



# **Benenden Neighbourhood Development Plan 2020 - 2036**

**Regulation 15 Submission**

**September 2020**





# Contents

Foreword.....	5
Introduction.....	7
Historic Context.....	17
Chapter 1 Landscape and the Environment.....	23
Chapter 2 Housing Supply and Site Allocation.....	41
Chapter 3 Design and the Built Environment.....	71
Chapter 4 Business and the Local Economy.....	81
Chapter 5 Transport and Infrastructure.....	95
Chapter 6 Plan Review Process.....	108
Glossary of Terms.....	109

## **Supporting Documents**

(listed below available to view online at: [www.benendenneighbourhoodplan.org](http://www.benendenneighbourhoodplan.org))

IA1	Consultation Statement
IA2	Basic Conditions Statement
IA3	Intelligent Plans' Health Check (Reg. 15 Draft)
IA4	BNDP Equality Impact Assessment
IA5	TWBC Statement of Common Ground
IA6	TWBC Habitats Regulation Assessment (HRA) Screening Final Report
IA7	TWBC Strategic Environmental Assessment (SEA) Screening Final Report
SEA1	AECOM Strategic Environmental Assessment

## **Historic Context**

HCA1	Schedule of Listed Buildings in the Parish
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## **Landscape and the Environment**

LEA1	SWOT Data Environment
LEA2	Landscape Character Assessments
LEA3	List of source documents
LEA4	High Weald AONB Landscape Character Maps
LEA5	View Assessments
LEA6	Local Green Space Assessments
LEA7	Wildlife Summary
LEA8	List of Local Wildlife Sites & SSSI
LEA9	Local Wildlife Site maps and citations

continued/-

### **Housing Supply and Site Allocation**

- HSA1 Process/background information
- HSA2 SWOT Analysis
- HSA3 Individual Site Assessments (ISAs)
- HSA4 High Weald AONB Site Assessments
- HSA5 Sites submitted in the Call for Sites

### **Design and the Built Environment**

- BDA1 Survey Documentation
- BDA2 Conservation Area Appraisal
- BDA3 Character Area Assessments
- BDA4 Summary of materials used in existing housing
- BDA5 Existing house styles in the Character Areas
- BDA6 Residential Parking Survey Analysis

### **Business and the Local Economy**

- BEA1 SWOT Analysis for Business/Local Economy
- BEA2 Employee Survey 2018
- BEA3 Local Business Survey 2018
- BEA4 Parish Magazine Article on Benenden Community Shop
- BEA5 Schedule of Community Facilities
- BEA6 Presentation to local businesses 2018

### **Transport and Infrastructure**

- TA1 SWOT Analysis for Transport and Infrastructure
- TA2 Cycle Route Report



## **Foreword to the Neighbourhood Development Plan for Benenden 2020-2036**

The Localism Act (2011) coming into force in April 2012, supported by the National Planning Policy Framework (2012), reinforced by the Neighbourhood Planning Act (2017) and the revised National Planning Policy Framework (July 2018 & February 2019), introduced Neighbourhood Planning into the hierarchy of spatial planning in England, giving communities the right to shape development at local level.

In April 2017 Benenden Parish Council unanimously decided to forge ahead with a Neighbourhood Plan, enabling the village to have an active role in influencing growth in the parish. Once the application for the designated Neighbourhood Area (the whole parish) was approved by Tunbridge Wells Borough Council in August 2017, a Steering Group Committee was set up, led with characteristic strength and perseverance by Paul Tolhurst, Chair of the NDP Committee.

It is a brave step for a small rural community to take on the challenge of delivering its own Neighbourhood Plan. Benenden was fortunate in having already prepared a Parish Plan in 2015, in which the origins of the NDP can be found. Whilst there has been professional advice and guidance from Community Planner, Jim Boot, and Merit Thornton Planning and Community Consultants Ltd, as well as support from the Tunbridge Wells Borough Council planning team, the Plan originates from, and still remains, very much a grass roots perspective of the way Benenden can develop and prosper.

Without doubt the biggest challenge for the NDP has been working out how to manage change by ensuring that development in Benenden will have minimal impact on a place that holds such an abundance of natural beauty.

The surveys, exhibitions and consultations sought to understand what is important to residents and stakeholders, and what came through first and foremost from this evidence gathering was the desire to preserve the beautiful open fields and panoramic views, as well as protecting the ancient woodland, the special ecological biodiversity, and the swathes of quintessential High Weald landscape. And of course, the dark skies. All this as well as providing an adequate and affordable housing supply for the needs of the elderly or single people and young families alike.

The NDP has worked hard to protect and preserve all of the natural assets that are dear to the hearts of the villagers by emphasising the use of brownfield sites. The result is a Plan that sees housing development as a means of growing and sustaining our community facilities, supporting the long-term security of our charities and stakeholders, allowing a rural parish to evolve whilst preserving all that it holds close.

The Parish Council and the Neighbourhood Plan Committee would like to thank all those residents who have taken the time to participate in the process and for supporting the Plan over its development to date.

Nicola Thomas — Chair, Benenden Parish Council — September, 2020







Benenden residents come together to discuss the NDP.

# Introducing Benenden Neighbourhood Development Plan

## Background

Benenden parish is some 2,600 hectares. The parish comprises three main settlements, Benenden, Iden Green, and East End (dominated by Benenden Hospital), and a number of smaller hamlets or 'dens'. In 2011 there were 1,820 residents (excluding Benenden School boarders), in 840 homes.<sup>1</sup> Benenden is broadly equidistant (35 – 45 minutes' drive) from Maidstone, Ashford, Hastings, and Tunbridge Wells. The parish is not well-served by public transport: the nearest train station (Staplehurst) is 7 miles north with no direct connecting bus service. Benenden parish is deeply rural. Even in the centre of Benenden housing density averages less than 10 dwellings per hectare (dph). Nearly 15% of housing is Listed, and the centres of Benenden and Iden Green are designated Conservation Areas. Over 98% of the parish lies within the High Weald Area of Outstanding Natural Beauty (AONB). Tourism, leisure, hospitality, and more traditional rural businesses such as farming and forestry, dominate local employment, alongside Benenden School and Benenden Hospital.

Successive UK Governments have failed to meet the growth in demand for housing. The Government has a current target to build 300,000 homes each year and has introduced changes to planning policies and regulations to drive up the pace of building. Amongst the changes was the introduction of Neighbourhood Development Plans (NDP).<sup>2</sup>

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<sup>1</sup> National Census 2011

<sup>2</sup> Neighbourhood Plans were initiated in the Localism Act 2011 and reinforced in the National Planning Policy Frameworks 2018 and 2019.

## Integrating Local Aspiration with Planning Regulation

NDPs are a powerful tool that give communities statutory power to shape future development<sup>3</sup>. They integrate local knowledge and aspiration with planning regulations, to ensure the community gets the right type of development in the right place. Benenden Neighbourhood Development Plan (BNDP) is the product of work started in April 2017. The plan responds to the national challenge of increased demand for housing, jobs and transport. During extensive consultation (see Supporting Document IA1 Consultation Statement), the local community provided a set of aspirations to those working on this plan:

- Protect the High Weald AONB and existing Conservation Areas
- Preserve and enhance the landscape, views and biodiversity of the countryside
- Maintain dark skies and tranquillity of the parish
- Provide affordable housing for local families
- Provide opportunities to downsize and remain in the parish
- Promote scattered, small scale and high-quality housing development
- Support working in the parish and promote local construction
- Support clubs, societies pubs and shops
- Improve infrastructure such as broadband and mobile phone access
- Improve road safety with changes to junctions, crossroads and speed limits

Summarising the aspirations of residents and local business the vision for Benenden 2036 was drafted and adopted at a consultation meeting on 28 October 2017:

### **Vision**

The Parish of Benenden in 2036 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, the community, 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:

- i) 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.
- ii) Infrastructure enhancements; managing traffic growth, improving connectivity, and enhancing community facilities for health & recreation.
- iii) 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.

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<sup>3</sup> Localism Act 2011, and reinforced in the National Planning Policy Frameworks 2018 and 2019.



From the Vision the BNDP developed five detailed Objectives, each supported by Policies, designed to deliver the vision for the parish:

- **Landscape & the Environment:** To protect valued environmental assets and support Benenden's peaceful, rural, way of life. Recognising that the parish of Benenden is one of the most unspoilt parts of the High Weald AONB, the policies will enable villagers and visitors to continue to enjoy the countryside, important Local Green Spaces, Public Rights of Way (PRoW), views and dark skies.
- **Housing Supply:** To support modest-scale housing development to meet local needs with a mix of well-designed, high quality, sustainable and affordable housing that enhances the existing built and natural environment.
- **Design & the Built Environment:** New buildings shall 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.
- **Business & the Local Economy:** 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.
- **Transport & Infrastructure:** To prioritise infrastructure improvements, minimise and 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.

These objectives balance the need to conserve and enhance the scenic beauty and tranquillity of the landscape; the historic character of Conservation Areas and protecting views, amenities and biodiversity. They also promote appropriate business and job creation while recognising the need to manage moderate housing growth and the impact that growth will have on amenities and services within the parish. The objectives will be delivered through a series of Policies and Projects.

Each Chapter of the Plan contains Policies and Projects designed to support the aspirations and requirements for the development of the community of Benenden:

- Policies must be drafted within the competence of a Neighbourhood Plan; in other words, the plan can only have policies on issues over which it has authority. Policies can be generic or site-specific proposals that must be considered by developers or landowners when they create planning proposals;
- Projects are specific proposals that fall outside the direct competence of a Neighbourhood Plan but which may be delivered in partnership with other competent authorities such as Kent County Council, or Tunbridge Wells Borough Council.

After the Neighbourhood Plan is made and Tunbridge Wells have adopted a CIL Policy (proposed 2021), the Parish Council will receive 25% of CIL contributions by right and may use such funds to complete the projects set out within the BNDP.

National planning guidelines are contained within the National Planning Policy Framework 2019 (NPPF). Tunbridge Wells Borough Council (TWBC) is the Local Planning Authority (LPA). The BNDP must be in general conformity with the policies of the NPPF and LPA adopted Local Plan. The current TWBC Local Plan (TWBC LP) 2006, Core Strategy 2010 and the Site Allocations Local Plan 2016, therefore, provide planning context. TWBC are updating their Local Plan which is intended to cover the period 2016-2036. This Draft Local Plan (DLP) will ultimately replace the current adopted Local Plan. Where neighbourhood planning is undertaken before an up-to-date Local Plan is in place, collaboration between the community

and the Borough Council is critical. In developing the BNDP, TWBC have taken an active role in advising and supporting the BNDP team, sharing evidence and information and ensuring the BNDP fits with any relevant up-to-date strategic needs. Alignment between the BNDP, TWBC Local Plan 2006, Core Strategy 2010, Draft Local Plan 2019 and the NPPF is set out in the Basic Conditions Statement (see Supporting Document IA2).

## **BNDP Strategic Approach**

The key challenge for Benenden's NDP team is the need to provide additional residential dwellings; this is at the heart of the BNDP. Benenden is located in the populous south east of England and within 50 miles of London; however, the sustainability of the parish is inadequate in planning terms. Major centres of employment and commerce are over 45 minutes' drive from the parish. Public transport links are irregular and slow, without any direct bus routes to mainline stations, which are a 20-minute drive away. The natural and built environment of the parish is highly constrained. Therefore, sustainable growth is difficult to deliver within the parish. The BNDP has addressed sustainability by:

- conserving the highest quality landscape and built heritage (Policies LE1, BD1 and BD8)
- supporting the vibrant rural local jobs and businesses of Benenden parish: local shops, pubs, farming, light industry, tourism (Policies BE1, BE2, BE3, BE4 and BE7)
- specifically providing protection for local business and industrial sites from speculative housing development (Policies BE3 and BE6)
- recognising changing work/life patterns and requiring developers to support and invest in identified local business requirements, including access to broadband and better mobile signals (Policies HS4 and T5)
- prioritising the need to deliver a balanced community (Policy HS2) by requiring affordable housing, and that designed for older residents and those with limited mobility (Site Specific Policies SSP1 to SSP4). In particular, supporting long-term affordable housing for local families, through the support for development by Benenden Almshouse Charities
- supporting community cohesion by encouraging the retention of existing community facilities (Policy BE5), and requiring developers to contribute to new community facilities (Policies HS1 and T3)
- providing measures to ensure new developments should be well-built and provide safe environments for older people, children, and those with mobility issues (Policies BD3, BD6, T1, T2 and T3)
- encouraging prudent use of natural resources (Policies BD8, HS1 and BE2) with over 70% allocated housing on previously developed land; at a density (Policy HS6) appropriate to the site setting (Policy LE1) and existing land usage
- attempting to mitigate the adverse impact of additional traffic (Policy T1), slowing transit through new developments (Policies BD3 and T2), providing adequate parking (Policy BD6), encouraging alternatives to car-journeys (Policies BD7 and T1), and encouraging take-up of electric vehicles (Policy T4)

TWBC have a target for housing growth and have taken the decision to work with parishes to establish appropriate levels of development. In collaborating with TWBC and aware of the difficulty of finding suitable sites, the approach taken by the BNDP centres around the following choices:



1. Benenden Parish Plan 2015 envisaged housing growth equating to around 1% per annum (or an average of 9.2 dwellings each year). The parish currently has around 920 dwellings<sup>4</sup> and this plan runs until 2036.<sup>5</sup>
  - **The BNDP proposes development of around 100 dwellings in addition to existing planning permissions (currently a total of 36 dwellings on two sites).**
2. TWBC opened a 'Call for Sites' across the Borough in 2016 as they developed a new Local Plan. Over the past 4 years landowners in Benenden offered 22 sites for residential development. This process is on-going and the BNDP will continue to assess any new sites that are submitted.
  - **The BNDP focusses upon the 22 sites offered by local landowners in response to the TWBC 'Call for sites' as the basis of its site allocation policy.**
3. Neighbourhood plans offer the opportunity for communities to shape and control development. The plan *could* simply set out policies which will influence the design, quality and general thrust of development while leaving final decisions on site allocations to the Local Planning Authority. Very few Neighbourhood Plans contain housing targets or site allocations.<sup>6</sup> However, Benenden NDP and the Parish Council determined to allocate sites in order to better deliver the aspiration for control expressed by the Parish.
  - **The BNDP allocates sites in order to create a best fit with the aspirations of the local community as expressed during local consultations.**
4. Many approved development sites suffer from 'mission creep'. Initial permission is granted for a modest development on part of a site which does not have clear boundaries. As a result, subsequent applications to extend the development onto adjacent land may prove difficult for parish councils or Local Planning Authorities to resist.
  - **The BNDP gives greater weight to sites with clearly defined boundaries and assumes that any allocated site will be fully built out at a density in line with the appropriate site-specific policy.**
5. National Planning Policy Framework (NPPF) para. 117 seeks a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed or 'brownfield' land. During consultation the Parish expressed a clear preference for development on 'brownfield' sites.
  - **The BNDP gives greater weight to previously developed or 'brownfield' sites, provided development will not adversely impact on local employment.**
6. NPPF para. 172 says great weight should be given to conserving and enhancing landscape and scenic beauty of the National Parks, the Broads and Areas of Outstanding National Beauty. Local consultation demonstrated considerable support for the protection of the High Weald AONB. Around 98% of the parish lies within the High Weald AONB.
  - **The BNDP particularly supports the development of sites which are outside the AONB as long as any detrimental effect on the environment, the landscape and recreational opportunities can be moderated.**

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<sup>4</sup> Parish Precept Receipts 2019.

<sup>5</sup> 9.2 Dwellings per year x 15 years = around 138 new dwellings during the plan period.

<sup>6</sup> Lichfield Insights May 2018: "Local Choices?"

7. TWBC LP 2006 places an obligation on developers under section 106 of the Town and Country Planning Act 1990 to provide affordable housing as part of a development site provided that 10 or more dwellings are being built. The village expressed a clear desire for affordable housing for local villagers, and in particular those that are designed to remain affordable.
  - **The BNDP allocates sites that will provide more than 10 dwellings in order to ensure affordable housing needs are met, and specifically supports the Benenden Almshouse approach.**
8. TWBC LP 2006 places an obligation on developers under section 106 of the Town and Country Planning Act 1990, to provide financial contributions or works to enhance infrastructure where the development will have a direct local impact. Local consultation highlighted the need for investment within the parish.
  - **The BNDP allocates sites that will provide more than 10 dwellings and describes infrastructure enhancements required in its site-specific policies.**
9. NPPF para. 84 suggests that, in rural areas, sites may have to be found beyond existing settlements and in locations not well served by public transport. Where such sites are on 'brownfield' land, development will be encouraged, provided it is sensitive to its local surroundings and does not have an unacceptable impact on local roads. Such development should also be designed to make the location more sustainable.
  - **The BNDP allocates 2 sites on 'brownfield' land beyond existing settlements. Each site has specific policies designed to improve long term sustainability.**
10. TWBC Draft Local Plan (DLP)<sup>7</sup> uses Limits to Built Development (LBD) as an indicator of location sustainability. It encourages the development of sites close to local amenities while taking into account the setting of the settlement.
  - **This Plan allocates two sites close to Benenden village and its amenities. Discussions between BNDP and TWBC have resulted in revisions to the Benenden LBD proposed in the TWBC DLP to incorporate the allocated sites.**

## Impact of the BNDP Approach

The Benenden Neighbourhood Plan will not seek to avoid or discourage growth. In line with the 'Vision' (see page 8), it supports appropriate, sympathetic and high-quality development within the parish.

- **The BNDP allocates four sites for development. Three sites are previously developed or 'brownfield'. Two sites are outside the AONB. One site is 'greenfield' and inside the AONB. This site is adjacent to existing amenities and provides affordable housing for local residents, in perpetuity, through the Benenden Almshouse Charities.**

Although not every aspiration of every resident will be fully met, the BNDP will provide a significant level of influence over development proposals within the parish. It will preserve and

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<sup>7</sup> Para. 4.81 TWBC Draft Local Plan.

enhance the character of local Conservation Areas while protecting the important landscape and scenic beauty of the High Weald AONB.

## **Benenden Parish & Limits to Built Development (LBD)**

Limits to Built Development are part of a national planning strategy intended to avoid inappropriate development in the countryside, merging/coalescence of settlements and ribbon development. LBD provides protection for rural areas because greater weight will be given to potential sites within the LBD and development outside the LBD is discouraged. However, if an LPA does not have a five-year supply of sites for development, the protection afforded by LBDs within the LPA areas is reduced and development sites outside the LBD may be promoted and approved.

The TWBC Local Plan 2006 and subsequent LPA site allocations do not provide a five-year supply of residential housing, so sites outside existing LBDs have been the subject of significant planning effort by both TWBC and Parish Councils. Once adopted, the emerging TWBC Draft Local Plan 2019 will secure a five-year supply of sites for residential development. This will secure the protection of LBDs to settlements throughout the Borough.

TWBC DLP policy STR9 and supporting text<sup>8</sup> set out the plan for LBDs and the circumstances where development will be permitted outside an LBD. The BNDP allocates sites which are outside the existing LBDs at Benenden and Iden Green. However, the two allocated sites which abut Benenden village will fall within the revised LBD proposed in the TWBC DLP.

Windfall sites, which emerge in the parish during the life of this plan, will need to meet the conditions set out in both BNDP Policy HS5 and the policies of the adopted TWBC Local Plan.

Under the TWBC Local Plan 2006, both Benenden and Iden Green have a designated LBD (see Figs. 1 & 2). The emerging TWBC Draft Local Plan 2019<sup>9</sup> omits the LBD around the hamlet of Iden Green and re-draws the LBD tightly around Benenden village only (see Fig. 3). The remainder of the parish outside the LBD is designated as countryside. Most of the countryside falls within the High Weald AONB and receives the highest level of protection from inappropriate development. The allocated sites at East End are outside both the LBD and the AONB and consist almost entirely of previously developed land (PDL). A masterplan setting out the intended future use of the PDL is required by both the BNDP (see Chapter 2 — Housing Supply and Site Allocation) and the TWBC DLP.

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<sup>8</sup> TWBC Reg. 18 DLP STR9 and pages 61-63.

<sup>9</sup> TWBC DLP STR10.



**Benenden Limits to Built Development 2006 Adopted**

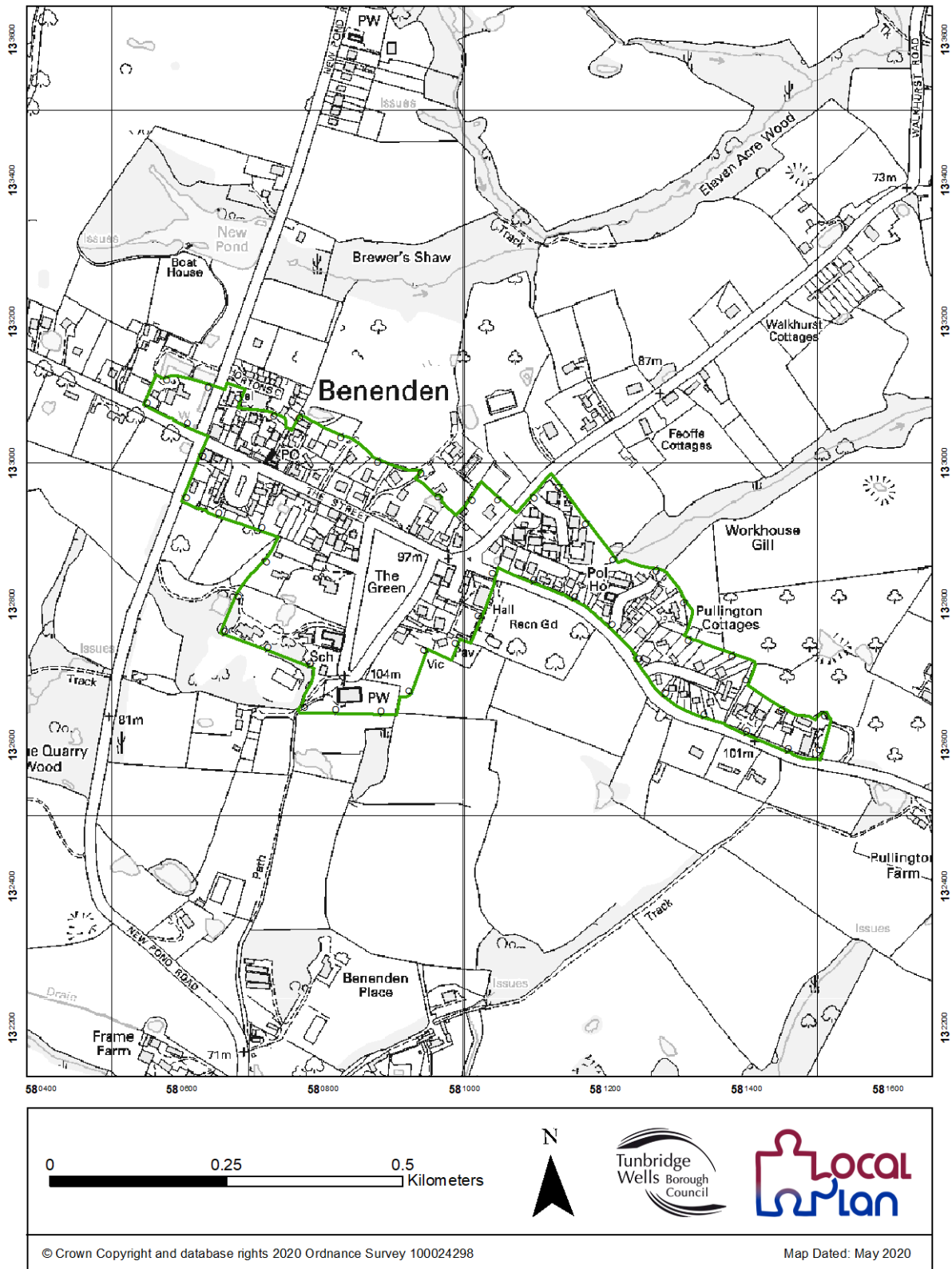


Fig 1. LBD's Benenden (TWBC Local Plan 2006)

## Iden Green Limits to Built Development 2006 Adopted

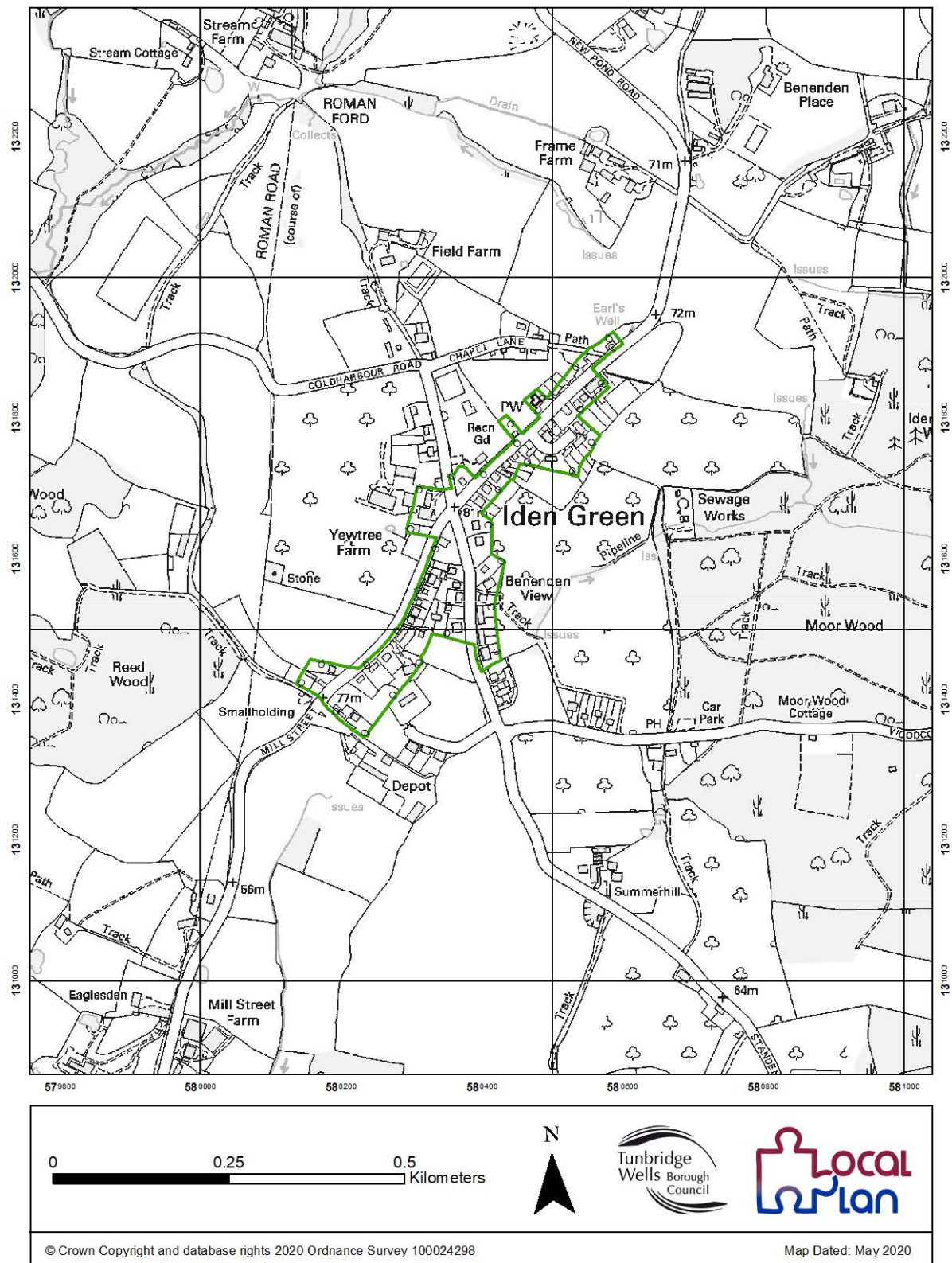


Fig. 2 LBD Iden Green (TWBC Local Plan 2006)

