biodiversity or geodiversity sites within, adjacent or close to the boundary of the site. The site is not within an SSSI impact risk zone for the type of development likely to be proposed. There are no BAP Priority Habitats on or in the immediate vicinity of the site.	
Climate change	Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of Iden Green and an intensification of uses at this location, although these are unlikely to be significant. Iden Green has no amenities (with the exception of the nursery school). As such, residents would be most likely to travel by motorised transport to access amenities, with implications for greenhouse gas emissions from transport. In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding.	
Landscape	The site is within the High Weald AONB. Given the quality of the existing villagescape at this location, redevelopment of the developed part of the site has the potential to enhance local distinctiveness if high quality design is incorporated into new development. Part of the north western part of the site is however undeveloped and open; development at this location would lead to increased impacts on landscape character. This is reflected by the assessment of the site undertaken by the High Weald AONB Management Unit in late 2018, which highlighted that development would lead to <i>“Moderate impact on the AONB due to the inclusion of part of the field at the western end.”</i>	
Historic Environment	The site is within the setting of the Grade II listed Weavers and the Grade II listed Weavers Cottage, both of which are located on the north west boundary of the site. The features are located opposite the undeveloped and open part of the site; as such development on this part of the site would impact on their setting. The site is not located in the vicinity of a conservation area. No further features listed on the HER are present. In terms of historic landscape character, the Kent Historic Landscape Characterisation classifies the site as within the following type: <i>“Post 1810 settlement (general).”</i> An assessment of the site undertaken by the High Weald AONB Management Unit in late 2018 highlighted that the undeveloped part of the site is part of a medieval field system.	
Land, Soil and Water Resources	Given existing uses as light employment, comprising a large area of hardstanding with large warehouse/agricultural buildings, most of the site comprises previously developed land. Development at this site would therefore support the efficient use of land. The site is not located within a Groundwater Source Protection Zone.	
Population and Community	Allocation of the site will contribute positively towards meeting local housing needs. However, given the site comprises light employment uses, which is of importance for local employment, redevelopment of the site for housing would impact on economic opportunities in the parish. The site is located in Iden Green, which has no amenities (with the exception of the nursery school). As such, the location has poor accessibility to day-to-day services and facilities.	
Health and wellbeing	The site is accessible to the settlement’s public rights of way and green infrastructure networks. The nearest GP facilities are in Cranbrook.	
Transportation	The site is located in Iden Green, which has no amenities (with the exception of the nursery school). As such, the location has poor accessibility to day-to-day services and facilities. The site is however located approximately 400m from a bus stop, with relatively infrequent services to a range of destinations.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.9: Site reference 41, Hospital Site North East Quadrant

SEA theme	Commentary, Hospital Site North East Quadrant	
Biodiversity and Geodiversity	There are no European or nationally designated biodiversity or geodiversity sites within, adjacent or close to the boundary of the site. The site is not within an SSSI impact risk zone for the type of development likely to be proposed. There are no BAP Priority Habitats on or in the immediate vicinity of the site. The cricket field, which comprises a large proportion of the site, has been designated as a Local Wildlife Site.	
Climate change	Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the hospital site and an intensification of uses at this location, although these are unlikely to be significant. The hospital site has few existing amenities and is poorly connected by public transport. As such, residents would be most likely to travel by motorised transport to access all amenities, with implications for greenhouse gas emissions from transport. In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding.	
Landscape	The site is not within the High Weald AONB. Development of the site has the potential to enhance local distinctiveness and the quality of the public realm if high quality design is incorporated into new development.	
Historic Environment	The site is not located in the vicinity or setting of a conservation area, listed building, registered park or garden or scheduled monument. No sites listed on the Historic Environment Record are present close to the site. In terms of historic landscape character, the Kent Historic Landscape Characterisation classifies the site as within the following type: <i>"Post 1810 settlement (general)."</i>	
Land, Soil and Water Resources	The site comprises a mixture of previously developed and greenfield land. In this context development at this location has the potential to support the intensification of uses, which will support the efficient use of land. The site is not located within a Groundwater Source Protection Zone.	
Population and Community	Allocation of the site will contribute positively towards meeting local housing needs. Benenden Hospital / East End have limited amenities, and public transport links are infrequent. As such, the location has poor accessibility to day-to-day services and facilities. However Kent County Council is proposing to introduce a 'Hopper' Bus service that will run twice a day between Iden Green, Benenden, East End and Tenterden. Development at this location however has the potential to support the vitality of East End.	
Health and wellbeing	The site is accessible to the area's public rights of way and green infrastructure networks. The nearest GP facilities are in Cranbrook and Tenterden.	
Transportation	The site is located at Benenden Hospital/East End, which has few amenities. As such, the location has poor accessibility to day-to-day services and facilities, and residents would need to travel some distance via private car for such amenities. In terms of public transport links, services are limited to a twice weekly bus service. However, Kent County Council is proposing to introduce a 'Hopper' Bus service that will run twice a day between Iden Green, Benenden, East End and Tenterden.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Summary of SEA site appraisal findings

4.19 The following table presents a summary of the findings of the site appraisal undertaken through the SEA process.

Table 4.10: Summary of SEA site appraisal findings

Site	Biodiversity and Geodiversity	Climate change	Landscape	Historic Environment	Land, soil and water resources	Population and Community	Health and Wellbeing	Transport
158, Greenacres / The Orchard Site								
222, Green Meadow, Land west of Iden Green Road								
277, Land adjacent to Feoffee Cottages								
424, Hospital Site South								
8, Next to Iden Green Recreation Ground								
16, Uphill, New Pond Road								
21, Little Weavers, Iden Green								
41, Hospital Site North East Quadrant								
Key								
Likely adverse effect (without mitigation measures)					Likely positive effect			
Neutral/no effect					Uncertain effects			

Current approach for the Neighbourhood Plan

4.20 In light of consultation undertaken to date through the Neighbourhood Plan's development process, consideration of the findings of the various site assessments undertaken for the Neighbourhood Plan, and with regard to the SEA appraisal findings presented above, the Neighbourhood Plan Steering Group took the decision to allocate four sites in the parish. These are as follows:

- Ref LS16, Uphill: 18-20 units
- Ref 277, Feoffee: 22-25 units
- Ref 424, Hospital South: 22-25 units
- Ref LS41, Hospital North: 23-25 units

4.21 The choice of these sites reflects an aim to prioritise the development of previously developed land while seeking to conserve and enhance the natural beauty of the AONB. This was combined with a desire amongst local people to maintain the rural nature of the parish while providing a range of types and tenures of housing, including affordable housing.

4.22 In this context three of the four site allocations are proposed on previously developed land, whilst the fourth allocation (Feoffee), will deliver almshouses and affordable homes on a greenfield site.

Neighbourhood Plan policies

4.23 To support the implementation of the vision statement for the Neighbourhood Plan, the submission version of the Benenden Neighbourhood Plan puts forward 42 policies to guide new development within the Neighbourhood Plan area. These were developed following extensive community consultation and evidence gathering, and were refined following Regulation 14 consultation undertaken in August 2019.

4.24 The policies are listed below in Table 4.11 and assessed in Chapter 5.

Table 4.11: Benenden Neighbourhood Plan policies

Policy Reference	Description
Landscape	
Policy LE1	Protect and Enhance the Countryside
Policy LE2	Special Views
Policy LE3	Local Green Spaces
Policy LE4	Public Rights of Way
Policy LE5	Trees, Woodland and Hedgerow
Policy LE6	Ecological and Arboricultural Site Surveys
Policy LE7	Protection of Habitats
Policy LE8	On-going Environmental Maintenance for All New Housing Developments in the Parish.
Policy LE9	Features to Encourage Wildlife.
Policy LE10	Sustainable Drainage
Housing Supply & Site Allocation	
Policy HS1	Site Allocation and Number of New Dwellings
Policy HS2	Delivering a Balanced Community
Policy HS3	Almshouses
Policy HS4	Live/Work (L/W) Units
Policy HS5	Windfall Sites

Policy Reference	Description
Policy HS6	Housing Density
Policy HS7	Windfall Sites
Policy HS8	Housing density
Site Specific Policies for the Allocated Sites	
Site Specific Policy 1	Land adjacent to Feoffee Cottages, Walkhurst Road, Benenden (ISA reference: Site 277)
Site Specific Policy 2	Uphill, New Pond Road, Benenden (ISA reference: Site LS16)
Site Specific Policy 3	Land at Benenden Hospital, South of Goddards Green Road, East End — South East Quadrant (SEQ) (ISA reference: Site 424 and LS40b)
Site Specific Policy 4	Land at Benenden Hospital, North of Goddards Green Road, East End — North East Quadrant (NEQ) (ISA reference: Site LS41)
Design and the Built Environment	
Policy BD1	General Design Policy
Policy BD2	General Appearance
Policy BD3	Layout
Policy BD4	Landscaping
Policy BD5	Dark Skies
Policy BD6	Parking
Policy BD7	Footpaths
Policy BD8	Materials and Technology
Business and the Local Economy	
Policy BE1	Rural Industries
Policy BE2	Major Employers/Businesses in the Parish
Policy BE3	Retaining Existing Commercial Areas
Policy BE4	Shops and Public Houses
Policy BE5	Community Facilities
Policy BE6	Redevelopment of Redundant Buildings
Policy BE7	Encouraging the Right Future Business
Transport and Infrastructure	
Policy T1	Car-free Connectivity
Policy T2	Improving Road Safety and the Impact of Traffic
Policy T3	Community Cohesion and Recreational Facilities
Policy T4	Renewable Energy and Low-emission Technology
Policy T6	Infrastructure, Broadband and Mobile

5. What are the appraisal findings at this current stage?

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the Benenden Neighbourhood Plan. This chapter presents:
- An appraisal of the current version of the Benenden Neighbourhood Plan under the eight SEA theme headings; and
 - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

Approach to this appraisal

- 5.2 The appraisal is structured under the eight SEA themes taken forward for the purposes of the SEA.
- 5.3 For each theme, 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 5.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Biodiversity and Geodiversity

- 5.5 Parsonage Wood Site of Special Scientific Interest (SSSI) is located west of Benenden village and Robins Wood SSSI lies just over 200m west from the parish boundary. Additionally, the Neighbourhood Plan area contains a number of Local Wildlife Sites and a variety of Biodiversity Action Plan (BAP) Priority Habitats.
- 5.6 Four sites have been allocated through the Neighbourhood Plan.
- 5.7 Site 277 (Land Adjacent to Feoffee Cottages) is allocated through Site Specific Policy 1. An area of deciduous woodland BAP Priority Habitat, which has also been categorised as ancient woodland, is located directly adjacent to the site to the south east. Whilst direct impacts on the woodland from landtake and fragmentation are not likely as a result of development on the site, disturbance may take place from noise, light pollution or trampling from enhanced access. This is recognised by Site Specific Policy 1, which states that development proposals should include a 'buffer' area adjacent to ancient woodland of a minimum of 25m free from any built development, track or private garden space. Additionally, the policy states that development proposals will be expected to minimise the impact of construction work on existing flora and fauna, in particular retaining the hedging which borders the site/mature trees on the site and encourage wildlife by including features within the development which are sympathetic to local wildlife and plants. This will help limit potential effects from new development at this location on this key area of local biodiversity importance.
- 5.8 Site LS16 (Uphill, New Pond Road) is located within an SSSI impact risk zone for residential development of 100 units or more. However, as the site is only providing residential development of around 18-20 dwellings, development will be within the threshold identified. A significant section of the eastern part of the site contains an area of traditional orchard BAP Priority Habitat, and further area of deciduous woodland BAP Priority Habitat is present to east of the site. The traditional orchard BAP priority habitat has the potential to be lost through new development. Reflecting this, Site Specific Policy 2 recognises that there are substantial trees and hedging on the site which should be retained and highlights that trees at the rear of the site and trees and hedging at all the site boundaries should be assessed, and that the

most significant trees and hedges should be protected and incorporated into the design of the development. The policy also recognises that the site lies within the National Biodiversity Networks area for Turtle Doves. The policy therefore seeks to reduce the impact of new development at this location.

- 5.9 Sites 424 Hospital South and LS41 Hospital North are allocated under Site Specific Policy 3. An area of deciduous woodland lies within the south of Site 424 Hospital South. Site LS41 is in close proximity to an area of deciduous woodland located in the north of the site. A Local Wildlife Site is also present in both sites. This is acknowledged through Site Specific Policy 3, which seeks to ensure that Local Wildlife Sites will be conserved and enhanced with a management plan adopted to achieve this, and the sites to not be used for recreational purposes. The policy also seeks to minimise the impact of development on existing flora and fauna, in particular retaining the hedging which borders the site and mature trees on the site. The commitment to prepare a comprehensive masterplan to address the combined and cumulative impacts of foreseeable future development of the estate and redundant sites released for non-hospital development will also help develop high quality green infrastructure provision on the two sites which will support enhancements to habitats and ecological networks.
- 5.10 More broadly, the policies within the Neighbourhood Plan, particularly those presented in Chapter 1: Landscape and the Environment aim to avoid and mitigate any negative effects on biodiversity, and secure enhancements. These policies have the potential to bring a range of benefits for habitats, species and ecological networks.
- 5.11 In this context Policy LE6 (Ecological and Arboricultural Site Survey) seeks to ensure that ecological and arboricultural site surveys are undertaken to accompany new development and that key features of biodiversity interest including trees, hedges, wildlife and biodiversity are protected, maintained and preserved during and after construction. This will be supported by Policy LE5 (Trees, Woodland and Hedgerow) which seeks to ensure that existing tree, woodland and hedgerow cover on sites is retained (and where possible, enhanced), and adequate capacity for growth is incorporated, and Policy LE1 (Protect and Enhance the Countryside), which seeks to protect ancient woodland.
- 5.12 This will be further supported by Policy LE9 (Features to Encourage Wildlife) which provides good detail on the specific types of measures which will help achieve features to encourage wildlife, including the use of 'native hedgerow species for boundaries in preference to walls or fencing', ensuring 'common areas, boundaries and verges on new developments are wildlife rich, not neatly mown' and including 'specific elements such as bird boxes, bat roosts, hedgehog highways'. Additionally, Policy LE7 (Protection of Habitats) states that 50m buffers should be provided to protect habitats, ancient woodlands, local wildlife sites and other areas of nature importance. Similarly, Policy LE8 emphasises that developers should be including on-going management plans for wildlife-related aspects of sites.
- 5.13 Overall, the Neighbourhood Plan provides a solid basis for limiting potential effects of new development areas on biodiversity, and for the protection and enhancement of habitats and ecological networks in the Neighbourhood Plan area.

