

Little Bishopsden
Biddenden
Ashford
Kent
TN278DS

28 April 2021

John Slater
Independent Examiner
c/o Independent Examiner's Referral Service
Bristol

Dear Sir,

Benenden Neighbourhood Plan

I write on behalf of the Friends of the East End. We would like to thank you very much for asking two questions of us to which we have given careful thought. As you know, we have been active in relation to the Neighbourhood Plan right from the start, but almost always we have been on the outside.

There are 76 households in the East End and almost all of them are members of the Friends of the East End (FEE). FEE also includes parishioners from Biddenden who fear that their parish may be affected as much as, or even more than, Benenden.

I might add that here on the border, it is not so easy to draw a clear line between the two parishes. You will notice that my postal address is Biddenden, yet I live in the parish of Benenden.

Question 36. Can I ask the Friends' view as to what beneficial use could the building (the Garland Wing) be put to, to secure its future use and restoration? Would they consider that a residential conversion would be acceptable in this location and roughly how many units would it deliver?

- The 1906 early modernist sanatorium building could be restored to provide a centre for well-being and holistic medicine.
- If this is not feasible, it would be acceptable to convert it into 10 townhouses (as part of a total of no more than 24 for the whole site - see our answer to question 37). This would enable the fabric of the building to be preserved and would be in keeping with its environmental and historic setting.

37. I would like to offer the Friends of the East End the opportunity to set out their vision for this redundant hospital site

- The only part of the hospital which is clearly redundant is the SE Quadrant but the BNP is including for development, the non-redundant site north of Goddards Green Road (GGR), where 18 dwellings are currently available to let. No further development is needed in this area.
- The extent of this northern site is uncertain. The area Benenden Healthcare Society (BHS) is referring to — in its request for 25 new houses there plus the option of re-building the existing 18 dwellings — is the area set aside for development in the pre-submission Local Plan (LP), which is an area of land that includes all the Local Wildlife Site (LWS). The BNP, however, only includes the southern section of the LWS (see attached LP and BNP plans for the northern site).
- There is overall uncertainty about the area up for development or, indeed, the area considered by BHS to be ‘redundant’. This uncertainty arises from the fact that the first draft of the Tunbridge Wells Borough Council LP (TWBC) shows the entire built-up area of the hospital site up for development (see attached map) and this same area is also marked for development on page 38 of the July 2019 Regulation 14 draft BNP (see attached page).
- Given that in 2012, BHS held a meeting on the future of the SE Quadrant when one of the options brought up by the CEO was returning it to agricultural land and that other options were for building first 6 houses, then more, then, finally, 24 houses at the site, we feel there is an attempt at development by incremental bites and this must be stopped.
- The Friends’ vision for the future starts with the request that there is a clear commitment on the part of BHS to produce a Masterplan for the entire built-up area.

The SE Quadrant

- This site was chosen in 1905 for a sanatorium because it is beautiful, remote and tranquil. It stands on a ridge with fine views, with plentiful clean, fresh air blowing in off the sea and with woods and fields all around. It should be restored to its original purpose as a place which promotes well-being.
- There was no cure for tuberculosis in 1905. Sanatoria aimed at providing a setting in which recovery was likely, though of course, not inevitable. The focus was on the well-being of both mind and body.
- In Benenden’s East End, the beauty of the rural situation catered to the mind, and the adjacent farm, producing healthy, fresh, local food, catered to the body. Patients also benefitted from healthy walks along local country lanes, where wide verges are crowded in spring and summer, with wild flowers.
- **Alternatively**, if the original sanatorium is not to be retained, then the site must be developed in a way that is sympathetic to the fundamental characteristics of its location. In particular:
 - In the SE quadrant, 49 houses are far too many for the site. The decision in 2012 that this unsustainable and isolated area could not support more than an additional 24 houses is barely justifiable. That is the maximum appropriate to an area such as the East End and is also, according to the recent Strutt & Parker sales particulars for the site (attached), appropriate in terms of its saleability;

- The site is clearly an unsustainable location with regard to applicable planning policy. As such, it is not suitable in planning policy for any form of development of the type of density as considered in the current planning application for 49 houses in the BNP and LP.

Once again, thank you so much for asking us these questions. If you decide to hold hearings, we do hope that you will include us.

Yours sincerely,

Hazel Strouts
Organiser, Friends of the East End

Little Bishopsden
Biddenden
Ashford
Kent
TN278DS

28 April 2021

John Slater
Independent Examiner
c/o Independent Examiner's Referral Service
Bristol

Dear Sir,

Benenden Neighbourhood Plan

I write on behalf of the Friends of the East End. We would like to thank you very much for asking two questions of us to which we have given careful thought. As you know, we have been active in relation to the Neighbourhood Plan right from the start, but almost always we have been on the outside.