## Benenden Limits to Built Development Proposed

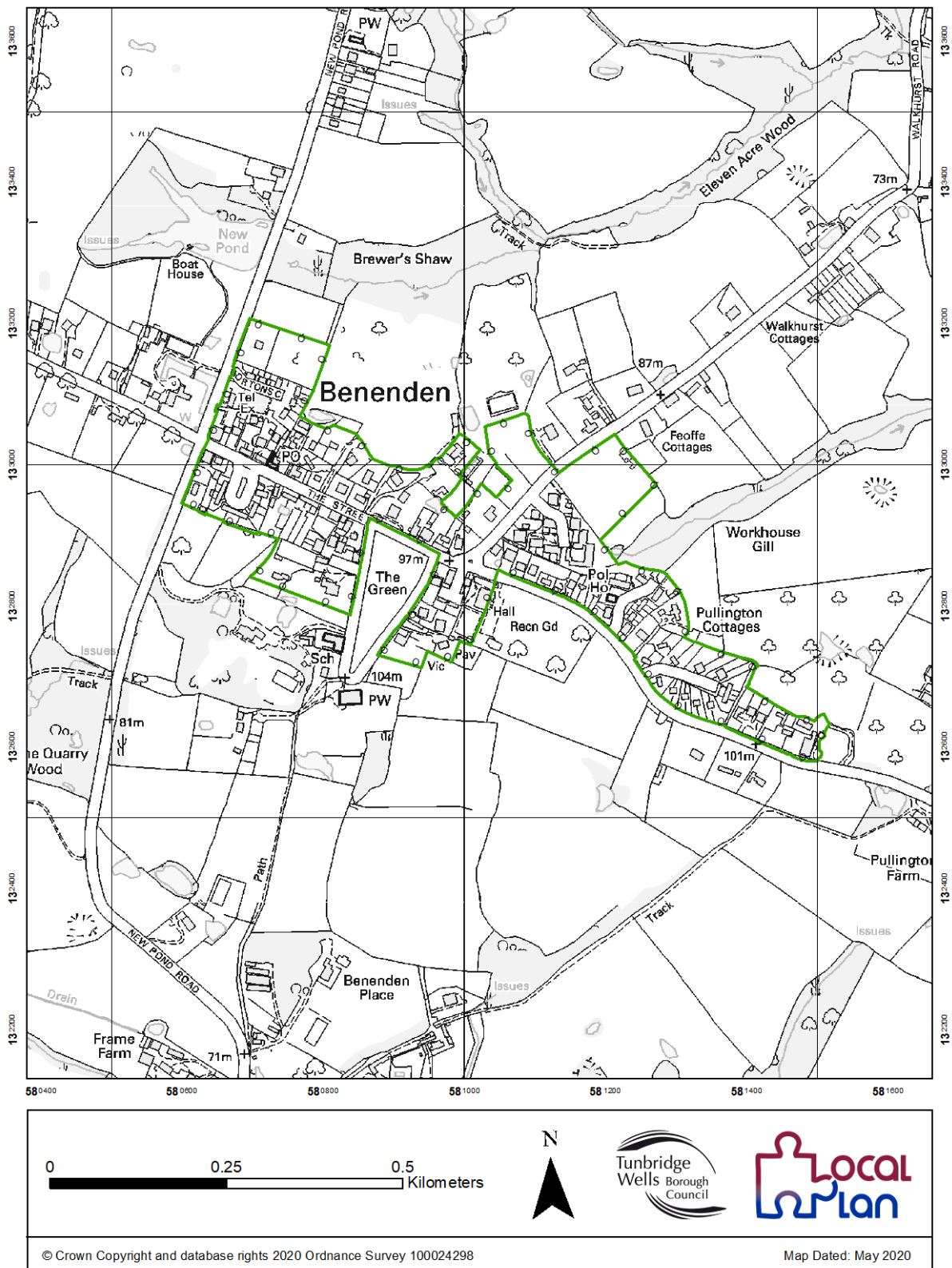


Fig. 3 The re-drawn Benenden LBD (TWBC DLP)

## Supporting Documents for Introduction

- IA1 Consultation Statement
- IA2 Basic Conditions Statement



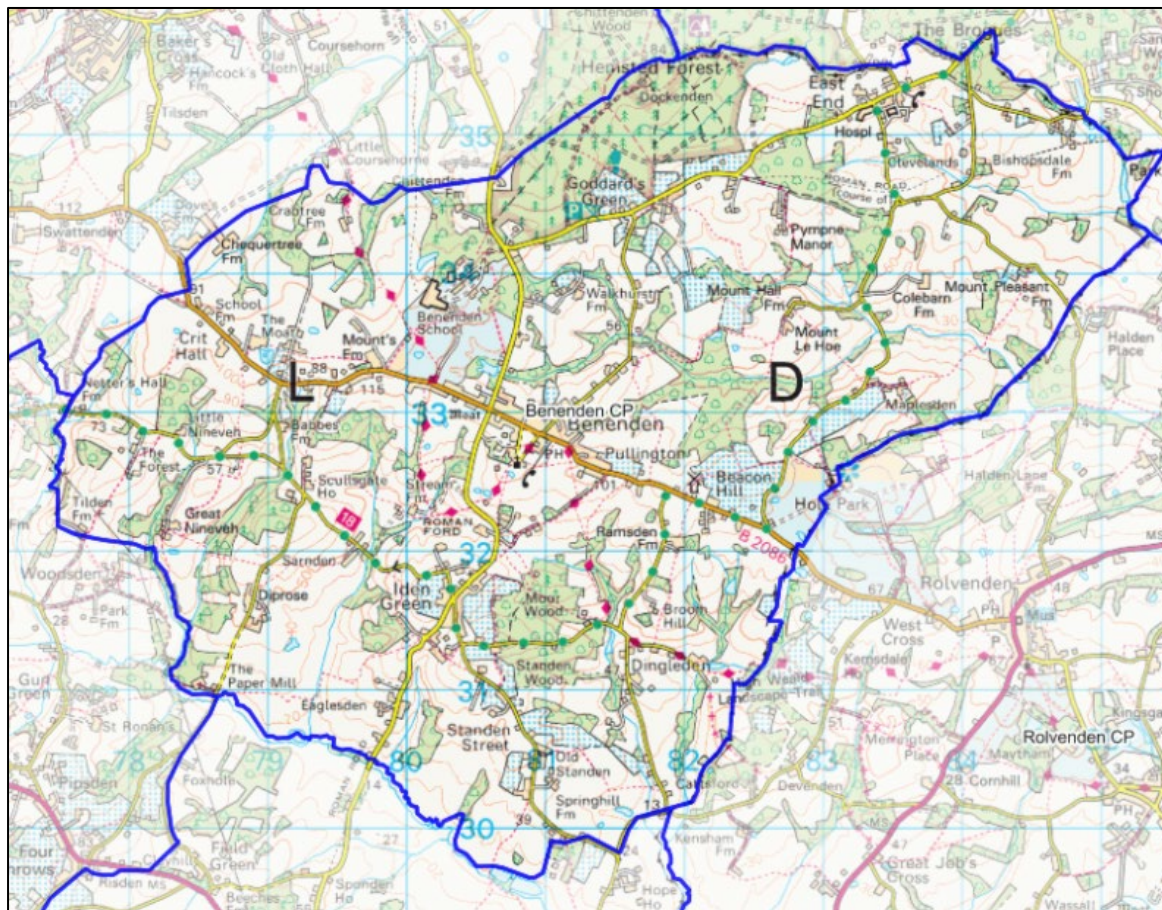


Fig. 4 Map of Benenden Parish. (pink diamonds: High Weald Landscape Trail, green dots: Cycle Route 18)

## The Historic Context of Benenden Parish

Benenden is a medieval village situated within the High Weald Area of Outstanding Natural Beauty (AONB). Settlement in the parish (see Fig. 4) dates back to the Roman period. The landscape of the parish has been shaped by the processes of human interaction with the environment over thousands of years to create the historic landscape character we see today.

The landscape was divided into large 'commons' which were used for seasonal grazing but were gradually broken up into 'dens' or 'swine pastures'. The den of Benenden<sup>1</sup> (which developed into the village of Benenden and its immediate environs) is thought to have been a large swine pasture located in what was to become the middle of the parish and centred on the cross way between the east-west ridgeway route (along which the medieval village developed) and the north-south Rochester to Hastings Roman Road.

Taking their names from the 'dens', small farmsteads were established as the land was enclosed from the wood and wood pasture, forming the fields for cultivation. A church, recorded in the Domesday Book, was founded in the den of Benenden before 1066, to provide spiritual welfare to the scattered farmsteads across the parish. The medieval village of Benenden grew up around the church which became the focus for ecclesiastical and secular activity, in particular fairs and markets.

Iden Green is thought to have evolved around existing farmsteads which developed as part of the medieval cloth industry. In contrast to Benenden, many of the buildings are modest in scale and they are thought to have been occupied by cloth workers. In terms of population it was at

<sup>1</sup> The Dens of Benenden and a Possible Early Lathe Boundary by Ernest Pollard and Hazel Strouts.

<https://www.kentarchaeology.org.uk/sites/default/files/archcant/2005%20125%20The%20Dens%20of%20Benenden%20and%20a%20Possible%20Early%20Lathe%20Boundary%20Pollard.pdf>

one time the larger settlement. Like Benenden, the village has a linear settlement form located on elevated land built up sporadically along two crossing roads.

East End, once also known as East Ridden, remained a small and scattered settlement until the fresh air and rural setting saw the arrival of Benenden Hospital. It was opened in 1907 by the National Association for the Establishment and Maintenance of Sanatoria to treat postal workers suffering from tuberculosis. The Association was a consortium founded by trade unions and friendly societies and the Benenden Healthcare Society (formerly the Post Office and Civil Service Sanatoria). With cases of TB declining, the Benenden Healthcare Society expanded treatment to include chest complaints and cancer and shortly afterwards an operating theatre, surgical wards and an x-ray department were introduced and today is a state-of-the-art modern private hospital.

## Historic Environment and Heritage Assets

The historic centres of both Benenden and Iden Green are designated as Conservation Areas (see Fig. 5). Each Conservation Area comprises areas of different character and extends into the surrounding countryside.

The National Planning Policy Framework (NPPF), (paras. 184-202), seeks to protect and enhance the historic environment, including the character and setting of listed buildings and Conservation Areas. Historic England's register catalogues over 150 listed buildings in the parish (see Fig. 6 and Supporting Document HCA1), of which eight are Grade II\*. There is a high incidence of listed buildings within the Conservation Areas.

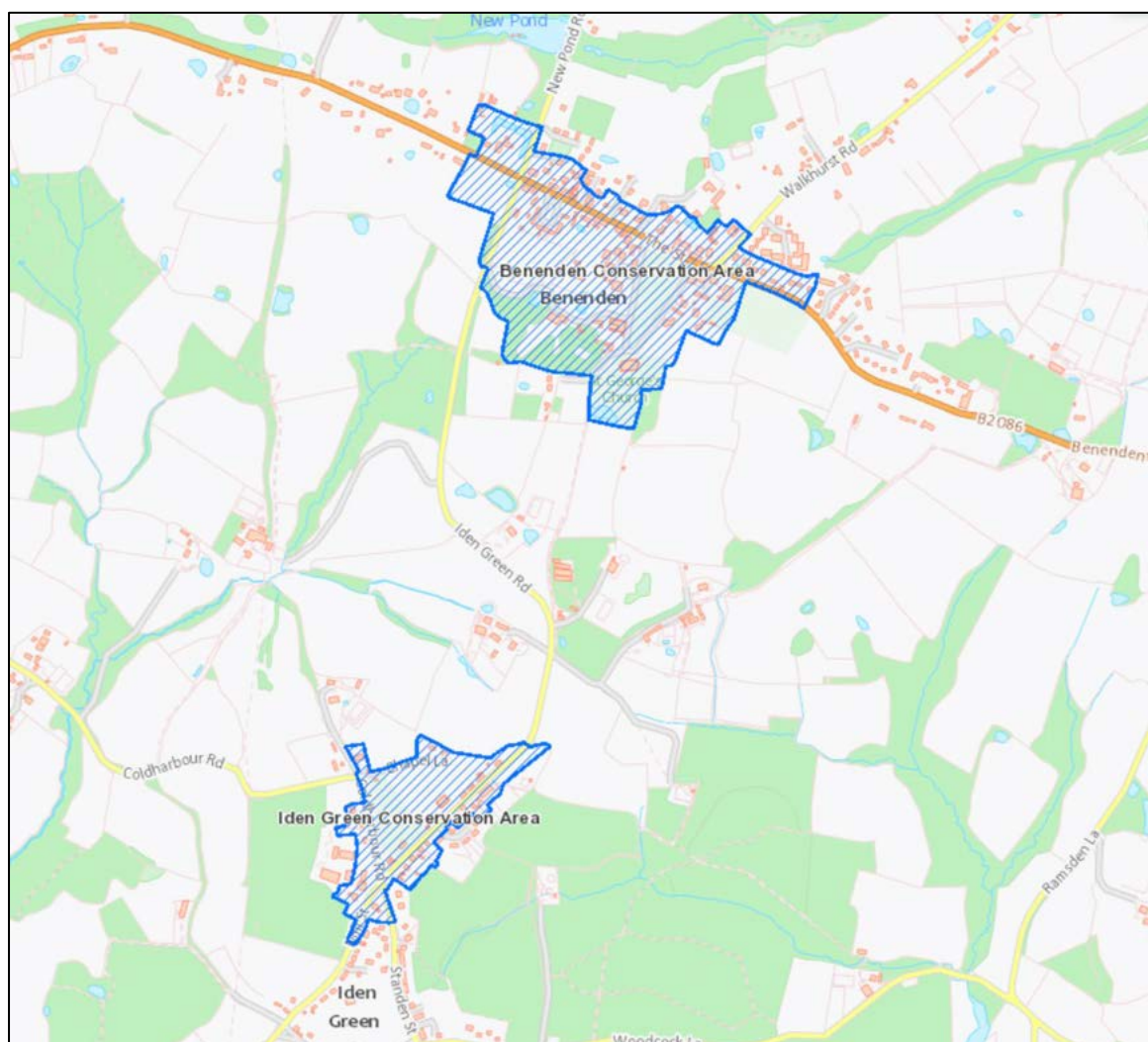


Fig. 5 Benenden & Iden Green Conservation Areas.



The historic environment<sup>2</sup> contributes to the historic character and beauty of the parish and plays a significant role in the health and wellbeing of residents and visitors. Heritage assets<sup>3</sup> are an irreplaceable resource that should be conserved and enhanced in a manner appropriate to their significance.

Heritage assets comprise buildings, monuments, structures, sites, places, areas, whole landscapes, or elements of landscapes, identified nationally and locally as valued components of the historic character of the parish. These can include designated heritage assets and non-designated assets identified as being of local historical importance.

Designated assets, protected by national and local policy and legislation, include the following:

- Listed Buildings
- Conservation Areas
- Scheduled Monuments
- Archaeological sites
- Registered Historic Parks and Gardens
- Ancient semi-natural woodland
- Veteran trees

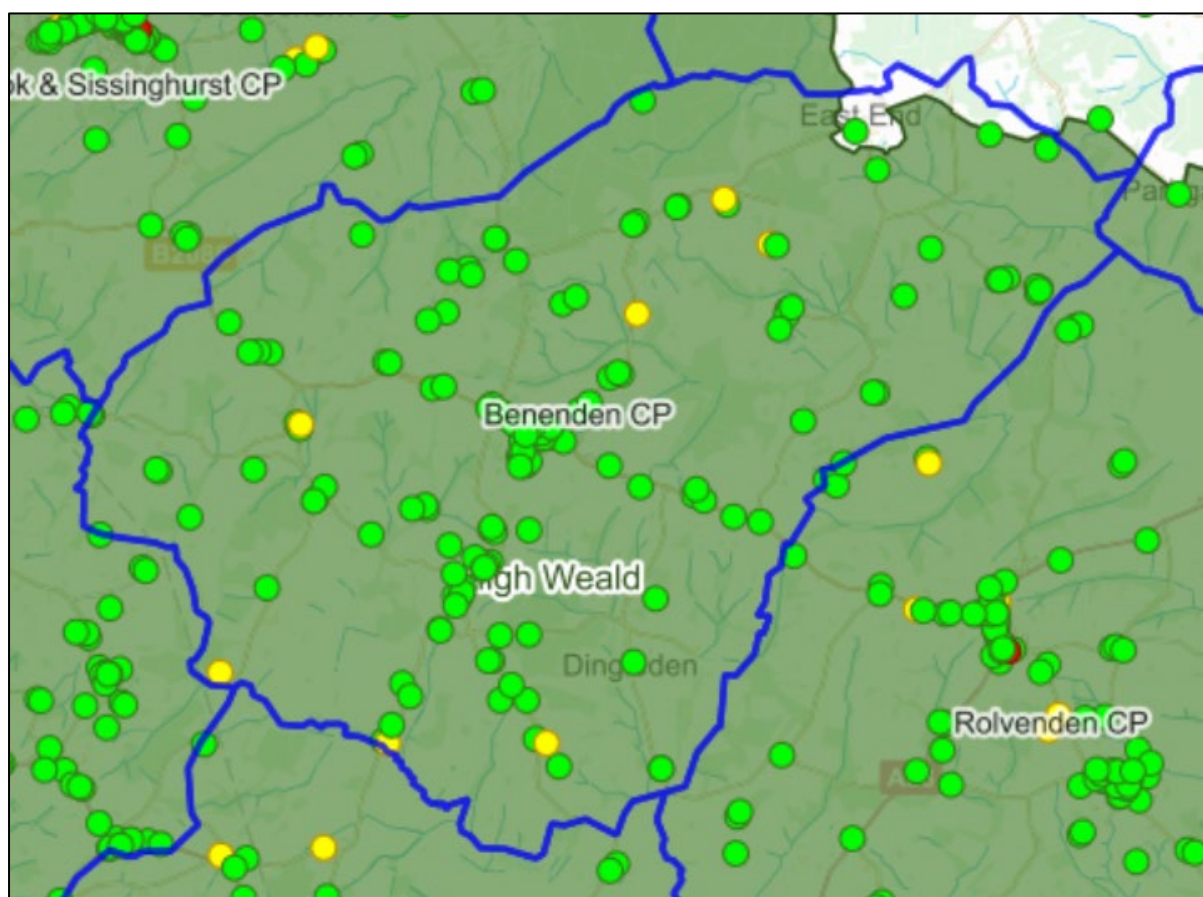


Fig. 6 Overview of distribution of Listed Buildings throughout the Parish (green dots: Grade II, yellow dots: Grade II\*).

<sup>2</sup> Tunbridge Wells Borough Council (TWBC) Historic Environment Review 2018.

<sup>3</sup> TWBC Draft Local Plan (DLP) Policy EN7 and TWBC Local Heritage Assets Supplementary Planning Document (SPD).



## Rural Assets

The vast majority of the Benenden Neighbourhood Development Plan (BNDP) area comprises countryside with 98% located in the designated High Weald AONB (only 2% of the parish, at East End, is outside, but adjacent to the AONB, see Fig. 7).

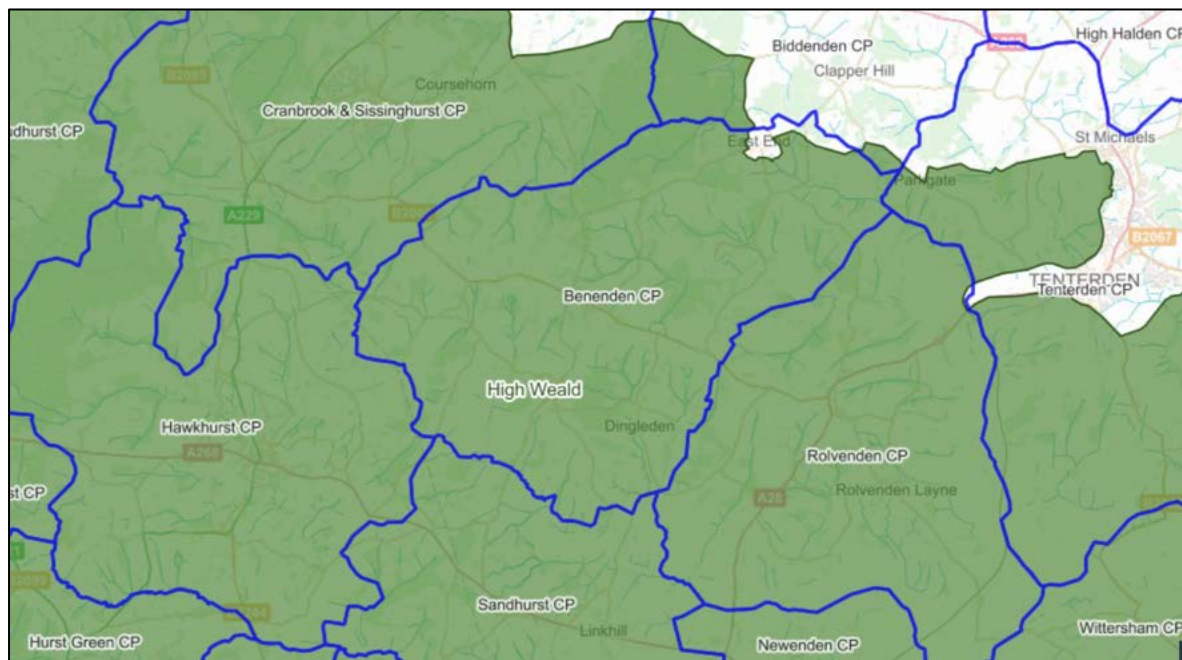


Fig. 7 Extent of High Weald AONB (in dark green) across Benenden Parish and adjacent parishes. (Blue lines indicate parish boundaries — note that East End is outside the AONB but just inside the parish boundary.)

Across the parish are significant areas of Ancient Woodland (see Fig. 8), areas of potential archaeological importance (including along Roman Roads), Historic Parks and Gardens, Sites of Special Scientific Interest (SSSIs), and significant rural lanes.<sup>4</sup>

Within the Tunbridge Wells Borough Landscape Character Assessment Supplementary Planning Document (SPD), the parish is located within Local Character Area 6: Benenden Wooded Farmland. Countryside and landscape form an outstandingly beautiful landscape with characteristic features:

- Watercourses and ponds, sandstone outcrops
- Historic routeways
- Historic settlements of farmsteads and hamlets
- Ancient Woodland, gills and shaws
- Historic field boundaries, medieval field systems, known wildflower meadows

A peaceful, well managed, small-scale and intact agricultural landscape with a larger-scale, open arable landscape dominant in some areas.

The combination of these assets forms a landscape of scenic beauty and is complemented by the substantial contribution to the quality of day-to-day life of parish residents, all of whom have easy access to the countryside via an extensive network of Public Rights of Way (PRoW), quiet country lanes, and ancient woodland. These contribute significantly to the 'village feel' that is highly valued in the community. The peaceful tranquillity and dark skies, the historic 'dens' of Benenden (the historic scattered settlements across the parish); the local views and Local Spaces, and the distinctive rural lanes which are prevalent in the parish, all contribute to the essence of the rural character of the parish.

<sup>4</sup> TWBC Rural Lanes SPD.



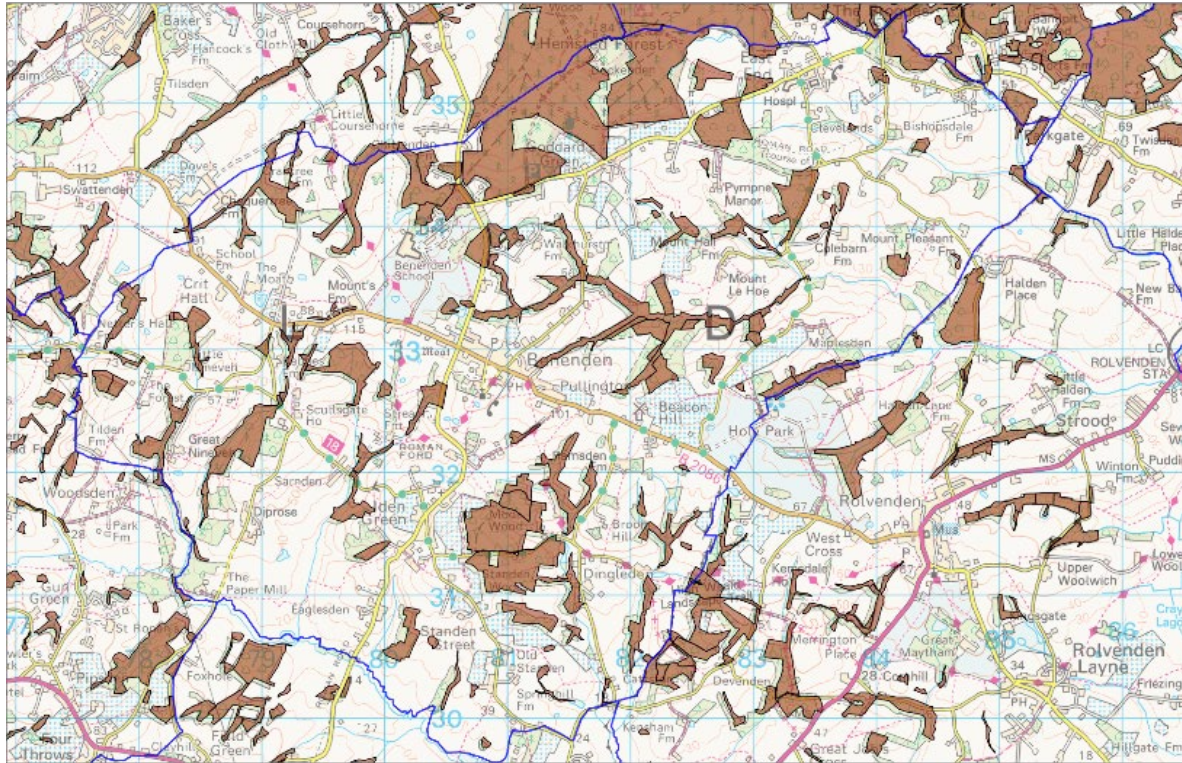


Fig. 8 Ancient Woodland in Benenden Parish.

The parish has a rich heritage of attractive historic lanes (see Fig. 9), covering 25 miles, often enclosed by hedges and trees, which contribute significantly to the distinctive character of the countryside and also provide natural wildlife habitats.

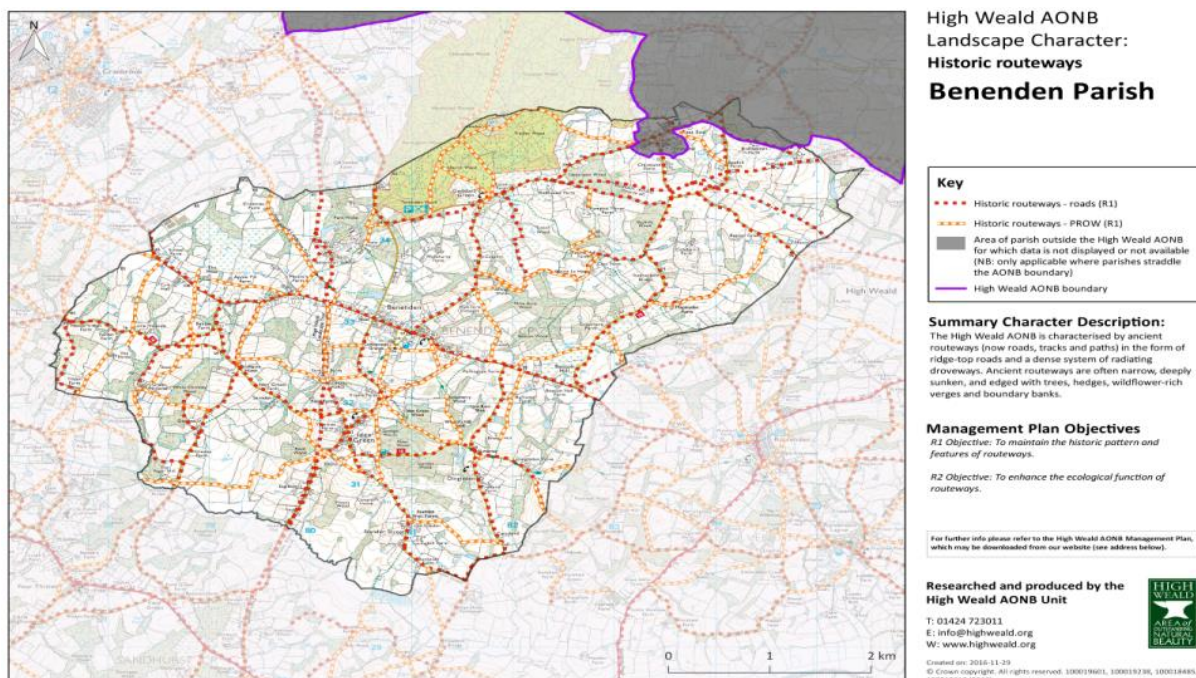


Fig. 9 Benenden's Historic Routeways.

Public response informs the BNDP of how strongly the residents value the rural character of the parish and the desire for it to be retained and protected.

The landscape forms a backdrop which contributes to the attraction of Benenden parish as a place to live and visit and plays a vital role in maintaining the health and wellbeing of the population.