Climate change

- 5.14 In terms of climate change mitigation, road transport is an increasingly significant contributor to greenhouse gas emissions in the Neighbourhood Plan area. Based on the 2011 census data, the most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van, with 90% of residents having access to at least one car or van. Policy T4 (Renewable Energy and Low-emission Technology) outlines that developers will ensure all new properties are provided with a minimum of one electric car charging point as well as encouraging walking/cycling by providing safe paths and planting native hedging. Similarly, Policy T1 (Car-free Connectivity) encourages developers who receive planning permission to contribute to projects identified by the parish to create 'all weather routes' where cyclists and pedestrians can move around the parish safely on new or existing public rights of way. This will positively encourage a limitation of greenhouse gas emissions within the Neighbourhood Plan area by encouraging alternative modes of transportation, particularly for undertaking day-to-day activities within Benenden. Policy HS4 (Live/Work (L/W) Units), through encouraging working from home and running a business from home, will also help reduce the need to travel, further contributing to a reduction in greenhouse gas emissions.
- 5.15 As part of Policy BD2 (General Appearance), developers are encouraged to adopt new materials and technologies to achieve sustainable, low-carbon, energy-saving designs. This will also limit greenhouse

- gas emissions and contribute to climate change mitigation. This is expanded on further in Policy BD8 (Materials and Technology) which strives for new dwellings to be constructed in a sustainable manner with the inclusion of measures to help conserve water and energy. Additionally, the use of renewable energy technologies, including air-source or ground-source heating/cooling, solar thermal (solar water heating), photovoltaics (PV), will be supported under this policy.
- 5.16 Policy LE3 (Local Green Spaces) focuses on allocating and subsequently protecting designated Local Green Spaces, and Policy (BD4 Landscaping) highlights the importance of retaining mature trees to provide open spaces within proposed development areas. In combination with the policies which seek to protect and enhance biodiversity (discussed above under the 'Biodiversity' SEA theme) these policies support the protection of natural carbon sequesters located within the landscape (i.e. trees and hedgerows) and positively contribute to climate change mitigation efforts.
- 5.17 The Natural Environment White Paper recognises that green infrastructure is 'one of the most effective tools available' to manage 'environmental risks such as flooding and heat waves' and the 25 Year Environment Plan highlights that green infrastructure 'brings wider benefits, including sequestering carbon, absorbing noise, cleansing pollutants, absorbing surface water and reducing high temperatures'. In this context the plan's focus on enhancements to green infrastructure provision will be a key contributor to adapting to climate change in the area. Policy LE3 (Local Green Spaces) focuses on designating and protecting open space, and designates four areas within the Neighbourhood Plan area as Local Green Space. Policy BD4 (Landscaping) also supports this, stating that green spaces should be included within the development as amenity areas and private gardens adjacent to properties. These policies will support positive gains with regard to climate change adaptation measures within the Neighbourhood Plan area through, for example, helping to regulate surface water run-off and helping manage extreme weather events
- 5.18 There are no policies in the Neighbourhood Plan which specifically relate to adapting to flood risk. However, this is appropriate given that Benenden is not within a high flood risk area; it is also considered that the provisions of the NPPF and national policy will help guide development away from potential flood risk areas and ensure that appropriate mitigation measures are implemented.

Landscape

- 5.19 The majority of the Neighbourhood Plan area (other than a small section of the northern part) is located within the High Weald AONB. The Neighbourhood Plan area falls within Local Landscape Character 6: Benenden Wooded Farmland from the 2017 Landscape Assessment for Tunbridge Wells and is described as a 'peaceful rural landscape of rolling hills with scattered farmsteads and rural dwellings'. The high quality landscape of the Neighbourhood Plan area is fully recognised through the policies within the Neighbourhood Plan have a strong focus on protecting the sense of place and special qualities of Benenden which contribute to its character and respect the setting of the AONB.
- 5.20 In terms of the proposed allocations within the Neighbourhood Plan, three of the four sites, Site LS16 Uphill New Pond Road, Site 424 Hospital South and Site LS41 Hospital North are located on previously developed land. Developing brownfield sites will help limit potential effects on landscape character since development at these sites already exists. Allocated Site 277 Feoffee is located on a greenfield site.
- 5.21 Two of the allocated sites (Feoffee and Uphill New Pond Road) are located within the AONB. Both sites are in less sensitive locations within the AONB. In terms of Feoffee site, an assessment of the site undertaken by the High Weald AONB Management Unit in late 2018 highlighted that development has the potential for "*Moderate impact on AONB due to proximity of gill and ancient woodland and potential impact on historic routeway.*" The same assessment highlighted that development at Uphill New Pond Road would lead to "*Moderate impact on AONB due to loss of open undeveloped land.*"
- 5.22 The sensitivities of the sites relating to the AONB are recognised through two site policies. Site Specific Policy 1 aims to mitigate potential impacts by ensuring that the density of housing is sympathetic to local character in order to conserve and enhance the character and distinctiveness of the village and Site Specific Policy 2 seeks to protect the natural environmental and landscape enclosure of the Uphill New Pond Road site through environmental surveys to ensure that trees and hedging at the site boundaries contribute to the landscape character of the AONB.
- 5.23 More generally, the policies for the Neighbourhood Plan have a strong focus on protecting and enhancing landscape character, the quality of the public realm and local distinctiveness. In this respect there are a

large number of policies within the Neighbourhood Plan which relate to landscape either directly or indirectly. Policies that relate directly to the landscape include Policy LE2 (Special Views), which seeks to protect 22 key views in and around the village to ensure that views are not adversely impacted by inappropriate development. Policy BD1 (General Design Policy) proposes that new development must plan positively for the achievement of high quality and inclusive building and landscaping design, at the same time demonstrating that they have sought to conserve local distinctiveness and the aesthetic qualities for traditional rural settlements and buildings found in the High Weald AONB. This is supported by Policy BD2 (General Appearance) and Policy BD3 (Layout), which set out a number of provisions for ensuring that new development conserves the distinct character of the local existing built environment. These policies will therefore respect and enhance local character and distinctiveness, which will also help enhance the wider villagescape character.

- 5.24 Policy BD4 (Landscaping) describes the importance of incorporating green spaces within development as amenity areas and private gardens. Policy LE3, which focuses on protecting and designating Local Green Spaces and designates four areas within the Neighbourhood Plan as green space also indirectly relates to landscape. The provision of green space will support enhancements to the public realm, support a limitation of effects on the open countryside and safeguard these areas from high levels of inappropriate development. Policy BD5 (Dark Skies) has a close focus on limiting light pollution in the Neighbourhood Plan area through setting out a range of provisions for protecting the night sky.
- 5.25 The policies for the Neighbourhood Plan therefore provide a robust basis for the protection and enhancement of landscape and villagescape character in the Neighbourhood Plan area, and on supporting the special qualities of the High Weald AONB.

Historic Environment

- 5.26 The Neighbourhood Plan area has a rich historic environment, recognised through the diversity of features and areas that are nationally and locally valued for their cultural heritage interest, including eight Grade II*, 144 Grade II listed buildings, one scheduled monument, Benenden Conservation Area and Benenden Registered Park and Garden.
- 5.27 Regarding the proposed allocations, none of the sites are directly within the setting of either of the two conservation areas in the Neighbourhood Plan area. However, Site LS16 (Uphill New Pond Road) is located opposite to Benenden Registered Park and Garden (located on the far side of New Pond Road); as such development at this site may have the potential to have some very limited impacts on the setting of this national designated site. Effects are limited given the presence of existing woodland opposite the site which offers significant screening. The site is also located approximately 100m from a number of Grade II listed buildings on The Street within Benenden Conservation Area. However, due to the flat topography and existing screening from development and trees on Hortons Close and St Georges Place, the setting of these historic features are unlikely to be impacted by development at this site.
- 5.28 Site 277 (Feoffee) is approximately 40 metres south west of the Grade II listed Feoffee Cottages. Due to its close proximity to the listed building, development at this site is likely to impact the setting of this historic feature. This is recognised by Site Specific Policy SSP1, which seeks to ensure that new development draws on the importance of conserving and enhancing the character and distinctiveness of the village in order to be sympathetic to local character, landscape and heritage setting. Similarly, Site 424 Hospital South is approximately 45 metres from a Grade II Listed Building on the far side of Green Lane. Site Specific Policy SSP3 seeks to ensure that design, scale, massing and overall density create a sense of place and focus to the residential communities and reflect the character and rural nature of the East End area adjacent to the AONB whilst acknowledging the scale of adjacent hospital buildings.
- 5.29 In terms of the other Neighbourhood Plan policies, whilst there are no policies dedicated specifically to the historic environment, the policies have a strong focus on protecting and enhancing landscape and villagescape character and local distinctiveness. For example, Policy BD1 (General Design Policy), Policy BD2 (General Appearance) and Policy BD3 (Layout) all focus on specific design principles to ensure that new buildings fit in with the distinct local character of the area. These include: the height of the buildings should be in keeping with the heights of other buildings in the local area (BD2), new developments should generally maintain the traditional appearance and layout of the built environment (BD2), materials and styles similar to those incorporated in buildings in the more historic parts of the parish will be encouraged (BD2) and a generally linear road layout through development is preferred rather than meandering roads which do not reflect local character and design (BD3). These policies are likely to provide opportunities for

new development to positively contribute to the fabric and setting of heritage assets through incorporating high-quality design which reflects the historic character and special qualities of Benenden.

- 5.30 As such, the policies provide an appropriate basis, alongside the provisions of national and local designations and policy provisions, to conserve and enhance the fabric and setting of the historic environment of the parish.

Land, Soil and Water Resources

- 5.31 The Neighbourhood Plan will support the efficient use of land. In this context the development strategy for the Neighbourhood Plan has a focus on locating new development on previously developed land, including at Site LS16 (Uphill New Pond Road), Site 424 (Hospital South) and Site LS41 (Hospital North - Site Specific Policy 3). This will promote the efficient use of land and help to limit the loss of agricultural land in the Neighbourhood Plan area. However, one of the sites is a greenfield site (Site 277). The Provisional Agricultural Land Quality dataset shows that the site is predominantly covered by Grade 3 agricultural land; however, without the subset grading (3a or 3b) it is not possible to determine whether the agricultural land is land classified as the best and most versatile.
- 5.32 The plan has a strong focus on green infrastructure enhancements, new planting, and improvements to existing areas of open space (Policy LE3 and Policy BD4). It also seeks to enhance ecological networks (including through Policy LE6, LE7, LE8 and LE9, as discussed under the 'Biodiversity' SEA them above). This will support the capacity of the villagescape and built and natural environment in and around the Neighbourhood Plan area to help manage surface water run-off (and associated pollutants) and provide regulating ecosystems services which support water and soil quality. Additionally, Policy LE10 (Sustainable Drainage) highlights the importance of using best practice sustainable drainage in order to not overwhelm the local ecosystem.
- 5.33 Policy BD8 (Materials and technology) seeks for new dwellings to be constructed to the highest manufacturing standards to be sustainable with the inclusion of measures to help conserve water (including the re-use of grey water) and energy. This will help encourage the sustainable use of water resources, and also indirectly contribute to water quality improvements through limiting suspended solids entering watercourses from surface water run-off, positively contributing to the Water Framework Directive's objective of achieving 'good status' for as many watercourses as possible by 2027.

Population and Community

- 5.34 The Benenden Neighbourhood Plan sets out a range of provisions which will support the quality of life of the parish's residents.
- 5.35 As outlined in Policy HS1 Site Allocation and Number of New Dwellings), the Neighbourhood Plan aims to provide up to 50 affordable dwellings and a total of around 95 homes. These will be delivered across the four sites in order to meet local housing needs. This meets the number of affordable homes identified as being required by the housing needs assessments undertaken to support the Neighbourhood Plan. Policy H3 (Partnership schemes) encourages and supports proposals for partnership-based locally-led housing scheme initiatives, on sites that satisfy national policy requirements, and which are designed to maintain an appropriate demographically mixed and balanced community, and which respects the local environment and upholds village services. Additionally, Policy HS4 (Almshouses) gives priority to schemes in the parish which apply the almshouse principle. Almshouses are a category of low cost housing which remains in the control of the local trustees, and as such with the parish's requirement for locally-led, locally-managed housing development. This is supported by the Neighbourhood Plan allocation at Feoffee, which will deliver at least 12 units provided for affordable housing adhering to the almshouse principle, and with an element of market housing necessary to provide the financial basis for the almshouse development.
- 5.36 The Neighbourhood Plan area has an ageing population, with the 2011 Census data confirming that 22.3% of residents are within the 60+ age group. Therefore, maintaining and enhancing the diversity of local community infrastructure is essential for the vitality of settlements, encouraging growth and meeting the needs of residents. In this respect Policy HS2 (Delivering a Balanced Community) is supportive of providing a suitable mix of properties which are affordable and available for individuals and families and, in particular to meet the need of an ageing population. The policy outlines that all developments should be designed with regard to the need for:

- Affordable housing in line with TWBC policy of 35% of dwellings;
 - Provisions of options for low cost rental/ shared equity/ Help to Buy equity loans;
 - Suitable property for older local residents who wish to downsize their housing and remain in the parish;
 - Mixed sizes of market housing for new residents;
 - Affordable and market housing should be well integrated within each development. This will help to establish and maintain a strong, mixed and balanced community; and
 - in developments of 10 dwellings or more, a minimum of 10% single storey or accessible units designed to support older and/or disabled occupants.
- 5.37 The provision of this policy will therefore support the creation of mixed, balanced and inclusive communities, aligning with both national and local policy objectives
- 5.38 Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. In relation to the proposed allocations taken forward through the Neighbourhood Plan, Site 277 and Site LS16 are accessible to the key services and facilities present in Benenden village centre, and are also accessible to key public transport links, including bus services. However, Site 424 Hospital South and Site LS41 Hospital North are further away from the amenities in Benenden village and are not readily accessible via foot. Additionally, there is limited public transport access from these sites to Benenden village, other settlements and key public transport links.
- 5.39 Recognising this, enabling and ensuring access to services and facilities is a close focus of a number of the Neighbourhood Plan policies. This includes through the creation of 'all weather routes' where cyclists and pedestrians can move around the parish safely on new or existing public rights of way (Policy T1, Car-free Connectivity), supporting projects designed to meet the health and well-being needs of residents such as easily-accessed healthcare facilities, a shop & café and a community hub at East End / Benenden Hospital (Policy T3, Community Cohesion and Recreational Facilities) and through the construction of new footpaths to increase connectivity within new developments and to aid access to local amenities (Policy BD7, Footpaths). Supporting these policies, Policy T2 (Improving Road Safety and the Impact of Traffic) aims to reduce congestion, facilitate access and support road safety in the parish.
- 5.40 Accessibility to amenities will be further be supported by Policy BE4 (Shops and Public Houses), which seeks to preclude the loss of existing village shops and public houses, and by Policy BE5 (Community Facilities), which seeks to retain key community services in the Neighbourhood Plan area. Alongside, and as previously highlighted, Policy T4 (Community Cohesion and Recreational Facilities) focuses on community cohesion and the provision of recreational facilities such as children's play areas as well as healthcare facilities, a shop & café and a community hub. These policies will support residents' access to facilities and services, in recognition of the rural setting of the Neighbourhood Plan area.
- 5.41 The Neighbourhood Plan takes an approach which seeks to deliver sustainable development which is sensitive to the environmental constraints and which is intended to meet specific housing requirements or other community objectives. For example, the provisions of Policy BD1 (General Design Policy), Policy BD2 (General Appearance), Policy BD3 (Layout), Policy BD4 (Landscaping), Policy BD6 (Parking), Policy BD7 (Footpaths) and Policy BD8 (Materials and technology) all focus on specific design principles to ensure that any new development fits in with Benenden's local character whilst also ensuring the local community will benefit.
- 5.42 The vitality of the Neighbourhood Plan area will be further supported by policies presented in the Business and the Local Economy chapter of the Neighbourhood Plan. These policies seek to support existing businesses and enterprises within the parish and to encourage new areas of economic activity to promote the parish's economic stability in the future. For example, recognising existing sectors of the rural economy, Policy BE1 (Rural Industries) seeks to maintain farming and forestry as a significant economic activity within the parish, and also identifies opportunities relating to sustainable land management practices such as regenerative agriculture, wilding and woodland management. This will support the economic opportunities afforded by the recent introduction of the Environment Bill. Existing businesses and employment opportunities will also be supported by Policy BE3 (Retaining Existing Commercial Areas), which seeks to ensure that commercial areas are not developed for housing, and Policy BE2 (Major Employers/Businesses in the Parish), which seeks to support the employment and career opportunities afforded by key businesses in the Neighbourhood Plan area. This will be further supported

by Policy BE7 (Encouraging the Right Future Business), which supports new economic activities if they are of low environmental impact.