There are 76 households in the East End and almost all of them are members of the Friends of the East End (FEE). FEE also includes parishioners from Biddenden who fear that their parish may be affected as much as, or even more than, Benenden.

I might add that here on the border, it is not so easy to draw a clear line between the two parishes. You will notice that my postal address is Biddenden, yet I live in the parish of Benenden.

Question 36. Can I ask the Friends' view as to what beneficial use could the building (the Garland Wing) be put to, to secure its future use and restoration? Would they consider that a residential conversion would be acceptable in this location and roughly how many units would it deliver?

- The 1906 early modernist sanatorium building could be restored to provide a centre for well-being and holistic medicine.
- If this is not feasible, it would be acceptable to convert it into 10 townhouses (as part of a total of no more than 24 for the whole site - see our answer to question 37). This would enable the fabric of the building to be preserved and would be in keeping with its environmental and historic setting.

Question 37. I would like to offer the Friends of the East End the opportunity to set out their vision for this redundant hospital site.

- The only part of the hospital which is clearly redundant is the South East Quadrant but the BNP includes for development, the non-redundant site north of Goddards Green Road (GGR) where there are 18 dwellings, all available to let. No further development is needed in this area.
- The extent of this northern site is uncertain. The area Benenden Healthcare Society (BHS) is referring to — in its request for 25 new houses there plus the option of re-building the existing 18 dwellings — is the area set aside for development in the pre-submission Local Plan (LP), an area of land that includes all the Local Wildlife Site (LWS). The BNP, however, only includes the southern section of the LWS (see attached LP and BNP plans for the northern site).
- There is overall uncertainty about the area up for development at the hospital or, indeed, the area considered by BHS to be ‘redundant’. This uncertainty arises from the fact that the first draft of the Tunbridge Wells Borough Council Local Plan (TWBC) shows the entire built-up area of the hospital site up for development (see attached map) and this same area is also marked for development on page 38 of the July 2019 Regulation 14 draft of the BNP (see attached page).
- At a 2012 BHS meeting on the future of the SE Quadrant, one of the options put forward by the CEO was returning it to agricultural land. Other options were for building first 6 houses, then more, then 24 and now 49 houses at the site. We feel there is an attempt at piecemeal development with incremental bites added on, one after the other. This must be stopped.
- The Friends’ vision for the future starts with the request that there is a clear commitment on the part of BHS to produce a Masterplan for the entire built-up area.

The SE Quadrant

- This site was chosen in 1905 for a sanatorium because it is beautiful, remote and tranquil. It stands on a ridge with fine views, with plentiful clean, fresh air blowing in off the sea and with woods and fields all around. It should be restored to its original purpose as a place which promotes well-being.
- There was no cure for tuberculosis in 1905. Sanatoria aimed at providing a setting in which recovery was likely, though of course, not inevitable. The focus was on the well-being of both mind and body.
- In Benenden’s East End, the beauty of the rural situation catered to the mind, while adjacent Cleveland’s farm, producing healthy, fresh, local food, catered to the body. The farm of course, belonged, and still belongs, to the hospital. Patients also benefitted from healthy walks along local country lanes, where wide verges are crowded in spring and summer, with wild flowers.
- **Alternatively**, if the original sanatorium is not to be retained, then the site must be developed in a way that is sympathetic to the fundamental characteristics of its location. In particular:
 - 49 houses are far too many. The decision in 2012 that this unsustainable and isolated area could not support more than an additional 24 houses is barely justifiable. That is the maximum appropriate to an area such as the East End and is also, according to the recent Strutt & Parker sales particulars for the site (attached), appropriate in terms of its saleability;
 - The site is clearly an unsustainable location with regard to applicable planning policy. As such, it is not suitable in planning policy for any form of

development of the type of density as considered in the current planning application for 49 houses in the BNP and LP.

Once again, thank you so much for asking us these questions. If you decide to hold hearings, we do hope that you will include us.