Ancient Woodland

# 1. Landscape and the Environment

## Objective

**To protect valued environmental assets and support Benenden's peaceful, rural, way of life. Recognising that the parish of Benenden is one of the most unspoilt parts of the High Weald AONB, the policies will enable villagers and visitors to continue to enjoy the countryside, important Local Green Spaces, Public Rights of Way (PRoW), views and dark skies.**

## Introduction

The Landscape and the Environment Working Group built on the Benenden Parish Plan 2015, written by a Steering Group of residents and endorsed by the Parish Council in 2015, following widespread consultation in the community and is a key supporting document for this Neighbourhood Development Plan. The Parish Plan Environment Chapter starts (p. 17) with highlights from the village survey that informed the writing of the 2015 Plan:

*In the village survey 218 people said they walk a local footpath every week, with a further 67 walking a route at least monthly, which is a significant proportion of the 428 who responded to the questions on footpaths in the survey.*

The introduction to the Environment chapter of the Parish Plan continues (p. 17):

*The village is fortunate to be set within the High Weald Area of Outstanding Natural Beauty (AONB) one of 46 such designated areas in the UK. Within the parish there are 66 footpaths covering 27.5 miles, in addition to this there are numerous tracks within Hemsted Forest which are used and enjoyed by residents and visitors. The High Weald Landscape Trail passes through the village and brings many walkers to the area. Route 18 of the National Cycle Network which runs 61 miles from Canterbury to Tunbridge Wells, passes through the parish along some of the quieter lanes. The lanes around the*

*parish have previously been recognised as being important in the Tunbridge Wells Supplementary Planning Guidance in terms of visual amenity, nature conservation, historical/archaeological importance and recreational amenity value.*

In terms of new building the Parish Plan states (p. 19):

*Careful consideration should be observed when planning where new buildings should be located, brownfield sites should be used wherever possible.*

51.5% of respondents to the survey said they would be ‘willing to help with nature conservation and footpaths’, the largest group of respondents.

Thirty-six residents and stakeholders attended the Landscape and Green Environment Workshop on 13th January 2018 which followed on from the original Visioning Workshop on 28th October 2017. After an introduction from a member of the working group, on some of the key environmental facts about the parish and its landscape, a number of topics were discussed using SWOT analysis (Strengths, Weaknesses, Opportunities and Threats — see Supporting Document LEA1) including:

- PRoW, routeways, footpaths, bridleways and public open spaces
- Ancient Woodland, veteran trees, hedgerows and field patterns
- biodiversity
- views, dark skies and tranquility
- streams, ponds, ditches and flooding
- developer contributions to conserving wildlife

After discussion of these points, and subsequent consultation with the Neighbourhood Plan Steering Group and the Parish Council, the objective for the Landscape and Environment Working Group was agreed as representing the views of many parishioners.

## **Process**

The working group started surveying Benenden’s natural assets in 2017 and, after training from officers from TWBC, identified the landscape characteristics (see Landscape Character Assessments Supporting Document LEA2), PRoW, environmental and historical features, Local Green Spaces (LGS), Local Wildlife Sites (LWS) and notable views. The working group walked all the PRoW, identifying key views, environmental and other features and met regularly to discuss their findings. The group also studied a number of source documents (see Supporting Document LEA3).

The initial findings were shared with the community at the April 2018 exhibition in the Village Hall, and subsequently through the Parish Magazine and further engagement with the local residents in September 2018, at the Iden Green Pavilion. The working group was given advice and training on aspects of the BNDP by external specialists, especially in relation to policies, identification of Local Green Spaces, notable views and their documentation. Additional guidance and information was sought from and provided by Tunbridge Wells Borough Council (TWBC)<sup>1</sup>, the High Weald AONB Unit, Natural England, Kent Wildlife Trust, Royal Society for the Protection of Birds (RSPB), the Woodland Trust and the Kent & Medway Biological Records Centre.

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<sup>1</sup> TWBC Local Green Space Designation Methodology — September 2018.

## Policy Context/Justification

The rural nature of the parish is of paramount importance to residents and visitors alike.

- Over 98% of the parish is within the High Weald AONB
- The landscape is characterised by medieval field systems, an SSSI and much Ancient Woodland
- The pattern of dispersed historic farmsteads and hamlets; the ‘dens’, add important local character
- Over 65 scenic footpaths
- 12 Local Green Spaces
- Historic Parks and Gardens (Benenden School, The Grange and the western area of Hole Park)
- Roman Roads, ancient routeways and areas of potential archaeological importance
- The parish has two Conservation Areas (Benenden village and Iden Green)
- Over 150 Listed Buildings

The policies in this chapter seek to protect, enhance and preserve the rural landscape character of the parish and have been drafted to complement those of the National Planning Policy Framework (NPPF) 2019: paras. 170-172; the TWBC Local Plan 2006, the TWBC Draft Local Plan 2019 (TWBC DLP) policies relating to landscape: EN18-EN21 together with associated policies; the High Weald AONB Management Plan 2019-2024: Objectives and the principles of designation as an AONB; and TWBC Landscape Character Assessment 2017 — Character Area 6: Benenden Wooded Farmland.

## The Policies

### Landscape

**1.1** The landscape is largely characterised as Wooded Farmland.<sup>2</sup> The undulating ridges and valleys of the parish define Benenden’s special combination of small irregular fields and wooded gills, panoramic views and sheltered, hidden, ancient sunken ways. The landscape still reflects many of its medieval origins in its field boundaries, numerous PRoW and historic routeways (see Supporting Document LEA4). Much of the pasture is unimproved and together with large areas of ancient woodland fosters a rich spectrum of bird, animal and insect species. The absence of artificial lighting in the villages of Benenden and Iden Green ensure that dark skies prevail, supporting and maintaining residents’ connection to the natural environment. Being so distant from any large conurbations, major roads or mainline railway stations has kept Benenden distinct and unspoilt by creeping development. This is reflected in the parish predominately being designated as part of the High Weald AONB.

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<sup>2</sup> Landscape Character Assessment 2017 — LCA 6 p. 64; TWBC Historic Environment Review — 2.4.2 p. 20.

### **Policy LE1 Protect and Enhance the Countryside**

**Development in the countryside is to be limited in order to conserve and enhance the High Weald AONB; views from public areas; formal and informal recreational amenities, as well as biodiversity.**

**Outside the Limits to Built Development, as defined in the Local Plan, priority will be given to protecting and enhancing the countryside. A proposal for development will only be permitted where:**

- a) It would conserve and enhance the landscape and scenic beauty of the High Weald AONB, including the tranquility and dark skies of the countryside, and must have regard to the High Weald AONB Management Plan;**
- b) It would not have an adverse effect on the character or landscape setting of settlements (including the designated Conservation Areas) or other historic 'dens';**
- c) It would maintain the distinctive views of the surrounding countryside from public vantage points, in particular those defined at Figs. 10 & 11 maps;**
- d) It would protect and, where possible, enhance the following features:**
  - i. Local Green Spaces, in accordance with Policy LE3**
  - ii. Ancient woodland**
  - iii. The landscape character of Hemsted Park (Benenden School) and Hole Park Historic Parks and Gardens, and**
  - iv. Rural lanes which have a historic, landscape or nature conservation importance**
- e) It would be well integrated into the surrounding landscape.**

**1.2** Benenden is particularly rich in views because of its undulating geography and the landscape of ancient woodland, juxtaposed with smaller, irregular fields and pockets of traditional buildings. This has consequences for planning decisions as developments can be seen for long distances and is a large component of Benenden's environmental significance.

**1.3** In the process of walking the parish a number of the many outstanding views were identified and recorded. These were publicised at the BNDP meetings and in the Parish Magazine where any additional suggested views were sought. These are identified in the maps overleaf (Figs. 10 & 11 and see also Supporting Document LEA5).



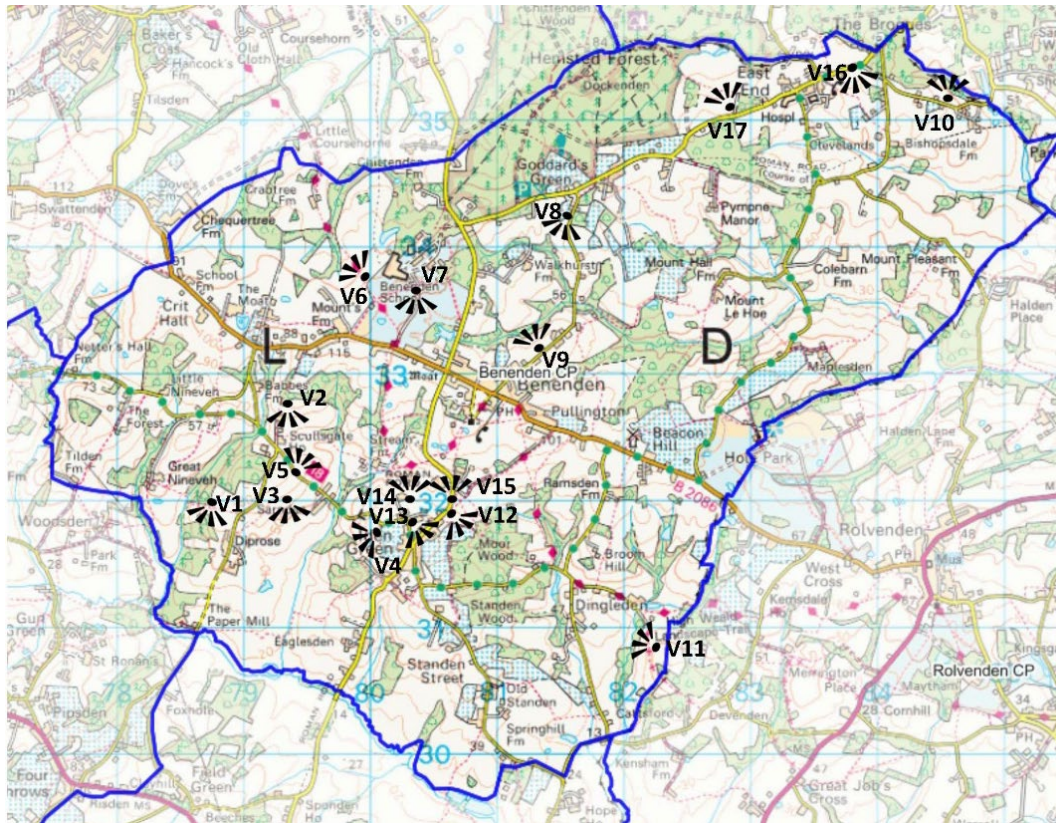


Fig. 10 Views.

## Views

Reference	Description
V1	Looking south/south-west from PRoW WC365
V2	Looking south-east from Parsonage Wood from track PRoW WC311 north of Coldharbour Road
V3	Looking south from PRoW WC313
V4	Looking west from PRoW WC316
V5	Looking north from Coldharbour Road
V6	Looking north-west towards Cranbrook, and across Dibley Shaw from High Weald Landscape Heritage Trail WC119
V7	Looking south across historic, designated parkland from Benenden School from PRoW WC315
V8	Looking south-west from Walkhurst Road across to village and church (see Fig. 17)
V9	Looking north-west from Walkhurst Road
V10	Looking north-east from Frogs Hole Lane near Bishopsden Farm
V11	Looking west from PRoW WC362 towards Dingleden
V12	Looking south-east from PRoW WC333, mentioned in TWBC Conservation Area Appraisal 2005
V13	Looking south-east from Iden Green Recreation Ground, mentioned in TWBC Conservation Area Appraisal 2005
V14	Looking north from Chapel Lane towards Benenden, mentioned in TWBC Conservation Area Appraisal 2005
V15	Looking north towards Benenden from Iden Green Road, mentioned in TWBC Conservation Area Appraisal 2005
V16	View south from east side of East End towards Bexhill Farm
V17	Looking north-west from Goddards Green Road across to Hemsted Forest

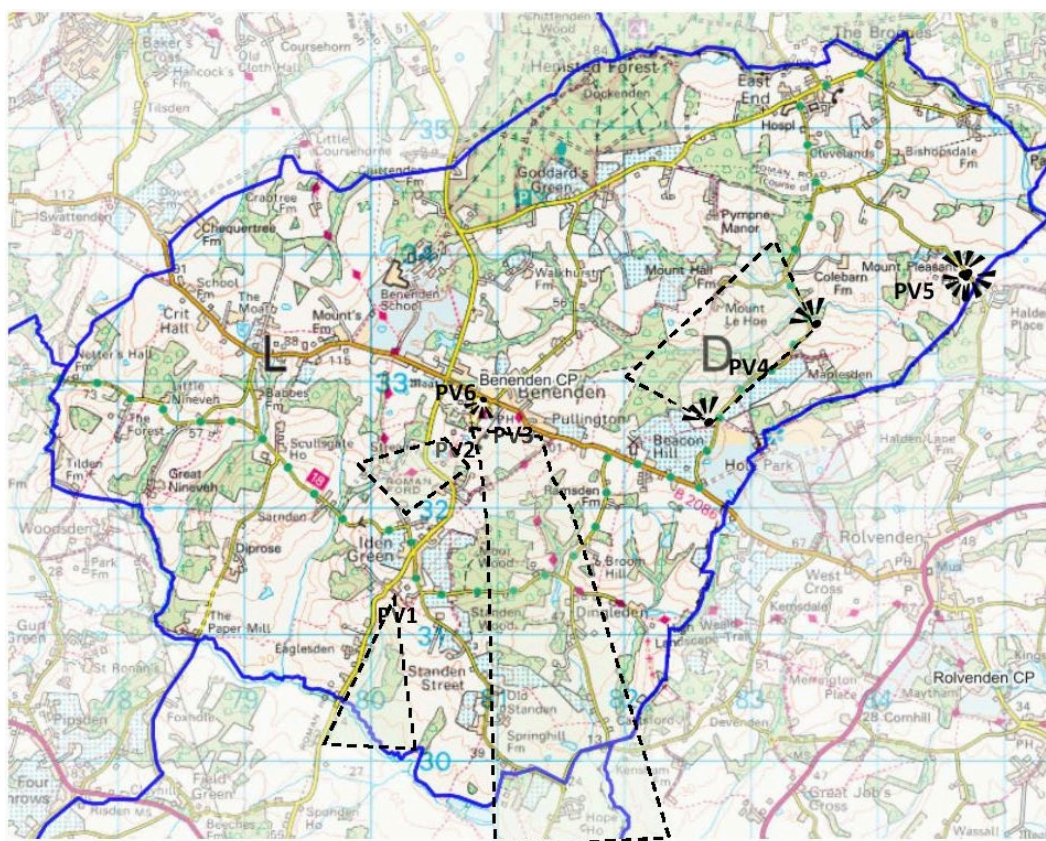


Fig. 11 Panoramic Views.

## Panoramic Views

Reference	Description
PV1	Panoramic views towards Sandhurst, from PRoW WC337
PV2	Panoramic views towards Iden Green from Iden Green Road, Hilly Fields green space (see Fig. 15)
PV3	Panoramic views from ridgeline south across Weald, visible from multiple points along PRoW WC325, WC327 (see Fig. 14), WC328 (see Fig. 16)
PV4	Set of westerly views along Stepneyford Lane
PV5	Panoramic views north and south from Halden Lane
PV6	Panoramic view of Benenden village green, mentioned in TWBC Conservation Area Appraisal 2005



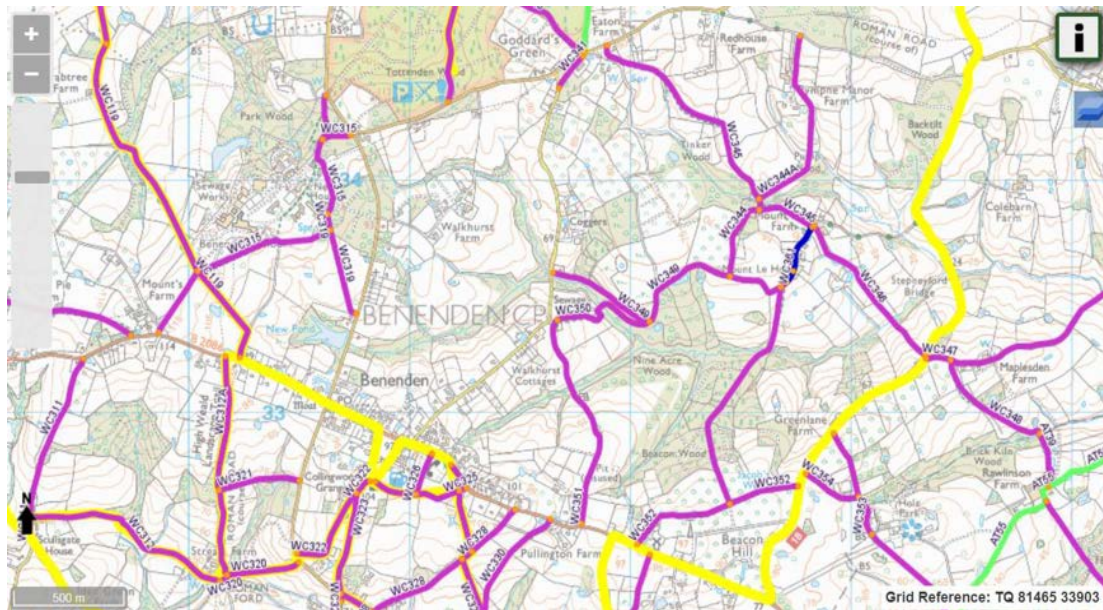


Fig. 12 PRoW map (north) showing footpaths referenced above.

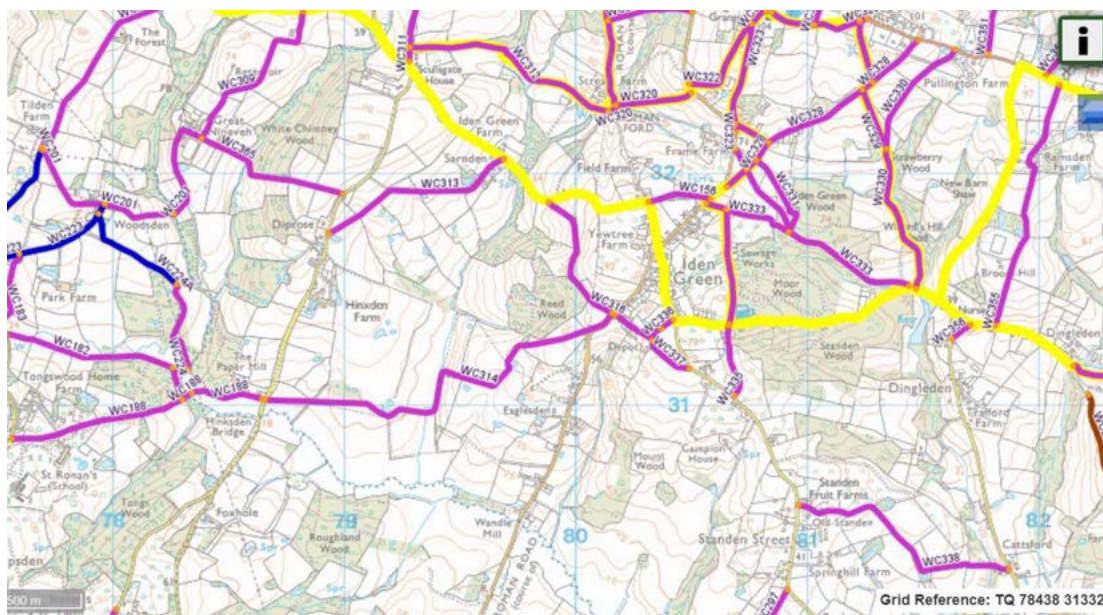


Fig. 13 PRoW map (south) showing footpaths referenced above.



Fig. 14 View south from PRoW WC327.



Fig. 15 View south from Hilly Fields.



Fig. 16 View south east from Pullington.





Fig. 17 View of the church from Walkhurst Road.

**1.3.1** The High Weald AONB Management Plan states the need to identify and protect views (see Supporting Document LEA5) as part of its objectives.<sup>3</sup>

#### **Policy LE2 Distinctive Views**

**Ensure that the identified views in Figs. 10 & 11 are not adversely impacted by development either inside the AONB or immediately outside it.**

**Developers should demonstrate that proposals will conserve and enhance the landscape and scenic beauty of the parish.**

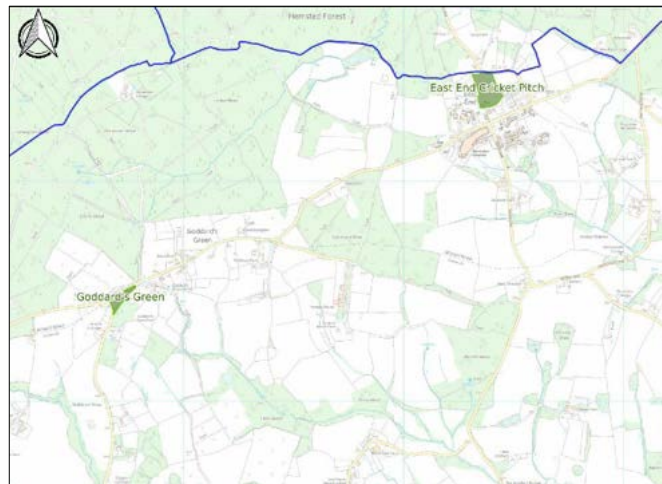
## **Open Space and Recreation**

**1.4** The parish features many aspects that support the health and wellbeing of its residents and visitors. From its clean air to its beautiful natural surroundings, Benenden is an ideal area for outdoor activities such as walking, cycling and riding, as well as sports such as cricket, bowling and tennis. There is specific provision for these through:

- an extensive network of PRoW throughout the parish
- two tennis courts in Iden Green, two tennis courts in East End
- the cricket pitch on Benenden Village Green
- the bowling green alongside Benenden Village Hall
- a football pitch on the Recreation Ground opposite Benenden Village Hall
- the playing field (Glebe Field) at Benenden used for village activities and by the local Primary School, and the Recreation Ground at Iden Green, both of which support a range of community outdoor activities including fairs, jazz concerts, firework display and rounders matches
- Benenden School often makes its facilities available to the local community and supports local charities and good causes
- play areas in Iden Green and Benenden

<sup>3</sup> The High Weald AONB Management Plan 2019-2024 Objective OQ4, Page 63.

## Local Green Spaces

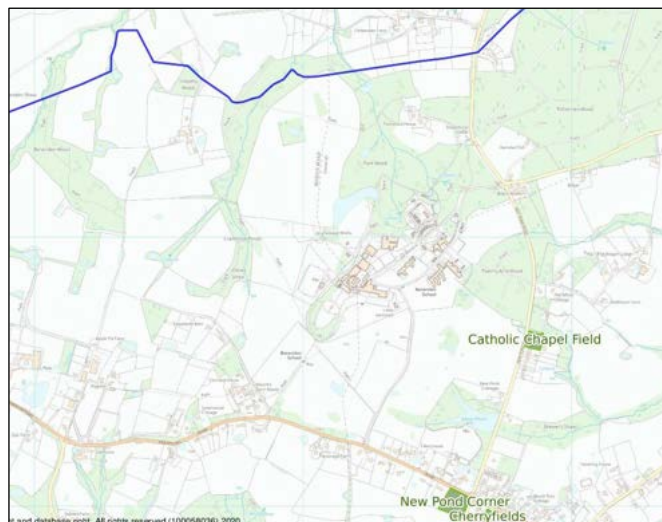


Parish boundary

**East End Old Cricket Pitch:** Part of Local Wildlife Site central to East End community.

**Goddards Green:** Corner Green on junction of Goddards Green Road and Walkhurst Road.

North-east of Parish

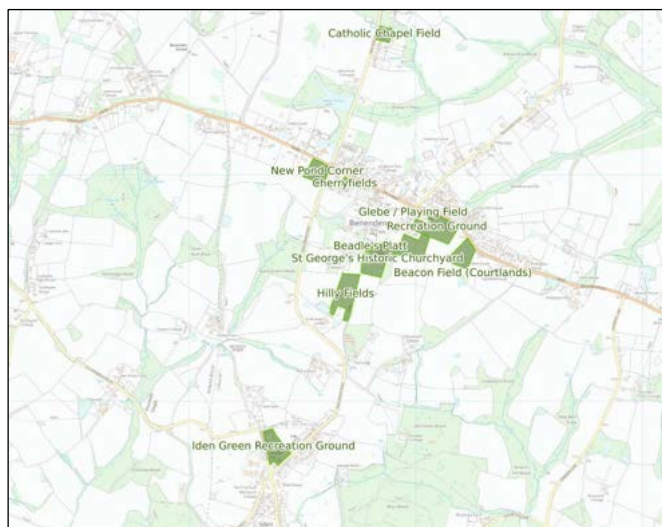


**Catholic Chapel Field:** Field surrounding Catholic Chapel.

**New Pond Corner:** Edge of Benenden Conservation Area.

**Cherryfields:** Green centre to Cherryfields development.

Centre-north of Parish



**Catholic Chapel Field:** Field surrounding Catholic Chapel.

**Glebe Field/Playing Fields:** Field used for school and village activities.

**Recreation Ground:** Recreation field for village activities.

**Beadle Platt:** Small triangular area outside churchyard.

**Historic Churchyard:** Churchyard surrounding St George's Church.

**Beacon Field (historically known as Courtlands):** Reconfigured green area as part of new school development.

**Hilly Fields:** Large paddock and field.

**Iden Green Recreation Ground:** Recreation ground for Iden Green.

Central Benenden/Iden Green

Fig. 18 Local Green Spaces.

**1.5** The working group identified the Local Green Spaces (LGS) that were perceived to be of particular importance to the local community and in line with the significance attached to open space and recreation in the NPPF.<sup>4</sup> LGS designation provides special protection consistent with that in respect of Green Belt. Guidance, in addition to training from external consultants, was given by TWBC who also provided supporting documentation.<sup>5</sup> Local Green Spaces were publicised at the public exhibitions and the opinions of landowners were also sought. TWBC was involved in ratifying the selected areas as appropriate for protection.

**1.5.1** These green areas are considered of particular importance to the residents of the parish, through their attributes which may include beauty, historical significance, recreational value, tranquility and richness of wildlife. The Local Green Spaces are identified in Fig. 18 and see also Supporting Document LEA6.

**Policy LE3 Local Green Spaces (LGS)**

**Protect and respect designated Local Green Spaces.**

**Development on these areas will only be permitted under very special circumstances.<sup>6</sup>**

**Any planned development should not adversely impact or affect the identified significance of the particular LGS.**

**1.5.2** A number of local green spaces were not included as they already had a high level of protection or other protections were more appropriate.

These green spaces are:

<b>Name</b>	<b>Reason</b>
<b>Benenden Village Green:</b>	Designated as a registered village green.
<b>Benenden School Park:</b>	In part has ancient woodland protection and in whole a Historic Park and Garden designation.
<b>The Grange Grounds:</b>	Sufficiently protected by multiple TPOs and Historic Park and Garden designation.
<b>Jubilee Plantation:</b>	More appropriate for TPO protection.

<sup>4</sup> NPPF — paras. 99, 100, 101.

<sup>5</sup> TWBC Local Green Space Designation Methodology — September 2018.

<sup>6</sup> TWBC DLP 2019 — Policy EN17



## Public Rights of Way

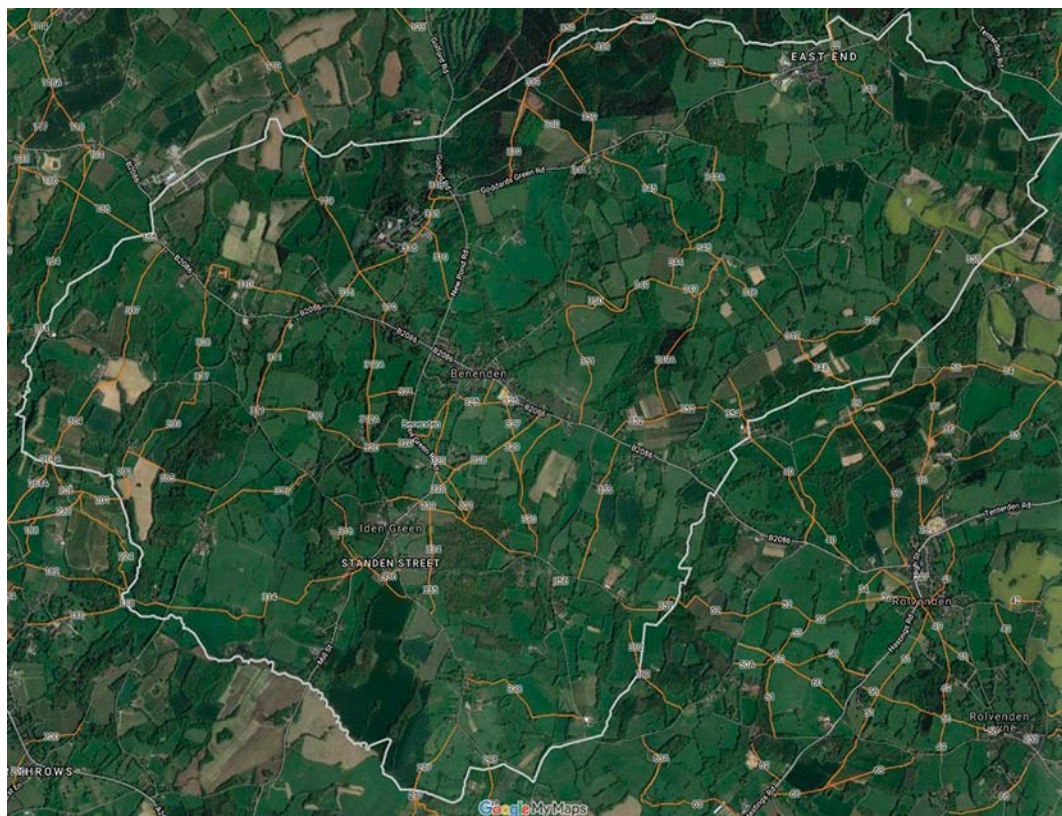


Fig. 19 Public Rights of Way in the parish.