- 5.43 The Neighbourhood Plan also recognises the value of the digital economy in the parish and flexible working practices, and the higher percentage of residents choosing to work from home in the parish in comparison to regional and national trends. In this context Policy T5 (Infrastructure, Broadband and Mobile) outlines support for projects which are designed to enhance broadband speed and also enable the centre of East End to be connected to superfast broadband. Similarly, Policy HS4 (Live/Work (L/W) Units) encouraged the development of live work units. This will support those who wish to work from home or run a business from home, which is an increasingly important economic activity in the Neighbourhood Plan area.
- 5.44 Overall, it is considered that the Neighbourhood Plan is likely to lead to a range of significant long term positive effects for community vitality in Benenden.

Health and Wellbeing

- 5.45 Based on the 2011 census data, 88.5% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', greater than the totals for Kent (81.5%), the South East of England (83.7%) and England (81.4%).
- 5.46 In relation to the quality of life and the wellbeing of local residents, Policy T3 (Community Cohesion and Recreational Facilities) aims to support public health and community wellbeing by supporting projects designed to meet the health and wellbeing needs of residents such as easily-accessed healthcare facilities, a shop & café and a community hub.
- 5.47 Additionally, Policy T1 (Car-Free Connectivity) and Policy BD7 (Footpaths) aim to promote active lifestyles by creating or improving walking and cycling routes in order for residents and pedestrians to move around the parish safely without the use of a car. The provisions of these policies will also positively support the physical and emotional health and wellbeing of local residents by encouraging measures which promote safety and community cohesion.
- 5.48 There is now robust evidence that access to the natural environment improves people's health and wellbeing through encouraging healthy outdoor recreation and relaxation. The benefits to emotional wellbeing and mental health resulting from close contact with the natural environment are well-documented. As such there is a strong drive to maintain and improve access to open spaces through the Neighbourhood Plan. In this context the provision of informal spaces to contribute to community amenity (Policy BD3), encouraging green space to be included within development (Policy BD4) and designating Local Green Spaces within the Neighbourhood Plan area (Policy LE3) will promote recreational opportunities, with benefits for health and wellbeing.
- 5.49 Recognising the trend of an ageing population within the Neighbourhood Plan area, Policy HS2 (Delivering a balanced community) is supportive of development proposals which meet a locally identified need for affordable housing for elderly residents. This is significant in the local context, as the quality and availability of housing for older people is an important contributor to health and wellbeing.

Transportation

- 5.50 The Neighbourhood Plan has a close focus on supporting the use of sustainable modes of transport. In terms of the proposed allocations taken forward through the Neighbourhood Plan, the allocations at Feoffee and Uphill New Pond Road are accessible to the key services and facilities present in the village centre, and are also accessible to key public transport links, including bus stops with regular services to Cranbrook, Tunbridge Wells and other nearby settlements. As discussed under the Population and Community theme, accessibility will be further supported by the Neighbourhood Plan's focus on improving routes for cycling and walking throughout the parish Policy T1 (Car-free Connectivity) and Policy BD7 (Footpaths). This will help reduce the need to travel for key services and facilities and promote accessibility to key amenities by alternative modes of transport to the private car.
- 5.51 However, Site 424 Hospital South and Site LS41 Hospital North are not within walking distance to the services and facilities in Benenden village centre. This is recognised by the Neighbourhood Plan, which

seeks to increase community facilities at this location, enhance walking and cycling links to elsewhere in the parish, and support community transport provisions.

- 5.52 More broadly, the Neighbourhood Plan directly seeks to promote the use of sustainable modes of transport. In this context Policy T4 (Renewable Energy and Low-emission Technology) seeks to ensure that all new properties are provided with a minimum of one electric car charging point and will contribute to projects designed to reduce the impact of pollution emitted by cars. Projects include supplying and supporting a minibus for the Primary School and encouraging walking/cycling by providing safe paths.
- 5.53 The Neighbourhood Plan also includes policies which seek to reduce the impact on residents from the road network and improve road safety. For example, Policy T2 (Improving Road Safety and the Impact of Traffic) seeks to enhance road safety and limit the adverse effects of traffic by requiring developers to demonstrate that road access to/from developments acts to slow the flow of traffic and provide safe access to, and transit past, new housing. Policy BD6 (Parking) outlines that all new residential development in Benenden will be required to provide sufficient parking for residents. Policy T4 (Renewable Energy and Low-emission Technology) suggests planting native hedging to screen new developments from the roadway and passing traffic which will be designed to shield the public from air pollution.

Conclusions at this current stage

- 5.54 The assessment has concluded that the current version of the Benenden Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community', 'Health and Wellbeing' and 'Transportation' SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on enhancing community vitality, providing housing of a range of type and tenures to meet local needs, promoting accessibility by sustainable modes of transport and protecting and enhancing the quality of the public realm and neighbourhood distinctiveness.
- 5.55 In terms of 'Land, Soil and Water Resources', three of the four Neighbourhood Plan allocations will take place on previously developed land. Whilst there will be some loss of greenfield land through allocations, including at the Feoffee site, the overall focus of the Neighbourhood Plan's development strategy is on the redevelopment of brownfield land. This will bring overall positive effects in relation to this theme through promoting the efficient use of land.
- 5.56 A central focus of the Neighbourhood Plan is on conserving and enhancing landscape and villagescape character in the parish, with a view to protecting the integrity of the High Weald AONB. This will also support the conservation of the fabric and setting of the historic environment. In this regard the Neighbourhood Plan will bring positive effects in relation to the 'Landscape' and 'Historic Environment' themes. The Benenden Neighbourhood Plan will also initiate a number of beneficial approaches regarding the 'Biodiversity' theme through protecting and enhancing habitats and supporting parish-wide ecological networks. Finally, in terms of the 'Climate Change' SEA theme, the Neighbourhood Plan sets out a range of provisions for limiting emissions from built development and transport, supporting climate change mitigation, and introducing provisions which will support climate change adaptation.

6. What are the next steps?

- 6.1 This Environmental Report accompanies the Benenden Neighbourhood Plan for submission to the Local Planning Authority, Tunbridge Wells Borough Council, for subsequent independent examination.
- 6.1 At independent examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Tunbridge Wells Local Plan.
- 6.2 If independent examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by Tunbridge Wells Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Benenden Neighbourhood Plan will become part of the development plan for Benenden Parish.

Appendix A Context Review and Baseline

A.1 Air Quality

Context Review

Key messages from the National Planning Policy Framework¹⁶ (NPPF) include:

- 'Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, considering the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.'
- 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.'
- 'New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.'

Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'¹⁷ sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' within the 25 year plan directly relate to the air quality SEA theme.

In terms of the local context, Tunbridge Wells Borough Council is required under Section 82 of the Environment Act (1995) to monitor air quality across the Borough, report regularly to DEFRA, and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO₂), sulphur dioxide (SO₂), ozone (O₃), benzene (C₆H₆) and particulates (PM₁₀). Where exceedances exist, areas are declared as Air Quality Management Areas (AQMA) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

Summary of Current Baseline

As of June 2018, there are no Air Quality Management Areas (AQMA) within the Neighbourhood Plan area as highlighted in the 2018 Air Quality Annual Status Report.¹⁸

There are no recent or anticipated exceedances of national air quality objectives in the Neighbourhood Plan area.

Summary of Future Baseline

New housing and employment provision within the parish and the wider area, including through the Tunbridge Wells Local Plan, has the potential for adverse effects on air quality through increasing traffic flows and

¹⁶ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf [accessed 01/04/19]

¹⁷ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 01/04/19]

¹⁸ Tunbridge Wells Borough Council (2018) 2018 Air Quality Annual Status Report (ASR) [online] available at: < http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0003/208353/Tunbridge-Wells-Borough-Council-2018-ASR-Final.pdf> [accessed 02/04/19]

associated levels of pollutants such as NO₂. However, this is unlikely to lead to exceedances of air quality objectives in the Neighbourhood Plan area.

Due to the absence of air quality issues within the Neighbourhood Plan area, the air quality theme has been scoped out for the purposes of the SEA process.

Due to the absence of any significant existing air quality issues within the Neighbourhood Plan area, air quality has been scoped out for the purposes of the SEA process.

A.2 Biodiversity and Geodiversity

Context Review

Key messages from the National Planning Policy Framework¹⁹ (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity.'
- 'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'
- 'Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.'
- 'To protect and enhance biodiversity and geodiversity, plans should:
 - a. Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - b. Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'
- Take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for biodiversity.
- The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

The Natural Environment White Paper (NEWP)²⁰ sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal wellbeing. It was in part a response to the UK's failure to halt and reverse the decline of biodiversity by 2010, and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other, and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;

¹⁹ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf [accessed 01/04/19]

²⁰ HM Gov (2011) The Natural Choice: securing the value of nature [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228842/8082.pdf [accessed 12/02/19]

- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy; the 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services'²¹ aims to 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'.

The recently published 25 Year Environment Plan²² sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:

- Using and managing land sustainably;
- Recovering nature and enhancing the beauty of landscapes;
- Connecting people with the environment to improve health and wellbeing;
- Increasing resource efficiency, and reducing pollution and waste;
- Securing clean, productive and biologically diverse seas and oceans; and
- Protecting and improving the global environment.

In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the Biodiversity SEA theme.

At the local level, Core Policy 4: Environment of the Tunbridge Wells Core Strategy (2010) specifically relates to the Biodiversity and Geodiversity SEA theme. Saved policies in the Tunbridge Wells Local Plan (2006) that relate to the Biodiversity and Geodiversity theme include:

- EN13: Tree and Woodland Protection; and
- EN15: Statutory Local Nature Reserves and other non-statutory Nature Conservation Sites.

Summary of Current Baseline

The location of the sites nationally and locally designated for their biodiversity value and Biodiversity Action Plan Priority Habitats are mapped in **Figure 3.1**.

European designated sites

There are no European designated sites within or in close proximity to the Neighbourhood Plan area.

Nationally designated sites

There is one SSSI that falls within the Neighbourhood Plan area. Notified in June 1985 'Parsonage Wood SSSI' is approximately 9.7 ha in size and is located towards the west of the Neighbourhood Plan area. The citation statement for the SSSI states the following²³:

'Parsonage Wood is a good example of a wealden ghyll woodland. The damp stream banks support many species of fern, moss and liverwort, some of which are rare in eastern Britain.

The woodland is predominantly hornbeam, sweet chestnut and ash coppice under pedunculate oak standards, with a rich ground flora dominated by brambles and bluebells. The coppice layer includes some hazel, field maple

²¹ DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf [accessed 12/02/19]

²² HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 12/02/19]

²³ Natural England (no date): 'Parsonage Wood SSSI', [online] available to download via: <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1000373&SiteName=parsonage&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=> [accessed 02/04/19]

Acer campestre and wild service tree *Sorbus torminalis*. In the ground flora are plants which suggest that this is ancient woodland, subject only to traditional woodland management for many centuries; these include butcher's broom *Ruscus aculeatus*, violet helleborine *Epipactis purpurata*, and pendulous sedge *Carex pendula*. The last species is especially abundant around the ponds in the north and west of the wood, but these are largely shaded and have little aquatic vegetation.

The ghylls cut through the Wadhurst Clay to expose the hard Ashdown Sands. The steep-sided gullies are kept moist by their shape, the woodland canopy, and the streams flowing through them, so that plants, which otherwise are restricted to the damper western seaboard of Britain, can flourish here. Examples of these 'Atlantic' ferns and bryophytes are the hay-scented buckler fern *Dryopteris aemula* and the mosses *Fissidens celticus*, *Hookeria lucens* and *Dichodontium pellucidum*.

The most recent condition assessments for the SSSI indicate that 100% of the SSSI is considered to be in a 'favourable' condition.

Robins Wood SSSI lies approximately 215m east of the Neighbourhood Plan area. Notified in March 1987 'Robin's Wood SSSI' is approximately 47.7 ha in size. The citation statement for the SSSI states the following²⁴:

'Robins Wood is typical of the linear woodlands which have developed along deep stream valleys (ghylls) in the weald. The humid conditions prevailing in such places support a rich assemblage of ferns, mosses and liverworts including species which are rare in Kent.'

The two main ghylls follow parallel lines of fracture (faults) in the underlying geological strata, and these fractures have brought contrasting beds of the Wealden series into contact along the stream bed, Wadhurst clays and the Ashdown sands. The valleys are likely to have retained a woodland cover since natural colonisation following the last ice age, and may thus be termed 'ancient woodland'.

*The woods consist mainly of mixed hornbeam *Carpinus betulus*, ash *Fraxinus excelsior* and hazel *Corylus avellana* coppice below oak *Quercus robur* and occasional beech *Fagus sylvatica* standards. In some areas the coppice layer has been restocked with sweet chestnut *Castanea sativa*, and here birch *Betula* spp. and aspen *Populus tremula* are also common. Guelder rose *Viburnum opulus*, and midland hawthorn *Crataegus laevigata* are present in the shrub layer, above a ground flora dominated by bluebells *Hyacinthoides non-scripta*, bramble *Rubus fruticosus* and dog's mercury *Mercurialis perennis*. Other more locally-distributed species include wild daffodil *Narcissus pseudo-narcissus*, violet helleborine *Epipactis purpurata*, imperforate St John's wort *Hypericum maculatum*, and early-purple orchid *Orchis mascula*.*

*Over the streams alder *Alnus glutinosa* coppice becomes dominant, with willows *Salix* spp. frequent above a ground flora reflecting the wetter conditions. Opposite-leaved golden saxifrage *Chrysosplenium oppositifolium*, yellow archangel *Galeobdolon luteum* and many species of fern occur here including the rare hay-scented buckler fern *Dryopteris aemula*. The damp, mild microclimate is ideal for bryophytes (mosses and liverworts) and a rich assemblage of species has been recorded. Several are more commonly found in the west of Britain and are present in Kent at the eastern-most extent of their national distribution; these include *Hookeria lucens*, *Trichocolea tomentella* and *Campylosteum saxicola*. Several ponds add to the habitat diversity of the site.*

The most recent condition assessments for the SSSI indicate that 100% of the SSSI is considered to be in a 'favourable' condition.

SSSI Impact Risk Zones (IRZs) are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this context, part of the Neighbourhood Plan area surrounding Parsonage Wood SSSI is located within an IRZ for residential and/or rural-residential developments, including the built up area of the village along Harts Lane. For residential, this applies to residential development of 50 units or more. For rural residential, this applies for any residential development of 10 or more houses outside existing settlements/ urban areas.