Yours sincerely,

Hazel Strouts
Organiser, Friends of the East End

- Scan 593: BNP Reg 14 draft July 2019 showing all sites with all of hospital site shaded, plus north and south sites
- First draft TW Local Plan, entire hospital site up for development (showing AONB boundary) 2019 September
- Scan 558: January 2021 TW Pre-Submission Local Plan hospital site (northern site including all the LWS)
- Scan 594: BNP February 2019 Informal Draft Plan showing northern hospital site which is same as the LP pre-submission plan
- Scan 597: BNP February 2019 Informal Draft Plan showing all allocations in Benenden (almost the same as final NP draft as well as the TW pre-submission LP)
- Strutt & Parker sale notice for SE Quadrant with Cleveland's Farm

Appendix

Scan 593: BNP Reg 14 draft July 2019 showing all sites with all of hospital site shaded, plus north and south sites

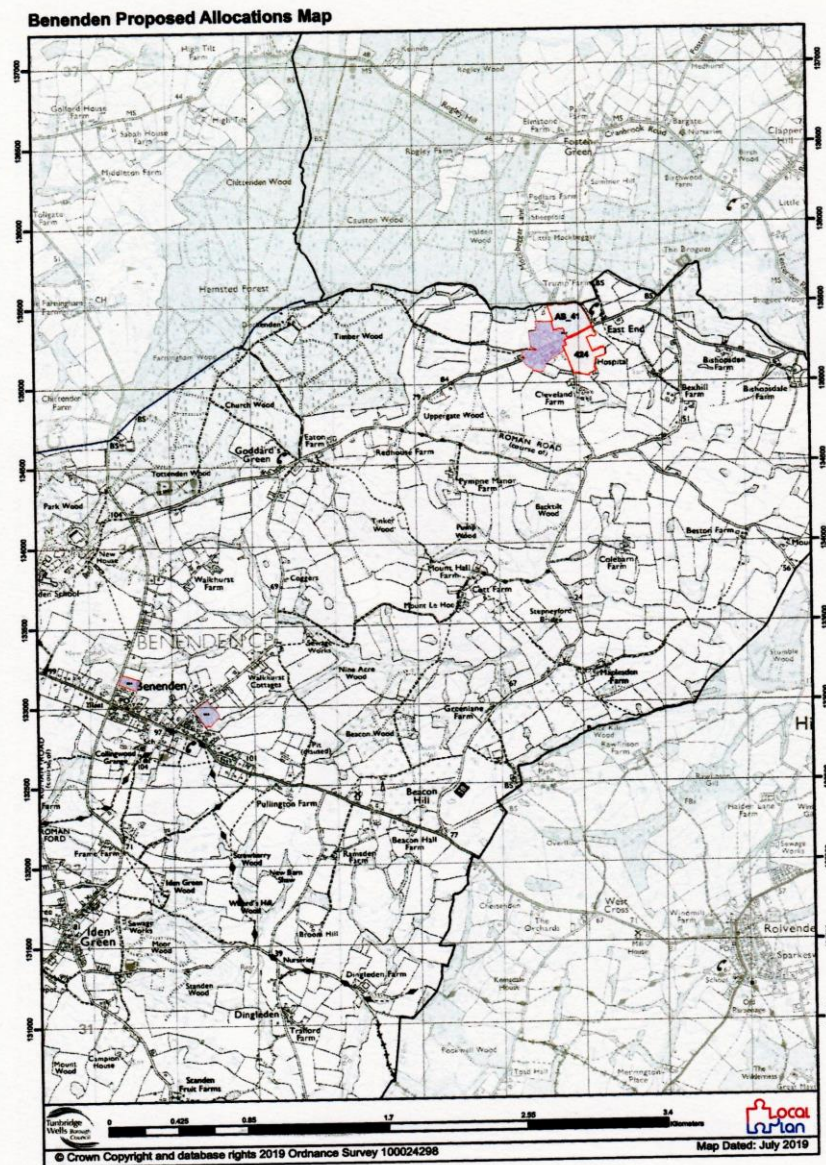
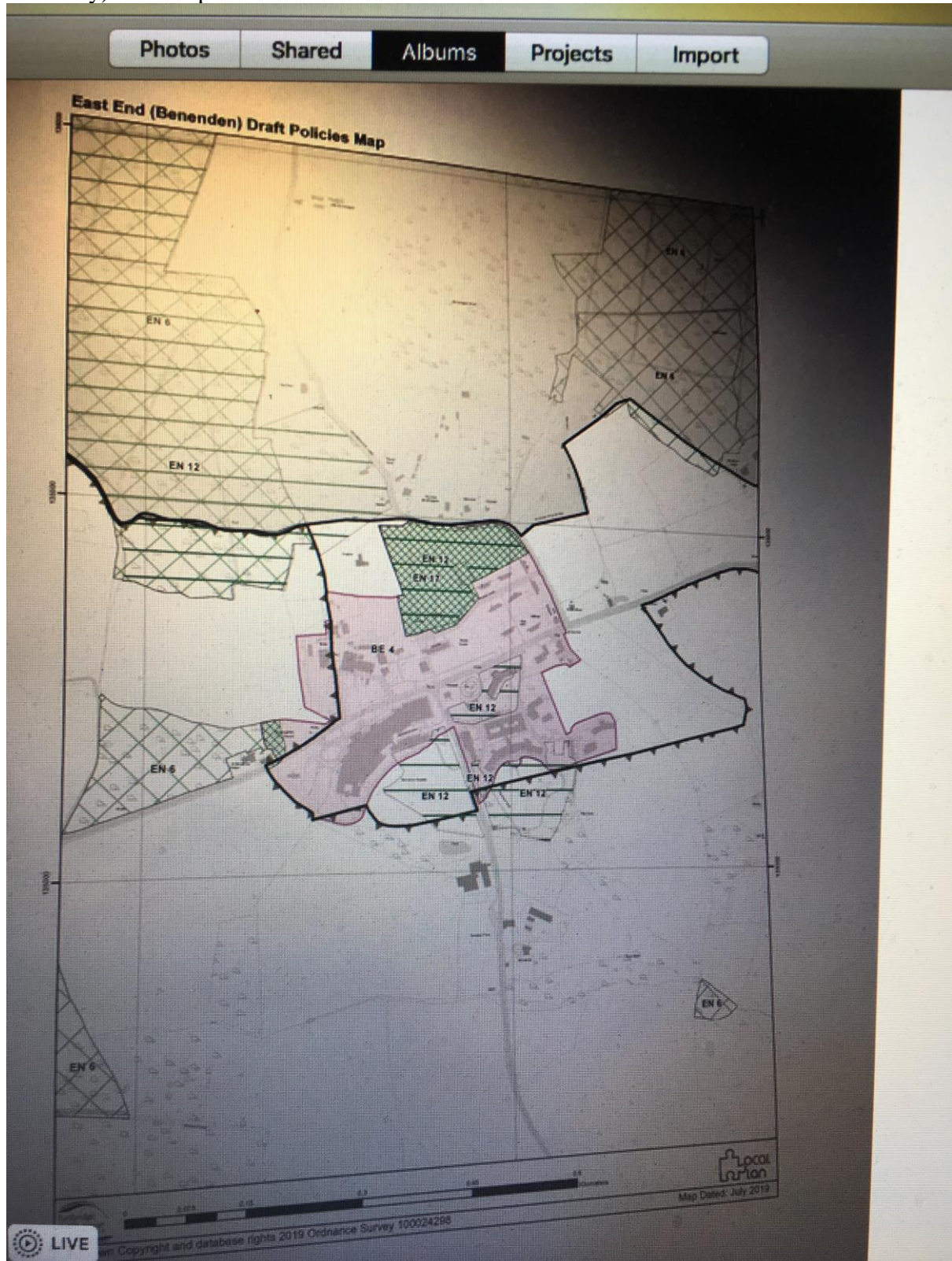