**1.6** The NPPF<sup>7</sup> specifies that planning policies should protect and enhance public rights of way. Footpath and cycle path improvements were also identified as a priority in TWBC's survey of the borough's residents.<sup>8</sup> (See BNDP Transport and Infrastructure Project 1.)

**1.6.1** The KCC Rights of Way Improvement Plan (ROWIP) is a statutory policy document for public rights of way, setting out a strategic approach for their protection and enhancement. This will enable successful partnership working to continue and deliver improvements to the public rights of way network in Benenden. Joint delivery of this strategic plan will ensure significant benefits, while its omission could result in a significant loss of access to additional funding opportunities. KCC seek engagement with the Parish Council to consider local aspirations for access improvements and the potential delivery of these schemes.

### **Policy LE4 Public Rights of Way (PRoW)**

**Any new development must preserve existing PRoW, rerouted where appropriate. Where new housing or commercial development affects an existing PRoW, it must be preserved, enhanced and maintained. New footpaths and cycle paths are to be created, where appropriate, to increase connectivity. Funding to be provided by CIL/Section 106 contributions.**

<sup>7</sup> NPPF — para. 98

<sup>8</sup> Tunbridge Wells Borough Council Open Space, Sport and Recreation Study (2013–2033) 4.2.8, 4.2.9 p. 34.

## Allotments

**1.7** An analysis by TWBC of all open spaces in the borough includes a summary for Benenden<sup>9</sup> and identifies shortfalls and opportunities. It is notable that there is a lack of provision for allotments in the parish.

**1.7.1** The local community have expressed a strong interest in shared green amenities, having lost its allotments over 40 years ago to new developments at the time. Research suggests that the tending of allotments have many beneficial effects on people's health and wellbeing and provides an additional connection with the outdoors and nature. Opportunities should be sought to provide these facilities in conjunction with new developments (see BNDP Landscape and Environment Project 2).

## Education

**1.8** Given the increasing population of the parish and the consequences of climate change, it is vital that incoming, as well as existing, residents are aware of the environment in which they live, both to be part of its preservation, and for enjoyment and an appreciation of its importance.

**1.8.1** Education about the natural environment is important in ensuring that the community itself appreciates the value and importance of the natural world and is actively involved in its long-term care. Funding should be provided, where justified under NPPF para. 56, by developers to meet this aim (see BNDP Landscape and Environment Project 3).

## Peaceful and Rural Nature

**1.9** The rural nature of Benenden is a fundamental feature identified in the 2015 Parish Plan and encompassed in the overall vision of this NDP. New development should not impact this important and distinctive characteristic of the parish. Keeping skies dark and the overall environment peaceful are key to the rural 'feel' of the parish. The High Weald AONB Management Plan includes proposed action for dark sky-friendly lighting and for general noise intrusion.<sup>10</sup>

**1.9.1** There is minimal artificial lighting in the parish. New developments should not introduce inappropriately bright lighting at night over paths/footways or other areas within the site. Artificial lighting at night creates light pollution and is detrimental to wildlife and to the rural nature of the parish. 'Smart' lighting or lighting on short timing devices are more environmentally friendly and would also be more efficient as suggested by the High Weald AONB Management Plan.<sup>11</sup> TWBC's Core Strategy emphasises the need to limit and reduce light pollution <sup>12</sup> (see BNDP Policy BD5).

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<sup>9</sup> Tunbridge Wells Borough Council Open Space, Sport and Recreation Study (2013–2033) pp. 55–56, 71, 90–91.

<sup>10</sup> The High Weald AONB Management Plan 2019–2024 Objective OQ4 p. 63.

<sup>11</sup> The High Weald AONB Management Plan 2019–2024 Objective G3 p. 29.

<sup>12</sup> Tunbridge Wells Borough Local Development Framework — June 2010 para. 5.120 p. 44.

## Environmental Aspects of New Development

**1.10** The parish's rural environment of ancient woodland, unimproved pasture, wooded gills, streams and ponds provides a favourable habitat for rare species of animal and plant. Notable recorded sightings are listed in Supporting Document LEA7. The parish is also part of the Linkhill Turtle Dove-friendly Zone which is an important initiative to reverse the catastrophic decline in the species.

**1.10.1** There are ten Local Wildlife Sites (LWS) in the parish and one Site of Special Scientific Interest (SSSI), Parsonage Wood, (see Supporting Documents LEA8 and LEA9) highlighting the wildlife-rich environment. The noted lichen-rich flora is a particular feature indicative of the clean, unpolluted air in the parish.

**1.10.2** The NPPF emphasises the importance of the natural environment.<sup>13</sup> It is especially important that new development pays special attention to this in an area so rich in biodiversity. TWBC provides guidance notes for planning applications in relation to Landscape and Nature Conservation and states that development should 'seek to protect and enhance the biodiversity of the site and the surrounding area'.<sup>14</sup>

**1.10.3** Development will be expected to comply with Policies EN1 and EN14 of TWBC DLP 2019.

### **Policy LE5 Trees, Woodland and Hedgerow**

**There will be a presumption in favour of the retention and enhancement of existing trees, woodland and hedgerow cover on site. Existing individual trees, or groups of trees, that contribute positively to the area shall be retained. Any proposed new landscaping, and any existing landscaping to be retained, shall include adequate capacity for future tree growth, where appropriate.**

**1.11** Before any development starts, a formal independent survey should be carried out by an independent expert, appropriately qualified to assess specific important environmental features (such as acid grassland). Developers will be expected to take these findings into account.

**1.11.1** The ecological and arboricultural site survey carried out as a condition of Policy LE6 should be used to identify the features required to be protected during construction and which must be taken into account during the planning process. The plans should include third party monitoring during the build phase to ensure the policy is met.

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<sup>13</sup> NPPF paras. 170-183.

<sup>14</sup> Landscape and Nature Conservation Guidance Notes for Applicants August 2002 — Part 1 p. 1.



#### **Policy LE6 Ecological and Arboricultural Site Surveys**

**Ecological and arboricultural site surveys must be conducted and submitted for any new housing or commercial development, as part of the planning process, to identify natural features, including trees, hedges, wildlife and biodiversity, to be protected, maintained and preserved during and after construction. The funding and monitoring costs of this process to be borne by the developer.**

**Where green spaces are proposed, they should be located within the areas where there are existing habitats, wherever possible, rather than creating new habitat.**

**1.11.2** The Woodland Trust suggest a minimum buffer of 50m.<sup>15</sup> Natural England state a lower minimum of 15m.<sup>16</sup> Natural England also state that the buffer zone should be a semi-natural habitat itself and specifically should not include gardens, access roads or sustainable drainage.

#### **Policy LE7 Protection of Habitats Adjacent to Development**

**Where new housing or commercial development is proposed, buffers must be provided to protect habitats. Developers should strive to achieve a buffer of 50m to protect ancient woodland, local wildlife sites and other areas of natural importance, and at no time should the buffer be less than 15m except where existing physical restrictions make this unfeasible. The buffer itself must be kept as a natural wildlife haven and not used as an amenity.**

**1.11.3** Developers will be expected to include plans for the long-term care of the features which encourage wildlife. This could include maintenance of woodland which remains on an undeveloped part of the site, new verges which encourage wildflowers or specific habitat features within the new development. TWBC's Green Infrastructure Planning document highlights the need for long-term management and its financing.<sup>17</sup>

#### **Policy LE8 On-going Environmental Maintenance**

**Where new housing or commercial development is proposed, developers must, where required by the Parish Council or TWBC, include an on-going management plan for wildlife-related aspects of the site and provision for its funding. Developers must, where required, also set up an environmental management service contract to maintain public areas, particularly LWS, and shall provide for long-term integration and enhancement of the environment.**

**1.12** All new developments should include features within the development which are sympathetic to Benenden's character, its wildlife and flora.

<sup>15</sup> Planner's Manual for Ancient Woodland and Veteran Trees by Woodland Trust, October 2017 — p. 20. TWBC Green Infrastructure Plan Supplementary Planning Document August 2014 — 6.2 p. 24.

<sup>16</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>17</sup> TWBC Green Infrastructure Plan Supplementary Planning Document August 2014 — 6.2 p. 24.

#### **Policy LE9 Features to Encourage Wildlife.**

**Plans for new housing or commercial developments must include elements that encourage wildlife and plants:**

- a) Use native hedgerow species for boundaries in preference to walls or fencing (see Policy BD4). Planting of pollinator-friendly native wildflowers should also be encouraged.**
- b) Ensure common areas, boundaries and verges on new developments are wildlife rich.**
- c) Include specific elements such as bird boxes, bat roosts and hedgehog highways to encourage wildlife.**

**See also Landscape and Environment Project 1.**

**1.13** Drainage should be structured in such a way as not to overwhelm the local ecosystem with the quantity and quality of the water emanating from any new development. In order to minimise the impact on the wildlife and plant habitats, it may be necessary to pump water off-site and it is expected that developers will provide independent surveys in order to satisfactorily achieve this aim.

#### **Policy LE10 Sustainable Drainage for New Housing or Commercial Development**

**Developers must demonstrate that best practice sustainable drainage will be incorporated into any development before construction commences. Developers should refer to KCC Surface Water Floor Maps as produced by the Environment Agency and the adopted KCC Drainage & Planning Policy Statement which provides direction for the incorporation of surface water drainage within new developments.**

## **Landscape and the Environment**

### **Projects**

#### **1. Creation of New Habitat**

Development should include provision for creating new wildlife habitat and joining up of existing wildlife-rich areas.

This could involve planting and other measures on an undeveloped part of the site, or funding to achieve the policy elsewhere within the parish. Measures should be meaningful and long-lasting. The NPPF refers to the establishment of coherent ecological networks <sup>18</sup> as part of the provision for net gains for biodiversity.

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<sup>18</sup> NPPF para. 170 d).

## **2. Allotments**

Promote the creation of shared amenities such as allotments and a community compost area.

## **3. Education**

Support on-going education of children and adults about the countryside and the environment. Primary school children are expected to spend a certain amount of time in the open air looking at nature and the intention is to extend this to older children and adults with organised nature trails, walks and encouragement to volunteer in the upkeep of Public Rights of Way and habitats. Contact with nature contributes to health and wellbeing.

## **4. Public Rights of Way**

Public Rights of Way provide a valuable amenity both for the existing local community and new residents as well as for tourists or visitors. In order to encourage greater use of this amenity there should be improved signage and access to the extensive Public Right of Way network.

## **Supporting Documents for Landscape and the Environment**

LEA1	SWOT Data — Landscape and the Environment
LEA2	Landscape Character Assessments 2018
LEA3	List of source documents
LEA4	High Weald AONB Landscape Character Maps
LEA5	View assessments
LEA6	Local Green Space assessments
LEA7	Wildlife Summary
LEA8	List of Local Wildlife Sites & SSSI
LEA9	Local Wildlife Site maps and citations





Painting by local artist



Fig. 20 Example sketch design for houses (by Clague Architects).

## 2. Housing Supply and Site Allocation

### Objective

**To support modest-scale housing development to meet local needs with a mix of well-designed, high quality, sustainable and affordable housing that conserves and enhances the existing built and natural environment.**

### Introduction

The Housing Supply and Allocation Working Group built on the work of the Benenden Parish Plan 2015,<sup>1</sup> adopted by Benenden Parish Council (BPC) following widespread consultation in the community and is a key supporting document for the Benenden Neighbourhood Development Plan (BNDP).

This Plan will support housing allocations on a number of sustainable and economically viable sites, the majority on previously developed land, the only exception being to allow an almshouse development for provision of affordable housing for the parish in perpetuity. The BNDP believes that suitable design (see Fig. 20) can minimise harmful impacts and improve the character and quality of Benenden parish.

### Housing Needs Within the Parish

Housing need in the parish is relatively low, as demonstrated in the Objectively Assessed Need (OAN) for housing in the Borough, established using standard methodology. The NPPF (para. 65) explains that strategic policies should also set out a housing requirement for designated neighbourhood areas which reflect the overall strategy for the pattern and scale of development and any relevant allocations. The TWBC Draft Local Plan (DLP) asserts this in Strategic Policies STR1 and STR/BE1.

The 2018 Tunbridge Wells Borough Council (TWBC) Housing Needs Study (HNS) identified Benenden as having the second lowest affordable housing needs within the Borough, with a requirement for 6 affordable dwellings per annum (4 for older residents and 2 for families) over a five-year period.

This Plan will provide up to 38 affordable dwellings over the Plan period, with a further 12 being provided by existing permissions.

<sup>1</sup> Parish Plan 2015 <https://www.benendenvillage.org.uk/ParishPlan/BenendenParishPlan2015ScreenCopy.pdf>



## Consultation

The Parish Plan and Housing Needs Study 2015 were used with other information collected in the interim to inform the Visioning Workshop held on 28<sup>th</sup> October 2017 and subsequent Housing and Design Workshop on 11<sup>th</sup> November 2017. Subsequent exhibitions, magazine articles and a presentation took place in 2018-2019 (Supporting Documents HSA1 & HSA2).

## Policy Context/Justification

- Over 98% of the parish is in the High Weald AONB designation
- Benenden parish has two Conservation Areas (Benenden village and Iden Green) and has over 150 listed buildings, many Roman roads, medieval field systems, an SSSI and much ancient woodland
- The facilities within the parish are focused on Benenden village and, whilst serving basic needs, are limited in range and scale resulting in the need to drive to other towns such as Cranbrook and Tenterden or further afield to the main centres
- Access to/from the parish is constrained by the distance from main centres: Tunbridge Wells 15m (24km), Maidstone 13m (22km), Ashford 14m (23km) and Hastings 14m (23km)
- Access within the parish is constrained by the width of the roads and rural lanes
- Poor infrastructure: broadband and mobile signal a particular concern
- The 2017 BNDP consultation highlighted local residents' top priority was to protect the rural nature of the parish

Historically, development has been scattered across 32 'dens' which make up the parish (see Fig. 21), with concentrations in the three main settlements of Benenden, Iden Green and East End.

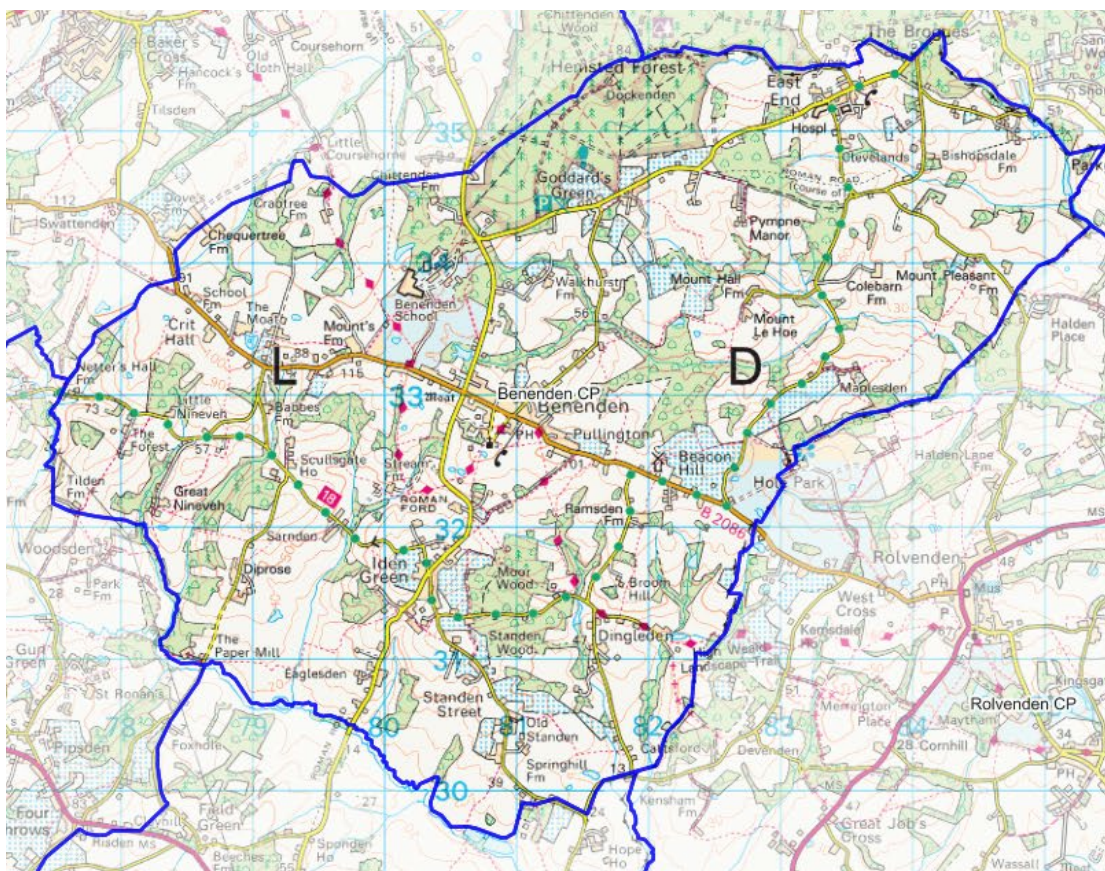


Fig. 21 Map showing the scattered settlements/dens of the parish.

'The pattern of dispersed historic farmsteads and hamlets...which add important local character', as recorded in TWBC Landscape Character Assessment 2017 and the High Weald AONB Management Plan, was of significant importance in the local consultation process.



The initial consultation workshop showed a clear preference for small scattered development rather than on one or two large sites in order to maintain the character and distinctiveness of the parish. BNDP therefore considered if this would be possible, but after assessment of the 22 sites identified in the TWBC Call for Sites, the following conclusions were drawn:

- Only two small sites were submitted (Site refs. 66 & 295)
- The impact on the AONB would be most detrimental if development was scattered across the parish: building on greenfield sites, loss of agricultural land, impact on the landscape and views in the AONB and increased traffic on quiet rural lanes. Contrary to the NPPF (para. 79)
- There would be less variety of housing types — small developments increase building cost per unit and favour larger, expensive properties
- There would be no obligation on developers to build affordable housing under the currently adopted development policies
- Building in a small part of a larger site would open up that site for larger schemes and more housing later
- Small sites can be delivered via windfall policy (see Policy HS5)

The impact of housing developments in an AONB, and protecting the rural nature of the parish, were the most important factors for most people in the consultation process. A number of the rural sites in the Call for Sites would, if developed, significantly harm the rural setting and be contrary both to the High Weald AONB Management Plan<sup>2</sup> and the protection afforded to the AONB in the NPPF.<sup>3</sup> For this reason they are not considered suitable for housing development in this Plan. Any housing built in, or adjacent to, the AONB will be required to be sensitively designed and landscaped in order to mitigate the impact on the rural setting (see Policy BD1).

## The Policies

### Quantity and Location of New Housing Development

**2.1** Following the 2016 Call for Sites, landowners and their agents in Benenden put forward 20 sites for consideration (see Supporting Document HSA5). Two further sites have recently been submitted. BNDP has chosen to allocate four sites. These are in addition to those already permitted but as yet either uncompleted or undeveloped (Walkhurst Road and Benenden Hospital respectively).

**2.1.2** The BNDP site allocation, made in close co-operation with TWBC, would meet the Government's requirement for sustainable and deliverable new housing.<sup>4</sup> This is an extrapolation of the approach set out in the Benenden Parish Plan of 2015<sup>5</sup> which outlined growth of 1% per annum up to 2025.

**2.1.3** The selection of the most suitable sites for allocation for housing development in the parish, that were submitted to the TWBC Call for Sites (during and since 2016), have been carefully considered using appropriate methods following national policies, guidance and best practice. This includes the consideration of a wide range of constraints such as the impact on the AONB, conservation areas, other heritage assets and their setting and the proximity of sites to facilities, together with the availability of sustainable transport links.

**2.1.4** The parish at consultation supported priority being given to brownfield sites and previously developed land (PDL). This accords with the NPPF (para. 117) stated preference for the use of brownfield sites. The BNDP therefore gave extra weight to those sites which met these criteria, making as much use as possible of previously developed or 'brownfield' land.'

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<sup>2</sup> AONB Management Plan 2019-24 p. 20.

<sup>3</sup> NPPF para. 172.

<sup>4</sup> NPPF para. 8.

<sup>5</sup> Parish Plan 2015 p. 7.

**2.1.5** In considering which sites should be allocated, attention was paid to the existing built environment, as an integral part of landscape character, especially given the high proportion of listed buildings in the parish<sup>6</sup> (see Historic Context and HCA1) and following guidelines set out by Historic England<sup>7</sup> and in the government's Planning Practice Guide.<sup>8</sup>

**2.1.6** Landscape Character Assessments have been carried out by the Environment Group (see Supporting Document LEA2). The particular characteristics of the different areas of the parish will be expected to be protected. The rare survival of the landscape that surrounds Benenden is of particular interest and importance.<sup>9</sup>

**2.1.7** Building Design Character Assessments in the main areas of the parish (see Supporting Document BDA3) were carried out by the Design and the Built Environment Group as a reference tool for future building design in the parish. In addition, the NPPF sets out the importance of conserving the historic built environment.<sup>10</sup>

**2.1.8** The environment is an important policy issue, both for the TWBC Draft Local Plan and in terms of the AONB Management Plan. Consequently, equal weight is given to both the built environment and the rural environment in this Neighbourhood Plan.

**2.1.9** Any new build housing development immediately adjacent to the AONB will have an impact upon it and must therefore be taken into account. Any development should conserve and enhance the landscape and scenic beauty, wildlife and cultural life of the AONB: major development would need to satisfy the requirements of para. 172 c) of the NPPF.

**2.1.10** Where a site is allocated within the AONB, the proposal should make a positive contribution towards achieving the objectives of the AONB Management Plan, and show how relevant guidance from the AONB Joint Advisory Committee has been considered, to meet the high standards required of the policies in this Plan for the High Weald AONB landscape.

**2.1.11** Sites allocated outside the AONB but within the High Weald Character Area, or close to the boundary of the designated AONB landscape, will have similar characteristics and are likely to contribute to the setting of the designated landscape. The AONB Management Plan and any supporting guidance will be a material consideration for these sites.

#### **Policy HS1 Site Allocation and Number of New Dwellings**

**In addition to existing planning permissions\* and windfall development allowed under Policy HS5, this Plan allocates four sites to accommodate approximately 90 additional new homes in the parish.**

<b>Ref. LS16</b>	<b>Uphill</b>	<b>18-20 units</b>
<b>Ref. 277</b>	<b>Feoffee</b>	<b>23-25 units</b>
<b>Ref. 424</b>	<b>Hospital South</b>	<b>22-25 units</b>
<b>Ref. LS41</b>	<b>Hospital North</b>	<b>22-25 units</b>

\*There are two existing planning consents in Walkhurst Road (12 units under construction) and at Benenden Hospital — South Site (24 units unimplemented).

<sup>6</sup> <https://britishlistedbuildings.co.uk/england/benenden-tunbridge-wells-kent>

<sup>7</sup> Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) p. 2.

<sup>8</sup> <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

<sup>9</sup> The High Weald AONB Unit has carried out a number of studies on the landscape character of the Benenden area, in particular: Historic Landscape Characterisation of the Parishes of Hawkhurst, Cranbrook, Goudhurst & Benenden updated 2017; Case Study report: Benenden by footpath March 2017; Fields in the High Weald Case Study Report Woodside Farm March 2017.

<sup>10</sup> NPPF paras. 184, 185.

## **Types of Housing — Achieving the Right Mix**

**2.2** Reflecting the findings of the initial consultation workshops in 2017/18, and the evidence provided in the 2015 Parish Plan Housing Needs Survey, the BNDP will deliver a mix of different types of well-designed, high quality, sustainable, and affordable housing that enhances the built and natural environment.<sup>11</sup>

**2.2.1** The 2015 Parish Plan identified a requirement for a range of house types in Benenden, whilst the more recent TWBC Housing Needs Study 2018, which focused on affordable housing, revealed a need for smaller 1-2 bed units. It is therefore considered important that the housing 'mix' should include some larger properties, suitable for families, as well as smaller units.

**2.2.2** The BNDP considers it necessary to have an adequate supply of housing of different types and sizes between which residents can move, within the parish, in order to help maintain an enduring sense of community.

### **Policy HS2 Delivering a Balanced Community**

**Proposals for housing development in accordance with the Neighbourhood Plan will be required to be designed to provide for balanced communities by meeting the TWBC Strategic Housing Assessment mix, and to take note of the Housing Needs Study (HNS). This will ensure suitable and affordable housing is available for individuals and families and, in particular, housing to meet the needs of an ageing population. New housing developments should include an integrated variety of housing types — such as flats, maisonettes and bungalows, in addition to family houses.**

#### **Each site should include:**

- a) affordable housing in line with TWBC policy**
- b) suitable property for older residents who wish to downsize within the parish**
- c) mixed sizes of market housing for parishioners and new residents**
- d) well-integrated affordable and market housing within each development, to help to establish and maintain a strong, mixed and balanced community**

## **Locally led Housing Delivery**

**2.3** It is considered that the local aspirations of the community for the provision of affordable/local needs housing, can often be best achieved by partnership-based and locally led development initiatives. The Parish Council has a history of working with rural housing associations on a number of locally based schemes by which affordable housing remains in the community (see Housing Supply Project 1).

**2.3.1** Benenden is unusual in having almshouses, a category of low-cost housing which remains in the control of local trustees. Almshouses also comply with the parish's requirement for locally led, locally managed housing development. They therefore have the full backing of the BNDP, and the scheme being considered for the Feoffee site (Site ref. 277) will increase the number of such units available in perpetuity to people, of all ages, with a connection to the parish.

**2.3.2** Almshouses provide low-cost rental available to individuals and families, of whatever age, with a local connection and are administered and regulated by local trustees. These properties

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<sup>11</sup> NPPF para. 61.



are exempt from the Government's 'Right to Buy' scheme.

#### **Policy HS3 Almshouses**

**The Parish Council will support schemes that apply the almshouse principle in accordance with the Neighbourhood Plan. Benenden's almshouses are administered by the Benenden Almshouse Charities (see Feoffee site ref. 277) and, where appropriate, this principle should be followed to provide an enduring supply of affordable housing in perpetuity.**

**2.3.3** It is anticipated that approximately 50 affordable dwellings of different types will be provided over the Plan period that conform to the definition of affordable housing as set out in the NPPF para. 61-63 and TWBC DLP.

**2.3.4** The parish at consultation expressed an interest in setting up a Community Land Trust (CLT) which could ensure that local housing remains genuinely affordable in perpetuity. However, because of the existing Benenden Village Trust and the Benenden Almshouse Charities, it may not be necessary to create a CLT. However, should land or assets be gifted to the community or made available at a reduced price, such as land for housing or for allotments, then it is recommended that a CLT be investigated (see Housing Supply Project 2) to administer such assets for the community.

#### **Supporting a Sustainable Community**

**2.4** Working from home is becoming increasingly common and the BNDP encourages the provision of facilities to enable sustainable homeworking which will improve locally based employment, support local services, and reduce traffic movements. The BNDP supports the provision of office space within new-build dwellings, provided the latter is compatible with residential amenity.

**2.4.1** Live/work (L/W) units are units of living accommodation which are specifically designed to accommodate work facilities for those residing therein. L/W units can be accommodated within a conversion of a non-residential building, or by new build. The units are a composite Class E/Class C3 use and enjoy Permitted Development Rights under Part 3 Class E of the General Permitted Development Order, allowing the work element to be extinguished by the live element. The BNDP would seek a condition of planning permission to prevent the subsequent conversion of the work element to the residential element.

#### **Policy HS4 Live/Work (L/W) Units**

**Proposals for live/work units will only be considered appropriate if they are within the LBD, as defined by the Local Plan, or are conversions of appropriate rural buildings, or are on previously developed land (PDL). A condition of planning permission will be that such workspaces cannot be converted to wholly domestic use.**

**All live/work units must have appropriate internet connectivity (see Policy T5).**

**2.5** Small scale housing development, such as infilling; redevelopment or conversion, is expected to come forward during the life of the BNDP, enabling windfall development and making a contribution towards the housing land supply in the BNDP area.