²⁴ Natural England (no date): 'Robins Wood SSSI', [online] available to download via: <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1001078&SiteName=Rob&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=> [accessed 02/04/19]

Locally designated sites

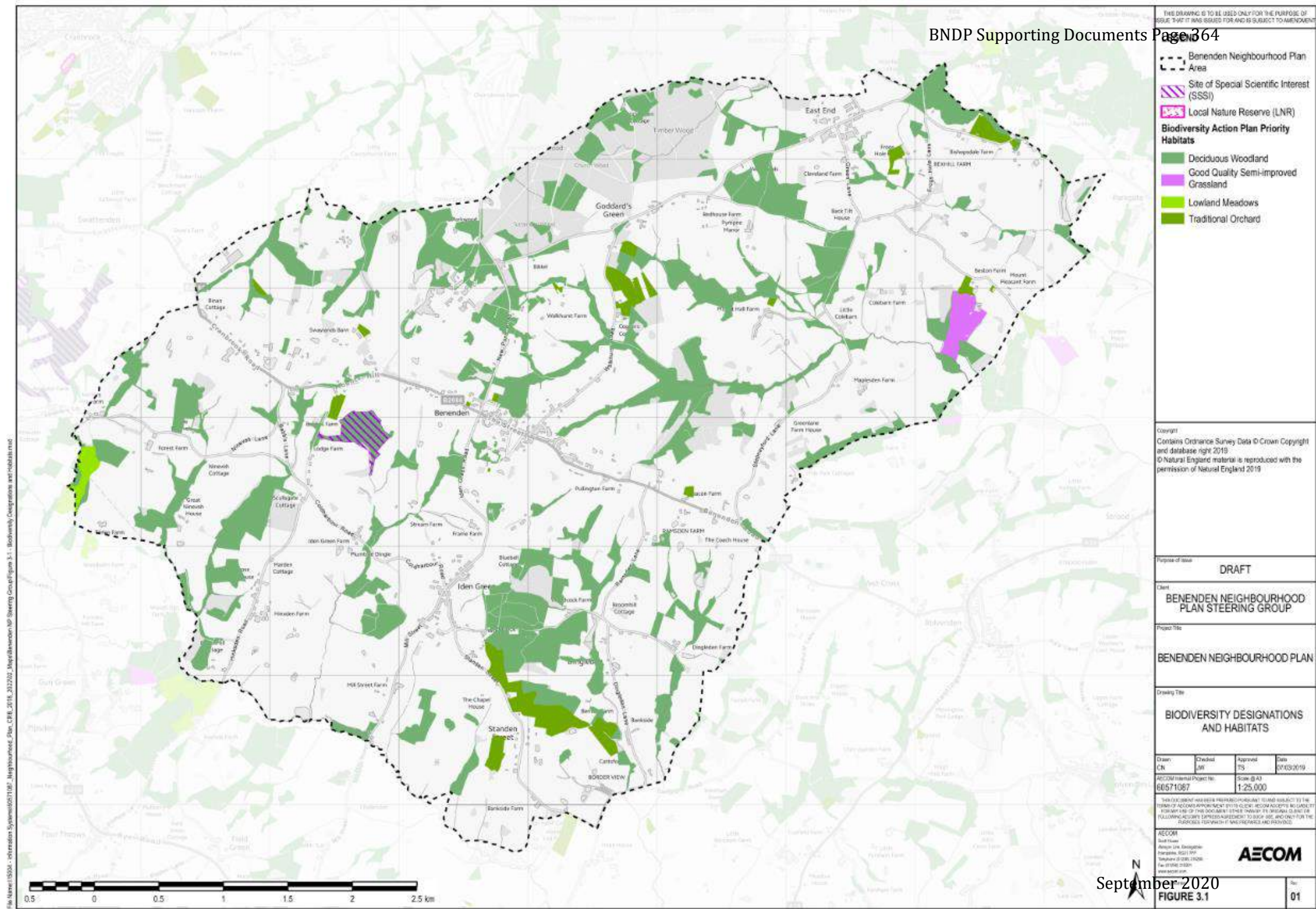
There are a range of Local Wildlife Sites and Biodiversity Action Plan Priority Habitats within and surrounding the Neighbourhood Plan area. The habitats include: Ancient Replanted Woodland, Wood-pasture and Parkland and Ancient & Semi-Natural Woodland.

There are no recent or anticipated exceedances of national air quality objectives in the Neighbourhood Plan area.

Summary of Future Baseline

Habitats and species are likely to continue to be offered protection through the higher level planning framework, however; they will potentially face increasing pressures from future development within the Neighbourhood Plan area with the potential for negative effects on the wider ecological network, which can be exacerbated by the effects of climate change.

The Neighbourhood Development Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species, undesignated sites, and connections between designated sites and undesignated sites at a localised scale, and at an early stage of planning for future growth. This is particularly relevant in the siting of new small scale housing development.



A.3 Climate Change

Context Review

The UK Climate Change Act²⁵ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 means that there is now in place a legally binding target of net zero by 2050. The Climate Change Act includes the following:

- Commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK's emissions. The 100% target was based on advice from the CCC's 2019 report, 'Net Zero – The UK's contribution to stopping global warming' and introduced into law through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
- The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The Act requires the Government to assess the risks and opportunities from climate change for the UK, and to prepare for them. The Committee on Climate Change's Adaptation Sub-Committee advises on these climate change risks and assesses progress towards tackling them. The associated National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same.

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report²⁶ contains six priority risk areas requiring additional action in the next five years, identified below:

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, wellbeing and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'²⁷ sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, policies contained within Chapter 1 'Using and managing land sustainably' and Chapter 6 'Protecting and improving the global environment', Goal 4 'A reduced risk of harm from environmental hazards such as flooding and drought' and Goal 7 'Mitigating and adapting to climate change' directly relate to the Climate Change SEA theme.

²⁵ GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<http://www.legislation.gov.uk/ukpga/2008/27/contents>> last accessed [19/09/18]

²⁶ GOV.UK (2017) UK Climate Change Risk Assessment Report January 2017 [online] available at: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017> [accessed 02/04/19]

²⁷ HM GOV (2019) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 02/04/19]

Key messages from the National Planning Policy Framework²⁸ (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.' 'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'
- 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'
- 'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.'
- Direct development away from areas at highest risk of flooding (whether existing or future). 'Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'

The Flood and Water Management Act²⁹ highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems.

At the local level, Core Policy 5: Sustainable Design and Construction of the Tunbridge Wells Core Strategy (2010) specifically relates to the Climate Change SEA theme. Policy EN1: Development Control Criteria from the Tunbridge Wells Local Plan (2006) also relates to the Climate Change SEA theme.

Summary of current baseline

Contribution to climate change

In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change suggests that Tunbridge Wells has lower per capita emissions compared to the South East of England and England as a whole since 2005 (see Table below). Tunbridge Wells has also seen a 39.7% reduction in the percentage of total emissions per capita between 2005 and 2016, greater than the reductions for the South East of England (36.7%) and England (37.6%).

²⁸ MHCLG (2018) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf [accessed 02/04/19]

²⁹ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents> [accessed 02/04/19]

Table: Carbon dioxide emissions and sources, plus emissions per capita, 2005-2016³⁰

	Industrial and Commercial (t CO ₂)	Domestic CO ₂	(t	Transport (t CO ₂)	Total (t CO ₂)
Tunbridge Wells					
2005	2.3	2.7		1.8	6.3
2006	2.3	2.7		1.7	6.2
2007	2.1	2.6		1.7	5.9
2008	2.0	2.6		1.6	5.7
2009	1.8	2.3		1.5	5.2
2010	1.9	2.5		1.5	5.4
2011	1.8	2.1		1.5	4.9
2012	1.9	2.3		1.4	5.1
2013	1.8	2.2		1.4	4.9
2014	1.4	1.9		1.4	4.2
2015	1.4	1.8		1.5	4.2
2016	1.1	1.7		1.5	3.8
South East					
2005	3.0	2.5		2.6	7.9
2006	3.0	2.5		2.6	7.9
2007	2.8	2.4		2.6	7.6
2008	2.7	2.4		2.4	7.3
2009	2.4	2.2		2.3	6.6
2010	2.4	2.3		2.3	6.8
2011	2.2	2.0		2.2	6.2
2012	2.2	2.2		2.2	6.4
2013	2.1	2.1		2.1	6.1
2014	1.7	1.7		2.2	5.4
2015	1.6	1.7		2.2	5.3
2016	1.4	1.6		2.2	5.0
England					
2005	3.8	2.5		2.3	8.5

³⁰ Department of Energy and Climate Change (2018) 2005 to 2016 UK local and regional CO₂ emissions – data tables [online] available to download via: <<https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>> last accessed [03/04/19]

	Industrial and Commercial (t CO ₂)	Domestic CO ₂	(t	Transport (t CO ₂)	Total (t CO ₂)
2006	3.8	2.5		2.2	8.4
2007	3.6	2.4		2.2	8.1
2008	3.5	2.4		2.1	7.8
2009	3.0	2.1		2.0	7.0
2010	3.0	2.3		2.0	7.2
2011	2.7	2.0		1.9	6.5
2012	2.9	2.1		1.9	6.8
2013	2.8	2.0		1.9	6.6
2014	2.4	1.7		1.9	5.9
2015	2.3	1.6		1.9	5.7
2016	2.0	1.5		1.9	5.3

Potential effects of climate change

Following the success of the UK Climate Projections released in 2009 (UKCP09), the Met Office recently released the UK Climate Projections for 2018 (UKCP18).³¹ UKCP18 provides the most up to date climate observations and projections out to 2100, using cutting-edge climate science. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the median estimate for effects of climate change on the South East by 2040-2059 are as follows:

- Increases in mean summer temperature of 1.5-2.5oC, and mean winter temperature increases of 1-2oC; and
- Decreases in mean summer precipitation of up to 30%, and increases in mean winter temperature of up to 30%.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:

- Effects on water resources from climate change;
- Reduction in availability of groundwater for extraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;

³¹ Data released 26th November 2018 [online] available at: <https://www.metoffice.gov.uk/research/collaboration/ukcp> [accessed 03/04/19]

- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

Flood risk

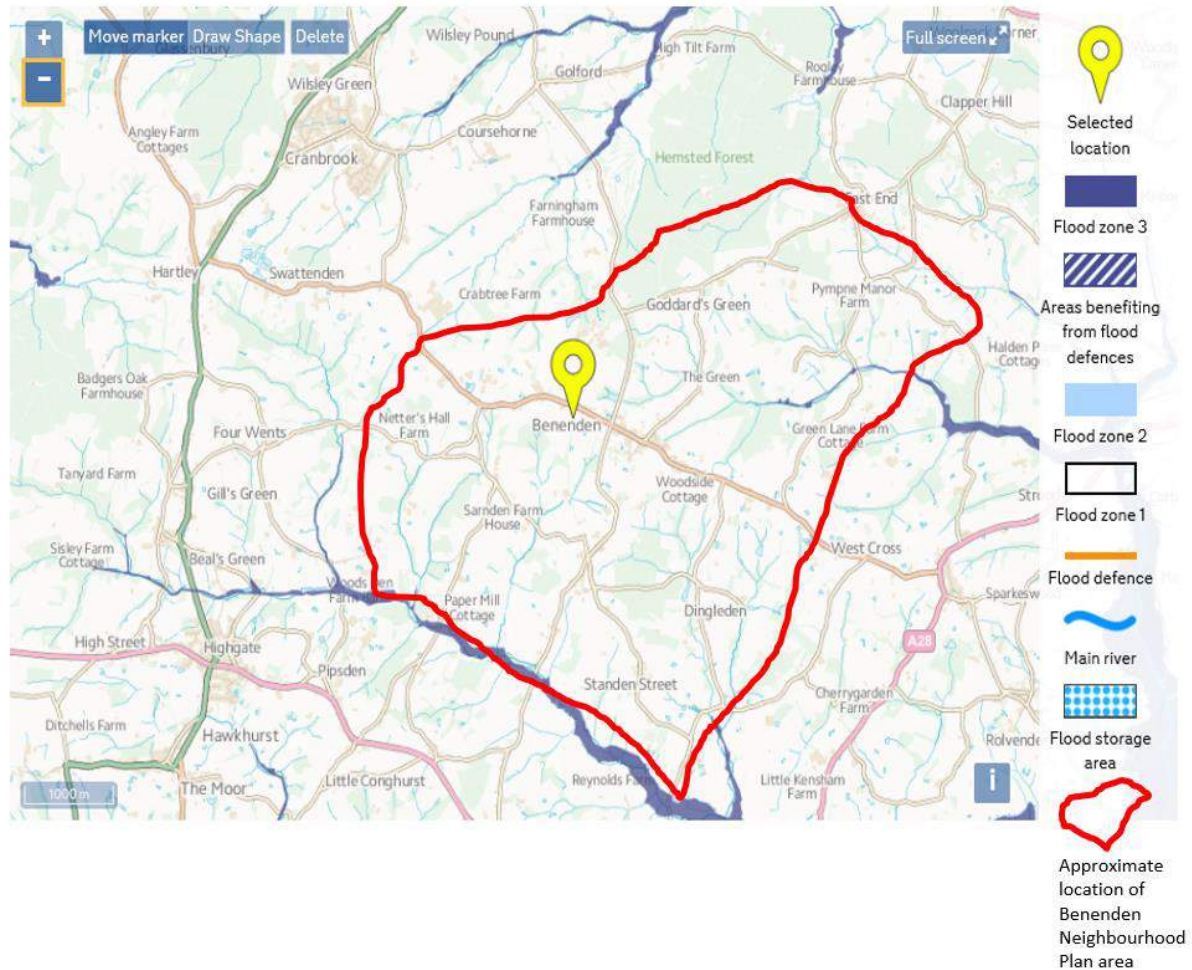


Figure: Fluvial flood risk within the Neighbourhood Plan area³²

As shown in the figure above, the majority of the Neighbourhood Plan area is located within Flood Zone 1, showing that there is a <0.1% chance (1 in 1000) of river flooding in any given year.

While a tributary of the River Rother falls within the Neighbourhood Plan area towards the east of the site, the areas of flood risk which are within Flood Zone 3 are not near any settlements where growth in the Neighbourhood Plan is likely to occur.

Surface water flooding is not a significant risk for the Neighbourhood Plan area with small sections of Neighbourhood Plan area identified as low risk.

³² GOV.UK (2019): 'Flood Map for Planning', [online] available at: <<https://flood-map-for-planning.service.gov.uk/>> [accessed 03/04/19]

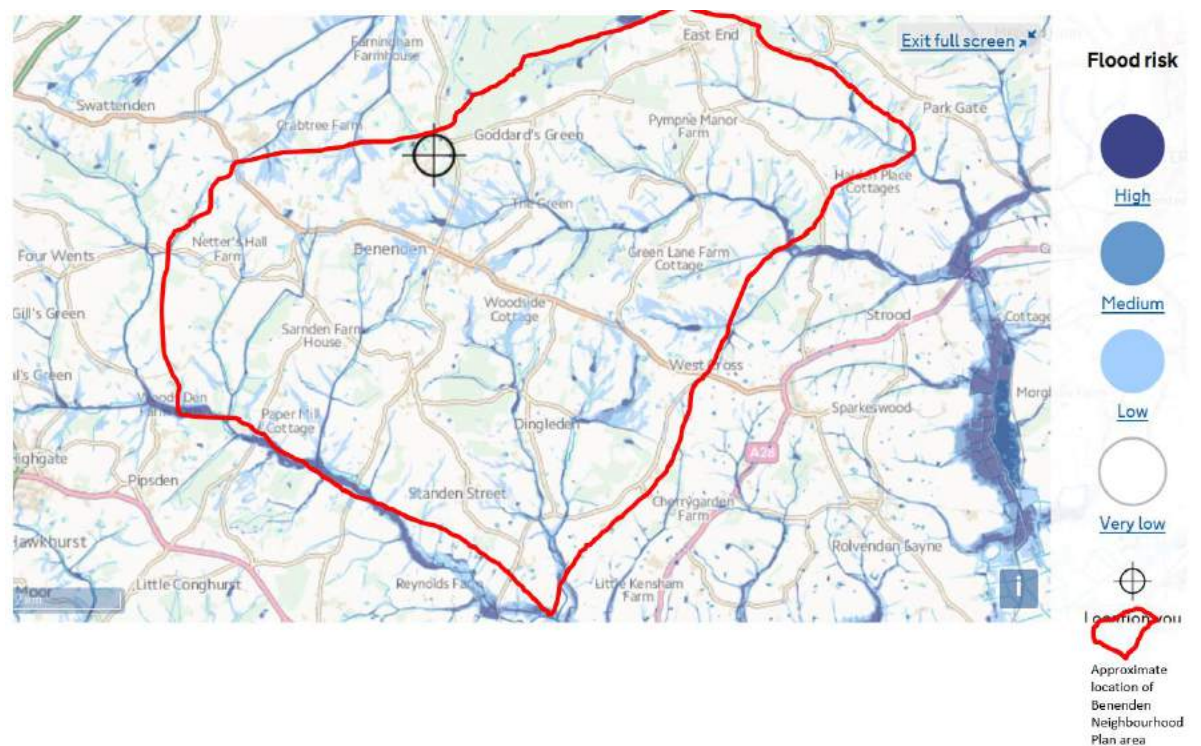


Figure: Surface water flood risk within the Neighbourhood Plan area³³

Summary of future baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation.