Fig.4 Map showing the 4 allocated sites

Regulation 14 Edition Draft
July 2019 BNP

First draft TW Local Plan, entire hospital site up for development (showing AONB boundary) 2019 September



Inset Map 18

Benenden Hospital

Benenden CP

Scale: 1:2,000

0 0.1 0.2 Km

© Crown Copyright and database rights 2020 Ordnance Survey 100024298

Pre-submission LP

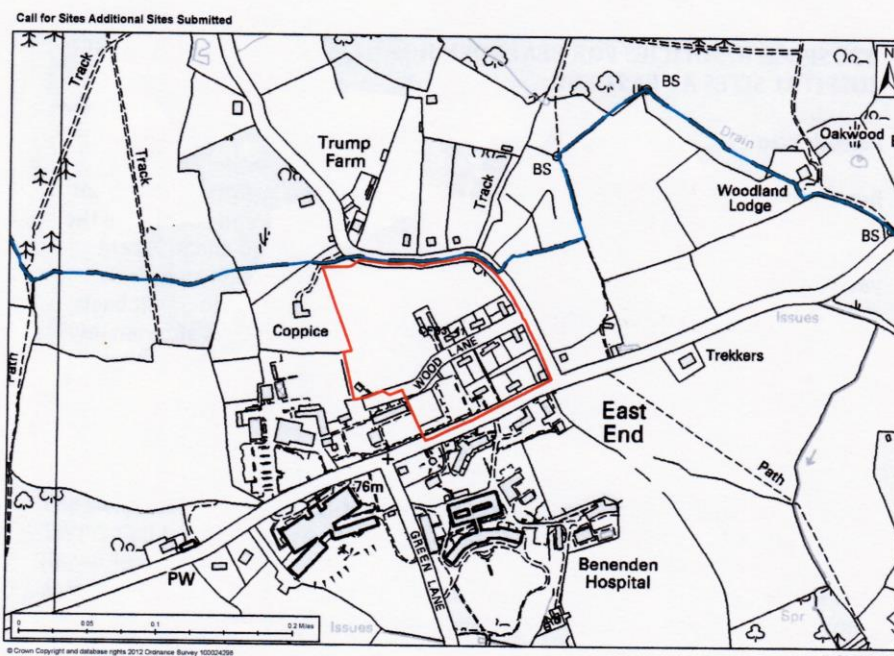
Pre-submission LP

Scan 594: BNP February 2019 Informal Draft Plan showing northern hospital site which is same as the LP pre-submission plan

BNP February 2019 Informal draft plan
(northern hospital site)

of the existing site, and as Site LS40(b) is a greenfield site and unimproved pasture, BNDP has rejected this suggestion. The southern third of the site, plus an area round Peak Lodge, is an important LWS and although the Hospital is not planning to build on those parts of the site, a condition of planning permission must be adequate, robust protection in the form of a buffer/screening in order to preserve the integrity of the LWS (see policies G2 and G8). This Plan supports development on the curtilage of the existing buildings (total capacity not to exceed 50 units on the site). Building density to be no greater than 24 dwellings per hectare.

Site Ref LS41 North of Goddards Green Road/west of Mockbeggar Lane, East End



Benenden Hospital Trust-owned site north of Goddards Green Road currently occupied by a car park, tennis courts and Hospital-built 1950s housing no longer needed by the Hospital and in need of upgrading/modernisation. Several houses are currently unoccupied. This site is also previously developed land outside the AONB though it also includes some important wildlife elements. The cricket pitch is a LWS and the site is bordered by ancient woodland, both of which will need adequate protection in the form of a buffer (see policy G2 and G8). If the development were to reflect the significance of the LWS, and the layout of the existing housing, then a sensitively designed scheme, at

BNP February 2019 Informal draft plan
(all allocations)

It is proposed that majority of the allocation should be on four main sites but that up to 20% of the total can be taken up by so-called 'windfall' sites here defined as small sites of 4 houses or fewer (see Policy HG11).

Hospital site (South)	East End	25 (+ existing pp for 24)
Hospital site (North)	East End	20 (+ existing 18)
Foefee site	Walkhurst Road	22-25
Uphill site	New Pond Road	15-20

Distribution and density

- Given a total of 90-110 new dwellings to be built between now and 2033 BNDP has considered how they should be distributed across the Parish
- The priority given to previously developed land and to sustainability ie proximity to village amenities (NPPF + AONB Management Plan) narrowed options and the led the BNDP to support fewer sites nearer to existing centres
- BNDP has argued for development to be kept at an appropriate density, in keeping with the existing neighbouring pattern of development (see Policy HG2), while cognisant of the fact that the most efficient use must be made of valuable land. This has been accepted by TWBC
- Density will vary depending on the location of the site and its impact on the AONB
- In order to protect more of the AONB, some sites nearer to built-up areas could be developed at greater density

Why not 10 x small sites?

The initial consultation workshop showed a clear preference for small scattered development. So why not have small developments scattered around the Parish?

- Small sites far from amenities are unsustainable and therefore contrary to the NPPF
- The impact on the AONB would be much greater
- No variety of housing types – it is likely only executive homes would be built
- For small sites (10 or fewer) there is no obligation on developers to build affordable housing
- Building in a small part of a larger site would open up that site for larger schemes and more housing later
- Most small sites (10 or fewer) would make as great a financial contribution to the Parish (as larger sites will) though in the emerging Local Plan, Affordable Housing Policy, they may have to make a contribution
- 'Windfall' sites of 4 houses or fewer constitute up to 20% of our allocation so small sites will not be excluded

Choice of sites

- The Plan has endorsed the allocation of 4 main sites: Uphill, Foefee Cottages and Benenden Hospital (sites 424 + LS41), the balance to be made up by smaller 'windfall' sites
- In order to ensure a broader range of housing types the inclusion of other sites was also considered
- If we put forward too many potential sites then we cannot 'protect' them in the Plan from being partly or fully developed either now or in the future and may

[Strutt & Parker sale notice for SE Quadrant with Clevelands Farm](#)