**2.5.1** Residential extensions will also come forward during the Plan period, but these do not add to the overall number of dwellings in the parish.

**2.5.2** Any development proposals must comply with national, local and BNDP policies.

#### **Policy HS5 Windfall Sites**

**Windfall residential development such as infilling, redevelopment, conversion or extension will be permitted subject to the following criteria:**

- a) Within the LBD, as defined in the Local Plan, where such proposals do not conflict with other policies in the Local Plan, or Neighbourhood Plan;**
- b) Outside the LBD, as defined in the Local Plan, on previously developed land (PDL), or the conversion of appropriate rural buildings, which are not currently in business use;**
- c) The scale, design and appearance comply with BNDP design policy.**

### **Density**

**2.6** BNDP has argued for development to be kept at an appropriate density, in keeping with the existing neighbouring pattern (see Policy HS6), while cognisant of the fact that the most efficient use must be made of valuable land. This position is supported by CPRE in order to protect more of the AONB, some sites nearer to built-up areas should be developed at greater density.

National guidelines are for 30 dwellings per hectare (dph) in rural areas though the TWBC Draft Local Plan states ‘the density of residential development should have regard to the character of the area, including landscape, topography and surrounding built form.’

**2.6.1** The average density in the parish is much lower (Benenden village averages 10dph) and as a result BNDP has argued that density should vary depending on the location of the site and its impact on the AONB.

**2.6.2** Sites which would increase the coalescence between major settlements, in particular between Benenden and Iden Green, or Benenden and East End, thus reducing their separate identities, have not been allocated. This is a key characteristic in the AONB Management Plan.<sup>12</sup>

**2.6.3** In the construction of new housing it is the BNDP’s view that one of the factors that contributes most to the distinctiveness and character of the parish is housing density. New development should take account of the density of neighbouring housing in order to maintain the distinctive character of that settlement. Furthermore, the character of the development itself should comply with the design requirements specified in the BNDP Design and the Built Environment chapter and the policies contained therein.

### **2.7 Policy HS6 Housing Density**

**While being aware of the need to make efficient use of land, as expressed in the NPPF <sup>13</sup>, the density of new housing should be comparable with the densities adjoining the proposed development, in order to maintain the character and distinctiveness of the location.**

<sup>12</sup> AONB Management Plan p. 31; Objective S2 p. 33.

<sup>13</sup> NPPF Para. 122(d)

## New Housing Site Allocations

### 2.7.1 Overview

The Working Group:

- looked at and objectively assessed the 13 originally submitted sites, the 7 late submitted sites and the 2 most recently submitted sites
- met regularly to discuss and debate their findings
- individual site assessments (ISAs) were based on site walks, addressing parish concerns (e.g. access, traffic) and reviewing relevant local and national planning policies and AONB guidelines (see Supporting Document HSA3)

### 2.7.2 Site Assessments Made by the AONB Unit

The High Weald AONB Unit has carried out a separate assessment of the sites within the Benenden AONB (see Supporting Document HSA4). Their conclusions underscore the importance of the rural landscape in Benenden and the need to protect it as much as possible by restricting development to previously developed land or sites outside the AONB. Their assessment is considered a key supporting document.

## 2.8 The Allocated Sites

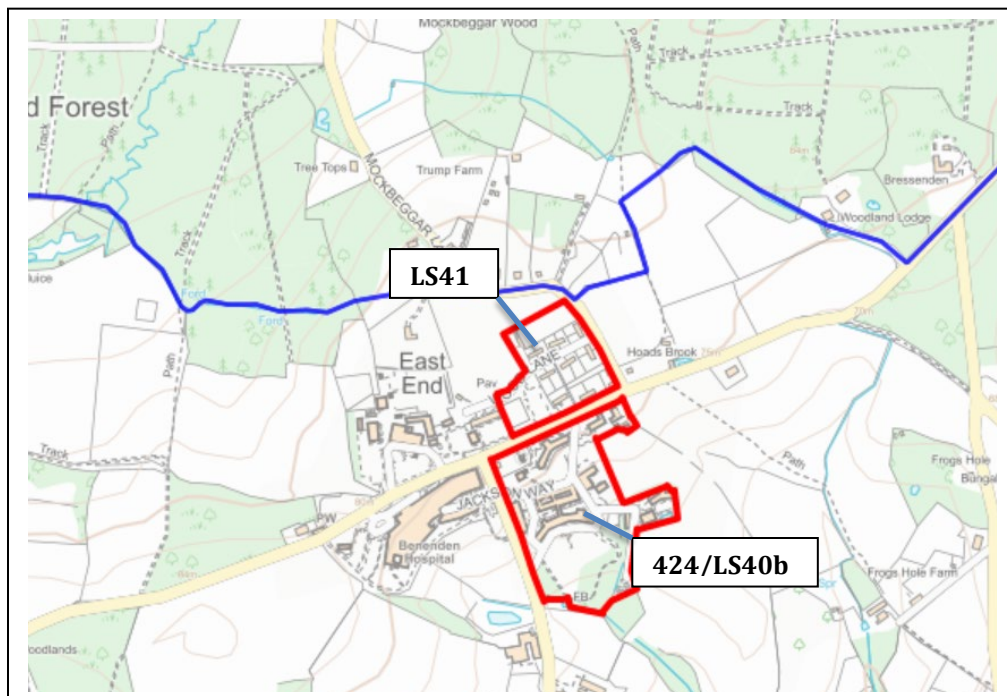


Fig. 22 Map showing the two allocated sites (edged in red) at the Hospital (Ref. 424+LS40b and Ref. LS41).



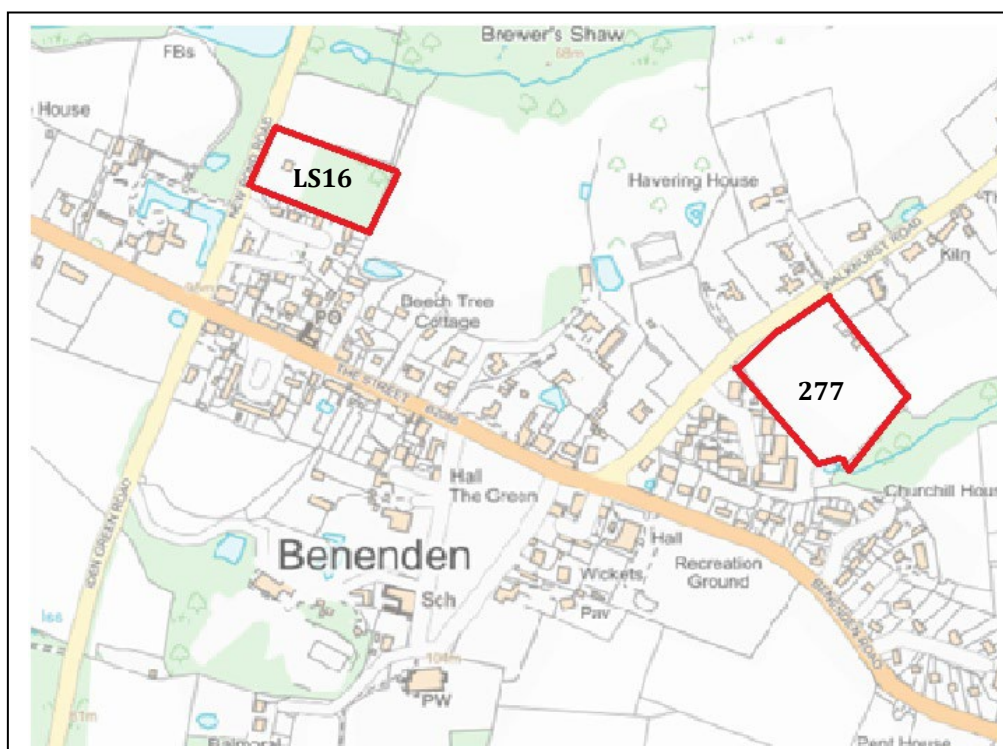


Fig. 23 Map showing the two allocated sites (edged in red) of Uphill (Ref. LS16) & Feoffee (Ref. 277).

To meet government aspirations, and the consequent indicative figure for TWBC, there is a requirement to accommodate some new housing development within the parish. After consultation, the BNDP and TWBC have agreed on the most appropriate site allocations which will achieve approximately 100 dwellings over the Plan period, in addition to existing planning permissions and windfall opportunities. This scale of development is consistent with the expectations of the 2015 Parish Plan, which suggested growth of 1% per annum.

The table below (Fig. 24) shows the sites that the BNDP has allocated for residential development and which most clearly meets the requirements of the NPPF (paras. 118c and 172) and that of the High Weald AONB Management Plan, to conserve and enhance natural beauty. The selection of these sites prioritises previously developed land, while at the same time fulfilling the wishes of the parish to maintain its rural nature as well as providing a range of housing, much of it affordable. The sites are situated on three 'brownfield' sites (see Figs. 22 & 23) and on one 'greenfield' site (see Fig. 23), which is going to providing almshouse accommodation in perpetuity for residents of the parish.

Site	Location	Min Homes	Max homes	Affordable homes
Existing permissions at Walkhurst Road (12 units) and Benenden Hospital South (24 units)		36	36	12
<b>BNDP Site Allocations:</b>				
LS16 Uphill	Previously developed land, inside AONB, close to facilities	18	20	6 - 8
277 Feoffee	Greenfield site for almshouses, inside AONB, close to facilities	23	25	12 - 14
424 Hospital South East Quadrant (SEQ)	Brownfield site, outside AONB, facilities to be provided	22	25	7 - 8
LS41 Hospital North East Quadrant (NEQ)	Brownfield/PDL site, outside AONB, facilities to be provided	22	25	7 - 8
<b>Total for the BNDP Sites</b>		<b>85</b>	<b>95</b>	<b>32 - 38</b>

Fig. 24 Table of Allocated Sites.

## 2.9 Site Specific Policies for the Allocated Sites

### Benenden Village Sites

#### Context

Benenden village is the largest settlement of the parish but remains a relatively remote and unsustainable location, with sensitive landscape character, built heritage and environmental quality. Planning applications should be refused for any development of poor design that fails to take the opportunities available for improving the character and quality of the area, and take into account the design and other requirements specified in the BNDP and the Design and the Built Environment chapter, and the policies and guidance in the TWBC Local Plan.

The identified sites present the best opportunities available for some well-designed development with a mix of housing size and type to meet a range of local housing needs, a substantial proportion of it affordable, and including a high standard of accessibility for older people and those with poor mobility.

#### 2.9.1 Site 277 Land adjacent to Feoffee Cottages, Walkhurst Road, Benenden



Fig. 25 Site Plan for Site ref. 277 (edged in red) Feoffee Cottages, Walkhurst Road, Benenden.



Fig. 26 Site ref. 277 Architect's Layout, also showing the open space/landscape buffer zone.



Fig. 27 Computer-generated image of Almshouse view.

### 2.9.1.1 Reasoned Justification

The site is within the AONB and within the recently revised LBD (see Fig. 3) and close to the Conservation Area. The developer is the Benenden Almshouse Charities which plans the construction of 23-25 dwellings on the north/western part of this 1.46ha site (see Figs. 25 & 26). 12-14 of the dwellings would be built in accordance with the existing almshouse principle (see Fig. 27) and, to support the almshouse delivery of affordable housing, further dwellings would be developed as market housing. The lower (south/eastern) part of the site would be left as grazing on the steep bank and to maintain the view of residents of Harmsworth Court. As almshouses are exempt from the Right to Buy legislation and are occupied only by those with a parish connection under licences to occupy, the development provides an enduring stock of low-cost housing for licencees. Furthermore, the Charity does not have a lower age limit restriction.



This Plan supports the building of 23-25 dwellings at a density of no more than 25 dwellings per hectare after discounting the buffer zone of 0.46 hectare.

There is an opportunity here to develop a group of houses along Walkhurst Road with a gradation from the low-density Conservation Area to essentially scattered and rural development further along Walkhurst Road, but within easy access of the core village amenities and services. Safe pedestrian access would, however, need to be provided and land would be provided by the Benenden Almshouse Charities for this purpose.

Given this site's proximity to a Grade II Listed Building (see Fig. 28), its position in the AONB and proximity to the Conservation Area, the BNDP is backing this scheme only on the basis that it will provide affordable housing for local families in perpetuity.



Fig. 28 Site ref. 277.

### 2.9.1.2 Description

- TWBC Call for Sites ref. 277
- Total site area 1.46ha, rectangular-shaped open greenfield site sloping steeply at the south (see Fig. 28)
- The site owner/developer is the Benenden Almshouse Charities
- Existing use is grazing land

### 2.9.1.3 Constraints

- Located in the High Weald AONB
- Located within the recently revised LBD of Benenden village and abuts development in Rothermere Close and Harmsworth Court
- Adjacent to Ancient Woodland and Workhouse Gill
- Outlook from Harmsworth Court across the site to be protected
- Walkhurst Road is a narrow characterful rural lane with no footway
- In proximity to heritage assets — the Benenden Conservation Area and Grade II Listed Building (Feoffee Cottages)

#### 2.9.1.4 Opportunities

- Highly sustainable location close to/within walking distance of village amenities
- Suited to a modest mixed development, including homes for families, and smaller dwellings; the majority being local needs affordable almshouse dwellings
- Design should be sympathetic to the setting of heritage assets, rural character of the lane, scale and character of nearby built development, and minimise impact on the landscape and scenic beauty of the AONB and natural environment
- Creation of a footway link into the village

#### **Site Specific Policy 1 (SSP1)**

#### **Land adjacent to Feoffee Cottages, Walkhurst Road, Benenden (ISA reference: Site 277)**

##### **Site Selection Approach:**

To support a suitable development proposal for the site, as an exceptional opportunity to provide a sustainable development to meet local needs for affordable housing through the Benenden Almshouse Charities, in a location that is close to village facilities. A suitable design must avoid or minimise harmful impacts of a development within the AONB, and close to the Benenden Conservation Area, and improve the character and quality of Benenden village.

##### **Achieved by:**

Supporting suitable proposals from the Benenden Almshouse Charities to maximise local needs affordable housing on the site.

##### **Proposals shall:**

1. Provide a mixed residential development of 23-25 C3 dwellings, with 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. To include a mix of housing types including affordable family housing as well as smaller units.
2. Be designed to conserve and enhance the character and distinctiveness of the village. The density of housing should be sympathetic to local character including the surrounding built housing density in the adjacent areas, the AONB landscape, and the landscape and heritage setting of the Benenden Conservation Area and nearby Listed Buildings. Density must not exceed 25dph (see Reasoned Justification para. 2.9.1.1) after discounting the buffer zone of 0.46ha.
3. Include the provision of adequate parking facilities to avoid on-street parking both within and beyond the development site. Reference should be made to the BNDP Design and the Built Environment chapter para. 3.6 and Policy BD6 for determining the quantity of vehicle parking spaces, in the context of a generally high reliance on private cars in this area of poor public transport provision. If provided, garages will not count towards the required quantity of parking spaces. Areas should be set aside for amenity vehicles turning and for the parking of mobility scooters, ideally under cover. Dwellings to be provided with electric car-charging facilities.

**Site Specific Policy 1 (SSP1) (continued)**  
**(ISA reference: Site 277)**

4. Protect the Ancient Woodland (and pond) lining Workhouse Gill, which should include a buffer area adjacent to the designated area of a minimum of 50m free from any form of built development, track or private garden space; the details and planting of the buffer area to be approved and thereafter maintained in accordance with Policies LE7 and LE8 The proposal must secure the management of the buffer in the long term.
5. Provide all dwellings with a suitable standard of shared semi-private and/or private garden space. Landscaping of open areas and the means of enclosure of all the site boundaries should be appropriately planted and screened with native hedging species (see Policies LE9 and BD4); solid fencing and other hard borders should be strictly minimised.
6. Provide a vehicle access link with a footpath to Walkhurst Road and a direct footway connection within the site to Rothermere Close to provide safe pedestrian access, on one side of the road only, to the village centre (see Policy BD7). The footway shall be designed having regard to the sensitive 'edge of settlement' character in this part of Walkhurst Road.
7. Reflect the location of the site on the edge of the settlement in the layout and design of the scheme and take into account the sensitive topography (see TWBC DLP EN1: Design and other development management criteria, EN20: Rural Landscape and EN21: High Weald Area of Outstanding Natural Beauty (AONB)). Development to be informed by a Landscape and Visual Impact Assessment and heritage assessment. Design and materials should comply with the design requirements specified in the BNDP Design and the Built Environment chapter and the policies contained therein.
8. Be sensitive to the approach and setting of the Benenden Conservation Area (see TWBC DLP Policy EN7: Heritage Assets).
9. Minimise the impact of construction work on existing flora and fauna, in particular retaining the hedging/mature trees on the site boundaries (see Policies LE5 and LE6) and encourage wildlife by including features within the development which are sympathetic to local wildlife and plants (see Policy LE9).
10. The parish is a dark skies area and any proposals for the outdoor lighting of new developments must comply with BNDP Policy BD5.

**It is expected that contributions will be required towards the following to mitigate the impact of the development:**

- i. Works to the junction of Walkhurst Road and the B2086 to include dropped kerbs with tactile paving.
- ii. Any further contributions identified through the pre-application and planning application process.



## 2.9.2 Site LS16 Uphill, New Pond Road, Benenden

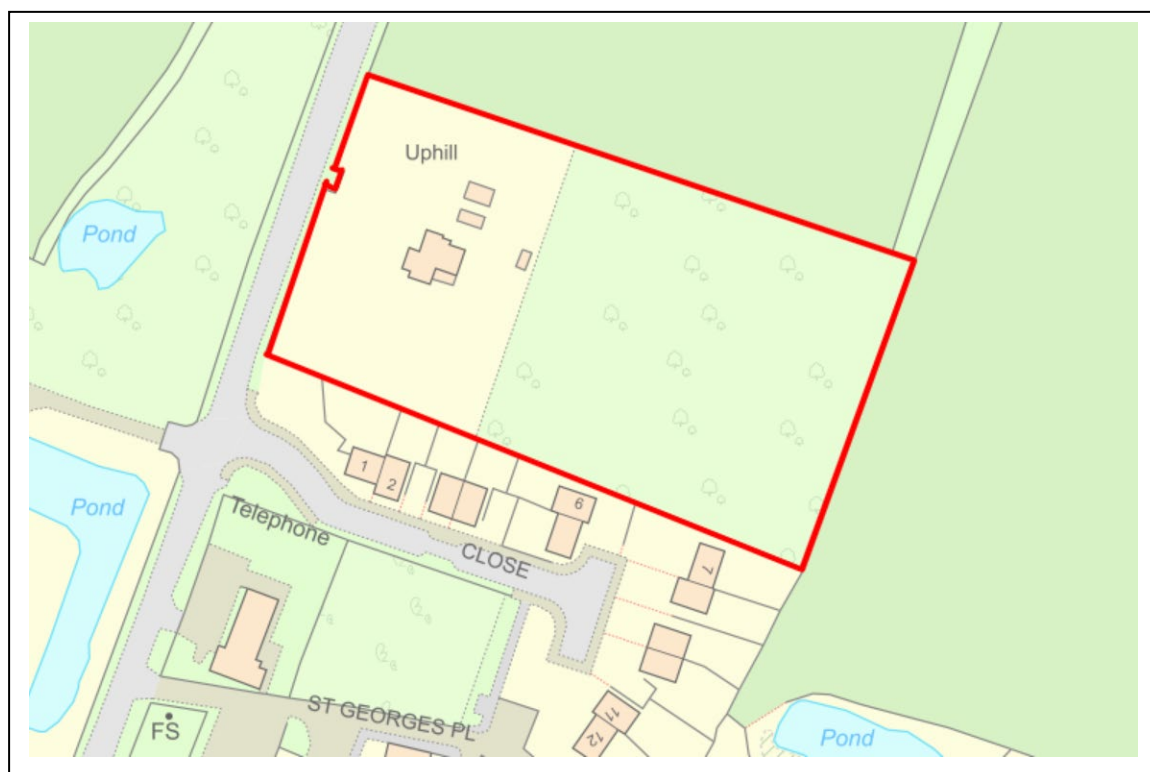


Fig. 29 Site plan for Site ref. LS16 (edged in red), New Pond Road, Benenden.

### 2.9.2.1 Reasoned Justification

The site contains a single house and curtilage fronting New Pond Road (see Fig. 29). This residential plot is within the recently re-drawn LBD of Benenden village and is in the AONB. It abuts Hortons Close, a 'rural exception site' development, and is close to the village centre.

Density should be aligned with nearby sites including Hortons Close which was built at 25dph; the nearby Conservation Area and the housing densities of recent permissions in Benenden (17dph Walkhurst Road). It is considered that this site should realistically be developed at a similar density in order to maintain the character and distinctiveness of the village centre, which it abuts. This Plan supports development of 18-20 dwellings on Site LS16.

It is anticipated that the lack of a footpath on New Pond Road could be addressed sensitively with a 'rural' style path,<sup>14</sup> on one side of the road only (see Policy BD7), to join up with the existing pavement of The Street.

The site offers the opportunity for a modest mixed housing development in a sustainable location. This is a previously developed site which is within close walking distance of the village centre, with good road access and relatively well screened within the AONB landscape.

The site is inside the recently re-drawn LBD (of the TWBC DLP 2019) and in an area of sensitive heritage and landscape character, and permission should be refused for any development of poor design that fails to take the opportunities available for improving the character, safety and quality of the area. Planning applications must take into account the design and other requirements specified in the BNDP Design and the Built Environment chapter and the policies and guidance in the TWBC Local Plan.

<sup>14</sup> See Kent Design Guide Interim Guidance Note 3.



Fig. 30 Site ref. LS16.

#### 2.9.2.2 Description

- Total site area 0.78ha
- Owner-occupier
- Existing use for a single dwelling and garden (see Fig. 30)

#### 2.9.2.3 Constraints

- Within the High Weald AONB
- Just outside the Benenden Conservation Area
- Direct existing access point to New Pond Road, but with fast traffic speeds (outside the 30mph limit) and some 140m from the Benenden crossroads. A contribution to traffic calming and safe pedestrian routes is required
- Substantial trees and hedging on the site to be retained
- Development to be contained within the existing site boundaries

#### 2.9.2.4 Opportunities

- Previously Developed Land (PDL) — existing residential curtilage of one substantial house, adjacent to relatively high-density housing at the Hortons Close development
- Inside the recently re-drawn LBD of Benenden village
- Scale, massing and design to respond to surroundings, suitable for a mixed housing development
- Visually a relatively enclosed site screened from long views from AONB footpaths, but visible from New Pond Road. Proposals should conserve and enhance trees, hedging, landscape screening and habitat of value
- Sustainable location close to/within walking distance of village centre amenities
- Creation of a footway link into the village
- Contribution to traffic calming on New Pond Road and at the Benenden crossroads

## **Site Specific Policy 2 (SSP2)**

### **Uphill, New Pond Road, Benenden (ISA reference: Site LS16)**

#### **Site Selection Approach:**

To support a modest scale development on a relatively enclosed and sustainable site close to village amenities. A suitable design must avoid or minimise harmful impacts and improve the character and quality of Benenden village.

#### **Achieved by:**

Supporting suitable development proposals and collaborating with the developer to achieve a traffic calming scheme on New Pond Road and at Benenden crossroads and create a new pedestrian footway to connect the site to Hortons Close and the village centre.

#### **Proposals shall:**

1. Provide a residential development of 18-20 C3 dwellings, with affordable housing in accordance with TWBC policy and a mix of type and size integrated throughout the development to help meet locally identified needs (see Policy HS2).
2. Be designed to conserve and enhance the character and distinctiveness of the village; the density of housing should be sympathetic to local character including surrounding built housing density in the adjacent areas, the AONB landscape, and the landscape and heritage setting of the Benenden Conservation Area. Density must not exceed 25dph (see Reasoned Justification para 2.9.2.1).
3. Include the provision of adequate parking facilities to avoid on-street parking both within and beyond the development site. Reference should be made to the BNDP chapter Design & the Built Environment chapter para 3.6 and Policy BD6 for determining the quantity of vehicle parking spaces, in the context of the generally high reliance on private cars in this area of relatively poor public transport provision. If provided, garages will not count towards the required quantity of parking spaces. Dwellings to be provided with electric car-charging facilities.
4. Protect the natural environmental and landscape enclosure of the site, the trees at the rear of the site and trees and hedging at all the site boundaries should be assessed at pre-application stage ecological and arboricultural site survey (Policies LE5 & LE6) for the health of the trees, their contribution to the landscape character of the AONB and biodiversity; the most significant trees and hedges should be protected and incorporated into the design of the development in order to maintain the rural nature of the development and surroundings. Existing hedges and trees at the New Pond Road frontage should be conserved and enhanced to screen the site and setting of the nearby historic parkland; Hemsted Park (Benenden School).



## **Site Specific Policy 2 (SSP2) (continued)**

### **(ISA reference: Site LS16)**

5. This site lies within, or very close to, the relevant impact risk zone for Parsonage Wood SSSI; hence an assessment of potential adverse effects on the SSSI as a result of the development will be required as part of any application, and if required the proposal shall include adequate mitigation measures, both during construction and on completion, to the satisfaction of Natural England to ensure no adverse effects on the SSSI as a result of the proposed development (see TWBC DLP Policies EN11: Net Gains for Nature: biodiversity and EN12: Protection of designated sites and habitats).
6. The MAGIC website identifies the potential for Woodpasture or Parkland, a BAP priority habitat, to be within 25m of the site. This should be taken into consideration as part of any detailed site-specific studies to inform development and any required mitigation (see TWBC DLP Policy EN12: Protection of designated sites and habitats).
7. The submission of relevant and proportionate archaeological investigations is required as part of the planning application process to demonstrate that the proposal will not have a materially harmful impact on the archaeological environment (see TWBC DLP Policy EN7: Heritage Assets).
8. Protect important habitat; the site lies within the National Biodiversity Networks area for Turtle Doves — a Priority Species in the UK post 2010 Biodiversity Framework, listed on the Red list of Threatened Species. Mitigation is required to minimise the impact of both construction work and the new housing on existing flora and fauna (see Policies LE5 and LE7) and encourage wildlife by including features within the development which are sympathetic to local wildlife and plants (see Policy LE9).
9. Provide all dwellings with a suitable standard of shared semi-private and/or private garden space. Landscaping of open areas and the means of enclosure of all the site boundaries should be appropriately planted and screened with native hedging species; solid fencing and other hard borders should be strictly minimised (see Policy BD4).
10. The provision of a pedestrian footway from the site entrance, past Hortons Close, to the junction of New Pond Road and the B2086 (on highways land). This shall be designed having regard to the designation of this part of New Pond Road as an Important Landscape Approach (see Policy BD7).
11. A single point of access for vehicles from New Pond Road should be designed to be compatible with and support the implementation of approved plans for the improved traffic calming and safety measures in New Pond Road.

continued/-

## **Site Specific Policy 2 (SSP2) (continued)**

### **(ISA reference: Site LS16)**

12. Design and materials should comply with the design requirements specified in the Benenden Neighbourhood Development Plan under the Design and the Built Environment chapter and the policies contained therein.
13. The parish is a dark skies area and any proposals for the outdoor lighting of new developments must comply with Policy BD5.

#### **It is expected that contributions will be required towards the following to mitigate the impact of the development:**

- i. Works to the junction between New Pond Road and the B2086.
- ii. The designation of a 30mph speed limit along New Pond Road to the north of the site.
- iii. Contribution towards children's play areas within the parish.
- iv. Any further contributions identified through the pre-application and planning application process.

## **Sites at East End, Benenden**

### **Context**

Benenden Hospital is the largest complex of buildings and employment site in the parish, established for over 100 years. The nature and services of the hospital continue to change and evolve.

Travelling west, Goddards Green Road links the settlement to Benenden village amenities and towards the station at Staplehurst; travelling east, via Castleton Oak crossroads, towards the town of Tenterden or the station at Headcorn.

TWBC has previously approved substantial redevelopment at the Hospital campus (planning application reference 12/03130) and related consents for the relocation and redevelopment of hospital buildings (now occupied) and construction of 24 dwellings, including 8 affordable homes (6 Affordable Rent and 2 Shared Ownership). Construction of the dwellings has yet to commence.

The Hospital Trust has now submitted three sites from its estate to the TWBC Call for Sites for residential allocation. This Plan addresses the future use of the two sites that have been allocated, in two parcels, north and south of Goddards Green Road, in Site Specific Policies 3 and 4 (below).