A Critical Drainage Area (CDA) is a discrete geographic area where multiple and interlinked sources of flood risk cause flooding in one or more Local Flood Risk Zones (LFRZ) during severe weather, impacting people, property and/or local infrastructure. Tunbridge Wells Borough Council may wish to designate their own CDAs (in the absence of any designations from the Environment Agency)³⁴ within the Neighbourhood Plan area within the future, for reasons such as surface water capacity issues.

In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.

³³ GOV.UK (2017): 'Long term flood risk assessment for locations in England', [online] available to access from: <<https://flood-warning-information.service.gov.uk/long-term-flood-risk/>> [accessed 03/04/19]

³⁴ GOV.UK (2017): 'Flood Risk Assessment in Flood Zone 1 and Critical Drainage Areas', [online] available to access via: <<https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zone-1-and-critical-drainage-areas>> [accessed 03/04/19]

A.4 Landscape

Context Review

Key messages from the National Planning Policy Framework³⁵ (NPPF) include:

- 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.'
- Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.'
- Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).'
- 'Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - a. Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils
 - b. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
 - c. remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'

The policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' environment' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'³⁶ directly relates to the Landscape SEA theme.

At the local level, Core Policy 4: Environment and Core Policy 14: Development in the Villages and Rural areas of the Tunbridge Wells Core Strategy (2010) specifically relate to the Landscape SEA theme. The following saved policies from the Tunbridge Wells Local Plan (2006) also relates to the Landscape SEA theme:

- EN1: Development Control Criteria;
- EN8: Outdoor Lighting;
- EN21: Areas of Landscape Importance;
- EN24: Arcadian Areas; and
- EN25: Development control criteria for all development proposals affecting the rural landscape.

The High Weald Area of Outstanding Natural Beauty (AONB) Management Plan³⁷ sets out the policy framework for the High Weald and seeks to make the High Weald a landscape which:

- Retains its remarkable character and scenic beauty and is functioning successfully as an attractive place to live and work.

³⁵ MHCLG (2018) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf [accessed 03/04/19]

³⁶ HM GOV (2019) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 03/04/19]

³⁷ High Weald AONB (2014) The High Weald Area of Outstanding Natural Beauty Management Plan 2014-2019 [online] available at: < <http://www.highweald.org/downloads/publications/high-weald-aonb-management-plan-documents/1475-high-weald-management-plan-3rd-edition-2014-2019/file.html> > [accessed 03/04/19]

- Is adapting well to changing economic and climatic conditions.
- Is recognised and valued by those living, working and visiting the area as a nationally important protected landscape championed by the High Weald Joint Advisory Committee.
- Is maintained under 'traditional' land management practices, carried out by people connected to the land through work, lifestyle and leisure.
- Displays the benefits of appropriate management in its highly interconnected and biodiverse ancient woodlands, meadows and heathland; and the improving condition of its routeways, sandrock and more naturally functioning river systems.
- Is embracing a low-carbon future with green technologies underpinning a strong rural economy and thriving communities.
- Accommodates an increasing number of households without compromising the characteristic historic settlement pattern as a result of strong planning policies and a sound understanding of the dynamics of sustainable communities.
- Celebrates its woodland history and nurtures a woodland economy whose timber products are highly valued.
- Sees land managed by a myriad of different people through diverse activities that are supported and nurtured where they deliver public benefits.
- Encourages active participation by people, their communities and businesses, in conserving the area and managing change.
- Provides a warm welcome and high quality experience for residents and visitors seeking inspiration and enjoyment of its landscape and rich, well understood and celebrated cultural heritage.

Summary of current baseline

High Weald AONB

Areas of Outstanding Natural Beauty (AONBs) are designated by the Government for the purpose of ensuring that the special qualities of the finest landscapes in England, Wales and Northern Ireland are conserved and enhanced. The primary purpose of the AONB designation is to conserve and enhance the natural beauty of the area, as confirmed by Section 82 of the Countryside and Right of Way Act 2000 (CRoW Act).

Designated in 1983, the High Weald AONB covers 1,461 m². It extends across four counties, 11 districts and 100 parishes. The vision for the AONB is for 'a landscape in which sustainable land management takes care of the natural resources of geology, soil, landform, and water systems, whilst delivering a wide range of social, economic and environmental benefits. The approach to land management will take account of, indeed will be partly stimulated by, climate change and rising sea levels.' The essential character of the High Weald was established by the 14th century and has survived major historical events, and social and technological changes. It is considered to be one of the best surviving coherent medieval landscapes in Northern Europe. There are five key components of the AONB's character:

- Geology, landform, water systems and climate: deeply incised, ridged and faulted landform of clays and sandstone. The ridges tend east-west, and from them spring numerous gill streams that form the headwaters of rivers. Wide river valleys dominate the eastern part of the AONB. The landform and water systems are subject to, and influence, a local variant of the British sub-oceanic climate.
- Settlement: dispersed historic settlements of farmsteads and hamlets, and late medieval villages founded on trade and non-agricultural rural industries.
- Routeways: ancient routeways (now roads, tracks and paths) in the form of ridge-top roads and a dense system of radiating droveways. These routeways are often narrow, deeply sunken, and edged with trees, hedges, wildflower-rich verges and boundary banks.
- Woodland: the great extent of ancient woods, gills, and shaws in small holdings, the value of which is inextricably linked to long-term management.
- Field and heath: small, irregularly shaped and productive fields often bounded by (and forming a mosaic with) hedgerows and small woodlands, and typically used for livestock grazing; small holdings; and a non-dominant agriculture; within which can be found distinctive zones of heaths and inned river valleys.

Key issues identified for the High Weald AONB are:

- Understanding the capacity for small scale mineral extraction to support conservation of heritage buildings and assist rural businesses without damaging the AONB;
- Managing multiple interests on the sandstone outcrops – soft rock climbing and cryptogams – in the face of threats to the integrity of the sandrock and its humid microclimate from invasive species such as rhododendron; mechanical damage and the use of drying agents for climbing; and climate change (increase in rainfall intensity with longer dry periods);
- The need to find a long term plan for the drained landscapes of the Eastern High Weald river valleys which unites the interests of profitable agriculture and conservation of historic assets with sustainable water management and biodiversity;
- Pressure on groundwater supply and threat of damage from engineering solutions to meet the growing demand for water across the South East from increased households and changes in agriculture and horticultural practices; and
- Understanding and responding to the affects of climate change on key landscape features and biodiversity.

The figure below identifies the areas of the Neighbourhood Plan area that fall within the High Weald AONB.

National Character Areas

The Benenden Neighbourhood Plan area lies within the National Character Area (NCA): High Weald.

The High Weald NCA³⁸ encompasses the ridged and faulted sandstone core of the Kent and Sussex Weald. It is an area of ancient countryside and one of the best surviving medieval landscapes in northern Europe. The High Weald Area of Outstanding Natural Beauty (AONB) covers 78 per cent of the NCA. Key characteristics of the High Weald NCA include:

- A faulted landform of clays, sand and soft sandstones with outcrops of fissured sandrock and ridges running east–west, deeply incised and intersected with numerous gill streams forming the headwaters of a number of the major rivers – the Rother, Brede, Ouse and Medway – which flow in broad valleys.
- High density of extraction pits, quarries and ponds, in part a consequence of diverse geology and highly variable soils over short distances.
- A dispersed settlement pattern of hamlets and scattered farmsteads and medieval ridgetop villages founded on trade and non-agricultural rural industries, with a dominance of timber- framed buildings with steep roofs often hipped or half-hipped, and an extremely high survival rate of farm buildings dating from the 17th century or earlier.
- Ancient routeways in the form of ridgetop roads and a dense system of radiating droveways, often narrow, deeply sunken and edged with trees and wild flower-rich verges and boundary banks. Church towers and spires on the ridges are an important local landmark. There is a dense network of small, narrow and winding lanes, often sunken and enclosed by high hedgerows or woodland strips. The area includes several large towns such as Tunbridge Wells, Crowborough, Battle and Heathfield and is closely bordered by others such as Crawley, East Grinstead, Hastings and Horsham.
- An intimate, hidden and small-scale landscape with glimpses of far-reaching views, giving a sense of remoteness and tranquillity yet concealing the highest density of timber-framed buildings anywhere in Europe amidst lanes and paths.
- Strong feeling of remoteness due to very rural, wooded character. A great extent of interconnected ancient woods, steep-sided gill woodlands, wooded heaths and shaws in generally small holdings with extensive archaeology and evidence of long-term management.
- Extensive broadleaved woodland cover with a very high proportion of ancient woodland with high forest, small woods and shaws, plus steep valleys with gill woodland.
- Small and medium-sized irregularly shaped fields enclosed by a network of hedgerows and wooded shaws, predominantly of medieval origin and managed historically as a mosaic of small agricultural holdings typically used for livestock grazing.
- A predominantly grassland agricultural landscape grazed mainly with sheep and some cattle.
- There is a strong influence of the Wealden iron industry which started in Roman times, until coke fuel replaced wood and charcoal. There are features such as a notably high number of small hammer ponds surviving today.

³⁸ Natural England (2018) NCA Profile: 122 High Weald [online] available at:
<http://publications.naturalengland.org.uk/publication/4706903212949504?category=587130> [accessed 03/04/19]

- An essentially medieval landscape reflected in the patterns of settlement, fields and woodland.
- High-quality vernacular architecture with distinct local variation using local materials. Horsham Slate is used on mainly timber structures and timber-framed barns are a particularly notable Wealden characteristic feature of the High Weald.

Landscape Assessment for Tunbridge Wells

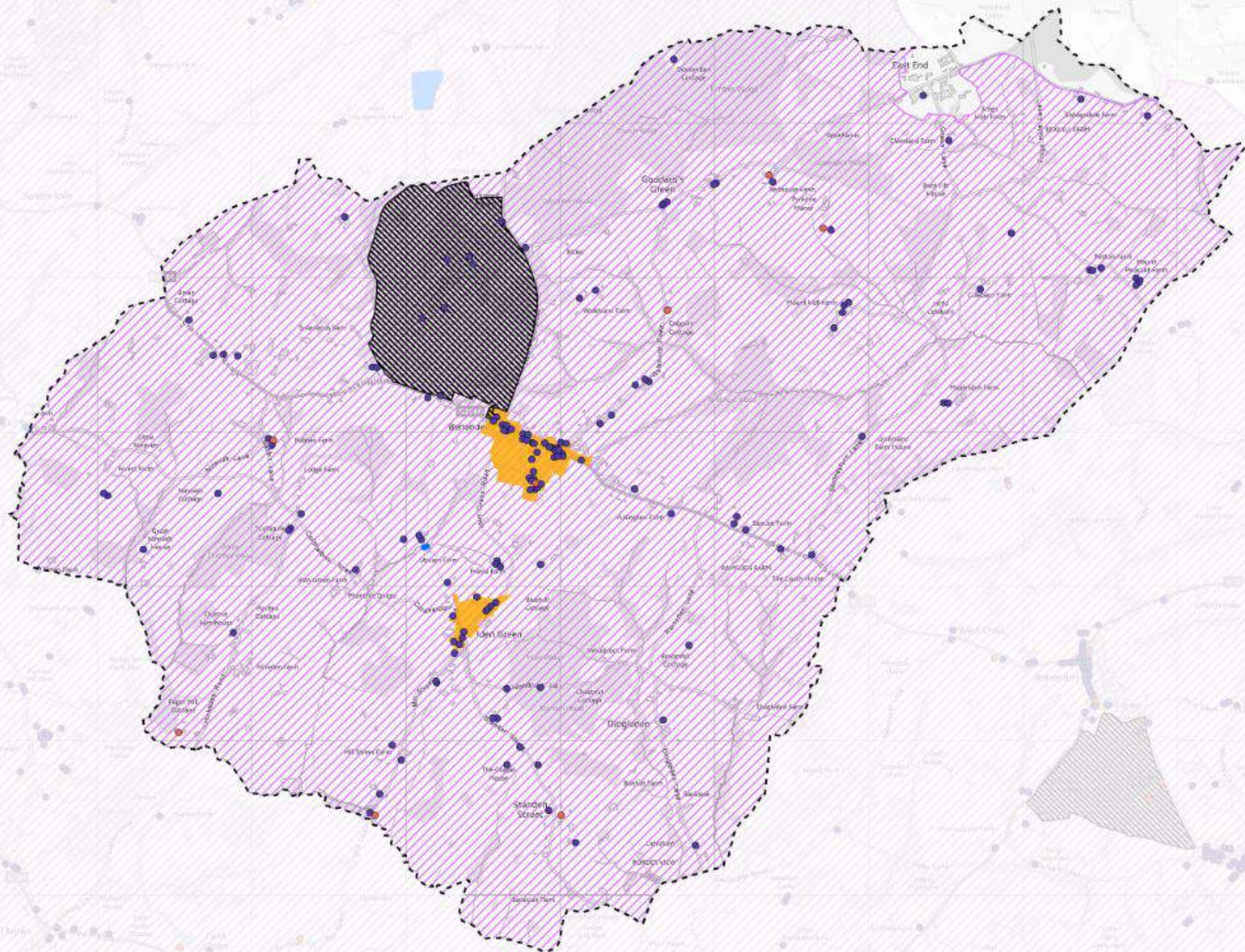
A Landscape Assessment for Tunbridge Wells Borough was carried out in 2017.³⁹ This breaks the Borough down into 19 landscape character areas. The Neighbourhood Plan area falls within Local Landscape Character Area 6: Benenden Wooded Farmland, which is described as having the following key characteristics:

- Action of the Benenden Fault that has resulted in a variation between Tunbridge Wells Sand and Wadhurst Clay;
- An elevated plateau of rolling hills incised by narrow ghyll valleys which drop down to the larger deep valley landscape of the Hexden Channel;
- Strong sense of prospect and long distance views from the ridge tops with a more intimate, smaller-scale experience within the ghyll valleys;
- Dominance of pasture landscape, with occasional isolated remnant areas of semi improved grassland;
- The appearance of a peaceful, well managed, small-scale and intact agricultural landscape, although with a larger-scale, open, arable landscape dominant in some areas;
- Very variable field boundary hedgerows, ranging from thick woodland shaws to some which have disappeared almost entirely;
- Attractive and ecologically-rich wooded framework created by the strong surviving intact network of ghyll and shaw woodlands particularly associated with the incised valleys;
- Strong ornamental parkland quality associated with Benenden School and Hole Park;
- A rich built heritage with numerous listed buildings and historic farmsteads dispersed throughout the countryside. Buildings are not generally prominent in the wider landscape, and are hidden by the hilly topography and woodland cover;
- Strong network of rural lanes; and
- A relatively intact medieval landscape.