TWBC believe that the scale of potential development relative to the small, established community at East End and the challenges of the location means that planning proposals require

the publication of a Masterplan to address the combined and cumulative impacts of foreseeable future development of the Benenden Hospital estate. The Masterplan should be prepared by the Benenden Hospital Trust in close collaboration with the local community, Benenden Parish Council and TWBC in advance of any future planning application. Justification:

- Large employment site
- Contributions required to mitigate impact of development
- Ensure control of future use of land
- Linked to a site with other competing needs
- Proposed density seen as delivering a good balance/use offered, taking into account the site's constraints

### Further Buildings and Sites at East End

Redundant farm buildings, an old school house and chapel are all understood to be included in the Hospital Trust's ambitions for redeveloping redundant buildings on the Hospital estate. Any further housing, office or other development would need to conform to BNDP and TWBC Local Plan policy requirements and would be subject to agreement of a Masterplan before any development across the site can commence.

### 2.9.3 Sites 424/LS40b Land at Benenden Hospital, South of Goddards Green Road, East End — South East Quadrant (SEQ)

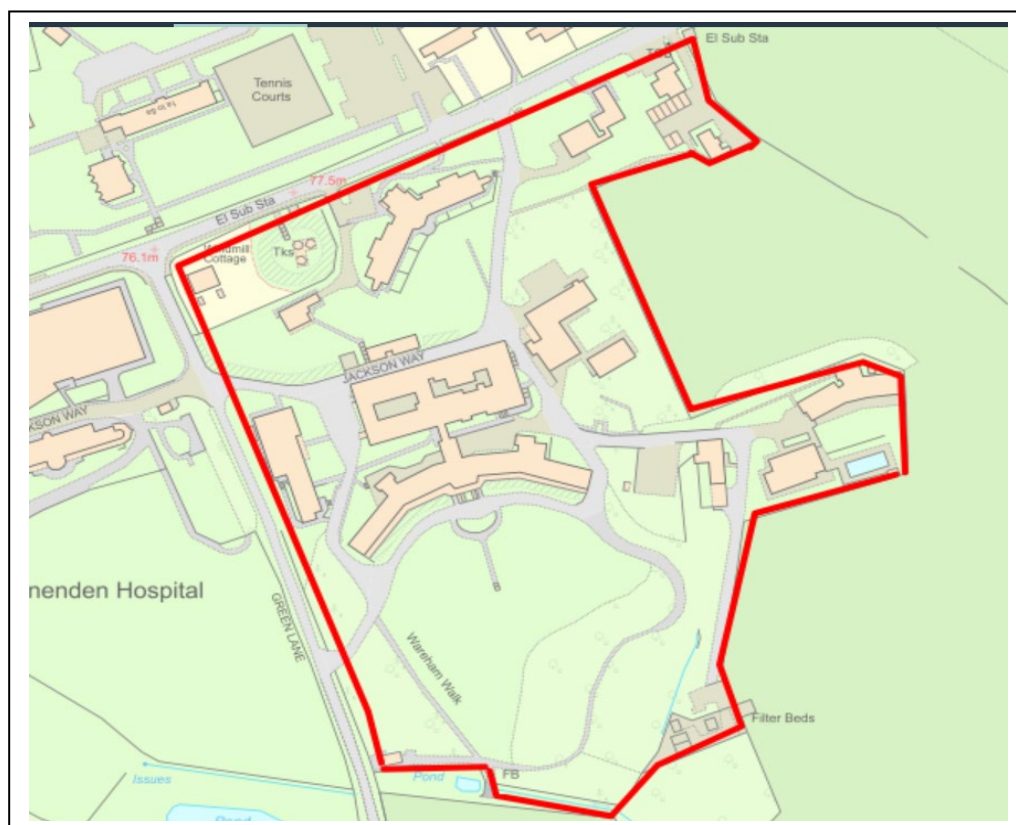


Fig. 31 Site Plan for Site 424/LS40b (edged in red), Goddards Green Road, East End.

#### 2.9.3.1 Reasoned Justification

Originally part of Benenden Hospital, the buildings on the site are now redundant (see Figs. 31 & 32) as they have been replaced by the new hospital building (west of this site). The site is owned by the Benenden Hospital Trust. Because this is previously developed land, outside the AONB, much of it currently occupied by dilapidated buildings (see Fig. 32), this is an appropriate site for a reasonable increase in the existing planning consent for 24 dwellings. A density of approximately 22dph is deemed appropriate for this semi-rural location.



The Hospital Trust has suggested increasing the site with the addition of Site LS40b which is accepted by this Plan. However, the suggested addition of an extra parcel of land, Site LS40a, a greenfield site and unimproved pasture, has been rejected in the BNDP because of the size of the existing brownfield site (Site 424/LS40b).

The southern third of the site, plus areas around Peek Lodge, are important Local Wildlife Sites (LWSs) and although the Hospital Trust 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 LWSs (see Policies LE7 & LE8) both during and after construction. This Plan supports development only on the footprint of the existing buildings.



Fig. 32 Site ref. 424/LS40b.

### 2.9.3.2 Description

- TWBC Call for Sites refs: Site 424, Site LS40a (on the eastern boundary of Site 424) and Site LS40b (NW corner of Site 424)
- Site areas: 424 = 4.2ha, LS40a = 0.64ha, LS40b = 0.04ha
- Outside but abutting the High Weald AONB
- Existing uses:
  - Site 424 — mostly previously developed land occupied by 9966m<sup>2</sup> redundant hospital buildings, Peek Lodge (hospital's former hotel) and including open parkland grounds (with Local Wildlife Sites)
  - LS40a — unimproved pasture, agricultural grazing land (specifically not allocated in the BNDP)
  - LS40b — existing pair of cottages

### 2.9.3.3 Constraints

- Sustainability of location, limited public transport access to Benenden village, larger centres and railway stations
- Goddards Green Road/Benenden Road is narrow in places and unsuitable for high volumes of traffic (accident history at Castleton Oak crossroads)
- No community facilities (save for s106 undertaking to provide access to the tennis courts to new residents of the, currently unbuilt, new housing)
- Impact on the setting of the AONB, the site has an elevated position and commands long views to/from the south and east; development would be highly visible from a distance within the AONB
- Poor mobile phone and broadband coverage
- Site includes important Local Wildlife Sites; some specimen trees

#### 2.9.3.4 Opportunities

- Development of Sites 424 and LS41 creates an opportunity to improve the overall sustainability of the area and create shared use of new and existing facilities and resources at East End, including improvement of sustainable transport links to Benenden and other destinations
- Development of land outside the AONB
- Previously developed land/redundant buildings, reducing the need to further encroach on new greenfield sites in the parish
- Site area includes an existing planning permission for 24 houses (Planning ref. 12/03130)
- Additional developable land (Peek Lodge added to the original site as submitted in 12/03130) creates scope for a comprehensive revised scheme with additional development capacity for mixed housing types
- Increased scale and comprehensive approach creates an opportunity to plan and improve the overall functioning of the area and shared use of new and existing facilities and resources at East End, including improvement of sustainable transport links to Benenden and other destinations

#### **Site Specific Policy (SSP3)**

#### **Land at Benenden Hospital, South of Goddards Green Road, East End — South East Quadrant (SEQ) (ISA reference: Site 424 and LS40b)**

##### **Site Selection Approach:**

To support development on a brownfield site outside, but adjacent to, the High Weald AONB. A suitable development must avoid or minimise harmful impacts on the setting of the AONB and improve the character and quality of the location, while providing an opportunity to improve amenities at East End (see Context bullet points page 60).

##### **Achieved by:**

This site is allocated for residential development (C3) to provide an additional number of residential units of 22-25. Planning permission has already been granted for 24 new dwellings at this site; this allocation would result in a total of 46-49 dwellings on this site.

Comprehensive development proposals, in the form of a Masterplan, must be submitted in respect of the land currently held in Benenden Healthcare Society estate ownership at this location, to be delivered in accordance with a phased timetable, which indicates land to the south of Goddards Green Road (SEQ) to be developed prior to any other phases.

The Masterplan should be produced in close collaboration with the local community, Benenden Parish Council and TWBC.

The Masterplan must be completed and accepted by TWBC and BPC, before any planning application can be submitted for the development of this area.

continued/-

### **Site Specific Policy (SSP3) (continued)**

#### **(ISA reference: Site 424 and LS40b)**

##### **Proposals shall:**

1. Provide a residential development of an additional 22-25 C3 dwellings, with affordable housing in accordance with TWBC policy and a mix of type and size integrated throughout the development to help meet locally identified needs (see Policy HS2).
2. 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. Density must not exceed 22dph (see Reasoned Justification para. 2.9.3.1). Building heights should generally be restricted to two storeys.
3. Include the provision of adequate parking facilities to avoid on-street parking both within and beyond the development. Reference should be made to the Design and the Built Environment chapter para. 3.6 and Policy BD6 for determining the quantity of vehicle parking spaces in the context of a generally high reliance on private cars in this area. If provided, garages will not count towards the required quantity of parking spaces. Dwellings to be provided with electric car-charging facilities.
4. Have close regard to the design and materials requirements specified in the BNDP under the Design and the Built Environment chapter and the policies contained therein.
5. Provide private garden space and/or shared semi-private spaces, all enclosure to be appropriately planted and screened with native hedging species to protect the occupiers' privacy (see Policy BD4).
6. Regard to be given to existing hedgerows and mature trees on site (see Policy LE5), with the layout and design of the development protecting those of most amenity value, as informed by an arboricultural survey and landscape and visual impact assessment (see TWBC DLP Policy EN14: Trees, Woodlands, Hedges, and Development and criterion 3 of TWBC DLP Policy EN1: Design and other development management criteria).
7. Reflect existing trees and hedges on the site, and the complex topography (particularly within the southern part of the site) (see criteria 1 and 3 of TWBC DLP Policy EN1: Design and other development management criteria).
8. Ensure the Local Wildlife Sites (LWS) be conserved and protected in accordance with national and local planning policy and in line with the guidelines laid out in Policy LE7.

continued/-



### **Site Specific Policy (SSP3) (continued)**

#### **(ISA reference: Site 424 and LS40b)**

9. Ensure the LWSs be conserved and enhanced as wildlife sites with a management plan (Policy LE8) adopted to achieve this, and the sites are not to be used for recreational purposes.
10. In order to reduce the amount of construction traffic using local roads where possible the disposal of earth spoil generated by construction works should be redistributed on the wider site in landscape remodelling. Provision of a Construction Management Plan must accompany any planning application.
11. The Construction Management Plan should address how to minimise the impact of construction work on existing flora and fauna, valuable micro-wildlife habitats in roadside verges, banks and ditches, in particular retaining the hedging which borders the site/mature trees on the site (see Policies LE5 & LE6).
12. Any planning application shall include a Traffic Impact Study detailing expected growth in traffic volumes and the mitigations required for road and pedestrian safety.
13. The parish is a dark skies area and any proposals for the outdoor lighting of new developments must comply with policy BD5.
14. Development on this site is to be built-out before construction work can commence on the North East Quadrant (Site LS41). The use of Castleton Oak Crossroads or Gelford Crossroads by construction traffic is problematic as demonstrated by the number of accidents that occur at these locations. Phasing of the development will ease this problem.

**It is expected that contributions will be required towards the following to mitigate the impact of development and enhance the sustainability of the location:**

- i. Provision of an active travel link between the site and Benenden village (see BNDP Supporting Document TA2 and Policies T1, T2 & T5).
- ii. The reduction of the existing 30mph speed limit through East End to 20mph.
- iii. Include an area for sport and recreational use by the local community and a children's play area, in part repurposing the existing tennis courts located in the North East Quadrant.
- iv. The means to secure the public use of the cafe at the hospital from occupation of 50% of the residential units until premises are provided through development of LS41 (NEQ).
- v. Provide a community space for events and to provide amenities such as a pre-school or play group. An appropriate building might be the existing old chapel building to the west of the site.

continued/-

### **Site Specific Policy (SSP3) (continued)**

#### **(ISA reference: Site 424 and LS40b)**

- vi. Provide a minibus for the use of Benenden Primary School and provide funding to maintain and run the minibus service to/from Benenden village/Primary School to serve school times thus reducing traffic and improving sustainability. From occupation of 50% of the residential units for 10 years from commencement.
- vii. Promote and support the Kent County Council Hopper Bus trial and other DRT initiatives. It is intended to serve the growing community in proximity to the Hospital in order to aid connectivity with larger conurbations, such as Tenterden, for the purposes of work, leisure and health.
- viii. Any further contributions identified through the pre-application and planning application process.

#### **2.9.4 Site LS41 Land at Benenden Hospital, North of Goddards Green Road, East End — North East Quadrant (NEQ)**

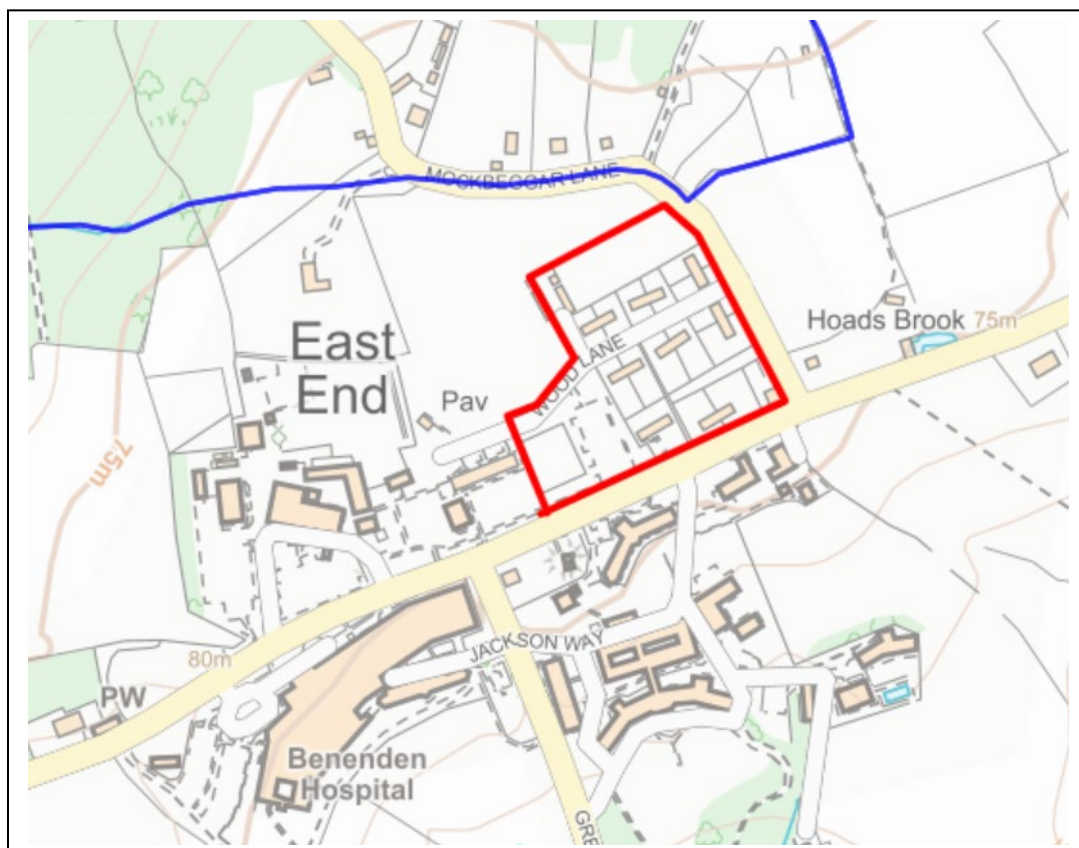


Fig. 33 Site Plan for Site ref. LS41 (edged in red), Goddards Green Road, East End.

### 2.9.4.1 Reasoned Justification

Benenden Hospital Trust-owned site north of Goddards Green Road (see Figs. 33 & 34) is 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 (see Fig. 34). Several houses are currently unoccupied. This site is previously developed land outside the AONB. It also includes some important wildlife elements: the cricket pitch and land north of the existing housing is a Local Wildlife Site (LWS). This will need adequate protection in the form of a buffer (see Policy LE7). Housing development proposals reflecting the significance of the LWS, and the curtilage of the existing housing, with a sensitively designed scheme, at the appropriate density, would be acceptable. This Plan supports refurbishment or redevelopment of the existing 18 dwellings and the building of an additional 22-25 dwellings, giving a building density of no more than 22 dwellings per hectare.



Fig. 34 Site ref. LS41.

### 2.9.4.2 Description:

- TWBC Call for Sites ref. LS41 (NEQ), area approx. 1.9ha
- Developable site area reduced to include existing low density, post-war housing (18 dwellings); tennis courts and car park
- Areas of actively used hospital car parking

### 2.9.4.3 Constraints:

- Sustainability of location, limited public transport access to Benenden village, larger centres and railway stations
- Goddards Green Road/Benenden Road is narrow in places and unsuitable for high volumes of traffic (accident history at Castleton Oak crossroads)
- Few community facilities (save for s106 undertaking to provide access to the tennis courts to new residents of, currently unbuilt, new housing)
- Poor mobile phone/broadband coverage
- Setting of the AONB



#### 2.9.4.4 Opportunities:

- Development of Sites 424 and LS41 creates an opportunity to improve the overall sustainability of the area and create shared use of new and existing facilities and resources at East End, including improvement of sustainable transport links to Benenden and other destinations
- Development of land outside the AONB
- Previously developed land/redundant buildings
- Comprehensive redevelopment creates scope for increased quantity and quality of housing and the opportunity to plan and improve the overall functioning of the area and shared use of new and existing facilities and resources at East End, including improvement of sustainable transport links to Benenden and other destinations
- Some of the existing dwellings may be suited to refurbishment rather than redevelopment

#### **Site Specific Policy (SSP4)**

#### **Land at Benenden Hospital, North of Goddards Green Road, East End — North East Quadrant (NEQ) (ISA reference: Site LS41)**

##### **Site Selection Approach:**

To support development on a brownfield site outside, but adjacent to the High Weald AONB. A suitable development must avoid or minimise the harmful impacts on the setting of the AONB and improve the character and quality of the location, while providing an opportunity to improve amenities at East End (see para. 2.9.4.4)

##### **Achieved by:**

This site is allocated for residential development (C3) to provide 22-25 residential units.

Comprehensive development proposals, in the form of a Masterplan, must be submitted in respect of the land currently held in Benenden Healthcare Society estate ownership at this location, to be delivered in accordance with a phased timetable, which indicates land to the north of Goddards Green Road (NEQ) will be developed as the second phase. No work to commence on phase two of the Masterplan until the south site (SEQ) is fully built-out.

The Masterplan should be produced in close collaboration with the local community, Benenden Parish Council and TWBC.

The Masterplan must be completed and accepted by TWBC and BPC, before any planning application can be submitted for the development of this area.

##### **Proposals shall:**

1. Provide a residential development of 22-25 C3 dwellings, with affordable housing in accordance with TWBC policy and a mix of type and size integrated throughout the development to help meet locally identified needs (see Policy HS2).

## **Site Specific Policy (SSP4) (continued)**

### **(ISA reference: Site LS41)**

2. 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. Density must not exceed 22dph (See Reasoned Justification para. 2.9.4.1). Building heights should generally be restricted to two storeys.
3. Include the provision of adequate parking facilities to avoid on-street parking both within and beyond the development. Reference should be made to the Design and the Built Environment chapter para. 3.6 and Policy BD6 for determining the quantity of vehicle parking spaces in the context of a generally high reliance on private cars in this area. If provided, garages will not count towards the required quantity of parking spaces. Dwellings to be provided with electric car-charging facilities.
4. Have close regard to the design and materials requirements specified in the BNDP under the Design and the Built Environment chapter and the policies contained therein.
5. Provide private garden space and/or shared semi-private spaces, all enclosure to be appropriately planted and screened with native hedging species to protect the occupiers' privacy (see Policy BD4).
6. Regard to be given to existing hedgerows and mature trees on site (see Policy LE5), with the layout and design of the development protecting those of most amenity value, as informed by an arboricultural survey and landscape and visual impact assessment (see TWBC DLP Policy EN14: Trees, Woodlands, Hedges, and Development and criterion 3 of TWBC DLP Policy EN1: Design and other development management criteria).
7. In order to reduce the amount of construction traffic using local roads, where possible the disposal of earth spoil generated by construction works should be redistributed on the wider site in landscape remodelling. Provision of a Construction Management Plan must accompany any planning application.
8. The Construction Management Plan should address how to minimise the impact of construction work on existing flora and fauna, valuable micro-habitats in roadside verges, bands and ditches, in particular retaining the hedging which borders the site/mature trees on the site (see Policies LE5 & LE6).
9. Any planning application shall include a Traffic Impact Study detailing expected growth in traffic volumes and the mitigations required for road and pedestrian safety.
10. The parish is a dark skies area and any proposals for the outdoor lighting of new developments must comply with policy BD5.

## **Site Specific Policy (SSP4) (continued)**

### **(ISA reference: Site LS41)**

11. Development on this site can only commence once construction is complete on the SEQ site.
12. Ensure the Local Wildlife Sites (LWS) be conserved and protected in accordance with national and local planning policy and in line with the guidelines laid out in Policy LE7.
13. Ensure the LWSs be conserved and enhanced as wildlife sites with a management plan (Policy LE8) adopted to achieve this, and the sites are not to be used for recreational purposes.

**It is expected that contributions will be required towards the following to mitigate the impact of development and enhance the sustainability of the location:**

- i. Provision of an active travel link between the site and Benenden village (see BNDP Supporting Document TA2 and Policies T1, T2 & T5).
- ii. The reduction of the existing 30mph speed limit through East End to 20mph.
- iii. Include an area for sport and recreational use by the local community and a children's play area, in part repurposing the existing tennis courts on the site.
- iv. Provision of premises that would be available as a publicly accessible café and small retail outlet.
- v. Provide a community space for events and to provide amenities such as a pre-school or play group. An appropriate building might be the existing old chapel building to the west of the site.
- vi. Provide a minibus for the use of Benenden Primary School and provide funding to maintain and run the minibus service to/from Benenden village/Primary School to serve school times thus reducing traffic and improving sustainability. From occupation of 50% of the residential units for 10 years from commencement.
- vii. Promote and support the Kent County Council Hopper Bus trial and other DRT initiatives. It is intended to serve the growing community in proximity to the Hospital in order to aid connectivity with larger conurbations, such as Tenterden, for the purposes of work, leisure and health.
- viii. Any further contributions identified through the pre-application and planning application process.



## **Housing Supply and Site Allocation**

### **Projects**

#### **1. Locally led housing initiatives**

The parish council will encourage partnership-based, locally led housing scheme initiatives by:

- encouraging developers to partner with local housing associations who understand the needs of rural residents
- supporting the marketing of help-to-buy schemes to existing residents and their families
- working alongside the Benenden Almshouse Charities

#### **2. Community Land Trust Feasibility Study**

Establish a group of interested volunteers to explore further the idea of setting up a Community Land Trust (CLT) — see para. 2.3.4. The purpose of this group would be to establish if there are assets or land holdings in the parish which might be acquired and run by a CLT to the benefit of the community. The group would also undertake to find out about government funding for such a scheme and how it would be administered.

## **Supporting Documents for Housing Supply and Site Allocation**

HSA1 Process/Background information

HSA2 SWOT Analysis

HSA3 Individual Site Assessments

HSA4 High Weald AONB Site Assessments

HSA5 Sites put forward in the Call for Sites



## 3. Design and the Built Environment

### Objective

**New buildings shall 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 complementary to the existing; the principal aim is to protect and enhance the beauty of the parish.**

### Introduction

The Design and Built Environment Working Group built on the work of the Benenden Parish Plan 2015, written following widespread consultation in the community and is a key supporting document for the Benenden Neighbourhood Development Plan (BNDP). It states:

*New homes in Benenden should be of a high quality in terms of building standards, architecture that is sympathetic to the local environment, and give sufficient space for modern living...New properties in the village need to be environmentally friendly and energy efficient. They should also be suitable for all ages and levels of mobility.*

Following on from the Visioning Workshop with residents and stakeholders held on 28<sup>th</sup> October 2017 and follow-up workshop on 11<sup>th</sup> November 2017, a number of design-based issues were raised including:

- Good architectural design
- Buildings of good quality
- Variety of design
- Appropriate landscaping
- Well-designed layout
- Minimise the impact on the environment (particularly lighting/dark skies)
- Preserve village character/village 'feel'
- Preserve rural character

- Developers to provide adequate parking to minimise on-street parking
- Varied types of buildings

After further discussions with the Parish Council and the Neighbourhood Plan Steering Group, the above objective was agreed as representing the views of many parishioners and to provide the basis for the working group.

## **Process**

The working group set out to produce a series of policies, which prospective developers must use to establish appropriate housing designs. The group reviewed current housing stock in the parish. The group chose the three main settlements — Benenden village, Iden Green and East End — to establish as ‘Character Areas’ for the parish. These Character Areas were then assessed for their individual characteristics so that development could be designed in harmony with the locality.

Common to all the main Character Areas is their remoteness and rural setting. Reference should be made to the Design Group’s survey documentation (Supporting Document BDA1) and to the Conservation Areas Appraisal (2005) produced by Tunbridge Wells Borough Council (TWBC)<sup>1</sup> as reviewed by the Neighbourhood Plan Design Group in 2018 — 2018 Review and Factual Update of Benenden and Iden Green Conservation Areas Appraisal 2005 (Supporting Document BDA2).

Using the data obtained from the surveys, the group was able to produce Character Assessments (Supporting Document BDA3) for each Character Area and these Assessments should be used by developers, together with the relevant policies in this Plan in order to produce development designs which are sympathetic to adjacent settlements.

## **Policy Context/Justification**

The design policies have been drafted to complement those of the National Planning Policy Framework (NPPF) 2019 and the Tunbridge Wells current Draft Local Plan (DLP).

Developers are required to have regard to TWBC Core Strategy Development Plan 2010; High Weald Housing Design Guide; High Weald AONB Unit’s Colour Study 2017; AONB Management Plan 2019-24; Kent Design Guide. Under the Government’s Building Better, Building Beautiful (2020) guidance document, developers are expected to consult with the Parish Council and the local community to co-create the most suitable scheme for a particular site.

## **The Policies**

New housing developments must be designed in accordance with this Neighbourhood Development Plan’s Building Design Policies BD1-BD8 inclusive.

The quality and safety of new build housing under the Building Regulations is of great concern to the Neighbourhood Development Plan. The BNDP strongly supports the use by developers of Tunbridge Wells Building Control Department (other building control providers are available) for carrying out inspections under the Building Regulations to ensure such quality and safety.



**3.1** Benenden is located in an Area of Outstanding Natural Beauty (AONB) and as such, any new development in this area must be designed so that it sits sensitively within its surroundings. Developers are required to refer to the High Weald Housing Design Guide published by the High Weald Joint Advisory Committee.

**Policy BD1 General Design Policy**

**Proposals for all forms of new development must plan positively for the achievement of high quality and inclusive building and landscaping design.**

**Designers must demonstrate that they have sought to:**

- **be sympathetic to local distinctiveness**
- **protect and enhance heritage assets and their settings**
- **create designs that are sympathetic to the aesthetic qualities for traditional rural settlements and buildings found in the High Weald AONB**

**3.2** The Design Group assessed the predominant characteristics of the existing housing in each of the Character Areas. Prospective developers must access these assessments to ensure that all new development is sympathetically designed. A summary of the main characteristics of every house in the Character Areas is noted in Supporting Document BDA4 and a percentage given for each characteristic. Also, house styles existing in the three Character Areas have been identified in Supporting Document BDA5. The BNDP believes that having an understanding of the weighting that each characteristic holds, architects can begin to formulate their designs so as to be sympathetic to the adjacent settlement.

**Residential Developments: General Appearance**

The following photographs show examples of a recently built, local development and the use of good quality design and materials:



General view of a local development showing green space incorporated into the design. Note that the roof 'eyebrow' detail is visible throughout the development giving an example of how a design feature can provide a cohesive thread.



**Dwellings designed to look like a house but in fact containing 4 no. 1 or 2-bedroom flats.**

**A detached 4-bedroom house with tile-hung upper façade, clay tile roof, mottled brick lower façade and dentil brick course running just below the hanging tiles. A substantial canopy over the front door is mirrored over each of the main upper floor windows. The front garden is laid to lawn with hedging planted at the boundary.**



**Detached 2-bedroom flat over a double brick-built car bay and bin storage. Upper façade clad in pre-finished fibre cement weatherboarding, a more realistic wood alternative to PVC.**



## **Policy BD2 General Appearance**

### **Residential Developments:**

**Any new housing development should conserve the distinctive character of the local existing built environment, should respect the density, footprint, separation and features of the surrounding area, and the scale and bulk of new buildings should be in keeping with the local area.<sup>1</sup> Reference should be made by developers to Supporting Documents BDA3, BDA4 and BDA5 when designing housing schemes, and to the High Weald Housing Design Guide.**

**Continued/-**

<sup>2</sup> TWBC Local Plan 2006 Policy EN1. Ch. 4 Environment Aims Para. 9 Policy EN25. TWBC Core Strategy Development Plan Document (Adopted June 2010) Core Policy 14: Development in the Villages and Rural Areas and Core Policy 4: Environment. NPPF paras: 125, 127, 128 and 172.