Summary of future baseline

New development has the potential to lead to incremental but small changes in landscape and villagescape character and quality in and around the Benenden Neighbourhood Plan area. This includes from the loss of landscape features and areas with an important visual amenity value.

³⁹ Land Use Consultants (2017) Tunbridge Wells Borough Landscape Character Assessment 2017 [online] available at: http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0017/140381/290817_Draft_Landscape_Character_Assessment_SPD.pdf [accessed 03/04/19]



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF
ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

-  Benenden Neighbourhood Plan Area
 Record of Scheduled Monument
 Registered Parks and Garden
 High Weald Area of Outstanding Natural Beauty
 Conservation Area

- Listed Building**
- Grade I
 - Grade II*
 - Grade II

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Purpose of issue	FINAL
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Client
BENENDEN NEIGHBOURHOOD
PLAN STEERING GROUP

Project Title

BENENDEN NEIGHBOURHOOD PLAN

Drawing Title:

LANDSCAPE AND HISTORIC
ENVIRONMENT DESIGNATIONS

Drawn CN	Checked JH	Approved TS	Date 03/04/2019
AECOM Internal Project No. 60571087		Scale @ A3 1:25,000	

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A.5 Historic Environment

Context Review

Key messages from the National Planning Policy Framework (NPPF)⁴⁰ include:

- Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.’
- Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).’
- ‘Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
 - c) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’
- Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk.
- ‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

Additionally, the National Planning Practice Guidance⁴¹ states that Neighbourhood Plans should include enough information, where relevant, ‘about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale’ and ‘about local non-designated heritage assets including sites of archaeological interest to guide decisions’.

Along with the policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’, Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’⁴² directly relates to the Historic Environment SEA theme.

At the local level, Core Policy 4: Environment and Core Policy 14: Development in the Villages and Rural areas of the Tunbridge Wells Core Strategy (2010) specifically relates to the Historic Environment SEA theme. The following saved policies from the Tunbridge Wells Local Plan (2006) also relate to the Historic Environment SEA theme:

- EN4: Demolition in Conservation Areas;
- EN5: Development within, or affecting the character of, a Conservation Area;

⁴⁰ MHCLG (2018) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf [accessed 03/04/19]

⁴¹ GOV (2018) Planning practice guidance [online] available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [accessed 03/04/19]

⁴² HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 03/04/19]

- EN10: Archaeological Sites; and
- EN11: Historic Parks and Gardens.

Summary of current baseline

The figure below identifies designated heritage assets within the Neighbourhood Plan area.

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. Listed buildings hold special historic or architectural interest for the community; these buildings are often selected because they provide insights into the history of the region.

There are three categories for listed buildings:

- Grade 1 (with exceptional interest, only 2.5% of all listed buildings).
- Grade II* (with greater special interest, only 5.8% of all listed buildings).
- Grade II (with special interest, 91.7% of all listed buildings).

The Neighbourhood Plan area contains eight Grade II* and 144 Grade II listed buildings. Additionally, towards the north-western side of the Neighbourhood Plan area lies the Benenden Grade II Registered Park and Garden.

The Neighbourhood Plan area contains one scheduled monument which is a Paved ford crossing the line of the Roman road at Iden Green located to the south west of Benenden village. A ford is a shallow place in a river or other stretch of water, where people, animals and vehicles may cross. Fords were sometimes paved in the Roman period to aid the crossing of pedestrians, horses and carts. There are few known examples of surviving paved fords in Britain, although many more have been identified elsewhere across the Roman Empire. Paved fords are significant component features of Roman roads.

Conservation Areas are designated because of their special architectural and historic interest. Conservation Area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England⁴³. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area and can be developed into a management plan.

- Within the Neighbourhood Plan area, there are two Conservation Areas: Benenden Conservation Area and Iden Green Conservation Area. In this context, the Benenden Conservation Area was originally designated in 1974 covers most of the village settlement and is described in the Benenden and Iden Green Conservation Areas Appraisal.⁴⁴ Summary of elements that contribute to Benenden Conservation Area's character are described below:
- Trees and Landscape: Trees are a particularly prominent element in the Conservation Area. They comprise large components such as at Collingwood (now The Grange) and the Manor House, as well as individual specimens such as at the eastern crossroads. Others provide a backdrop to the buildings. There are a number of particularly statuesque, exotic specimens which provide a distinctive variety of shape and provide a Victorian/'gardenesque' feel to the Conservation Area.
- Boundaries: With only a few exceptions there are good boundaries to plots. They comprise, in the main, hedging, but also estate railings and picket fencing. The height and privacy/ openness are generally well balanced with only a few examples which are too high or too low.
- Special Containment: The Street and The Green comprise the main spaces in the Conservation Area. They are both simple forms which are strongly contained by buildings and their boundaries. This provides no real opportunities for views out or even glimpses of the surrounding countryside. In the case of The Street it is through a well-balanced mix of landscape and built elements. In the case of The Green it is primarily through the landscaped edge punctuated only occasionally by building. This provides an interesting and characteristic contrast.
- Materials: Traditional materials dominate in the area, even on newer developments. Roofing is primarily clay peg tile roofing with only a few examples of slate. Often the roof is the only element visible in the Arcadian setting.

⁴³ Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available at: <<https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> [accessed 03/04/19]

⁴⁴ Tunbridge Wells Borough Council (2005): 'Benenden and Iden Green Conservation Areas Appraisal' [online] available at: <http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0017/19403/PP_SPG_Benenden_Iden_Green_CAA.pdf> [accessed 03/04/19]

- **Tile Hanging:** Traditional materials dominate in the area, even on newer developments. Roofing is primarily clay peg tile roofing with only a few examples of slate. Often the roof is the only element visible in the Arcadian setting.
- **Chimneys:** These provide an important punctuation of the roofscape and architectural features amongst the trees. Many of the chimneys are substantial structures with stepped and projecting brick courses.
- **Architectural Punctuation:** Within the fairly strong, consistent building materials and homogeneity, there are some distinctive punctuation points, which add to the character and provide crucial reference points and individual identity. They include white boarding, black and white gables, porches with columns and arcades, and the cupola. These introduce a small but appropriate variety to the strength and simplicity of materials.
- **Balance and Simplicity:** The Street has a simple and strong linearity, which is complemented by the variety of containment types such as hedges with buildings set back in gardens, or the buildings in other instances located tighter to the footway.
- **Architectural Detail:** White painted timber windows are a consistent theme throughout the Conservation Area. The use of dentilled eaves detailing is also a very evident feature.
- **Rear Elevations:** When visible, rear elevations provide an interesting feature. Their strongly geometric/architectural forms are punctuated by gables, hips and chimneys. Many are still untouched by later extensions and alterations.

Iden Green Conservation Area which was originally designated in 1973 lies to the south of Benenden village and is also described in the Benenden and Iden Green Conservation Areas Appraisal.⁴⁵ Summary of elements that contribute to Iden Green Conservation Area's character are described below:

- **Views:** The position of the hamlet on a spur allows strong visual links out to the countryside through a series of glimpses and panoramas. There are one or two notable long views to distant landmarks, including St George's Church in Benenden and Beacon Windmill. Views into the area; however, are restricted by the surrounding topography and tree cover, making the buildings not readily apparent in the landscape.
- **Spatial Layout:** The Conservation Area has a variety of spatial relationships, with some areas of tightly related buildings and other parts being much more sporadic in layout. This is an important feature. Also the relationship of buildings to the roads is varied where some buildings are tight to roads and others are set back. In most instances car parking seems to be discreetly located and therefore not intrusive.
- **Green:** The central convex recreation ground and central field subtly dominate the Conservation Area due to their position and the nature of the topography. This serves to reinforce the visual separation and sporadic character of the area, with few cross views within the hamlet and most views forced outwards. This green area is particularly sensitive insofar as any changes would have the potential of wider effect.
- **Architectural Scale:** Buildings in the main comprise modestly-scaled artisans' cottages. Invariably these are of a simple, shallow depth plan, with recessive roof forms, that is front to back roof pitches. Grand, deep plan buildings are notably absent, as is the use of assertive gables and dormers.
- **Edges:** The majority of roads and lanes still have soft edges, giving a very informal character. The alignment sometimes meanders, adding to the informality. Recent developments in the area and highway improvement works have compromised this in places.
- **Boundaries:** Low-key boundaries predominate, whether they are the characteristic metal estate fencing, low picket fence, or hedging. Although there is a variety of enclosures, they are generally consistently low in height allowing the buildings themselves to be appreciated. Some recent examples of closeboarded fences have not acknowledged this essential character.
- **Variety of Materials:** White weatherboarding is perhaps the most prevalent and strongest characteristic material in the Conservation Area, most noticeably in the eastern part. Otherwise there is no other strong theme of building materials, with a range of types being present in the area, often reflecting the age of building and fashion prevalent at the time of construction.
- **Details:** The use of pastel colours to front doors is noticeable, as are the latticed timber door surrounds which are very evident.

⁴⁵ Tunbridge Wells Borough Council (2005): 'Benenden and Iden Green Conservation Areas Appraisal' [online] available at: <http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0017/19403/PP_SPG_Benenden_Iden_Green_CAA.pdf> [accessed 03/04/19]

- Chimneys: Although generally only modest in scale and height, the chimneys are invariably apparent amongst trees and through hedges and over the rise of the central green. They provide punctuation to the skyline and reference points, including the focal point provided by the cupola to the church.

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are seen as important by local communities.

Following a high-level review of the Historic Environment Record (HER) for Kent (accessed via the Heritage Gateway)⁴⁶, there are 105 records within Benenden Parish including a variety of archaeological sites, historic buildings and landscapes dating from the palaeolithic period to the present day. These include quarries, cottages, farms and gateways.

Summary of future baseline

New development in the Neighbourhood Plan area has the potential to impact on the fabric and setting of cultural heritage assets; for example through inappropriate design and layout. It should be noted; however, that existing historic environment designations offer a degree of protection to cultural heritage assets and their settings.

Conversely, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the village and better reveal assets' cultural heritage significance.

A.6 Land, Soil and Water Resources

Context Review

The EU's Soil Thematic Strategy⁴⁷ presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

The EU Water Framework Directive ⁴⁸(WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances; and
- Ensure the progressive reduction of groundwater pollution.

Key messages from the National Planning Policy Framework⁴⁹ (NPPF) include:

- 'Planning policies and decisions should contribute to and enhance the natural and local environment by:
- Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and

⁴⁶ Heritage Gateway (2019): Historic Environment Record for Kent, [online] available to access via: <http://www.heritagegateway.org.uk/gateway/> [accessed 03/04/19]

⁴⁷ European Commission (2006) Soil Thematic Policy [online] available at: http://ec.europa.eu/environment/soil/index_en.htm [accessed 03/04/19]

⁴⁸ European Commission (2016) The EU Water Framework Directive – integrated river basin management for Europe [online] available at: http://ec.europa.eu/environment/water/water-framework/index_en.html [accessed 03/04/19]

⁴⁹ MHCLG (2018) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf [accessed 03/04/19]

- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland
- Prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.
- ‘Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.’
- ‘Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.’
- Planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs’, and ‘promote and support the development of under-utilised land and buildings.’
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.
- Encourage the effective use of land’ through the reuse of land which has been previously developed, ‘provided that this is not of high environmental value’. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to ‘set out their own approach to housing density to reflect local circumstances’.
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.
- With regards to waste, the NPPF does not contain any specific waste policies as waste planning policy will be published as part of the National Waste Management Plan.

Along with the policies contained within Chapter 1 ‘Using and managing land sustainably’ and Chapter 4 ‘Increasing resource efficiency, and reducing pollution and waste’, Goal 2 ‘Clean and plentiful water’, Goal 5 ‘Using resources from nature more sustainably and efficiently’ and Goal 8 ‘Minimising waste’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’⁵⁰ directly relates to the land, soil and water resources SEA theme.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England⁵¹, which sets out a vision for soil use in England. Furthermore, the Water White Paper⁵² sets out the Government’s vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

In terms of waste management, the Government Review of Waste Policy in England⁵³ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

The National Waste Management Plan⁵⁴ provides an analysis of the current waste management situation in England, and evaluates how it will support the implementation of the objectives and provisions of the revised

⁵⁰ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 15/02/19]

⁵¹ DEFRA (2009) Safeguarding our Soils: A strategy for England [online] available at: <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england> [accessed 15/02/19]

⁵² DEFRA (2011) Water for life (The Water White Paper) [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf [accessed 15/02/19]

⁵³ DEFRA (2011) Government Review of Waste Policy in England [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69401/pb13540-waste-policy-review110614.pdf [accessed 03/04/19]

⁵⁴ DEFRA (2013) Waste Management Plan for England [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf [accessed 03/04/19]

Waste Framework Directive⁵⁵. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

The South East River Basin Management Plan⁵⁶ provides a framework for protecting and enhancing the benefits provided by the water environment. It also informs decisions on land-use planning and provides baseline classification of water bodies, statutory objectives for protected areas, statutory objectives for water bodies, and a summary programme of measures to achieve statutory objectives.

At the local level, Core Policy 5: Sustainable Design and Construction of the Tunbridge Wells Core Strategy (2010) specifically relates to the Land, Soil and Water Resources SEA theme. The following saved policies from the Tunbridge Wells Local Plan (2006) also relate to the Land, Soil and Water Resources SEA theme.

- EN16: Protection of groundwater and other watercourses; and
- EN18: Flood risk.

Summary of current baseline

Soil resources

The Agricultural Land Classification (ALC) classifies land into size grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.

At the local level a detailed classification has not been undertaken for the majority of the Neighbourhood Plan area. As such, there is a need to rely on the national 'Provisional Agricultural Land Quality' dataset.

The Provisional Agricultural Land Quality dataset⁵⁷ shows that the Neighbourhood Plan area is predominantly covered by Grade 3 agricultural land; however, without the subset grading (3a or 3b) it is not possible to tell at this stage whether the agricultural land is considered to be 'best and most versatile'. It is also important to note that the national dataset is of very low resolution and may not necessarily provide an accurate reflection of the agricultural land quality within the Neighbourhood Plan area.

Water resources

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. As of March 2019, the plan area does not intersect with any SPZs.

The EU Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. These areas are designated as Nitrate Vulnerable Zones (NVZs) and, as such, are recognised as being at risk from agricultural nitrate pollution. Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination. The entire plan area is contained within an NVZ.

Water quality

The Neighbourhood Plan area lies within the Beult Operational Catchment to the north and the Rother Levels Operational Catchment to the south⁵⁸.

Within the Beult Operational Catchment, there are ten water bodies in total. All ten have 'good' chemical status. Ecological status of the water bodies varies with the majority having 'moderate' ecological status, but three others have 'poor', 'bad' and 'good' ecological status.

⁵⁵ Directive 2008/98/EC

⁵⁶ DEFRA & Environment Agency (2015) Water for life and livelihoods Part 1: South East river basin district River basin management plan [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718337/South_East_RBD_Part_1_river_basin_management_plan.pdf accessed 03/04/19]

⁵⁷ Natural England (2018) Agricultural Land Classification map London and the South East (ALC007) [online] available at < <http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736> > [accessed 03/04/19]

⁵⁸ Environment Agency (2019) Catchment Data Explorer [online] available at: < <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/7> > [accessed 03/04/19]

Within the Rother Levels Operational Catchment, there are nine water bodies in total. All nine have 'good' chemical status, with the majority having 'moderate' ecological status but two water bodies having 'poor' and two others having 'good' ecological status.

Summary of Future Baseline

Future development has the potential to affect water quality through diffuse pollution, waste water discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area.

In the absence of a detailed Agricultural Land Classification assessment for the majority of the Parish, it remains uncertain whether new development in the Neighbourhood Plan area will lead to losses of higher quality (best and most versatile) agricultural land.

A.7 Population and community

Context Review

Key messages from the National Planning Policy Framework⁵⁹ (NPPF) include:

- 'One of the three overarching objectives of the NPPF is 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 wellbeing.'
- To support the Government's objective of significantly boosting the supply of housing, strategic policies 'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change⁶⁰ warns that society is underprepared for an ageing population. The report states that 'longer lives can

⁵⁹ MHCLG (2018) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf [accessed 04/04/19]

⁶⁰ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf> [accessed 04/04/19]

be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

Policies contained in Chapter 1 'Using and managing land sustainably' and Chapter 4 'Increasing resource efficiency and reducing pollution and waste' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'⁶¹ directly relate to the Population and Communities SEA theme.

At the local level, Core Policy 1: Delivery of Development, Core Policy 6: Housing Provision, Core Policy 7: Employment Provision and Core Policy 8: Retail, Leisure and Community Facilities Provision of the Tunbridge Wells Core Strategy (2010) specifically relate to the Population and Community SEA theme. The following saved policies from the Tunbridge Wells Local Plan (2006) also relate to the Population and Community SEA theme.

- CR13: Retention of community facilities in neighbourhood centres or villages;
- R1: Recreation of existing recreation open space;
- CS4: Development of contributions to school provision for developments over 15 bedspaces; and;
- CS6: Retention of community buildings.

The Kent Better Homes: localism, aspiration and choice Housing Strategy⁶² sets out of key ambitions to be delivered across Kent and Medway to tackle local housing challenges.

Summary of current baseline

Population

Table: Population growth 2001-2011⁶³

Date	Benenden	Kent	South East	England
2001	2,230	1,329,718	8,000,645	49,138,831
2011	2,374	1,463,740	8,634,750	53,012,456
Population Change 2001-2011	+6.5%	+10.1%	+7.9%	+7.9%

As shown in **Table 8.1**, the population of Benenden increased at a lower rate between 2001 and 2011 in comparison to Kent, the South East of England and England averages.

⁶¹ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 04/04/19]

⁶² Kent Housing Group (2011) Better Homes: localism, aspiration and choice [online] available at: https://www.kent.gov.uk/_data/assets/pdf_file/0003/6177/Better-homes-localism-aspiration-and-choice.pdf [accessed 04/04/19]

⁶³ ONS (no date): Census 2011: Population Density 2011 (Table QS102EW); Population Density 2001 (Table UV02)

Age Structure

Table: Age Structure (2011)⁶⁴

	Benenden	Kent	South East	England
0-15	26.0%	19.4%	19.0%	18.9%
16-24	14.7%	11.3%	11.2%	11.9%
25-44	17.1%	25.0%	26.5%	27.5%
45-59	19.9%	19.8%	19.9%	19.4%
60+	22.3%	24.5%	23.3%	22.3%
Total Population	2,374	1,463,740	8,634,750	53,012,456

Generally, there are a similar proportion of residents within the 60+ age category within the Neighbourhood Plan area (22.3%) in comparison to the total for Kent (24.5%), the South East (23.3%) and England (22.3%), as shown in the table above. In contrast, a lower proportion of residents are within the working age categories (25-44 and 45-59) in the Neighbourhood Plan area (37.0%) in comparison to the percentages for Kent (44.9%), the South East of England (46.4%) and England (46.9%). Additionally, 40.7% of residents within the Neighbourhood Plan area are within the younger age categories (0-15 and 16-24), greater than the percentages for Kent (30.6%), the South East of England (30.2%) and England (30.8%). However, the higher percentage of younger people in Benenden is likely to be due to Benenden School which boards 550 girls aged 11-18. 2011 census data indicates that the population of residents living in Benenden out of term time is 2,010.

Household deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarised below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health or has a long term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Table: Relative household deprivation dimensions⁶⁵

	Benenden	Kent	South East	England
Household not deprived	56.3%	43.8%	47.7%	42.5%
Deprived in 1 dimension	28.6%	33.0%	32.2%	32.7%
Deprived in 2 dimensions	12.5%	18.4%	16.0%	19.1%
Deprived in 3 dimensions	2.4%	4.4%	3.7%	5.1%
Deprived in 4 dimensions	0.2%	0.5%	0.4%	0.5%

⁶⁴ ONS (no date): Census 2011: Age Structure 2011 (Table KS102EW)

⁶⁵ ONS (no date): Census 2011: 'Households by Deprivation Dimensions 2011 (Table QS119EW)

Based on the information presented in **Table 8.3**, fewer households are deprived in 1 or more dimensions within the Neighbourhood Plan area (43.7%) in comparison to Kent (56.2%) the South East of England (52.3%) and England (57.5%). Out of the 43.7% of households which are deprived in the Neighbourhood Plan area, the majority are deprived in one or two dimensions, which is similar to the regional and national averages.

Index of Multiple Deprivation (IMD)

The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

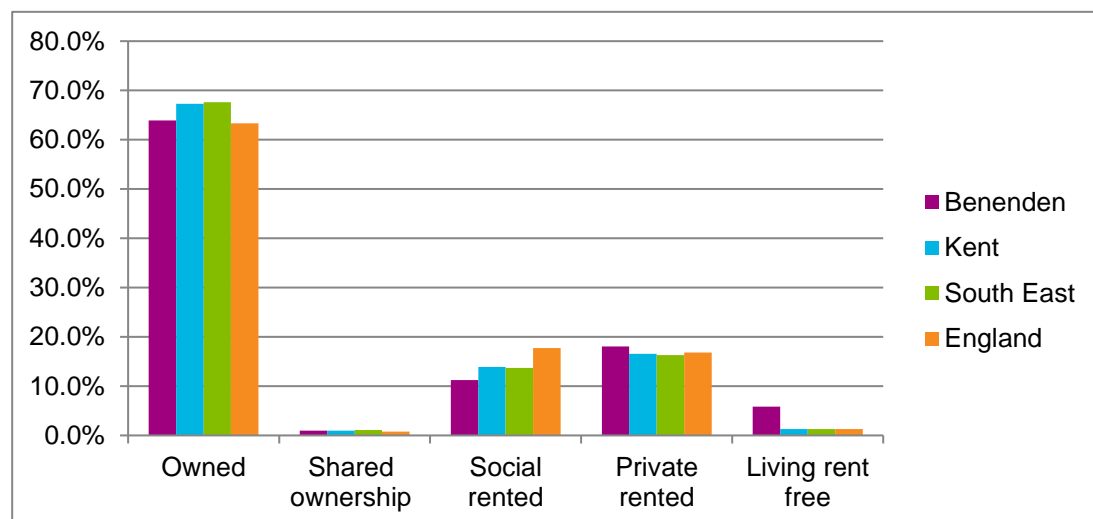
- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 - a) 'Geographical Barriers': relating to the physical proximity of local services
 - b) 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
 - a) 'Indoors Living Environment' measures the quality of housing.
 - b) 'Outdoors Living Environment' measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
 1. Income Deprivation Affecting Children Index: The proportion of all children aged 0 to 15 living in income deprived families.
 2. Income Deprivation Affecting Older People Index: The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardised geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalised into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

The Neighbourhood Plan area falls within the LSOA Tunbridge Wells 014A. This LSOA is within the 40% least deprived LSOAs in England.

Housing tenure

Figure:



'Tenure by Household' ⁶⁶

Within the Neighbourhood Plan area, 63.9% of residents either own their home outright or with a mortgage, lower than the totals for Kent (67.3%) and the South East of England (67.6%) but broadly similar to the totals for England (63.3%). As shown in Figure 8.4, there are a slightly higher proportion of residents living within privately rented homes in the Neighbourhood Plan area in comparison to the regional and national trends. Additionally, there are a lower proportion of residents living in social rented accommodation in comparison to Kent, the South East of England and England. The percentage of residents in the Neighbourhood Plan area living in shared ownership accommodation (1.0%) is similar to the totals for Kent (1.0%), the South East of England (1.1%) and England (0.8%). Additionally there is a higher proportion of people living rent free within the Neighbourhood Plan area in comparison to the regional and national proportions. This could relate to the greater proportion of people within the younger age categories suggesting that more younger people are living at home with parents within the Neighbourhood Plan area. Additionally, this might be skewed by the 550 children who board at Benenden School.

Education

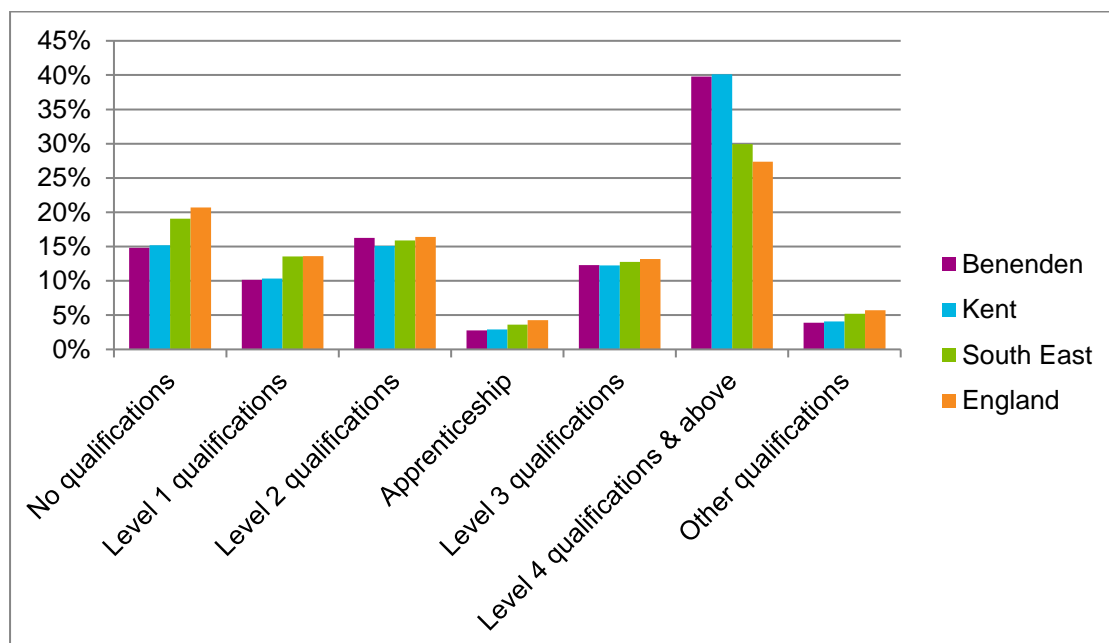


Figure: 'Highest level of Qualification' ⁶⁷

Based on the 2011 census data presented in the figure above, 14.8% of residents in the Neighbourhood Plan area have no qualifications, slightly lower than the total for Kent (15.2%), the South East of England (19.1%) and

⁶⁶ ONS (no date): Census 2011: Tenure-Households 2011 (Table QS405EW)

⁶⁷ ONS (no date): Census 2011: Highest Level of Qualification 2011 (Table QS501EW)

England (20.7%). Comparatively, 39.8% of residents within the Neighbourhood Plan area have a Level 4 qualification or above, which is over 10% higher than the total for the South East of England (29.9%) and the total for England (27.4%).

Employment

In regard to employment within the Neighbourhood Plan area, the following three occupation categories support the most residents:

- Professional occupations (23.4%);
- Associate professional & technical occupations (15.3%); and
- Managers, directors, senior officials (15.2%).

Overall, 54.0% of residents within the Neighbourhood Plan area are employed in one of the above three occupation categories, higher than the totals Kent (40.3%), the South East of England (44.8%) and England (41.1%). This is highlighted in the figure below. This suggests that the Neighbourhood Plan area has a highly skilled workforce, supported by the percentage of residents with a Level 4 qualification or above (as shown in the above figure).

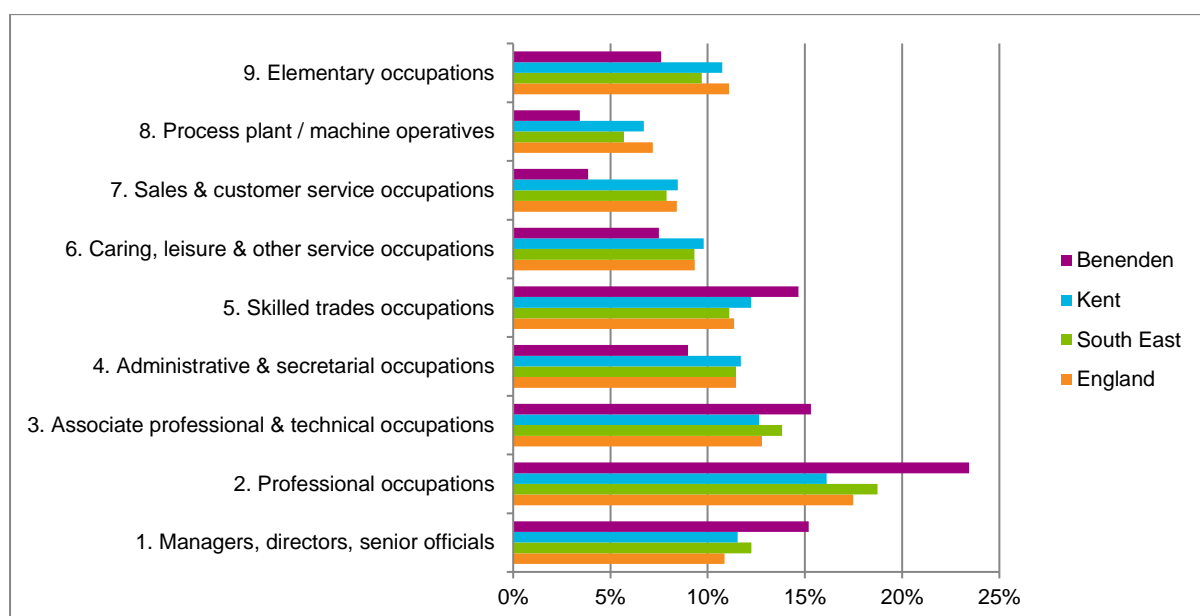


Figure: 'Occupation of usual residents aged 16 to 74 in employment'⁶⁸

Summary of future baseline

As the population continues to age, this has the potential to place pressures on the existing services and facilities within the timeframe of the Neighbourhood Plan. This could negatively impact on the future vitality of the local community and economy.

Considering that the area is not deprived in relation to indices such as health deprivation and disability, it is expected that increasing numbers of elderly residents will continue. This can have implications for housing and may indicate a need for more specialist accommodation to meet the needs of the elderly in the future.

Overall levels of deprivation in the Neighbourhood Plan area are likely to remain low.

⁶⁸ ONS (no date): Census 2011: 'Occupation 2011' (Table KS608EW)

A.8 Health and Wellbeing

Context Review

Key messages from the National Planning Policy Framework⁶⁹ (NPPF) include:

- One of the three overarching objectives of the NPPF is 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 wellbeing.'
- 'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'
- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

The policies contained in Chapter 3 'Connecting people with the environment to improve health and wellbeing' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'⁷⁰ directly relates to the health and wellbeing SEA theme.