## **Policy BD2 General Appearance (continued)**

**In addition, designs must take into account:**

- a) The height of buildings should be in keeping with the heights of building in the local area.<sup>3</sup>**
- b) Styles and materials that relate to the existing built environment for the local area will be encouraged including roof construction materials.<sup>3</sup>**
- c) New developments should generally maintain the traditional appearance and layout of the built environment<sup>2</sup> but innovative, high quality, exceptional modern design which would significantly enhance the setting and be sensitive to the defining characteristics of the surrounding area, would be considered, on its own merits, via the planning process.**
- d) Materials and styles similar to those incorporated in buildings in the more historic parts of the parish will be encouraged.<sup>4</sup>**
- e) Developers are, however, encouraged to adopt new materials and technologies to achieve sustainable, low-carbon, energy-saving designs.<sup>5</sup>**
- f) Any chimney, which is constructed, must be a working chimney.**
- g) The design must incorporate the sensitive use of colour and materials to be cohesive with the local surroundings. Developers are encouraged to use the High Weald AONB Unit's Colour Study ([www.highweald.org.uk](http://www.highweald.org.uk)). Developers should note that there is currently no domestic property in the parish constructed with yellow brick and this Plan discourages its use.**
- h) Developers must demonstrate that all materials used in construction are from sustainable sources.**

**Any proposed extensions or additions to existing residential properties must be designed in accordance with the BNDP Design Policies BD1, BD2, BD3 d) and BD5.**

### **Non-residential Developments:**

**Any new development should conserve the distinctive character of the local existing built environment and the scale and bulk of new buildings should be in keeping with the local area.<sup>2</sup>**

**Policy BD2 a), b), e), g) and h) above apply.**

**Any proposed new, or extensions to existing, commercial developments must be designed in accordance with the BNDP Design Policies BD1, BD2 a), b), e), g) & h), BD4 c) & e), BD5 & BD8 b), c), d), e) & f).**

<sup>2</sup> TWBC Local Plan 2006 Policy EN1. Ch. 4 Environment Aims Para. 9 Policy EN25. TWBC Core Strategy Development Plan Document (Adopted June 2010) Core Policy 14: Development in the Villages and Rural Areas and Core Policy 4: Environment. NPPF paras: 125, 127, 128 and 172.

<sup>3</sup> TWBC Local Plan 2006 Policy EN25. TWBC Core Strategy Development Plan Document (Adopted June 2010) Core Policy 14: Development in the Villages and Rural Areas. NPPF paras: 125, 127, 128 and 172. High Weald AONB Unit's Colour Study 2017.

<sup>4</sup> Benenden and Iden Green Conservation Areas Appraisal (2005) as reviewed in 2018 by the BNDP Group. High Weald AONB Management Plan 2019-2024.

<sup>5</sup> TWBC Local Plan 2006 Strategic Objective 2, Core Policy 5 of the Core Strategy Development Plan Document, Policy EN1 of the TWBC Local Plan 2006, Kent Design Guide Pages 170-173.





An example of recently constructed, local, terraced dwellings with lower brick façade, white weatherboard upper façade, clay tiled roof and dormer windows, utilising attic space.

**3.3** As part of the Character Assessments (Supporting Document BDA3) of the existing settlements it has been noted that in addition to the variety in material composition and detailing, there is generally a staggered street frontage, characteristic of the historic and organic growth pattern of the settlements. In order to conform to existing street layouts, the positioning of new buildings should also be varied.

#### **Policy BD3 Layout**

- a) The street scene should incorporate variations in form and detail; the positioning of dwellings in relation to the road should be varied to create a stepped/staggered street scene.<sup>6</sup>**
- b) Developers will be encouraged to ensure site permeability<sup>7</sup> via roadways to allow integration of the proposed development into existing areas of built development.**
- c) Designs should include open green spaces of appropriate scale and quality in order to promote health and wellbeing.**
- d) Housing should be positioned to minimise the overlooking of adjacent properties and to reduce the transference of air-borne sound between properties.<sup>8</sup>**

<sup>6</sup> NPPF paras. 125, 127, 128 and 172.

<sup>7</sup> Kent Design Guide Para. 2.3 Designing for Movement. 'Developments must be easy to move through in all directions.'

<sup>8</sup> Kent Design Guide 2.2.6 Protection from noise and visual privacy.

#### **Policy BD3 Layout (continued)**

- e) The layout of any housing development should be such as to create an impression of organic growth over time. To achieve this, a large variation in style and material finishes in any one group of houses, or development, should be avoided.**
- f) A generally straight or gently curving road layout through developments is preferred rather than meandering roads which do not reflect local character and design.<sup>9</sup>**
- g) Road narrowing or other design features, including planting, to be put in place to reduce traffic speeds, minimising the use of signs.**
- h) Development must be well integrated into the surrounding landscape.**

**3.4** A mix of indigenous tree planting must be incorporated to give an aesthetically pleasing street view, to reflect the rural locality and minimise the impact on the AONB. Attention should be paid to the Character Assessment for each Character Area. Benenden's designated important landscape character as an Area of Outstanding Natural Beauty (AONB)<sup>9</sup> is of primary importance to residents of the parish, as noted at consultation meetings. It is this landscape character that the High Weald AONB Management Plan seeks to preserve and this Neighbourhood Development Plan contains planning policies and objectives that are complementary to this work.

#### **Policy BD4 Landscaping**

- a) Green spaces should be included within the development as amenity areas and private gardens adjacent to properties.<sup>11</sup>**
- b) Plot boundaries should be designed to complement the surrounding countryside, using, for example, native hedging with mesh or stock fencing; solid fencing should be avoided.<sup>12</sup>**
- c) Sufficient landscaping will be required to reflect the existing rural streetscape adjacent to the development.**
- d) Existing mature trees should be retained to provide open spaces within the proposed development and are considered essential to maintain the rural nature of the area<sup>13</sup> as well as to provide adequate amenity space for each dwelling.**
- e) Creative landscaping to avoid the urbanising effect of car parking spaces will be encouraged.**

<sup>9</sup> Kent Design Guide Para. 2.3 Designing for Movement. Page 130 Reference 'Lane' applicable to rural sites next to village centres or within small village centres where these are not built up.

<sup>10</sup> TWBC Local Plan 2006 Policy EN1: Landscaping Paras. 4.23 to 4.28. TWBC Core Strategy Development Plan Document (Adopted June 2010) Core Policy 14: Development in the Villages and Rural Areas. NPPF para. 172. High Weald AONB Management Plan 2019-2024.

<sup>11</sup> Kent Design Guide: 2.2.9 The Design of Open Spaces.

<sup>12</sup> TWBC Local Plan 2006 Policy EN1.

<sup>13</sup> Kent Design Guide para. 2.2.1 Retaining existing buildings and features (page 64).

**3.5** There is minimal artificial lighting in the parish. New developments must not introduce inappropriately bright lighting at night over pathways or other areas within the site. Artificial lighting at night creates light pollution and is detrimental to wildlife and to the rural nature of the parish. Sites on top of a ridge or very open sites would be particularly impactful and low lighting levels would be expected to be used. The parish has repeatedly stressed a wish to preserve Benenden's dark skies. (See Guidance Notes for the Reduction of Obtrusive Light, The Institution of Lighting Engineers 2005, and any subsequent revisions.)

#### **Policy BD5 Dark Skies**

**In order to support the Benenden dark skies policy<sup>14</sup> and to preserve a key characteristic of natural beauty defined in the High Weald AONB Management Plan as 'intrinsically dark landscapes with a sense of remoteness and tranquility', all external lighting included in any proposal must be carefully designed and strictly limited.**

**All proposals for external lighting should include:**

- a) full details of the proposed lighting to be installed and maintained for approval**
- b) any proposed lighting must not have a noticeable impact on the dark skies enjoyed by the parish**
- c) lighting should be limited to that required for safe access and only where carefully designed and justified, for security purposes**
- d) all lighting must be time limited and only low level (in terms of height and wattage); no street lighting will be acceptable**
- e) floodlighting, to enable the use of sports and other facilities and for the activity and security of some businesses, will need strong justification and will be required to have time restrictions and automated controls for switch off and dimming; reference should be made to the Guidance Notes for the Reduction of Obtrusive Light, The Institute of Lighting Engineers 2005 and any subsequent revisions**
- f) planning conditions may be added to ensure approved lighting is properly maintained, and that additional exterior lighting is only allowed with prior approval from the Parish Council and TWBC**

**The Parish Council will work with the owners of existing exterior lighting schemes to modify these to enhance the quality of the dark sky of the parish.**

**3.6** Benenden is more or less equidistant from Tunbridge Wells, Ashford, Maidstone and Hastings and so is remote from major towns. The likelihood of people using public transport is low with people relying on private transport for travel anywhere within the area. Adequate parking within new developments is therefore an absolute necessity as on-street parking is already a problem in the main settlements in the parish. The BNDP would expect an increase in the numbers of parking spaces, provided by developers, over and above the average parking guidance set out in the Kent Design Guide and TWBC Draft Local Plan 2019.

The BNDP carried out a residential parking survey the results of which provides the evidence (Supporting Document BDA6) in determining the parking requirements of Policy BD6. Attention should be paid to the Character Assessment for each Character Area. Garages or car barns would be acceptable with a design appropriate to match the adjacent buildings.

<sup>14</sup> TWBC Local Plan 2006 Policy EN8: Outdoor Lighting. TWBC Core Strategy Development Plan Document (Adopted June 2010) Core Policy 14: Development in the Villages and Rural Areas. NPPF para. 180 c). High Weald Housing Design Guide DG9 (Signage and Lighting).



#### **Policy BD6 Parking**

- a) **Sufficient off-road parking must be incorporated in all new housing developments — minimum car parking spaces to be provided:**
- i) 1 bed flat and 1 bed house — 1 car parking space per unit
  - ii) 2 bed flat and 2 bed house — 2 independently accessible car parking spaces per unit
  - iii) 3 bed flat, 3 bed house } — 2 independently accessible  
and 4+ bed flat } car parking spaces per unit
  - iv) 4+ bed house — 2.5 independently accessible car parking spaces per unit
- Garages will be discounted as car parking spaces.**
- b) **Additional visitor parking spaces must be provided at a minimum of 0.3 spaces per unit.**
- c) **In addition, there should be space for storage, refuse and recycling bins, and bicycle parking to ensure a high quality, well-managed streetscape.**
- d) **Driveways should have, as a minimum, semi-permeable surfaces.**
- e) **On-road parking is discouraged to prevent the blocking of access roads and endangering pedestrians.**
- f) **Access roads should be of sufficient width to allow two vehicles to pass each other.<sup>15</sup>**

**3.7** Developers will be encouraged to ensure site permeability via footpaths/footways to increase connectivity within new developments and to aid access to local amenities. The design of footways should reflect the rural nature of the locality and be constructed with semi-permeable surfaces. They should be constructed on one side of the road only to reflect the existing local custom in Benenden, Iden Green and East End, to limit the amount of hard surfacing. In the whole of the parish, there are only 2.5 miles of paved footway adjacent to public roads. Designs should reflect the existing footway characteristics of the parish and reference made to the KCC Design Guide and the High Weald Housing Design Guide.

#### **Policy BD7 Footpaths**

**All footways/footpaths in a new development should be constructed on one side of the road only, to reflect the rural character of the local area. Materials used for the footway are to be sensitive to the rural setting and preferably be semi-permeable in nature.**

**3.8** Any new development, both residential and non-residential, should be shaped and influenced by the traditional character and style of the existing settlements within the parish. All new developments should reference the local context and demonstrate the use of high-quality materials and styles appropriate to the location. Development around the edges of settlements should be sensitive to the rural and historic context by reflecting the character of buildings in proximity to adjacent countryside.

<sup>15</sup> KCC Kent Design Guide Review: Interim Guidance Note 3: Residential Parking. Guidance table for residential parking Suburban/Edge/Village/Rural. TWBC Draft Local Plan 2019 Policy TP3 Transport and Parking Standards. NPPF para. 105.

### **Policy BD8 Materials and Technology**

- a) All new development must be constructed be sustainable, with the inclusion of measures to help conserve water<sup>16</sup> (including the re-use of grey water) and low energy solutions.**
- b) The use of renewable energy technologies, including air-source or ground-source heating/cooling, solar thermal (solar water heating), photovoltaics (PV), will be supported.**
- c) Any impact on the setting/appearance/character of heritage assets/ Conservation Areas by the installation of solar panels to be considered at the planning stage.**
- d) Developers will be expected to refer to the TWBC Renewable Energy Supplementary Planning Document and subsequent 2016 update.**
- e) The re-use and recycling of building materials will be encouraged as will the use of locally sourced materials.<sup>17</sup>**
- f) Zero-carbon and low-emission development will be strongly supported, subject to all other material considerations being acceptable.<sup>18</sup>**

## **Conclusion**

The aim for all new developments is to leave a positive architectural legacy, to be sensitive to their local context and environment and enhance the character of the Benenden parish.

## **Design and the Built Environment**

### **Projects**

- **Reduce existing light pollution**

The current excessive car park illumination at Benenden Hospital, lighting at Benenden School and outside Benenden Village Hall until late into the night is contrary to the express wish of the parish for 'dark skies', and is the cause of local grievance. Negotiations should be undertaken by the Parish Council to see if the lighting could be timed or set to switch off earlier in the evening.

## **Supporting Documents for Design & the Built Environment**

- BDA1 Survey Documentation
- BDA2 2018 Review and Factual Update of Benenden and Iden Green Conservation Areas Appraisal 2005
- BDA3 Character Area Assessments
- BDA4 Summary of materials used in existing housing
- BDA5 Existing house styles in the Character Areas
- BDA6 Residential Parking Survey Analysis

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<sup>16</sup> TWBC DLP 2019 EN27 Conservation of water resources.

<sup>17</sup> TWBC Local Plan 2006 Chapter 4 Environment — Aims: Para. 13, and subsequent update, or policy in the TWBC DLP 2019. NPPF para. 8.

<sup>18</sup> TWBC Core Strategy Development Plan Document (Adopted June 2010) Core Policy CP5. TWBC DLP 2019 Policy EN4.



## 4. Business and the Local Economy

### Objective

**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.**

### Introduction

The Business and Local Economy Working Group built on the work of the Benenden Parish Plan 2015,<sup>1</sup> a key supporting document, in developing the Benenden Neighbourhood Development Plan (BNDP), which was written following widespread consultation with the community. An earlier survey carried out in 2015 for the Parish Plan included the following concerns of residents and businesses:

- Local employment opportunities should be expanded
- More small business units are needed
- Significant problems with both broadband speed and lack of mobile phone signal
- Almost all workers in local businesses commute in to Benenden
- Existing businesses liked being in the parish and wanted to remain the same size or to expand their premises
- Creation of more local job opportunities, both within existing businesses and with new businesses
- Redundant buildings should be investigated for possible change of use for housing or live/work units and business use

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<sup>1</sup> Benenden Parish Plan 2015 pp.13, 15-16.



# Some examples of the 100+ businesses in Benenden



These concerns have been echoed in the surveys and meetings carried out as part of the process of the BNDP (see below).

At the Visioning Workshop with residents and stakeholders held on 28<sup>th</sup> October 2017 a 'SWOT' (strengths, weaknesses, opportunities and threats) exercise (see Supporting Document BEA1<sup>2</sup>) highlighted that:

- amongst the many businesses in the parish, Benenden has several large employers and it was important to ensure these larger, established businesses continue to benefit the local community and the economy
- tourism and leisure were important contributors to the local economy
- businesses suffered from poor infrastructure/transport
- lack of work opportunities for young people
- opportunity to improve childcare facilities to support local employment
- importance of agriculture in the parish/seasonal work
- better use of redundant buildings could enhance employment
- the community village shop was seen as a significant asset
- a significant proportion of self-employed people in the parish/working from home
- encouraging small businesses can create employment
- there could be a website to showcase local businesses/crafts/local shops

After further discussions with the Parish Council and the Neighbourhood Plan Steering Group, the objective was agreed as representing the views of many parishioners and to provide a basis for the working group.

## Process

By undertaking two significant surveys (Supporting Documents BEA2 and BEA3),<sup>3 4</sup> conducting local and regional research and consultations with parish residents, businesses (Supporting Document BEA6), employers and employees, the BNDP Business and Local Economy Group has developed policies to sustain and improve local economic development. They focus on supporting existing businesses and encouraging new areas of economic activity to nurture the parish's economic stability through the Plan period.

## Policy Context/Justification

These principles and the following policies are consistent with the National Planning Policy Framework (NPPF) 2019 <sup>5</sup> in which it is stated that planning policies and decisions should enable:

- the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings
- the development and diversification of agricultural and other land-based rural businesses
- sustainable rural tourism and leisure developments which respect the character of the countryside
- the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship

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<sup>2</sup> SWOT Analysis from Visioning Workshop 28th October 2017 (Supporting Document BEA1).

<sup>3</sup> BNDP Employee Survey 2018 (Supporting Document BEA2).

<sup>4</sup> BNDP Local Business Survey 2018 (Supporting Document BEA3).

<sup>5</sup> NPPF para. 83 — <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

## Business Surveys

**4.1** The Business Surveys conducted for this Plan indicate that there are approximately 100 small businesses typically employing fewer than 5 people as well as a growing number of solo home workers. For more detailed information on the majority of businesses across the parish see the Local Business Survey 2018 (Supporting Document BEA3).

**4.1.1** Over a quarter of the businesses in the Business Survey are likely to require larger premises in the next 3 to 5 years, but most respondents stated that these are becoming increasingly difficult to find.

**4.1.2** The Business Survey indicated a rich variety of over 30 business types in the parish that provide opportunities for symbiotic development. Almost half of the respondents of long-established businesses stated that at the time of setting up their business, the availability of suitable premises was an attraction to locate in the parish.

**4.1.3** The Business Survey confirmed the findings of the 2015 Benenden Parish Plan<sup>6</sup> that there are significant challenges that need addressing in the provision of good quality broadband and mobile phone communication (see Policy T6). It also highlighted the requirement for safe and well-maintained roads, local recycling of a full range of refuse, renewable energy sources, utility and sewerage provision.

## The Policies

**4.2** Benenden parish has historically been sustained by economic activities dependent on its location, such as farming and forestry (see Figs. 35 & 36), which are interdependent with the associated rural trades and services. These activities remain significant employers within the parish, with over 60% of the parish being farmland and over 20% managed woodland. The High Weald AONB Management Plan is keen that these should continue:

*In pursuing the primary purpose of (AONB) designation, account should be taken of the needs of agriculture, forestry, other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.<sup>7</sup>*

**4.2.1** The intention of all the policies is to complement the High Weald AONB Management Plan 2019-24 Objective S1<sup>8</sup> which is 'to reconnect settlements, residents and their supporting economic activity with the surrounding countryside.'

### Policy BE1 Rural Industries

**The BNDP seeks to promote the economic viability of the parish and will:**

- **support proposals for farming and forestry operations, in accordance with the AONB Management Plan objectives, to maintain the significant contribution these bring to the local economy**
- **support proposals that encourage sustainable land management practices such as regenerative agriculture, wilding and woodland management**

<sup>6</sup> Parish Plan 2015 pp. 13-15.

<sup>7</sup> High Weald AONB Management Plan 2019-24 p. 17.

<http://www.highweald.org/high-weald-aonb-management-plan.html>

<sup>8</sup> High Weald AONB Management Plan 2019-2024 Objective S1 p.33.





Fig. 35 Harvest Time!



Fig. 36 Forestry — Coppiced Woodland.

## Business Locations

**4.3** Businesses are spread across the parish with, for example, Benenden Hospital at East End, Benenden School at Hemsted, Laurels Nursery and Dingleden Vineyard at Dingleden, a farm shop, Mr Noah's Nursery School and The Woodcock Pub in Iden Green. The Street, at the centre of Benenden, hosts several disparate enterprises including Wards the Butchers, St George's Social Club, Benenden pre-school playgroup, the community shop, post office and café, the Bull pub and most recently Dream Lashes, Nails & Brows. In the centre of Benenden, the Grange Care Home and the Primary School each employ over 25 people, as well as providing essential community services.



**4.3.1** These businesses all provide important services and employment and contribute significantly to maintaining a vibrant local economy. Of the near 1000 employees working in parish businesses, approximately 90% commute into the parish to come to work.

**4.3.2** The rural beauty of the landscape and heritage of the parish attracts visitors all year round, particularly in the summer, and consequently there are numerous B&Bs and holiday lets. Tourism helps to support local shops and public houses and the available ancillary accommodation contributes to the local economy.

**4.3.3** The working group conducted a survey of local businesses to assess the business and economic activities in the parish. The Business Survey identified numerous active business sectors, the most prevalent being education, healthcare, building and construction work, retail and tourism. These businesses are distributed across all the main settlements within the parish. The largest employers are Benenden Hospital (see Fig. 38) and Benenden School (see Fig. 39) which between them employ approximately 800 staff. There are several smaller-scale business sites in the parish including the Cranden Diamond Products site, Apple Pie Farm, the Hams Travel site and Turks Yard (see Fig. 37) which support a range of businesses, with up to 50 employees.

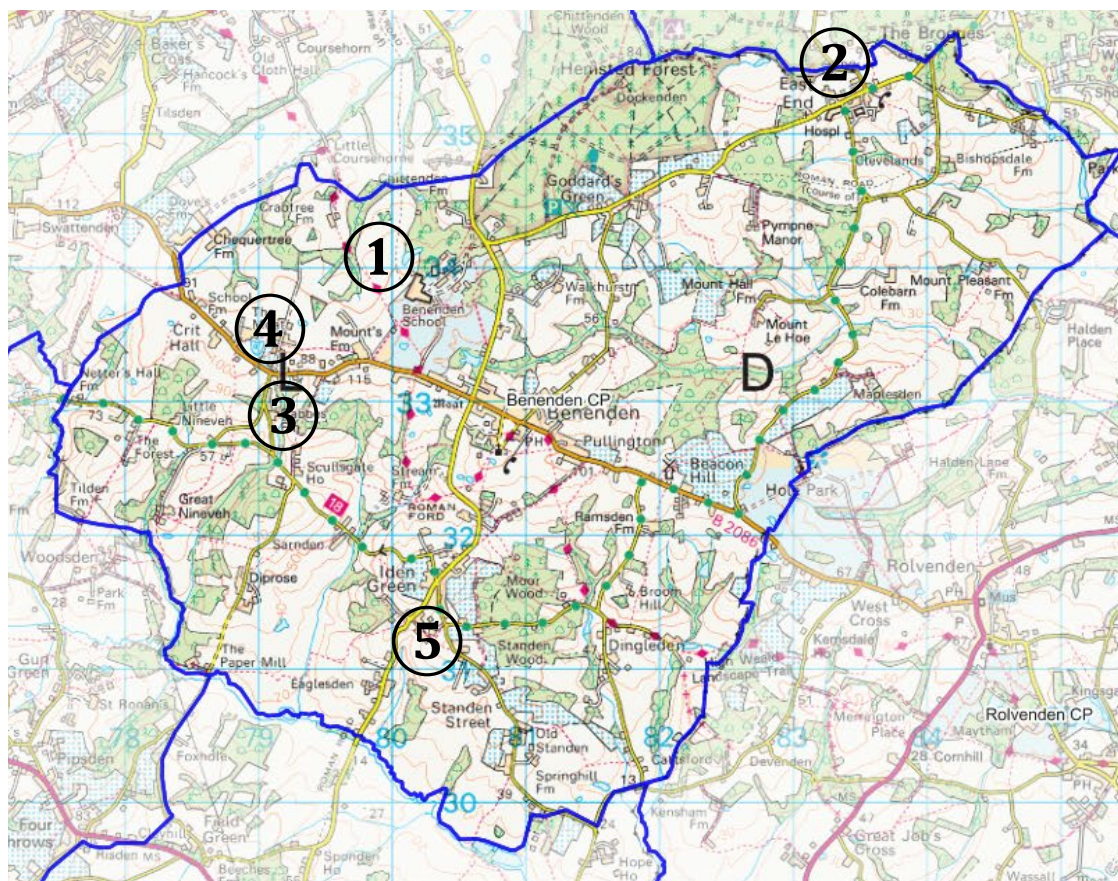


Fig. 37 Map of Principal Business Areas in the Parish.

**KEY:** ① Benenden School ② Benenden Hospital ③ Cranden Diamond Products  
④ Apple Pie Farm/Hams Travel ⑤ Turks Yard

### **Policy BE2 Major Employers/Businesses in the Parish**

**The BNDP recognises the contribution of major employers to the community and local economy. Development proposals that provide employment and career opportunities, provided that these comply with the policies of the BNDP, will be supported.**



Fig. 38 Benenden Hospital.



Fig. 39 Benenden School.

## Commercial Areas

**4.4** Whilst the parish is significantly rural in nature, there are a number of commercial areas located within the parish and these provide the opportunity for local employment. It is the intention of the BNDP to retain these areas to preserve the local economy and prevent the loss of these important isolated zones to housing development.<sup>9</sup>

**4.4.1** The existing commercial areas may also be suitable for further intensification and regeneration subject to meeting the requirements of national and local planning policy.

### **Policy BE3 Retaining Existing Commercial Areas**

**The following existing commercial areas, as identified in Fig. 37 above, will be retained in business/commercial use unless it can be demonstrated that there is no reasonable prospect of their take-up, sale or continued use for business/commercial purposes during the Neighbourhood Plan period:**

- **Cranden Diamond Products**
- **Apple Pie Farm**
- **Hams Travel site**
- **Turks Yard**

## Shops and Public Houses

**4.5** To promote a prosperous rural economy, the NPPF (para. 83) states that the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship, should be encouraged.

**4.5.1** Benenden's Community Shop and Post Office (see Fig. 40) is an example of sympathetic and synergistic development that has been developed and maintained as a joint project between community volunteers and Benenden School, and which has been of considerable benefit to the community. Its café attracts local people, passers-by and tourists.

**4.5.2** The loss of shops and services in this rural location will be resisted, and the BNDP seeks to protect the existing local premises.<sup>10</sup> (See Fig. 41) The Business Survey identified a significant proportion of businesses operating from home; the café and both public houses provide important business networking hubs.

**4.5.3** The two seventeenth-century, Grade II Listed Buildings, The Bull Inn in Benenden dating from 1608 (see Fig. 42) and The Woodcock Inn in Iden Green dating from 1621 (see Fig. 43) are popular with local people and tourists; they each make a contribution to the economic, social and environmental wellbeing of the community.

<sup>9</sup> Tunbridge Wells Borough Council (TWBC) Draft Local Plan (DLP) Policy ED12 Retention of Existing Employment Sites and Buildings.

<sup>10</sup> TWBC DLP Policy ED12 Retention of Local Services and Facilities within Defined Neighbourhood and Village Centres.





Fig. 40 Benenden's Community Shop & Post Office and Café.