Other key national messages in relation to health include; Fair Society, Healthy Lives⁷¹ ('The Marmot Review') which investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is 'overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities'.

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012⁷² transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

The Kent Joint Strategic Needs Assessment⁷³ presents an understanding of the issues impacting on the population of Kent. Key objectives for producing a JSNA are:

- To coordinate strategic direction, effort and resource commitment of the range of public, private and voluntary/ community sector organisations that work to the common goals of improving health and wellbeing for the population of Kent;
- To ensure that resources are focused on achieving maximum impact on improving the health and wellbeing of the people of Kent specifically targeting those who are in greatest need;
- To maintain a focus on health improvement and prevention and ensuring efficient use of available resources; and

⁶⁹ MHCLG (2018) National Planning Policy Framework [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf [accessed 04/04/19]

⁷⁰ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 04/04/19]

⁷¹ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at:

<http://webarchive.nationalarchives.gov.uk/20170106161952/http://www.apho.org.uk/resource/item.aspx?RID=106106> [accessed 04/04/19]

⁷² Health and Social Care Act 2012: <http://www.legislation.gov.uk/ukpga/2012/7/contents/enacted>

⁷³ Kent County Council (2012) Joint Strategic Needs Assessment [online] available at:

<https://democracy.kent.gov.uk/documents/s30802/Item%206%20-%20JSNA.pdf> [accessed 04/04/19]

- To provide evidence of cost effectiveness and value for money.

At the local level, Core Policy 8: Retail, Leisure and Community Facilities Provision of the Tunbridge Wells Core Strategy (2010) specifically relates to the Health and Wellbeing SEA theme.

Summary of current baseline

Health indicators and deprivation

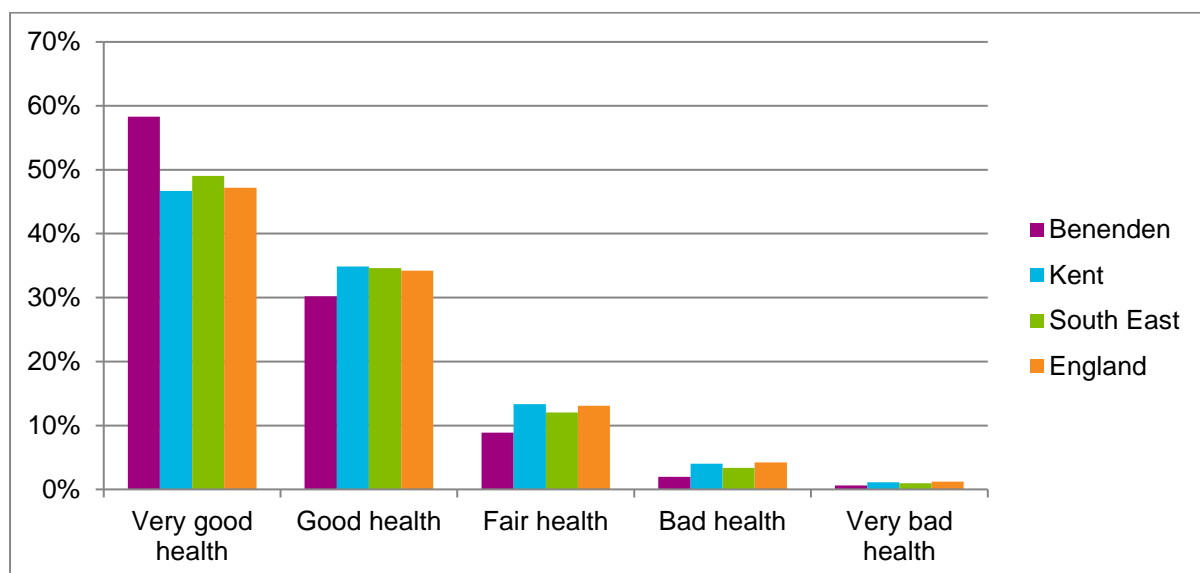


Figure: 'General Health'⁷⁴

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail in Chapter 8. As highlighted in the figure below, 88.5% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', greater than the totals for Kent (81.5%), the South East of England (83.7%) and England (81.4%). Similarly, the percentage of residents in the Neighbourhood Plan area considering themselves to have 'bad health' or 'very bad health' is 2.6%, lower than the totals for Kent (5.1%), the South East of England (4.3%) and England (5.4%).

Table: Disability⁷⁵

	Benenden	Kent	South East	England
Activities limited 'a lot'	4.9%	8.0%	6.9%	8.3%
Activities limited 'a little'	7.2%	9.6%	8.8%	9.3%
Activities 'not limited'	87.9%	82.4%	84.3%	82.4%

The total percentage of residents within the Neighbourhood Plan area who report that their activities are limited 'a little' is less than the regional and national totals shown in **Table 9.1**. There are also a lower number of residents within the Neighbourhood Plan area who report that their activities are limited 'a lot' (4.9%) in comparison to Kent (9.6%), the South East of England (6.9%) and England (8.3%). Overall, 87.9% of residents in the Neighbourhood Plan area report that their activities are 'not limited', slightly higher than the totals for Kent (82.4%), the South East of England (84.3%) and England (82.4%).

⁷⁴ ONS (no date): Census 2011: 'General Health 2011' (Table QS302EW)

⁷⁵ ONS (no date): Census 2011: 'Long-term Health Problem or Disability 2011' (Table QS303EW)

Summary of future baseline

Health and wellbeing levels within the Neighbourhood Plan area are generally better than regional and national averages with a higher percentage of residents reporting 'good' or 'very good' health.

A growing and ageing population within the Neighbourhood Plan area may increase the reported cases of disability, reduce the levels of good health, and place future pressures on health services in the area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing.

Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

A.9 Transport

Context Review

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

Key messages from the National Planning Policy Framework⁷⁶ (NPPF) include:

- 'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
 - a) The potential impacts of development on transport networks can be addressed
 - b) Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised
 - c) Opportunities to promote walking, cycling and public transport use are identified and pursued
 - d) The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account
 - e) Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'
- 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008.⁷⁷ Kent's Local Transport Plan 4⁷⁸ highlights the strategic transport priorities in Kent which are:

- A new Lower Thames Crossing;
- Bifurcation of port traffic;
- Transport infrastructure to support growth in the Thames Estuary including Crossrail extension to Ebbsfleet;
- A solution to Operation Stack;

⁷⁶ MHCLG (2018) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf [accessed 04/04/19]

⁷⁷ Local Transport Act 2008 [online] available at: <http://www.legislation.gov.uk/ukpga/2008/26/contents> [accessed 15/02/19]

⁷⁸ Kent County Council (2016) Local Transport Plan 4: Delivering Growth without Gridlock 2016-2031 [online] available at: <https://www.kent.gov.uk/_data/assets/pdf_file/0011/72668/Local-transport-plan-4.pdf> [accessed 04/04/19]

- Provision for overnight lorry parking;
- Journey time improvements and Thanet Parkway Railway Station;
- Ashford International Station signalling;
- Rail improvements; and
- Bus improvements.

At the local level, Core Policy 3: Transport Infrastructure of the Tunbridge Wells Core Strategy (2010) specifically relates to the Transportation SEA theme. Within the Tunbridge Wells Local Plan (2006), Chapter 11: Transport and Parking has 21 policies which relate to the Transport SEA theme.

Summary of current baseline

Rail network

There are no railway stations in the plan area, with the closest rail connections to Benenden being Etchingham (8.6km) and Staplehurst (9.6km), the latter of which offers roughly two services an hour to London during weekdays; a journey that takes just over an hour.

In addition, Headcorn railway station has direct links to London, and is closer to the northern parts of the parish than Etchingham or Staplehurst. Trains to London take 1 hour 5 mins from Headcorn.

Bus Network

There are two bus stops in Benenden village, from which services run to Sandhurst, Headcorn, Maidstone, Tenterden, Rolvenden, Cranbrook, Goudhurst, Paddock Wood and Tunbridge Wells. The first bus service runs at 6:30, with the last buses departing at 20:30 with most of the services running every hour.

Cycle and footpath network

National Cycle Network route 18 runs along the southern border of the plan area. The parish also has a well developed public rights of way network.

Road network and congestion

The B2086 forms the main highway through Benenden village, allowing east/ west traffic to flow freely through the village. The B2086 joins the A229 at Hartley which provides links north to Maidstone and south to Hastings.

The 2015 Benenden Parish Plan⁷⁹ observes that: 'Whilst Benenden, Iden Green and East End all suffer from through traffic, two commercial centres attract specific vehicle movements as destinations. The Hospital at East End and Benenden School both have heavy vehicle concentrations - the former on a daily basis and the school when parents visit.'

⁷⁹ Benenden Village Plan Steering Group (2015) Benenden Parish Plan 2015 [online] available at: <
<https://www.benendenvillage.org.uk/ParishPlan/BenendenParishPlan2015ScreenCopy.pdf>> [accessed 04/04/19]

Availability of cars and vans

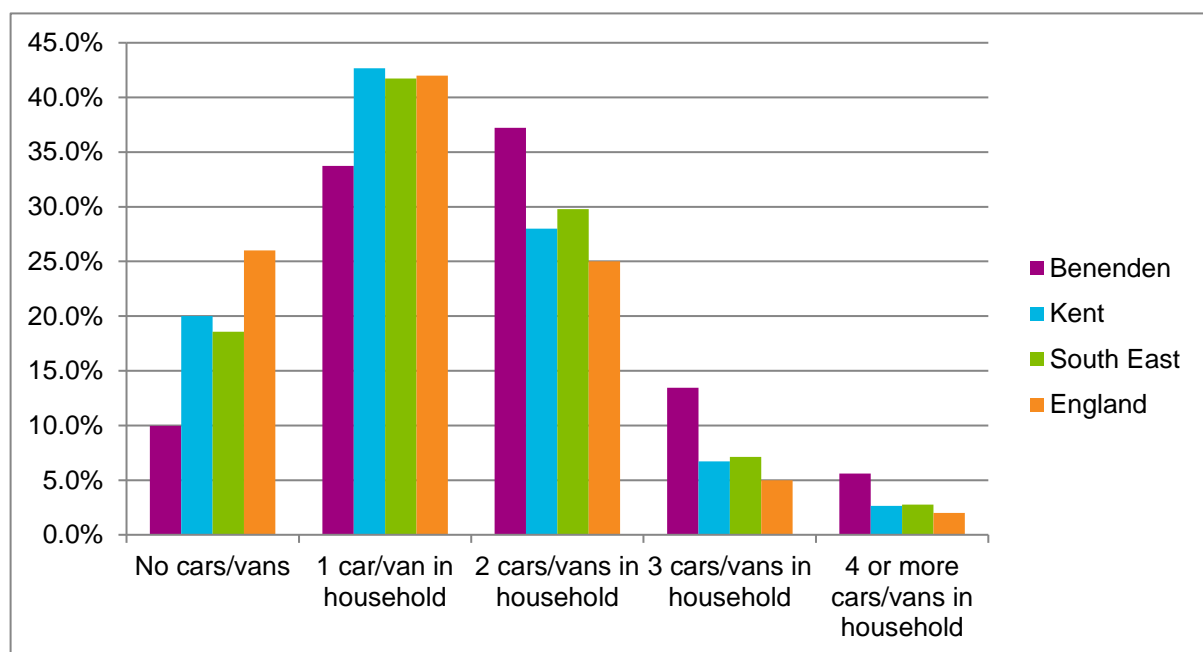


Figure: 'Car and van ownership'⁸⁰

Based on the 2011 census data presented in the figure above, 90.0% of households in the Neighbourhood Plan area have access to at least one car or van, which is significantly higher than the percentages for Kent (80.0%), the South East of England (81.4%) and England (74.2%). The total number of households in the Neighbourhood Plan area with access to at least two cars or vans (56.3%) is almost 20% higher than the total for Kent (37.3%), and the total for the South East of England (39.7%) and almost 25% higher than the total for England (32.0%).

Travel to work

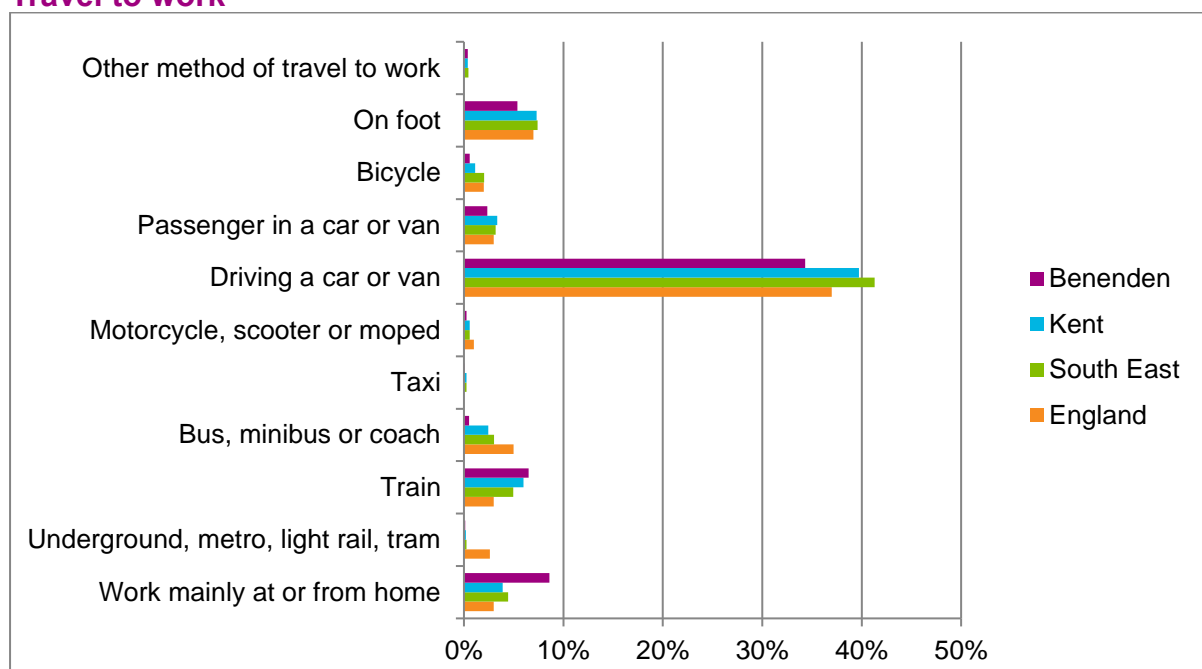


Figure: 'Method of Travel to Work'⁸¹

As shown in the figure above, the most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (34.3%) which is slightly lower than Kent (39.7%), the South East of England (41.3%) and England (36.9%). A higher percentage of residents in the Neighbourhood Plan work mainly from home in

⁸⁰ ONS (no date): 'Car or Van Availability 2011', (Table QS416EW)

⁸¹ ONS (no date): Census 2011: 'Method of Travel to Work 2011' (Table QS701EW)

comparison to the regional and national trends. In contrast, a lower proportion of residents walk to work or catch a bus, minibuss or coach.

Summary of future baseline

A continued reliance on the private car is highly likely within the Neighbourhood Plan area, particularly given the size of the village and its rural nature; residents are likely to continue to travel outside of the Neighbourhood Plan area to access key services and facilities.

New development has the potential to increase traffic and lead to additional congestion issues within the Neighbourhood Plan area. Additionally, public transport use is likely to remain low compared with private car use given the lack of public transport options.

Given the scale of development likely to come forward through the Neighbourhood Plan area, it is unlikely that this development will contribute to any significant improvements in public transport provision.