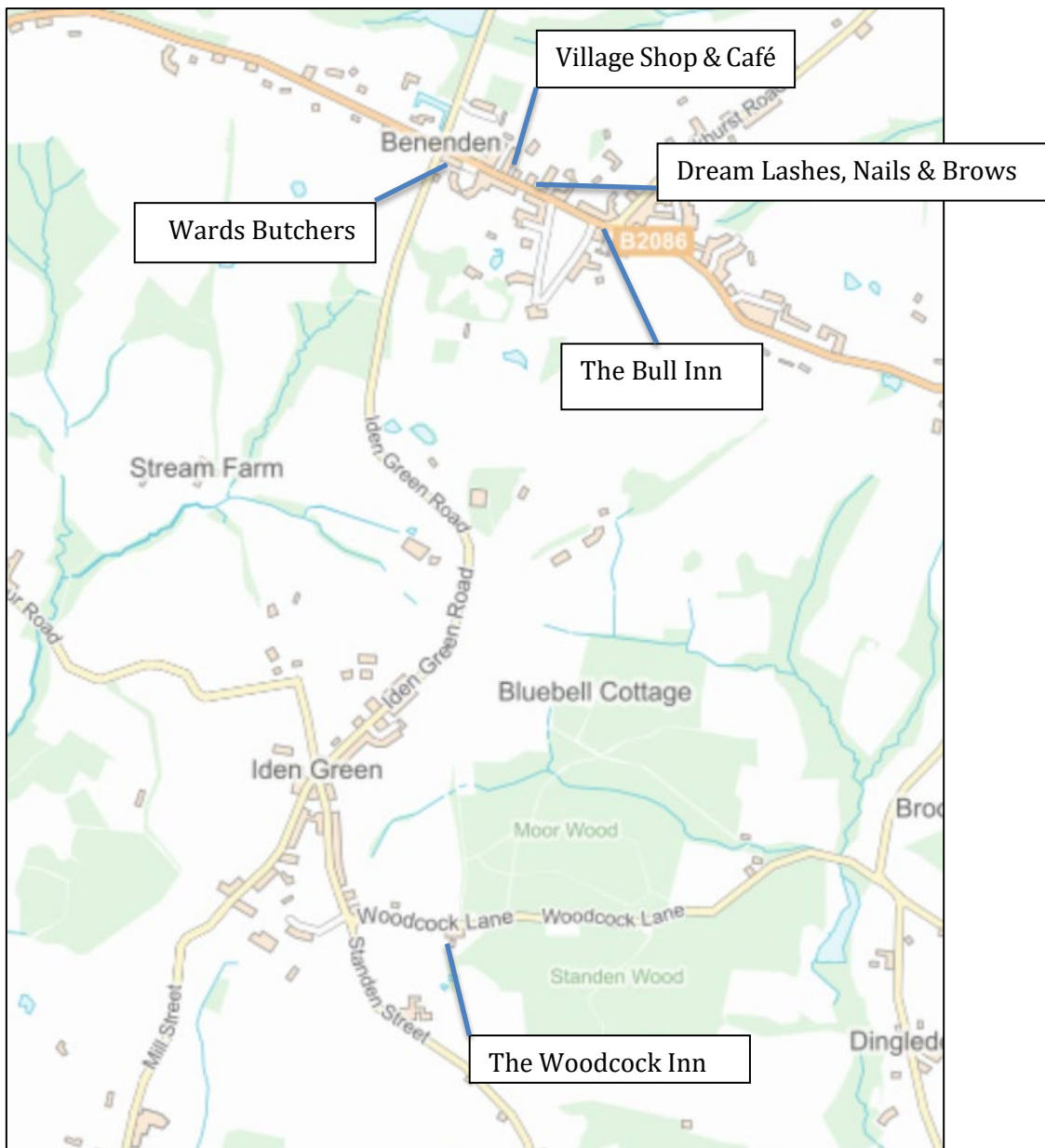


Fig. 41 Map showing location of shops and public houses.





Fig. 42 The Bull Inn, Benenden.



Fig. 43 The Woodcock Inn, Iden Green.

#### **Policy BE4 Shops and Public Houses**

**The existing village shops and public houses are valued by the community and their loss will be resisted unless:**

- **sufficient evidence is provided to demonstrate that the operation of the shop or public house is no longer financially viable, and**
- **that despite a genuine sustained attempt to market it on reasonable terms, there are no other reasonable prospects for retail or public house uses on the site**

## Community Facilities

**4.6** The parish has a number of excellent community facilities<sup>11</sup> which are sources of employment. These include the Primary School, Village and Memorial Halls, Iden Green Pavilion, the St George's Club and Benenden Pre-School. Other facilities include: bowling green, the village green, the recreation grounds, the scout hut and children's play areas in Benenden and Iden Green, St George's Church, the Catholic Chapel and the Congregational Church in Iden Green (see Figs. 44 & 45).

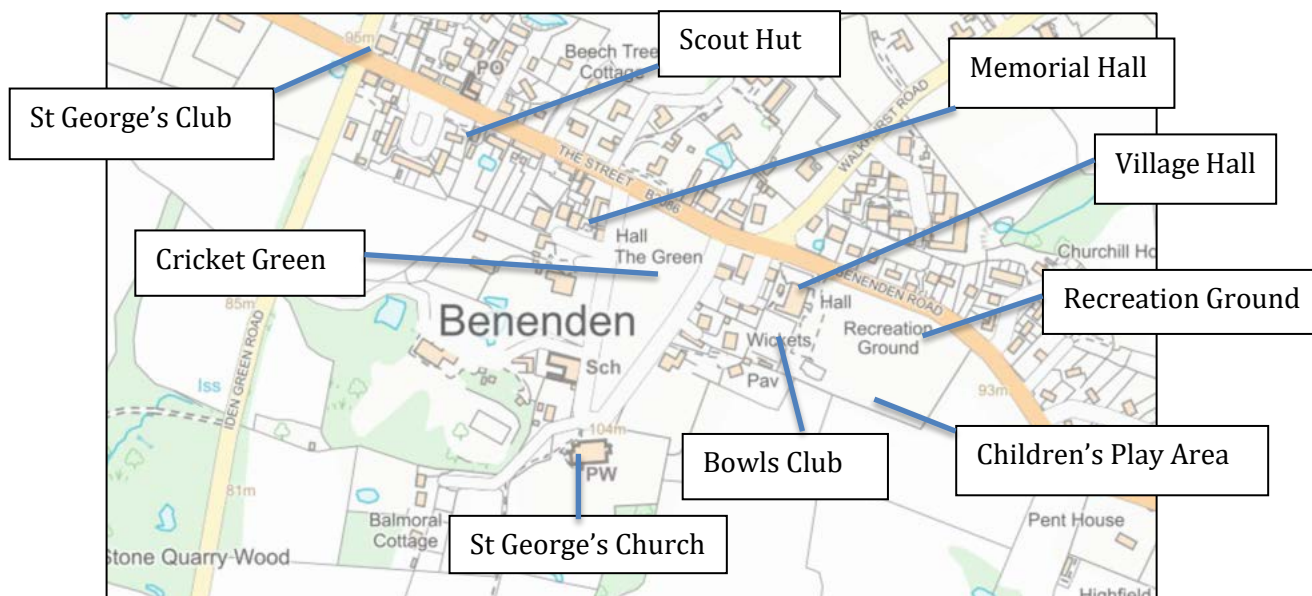


Fig. 44 Community Facilities in Benenden.

**4.6.1** The facilities maintain the social fabric of the community, with many of the facilities being available for hire. These existing well-used facilities need to be maintained and enhanced<sup>12</sup> to continue their contribution to the local economy and the health and wellbeing of the community.

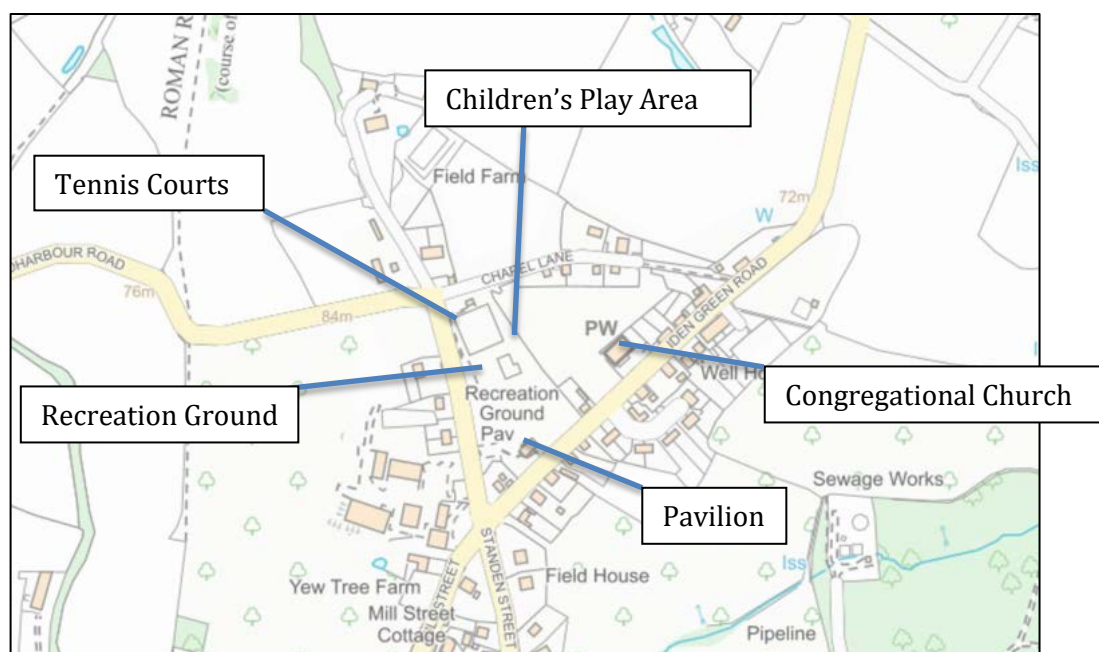


Fig. 45 Community Facilities in Iden Green.

<sup>11</sup> Schedule of Community Facilities (Supporting Document BEA5).

<sup>12</sup> TWBC DLP Policy ED12.

### **Policy BE5 Community Facilities**

**Community facilities are important to the social fabric of the parish and are to be retained where possible.**

**The support for existing community facilities on the maps (Figs. 44 & 45) will be maintained. Any development proposal that involves the loss or a reduction in provision must:**

- 1. demonstrate that demand for the facility no longer exists, or**
- 2. provide a suitable alternative elsewhere**

### **Re-use of Redundant Buildings**

**4.7** The Tunbridge Wells Borough Local Development Framework, Core Strategy Development Plan Document (adopted June 2010), Section 5.191 quotes PPS4<sup>13</sup> in supporting the re-use of appropriately located and suitably constructed existing buildings and states that re-use for business purposes will usually be preferable to residential. It also notes that the change of use, or conversion, of an existing building may therefore be permitted if it would provide the best reasonable means of conserving the character, appearance, fabric and setting of a listed building or a building whose loss would be detrimental to the character of the countryside. This is reflected in TWBC Core Strategy Development Plan Core Policy 14 and in TWBC DLP Policy ED5 and paragraphs 6.443–6.459.<sup>14</sup>

### **Policy BE6 Redevelopment of Redundant Buildings**

**The BNDP will support the retention and conversion of existing agricultural, rural or other buildings, for business, recreation and tourism uses.**

### **Encouraging the Right Future Business**

**4.8** The National Planning Policy Framework<sup>15</sup> notes that although business development sites in rural areas ‘may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport...it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable’.

**4.8.1** Land-based industry, tourism, sporting and craft-based businesses will be encouraged whilst those attracting high volumes of vehicular traffic and that have potentially significant environmental impact will not. Businesses and institutions that provide services required by the whole community including older people and the disabled, such as medical facilities, care provision, training and education, will be actively sought to support the economic objective of the NPPF para. 8 a).

<sup>13</sup> Tunbridge Wells Borough Local Development Framework, Core Strategy Development Plan Document (adopted June 2010), Section 5.191 Planning Policy Statement 4: Planning for Sustainable Economic Growth.

<sup>14</sup> Tunbridge Wells Borough Council Core Strategy Development Plan Policy 14, TWBC DLP Policy ED5 and paras. 6.443-6.459.

<sup>15</sup> NPPF — <https://www.gov.uk/government/publications/national-planning-policy-framework--2>



### **Policy BE7 Encouraging the Right Future Business**

**Continued economic stability and employment within the parish is critical to maintain its vibrancy and diversity.**

**The BNDP:**

- a) encourages existing businesses to grow and will support new development proposals for business in the designated commercial areas, where infrastructure links are more sustainable**
- b) will support appropriate types of new business development, provided that the proposal causes a low environmental impact and generates low volumes of traffic on the narrow lane infrastructure**

## **Business and the Local Economy**

### **Projects**

#### **1. Technical Feasibility Study to Improve Broadband and Mobile Signal**

In conjunction with operating companies, consultants and the community (asset owners) conduct a technical and commercial feasibility study to improve broadband and mobile communications in the parish.

#### **2. Renewable Energy and Local Recycling**

Engage with businesses to assess the potential for renewable energy and local recycling.

#### **3. Increased Connectivity**

Opportunities will continue to be sought to foster closer working relationships with and between all the village businesses and enterprises where it is beneficial to the community and the environment. An existing example of sympathetic and synergistic development is the community shop that has been developed and maintained as a joint project between the Parish Council and Benenden School (see Supporting Document BEA4).

#### **4. Meetings/Online Directory**

Over a third of the businesses responding to the business survey are interested in regularly meeting with others in the village and over 75% would like to be listed in an online village directory. Develop, maintain and host the online village directory with a view to using this as the connecting hub for local businesses and residents.

#### **5. Utilise Data Gathered in Researching the BNDP**

Ensure that data gathered as a part of the plan process, for example, sources of financing and creative development schemes are rolled out to interested parties in site specific meetings (see Supporting Document BEA6).

## **Supporting Documents for Business and the Local Economy**

BEA1	SWOT Analysis from Business & Economy Workshop 9 <sup>th</sup> December 2017
BEA2	Benenden Employees Survey 2018
BEA3	Benenden Business Survey 2018
BEA4	Parish Magazine Article on Benenden Community Shop
BEA5	Schedule of Community facilities
BEA6	Presentation to Local Businesses 2018



Fig. 46 Benenden Crossroads.

## 5. Transport and Infrastructure

### Objective

**To prioritise infrastructure improvements, minimise and 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.**

### Introduction

The Transport and Infrastructure Working Group built on the Parish Plan 2015.<sup>1</sup> It is a key supporting document for the Benenden Neighbourhood Development Plan (BNDP). The relevant chapters on Roads and Byways, and Health and Wellbeing raised a number of issues of concern:

#### Roads and Byways

- Benenden Parish Council should explore the possibility of having 20mph limits within the main settlements of Benenden village, East End and Iden Green and explore extension of existing 30mph limits to encourage drivers to slow down as they approach any new 20mph area.
- The crossroads at Benenden (see Fig. 46) and at Iden Green are both potentially dangerous and there have been a number of near collisions [now several serious accidents]. It is recommended that the Parish Council raises the issue of the crossroads with Kent County Council (KCC).

<sup>1</sup> Parish Plan 2015 – Roads and Byways p. 21; Health and Wellbeing p.25.



- Facilities for cyclists are inadequate within the parish and should be improved.

## **Health and Wellbeing**

- Healthcare provision in the village is limited. Benenden Hospital offers limited NHS services and some other services to members of its healthcare plan. District nurses and associated staff visit the village but there is no clinic base. Family doctor services are provided to parishioners from practices in Tenterden, Cranbrook and Hawkhurst. Other services, such as dentistry and opticians, are also based in nearby towns.
- Over 40% of parishioners felt that access to healthcare services is a problem; with over 70% stating that they would like to see a nurse-led clinic and chiropody services visit the village.

Following the initial Neighbourhood Plan Visioning Workshop on 28<sup>th</sup> October 2017, the Transport and Infrastructure Workshop took place on 9<sup>th</sup> December 2017. As well as addressing business and economic issues, this workshop also considered transport and infrastructure. At the Visioning Workshop a 'SWOT' (strengths, weaknesses, opportunities and threats) exercise (see Supporting Document TA1) explored issues including:

- improved infrastructure to cope with more houses/cars
- better maintained roads
- hazardous crossroads at Benenden and Iden Green
- poor broadband/mobile signal
- improve existing leisure amenities (tennis/bowls/football/cricket)
- a school minibus/community minibus

After further discussions with the Parish Council and the Neighbourhood Plan Steering Group, the objective (above) was agreed as representing the views of many parishioners and to provide a basis for the working group.

## **Process**

The residents of Benenden have consistently supported managed housing growth.<sup>2</sup> However, they have real concerns about the impact of growth on the limited rural infrastructure of the parish. Following the Transport & Infrastructure Workshop, a number of avenues were explored to enhance the experience of living in the parish during the lifetime of the BNDP.

## **Policy Context/Justification**

The High Weald Area of Outstanding Natural Beauty (AONB) Management Plan<sup>3</sup> seeks to preserve the character of both the landscape and its settlements but also stresses that they should be economically viable i.e. not a museum. The BNDP contains planning policies and projects that complement the High Weald AONB Management Plan.

The transport and infrastructure policies have been drafted to complement those of the National Planning Policy Framework (NPPF) 2019 and the draft Tunbridge Wells Local Plan. Para. 102 of the NPPF demands that potential impacts of development on transport networks is addressed and that opportunities to promote walking, cycling and public

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<sup>2</sup> Parish Plan 2015 page 9: proposed housing growth of 1% per year would be an appropriate target.

<sup>3</sup> AONB Management Plan 2019-2024.

transport are identified. Para. 104 of the NPPF requires planning policy makers to engage with highways authorities and to provide high quality walking and cycling networks. NDP creators are asked to produce policies that will support high quality communications. NPPF paras. 112–114 seek to discourage creation of new mobile phone masts by making maximum use of existing facilities and encouraging wireless technology. However, if new facilities are required, they should be camouflaged to minimise their adverse visual impact. Landowners and developers must review the Infrastructure Policies set out in the BNDP and set out within their plans how they will contribute to their delivery. Community Infrastructure Levies (CIL), Section 106 contributions and other grants or donations made via Tunbridge Wells Borough Council or direct to Benenden Parish Council will be used to enable the policies listed below.

## **Neighbourhood Planning and Transport**

A number of the transport/traffic concerns/issues raised at the workshops are outside the remit of the BNDP. This Plan makes recommendations for infrastructure enhancements based on local knowledge and requirements. These recommendations should be taken into account by planners when outlining infrastructure requirements to support housing development in the parish.

Locality, a government-funded planning advisory body, advises neighbourhood planners as follows:

*Many traffic matters fall outside the scope of planning. For example, changes to traffic management on existing transport networks are usually a matter for the highways authority to deal with. Changes to traffic lights, restrictions, speed limits, signage, traffic circulation, crossing points and other traffic management devices usually fall outside the scope of neighbourhood planning.*

*A possible exception to this may be where new development would impact on existing networks, and this necessitates changes to those networks in order to accommodate such development. However, even in cases like these, a neighbourhood plan cannot be prescriptive about the actual solution. For example, planning policies could not include changes to the speed limit or specific highway improvements.*

However, the Plan could highlight localised traffic capacity and safety issues, or infrastructure deficiencies that would need to be addressed.

### **Parish Infrastructure: Transport**

Benenden Parish is one of the most remote parts of the Tunbridge Wells Borough, roughly equidistant from centres of commerce and potential sources of work in Ashford, Hastings, Maidstone and Tunbridge Wells. It comprises three main settlements (Benenden, Iden Green and East End), and 29 smaller settlements or ‘dens’ connected by a network of narrow lanes.

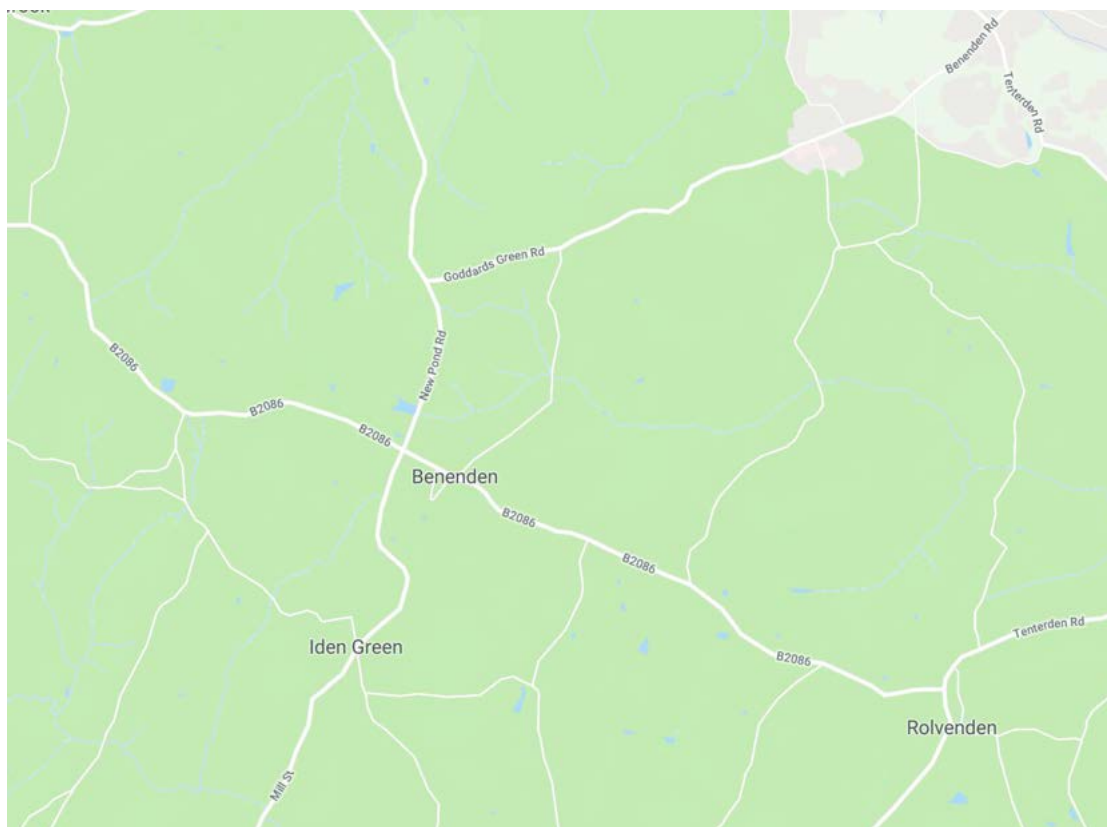


Fig. 47 Benenden Parish road map<sup>4</sup>

The UK Department for Transport forecasts an increase in road traffic of between 19% and 55% by 2040.<sup>5</sup> This will place further pressure on transport infrastructure that is already coping with high demand:

- Roads: The B2086, Iden Green Road, New Pond Road and Goddards Green Road (see Fig. 47) will be subject to increased traffic volumes. Each road has increasing and inappropriate traffic for rural lanes and are poorly maintained.
- Pedestrians: Footway links between the main settlements of Benenden, East End and Iden Green should be improved to separate pedestrians from vehicles.
- Cycles: speeding traffic and constricted rural lanes make cycling dangerous.
- Public transport is limited and connectivity between bus and rail services non-existent.

Maintaining safe connectivity for drivers, pedestrians and cyclists within the parish will require careful management and investment. The local roads are narrow and often not well maintained. There are already significant traffic bottle-necks in Hawkhurst, Sissinghurst and Goudhurst on journeys to the A21 and to the railway stations at Staplehurst or Headcorn. Increased traffic is adding to the risk of accidents and discourages walking/cycling.

### Public Transport

Public transport connections are very limited: it takes 1 hour 17 minutes to travel to Tunbridge Wells by bus, with a maximum of 6 buses per day. It takes 30 minutes to travel to Tenterden by bus. There is no direct bus route to Maidstone or Ashford nor to the railway station at Staplehurst. Train journeys to central London take an hour, but the drive to Staplehurst (nearest train station) adds a further 20 minutes travel time.

<sup>4</sup> Google map: May 2019.

<sup>5</sup> DfT — Road Traffic Forecasts 2018.



It is disappointing that the 2019 trial by Kent County Council of a new 'hopper' bus service has been cancelled due to low passenger volumes. It ran Monday to Friday between Iden Green, Benenden and East End, to and from Tenterden. It was designed to be a taxi-bus service calling at scheduled stops but also able to pick up and drop off passengers in more rural locations. The service was planned to run directly past three of the four allocated sites within the Plan and very close to the fourth site. The Plan envisages that as the parish grows, greater demand for public transport will allow reinstatement of this imaginative solution.

## The Policies

**5.1** There are currently around 920 dwellings in Benenden parish and this Plan allows for an indicative figure of around 100 further dwellings. This increase in homes will place additional strain on the rural road network. The scattered nature of settlement results in high levels of car use for journeys within the parish.

**5.1.1** Average car ownership in Benenden is 1.8 vehicles per household compared to 1.2 cars per household across Kent as a whole.<sup>6</sup> Increased car journeys may result in increased congestion and accident risk so alternative means should be encouraged. NPPF para. 102(c) underlines the importance of promoting walking and cycling as part of a wider transport infrastructure. Cycling has grown in popularity as the benefits of regular exercise and UK success in Olympic cycling events has raised awareness and participation.

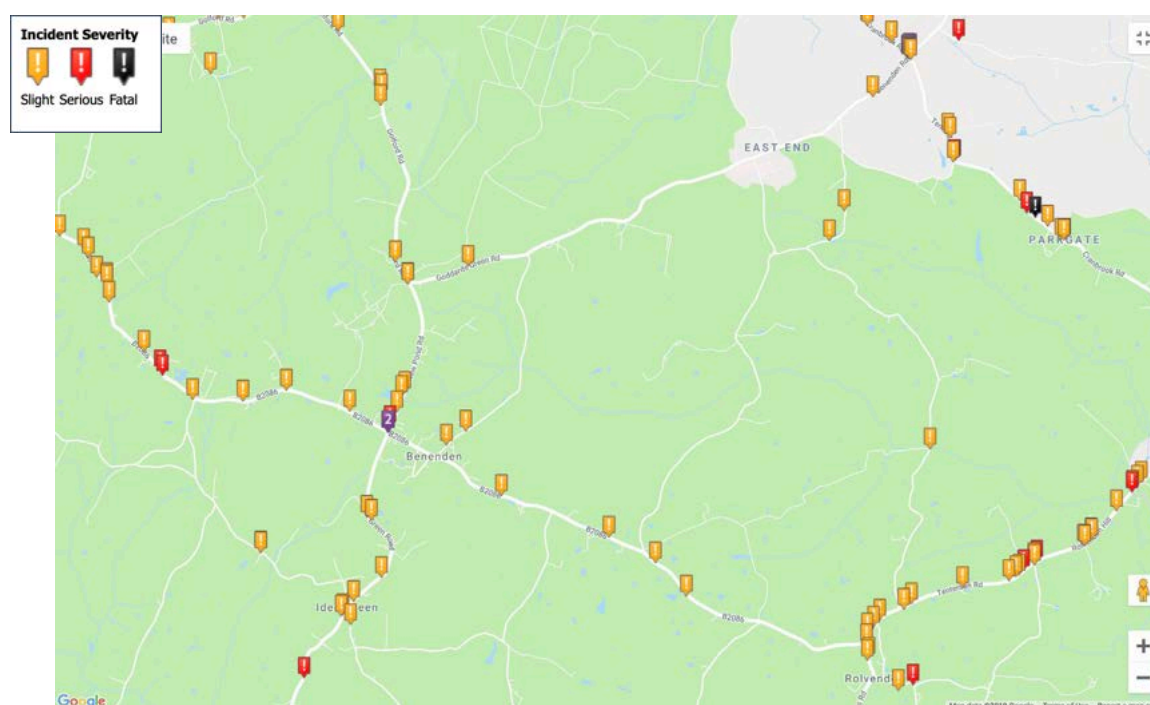


Fig. 48 Crash Map — Road Traffic Accidents reported to Kent Police 2009-2019.

There is evident danger at the crossroads in Iden Green, at Benenden, and at Castleton Oak (see Fig. 48) where KCC have recently introduced traffic calming measures.<sup>7</sup>

**5.1.2** Policy T1 promotes walking and cycling for environmental and health benefits while supporting the important face to face interactions of rural life.

<sup>6</sup> UK Census 2011.

<sup>7</sup> See Fig. 49.

### Policy T1 Car-free Connectivity

**Any new housing or commercial developments which receive planning permission will be expected to contribute to projects identified by the parish, where appropriate, to create 'all-weather routes', where cyclists and pedestrians can move around the parish safely on new or existing public rights of way, subject to meeting relevant national policy or legislative requirements.**



Fig. 49 Traffic calming at Castleton Oak Crossroads.

Fig.

**5.2** The additional housing in Benenden and surrounding parishes dictated by the Government and Local Planning Authorities means that a significant increase in vehicle movements is anticipated. This growth in traffic will coincide with an increase in the number of more vulnerable, older or school-age residents.<sup>8</sup> Policy T2 is designed to reduce the impact of increased traffic, allowing walkers or cyclists to continue to travel safely in the parish.

<sup>8</sup> TWBC Housing Needs Survey 2018.

## **Policy T2 Improving Road Safety and the Impact of Traffic**

**Proposals for any new housing or commercial development will be required to demonstrate that road access to and from developments provides safe access to, and transit past, new housing: this may include slowing the flow of traffic. Such design features must be in keeping with the rural nature of the parish.**

**The provision of appropriate footways to facilitate safe access to amenities is set out in the Site Specific Policies (see Housing Supply Chapter 2) relevant to the allocated sites.**

**Developers will be required, where appropriate, to submit traffic impact studies, at planning application stage, through a Transport Assessment. Where a negative impact on non-motorised users is identified, developers will be required to provide, or contribute towards, appropriate mitigation measures.**

**5.2.2** To ensure the safety of pedestrians and cyclists, traffic calming measures need to be put in place to protect them from the increasing numbers of vehicles, many of them heavy goods vehicles, travelling through the village.

**5.3** An increasing number of visitors come to Benenden to enjoy village activities and the rural environment; tourism is a key contributor to the local economy. To ensure that appreciation of the village and the AONB is sustainable, adequate parking needs to be provided for visitors and residents alike.

### **Parish Infrastructure: Amenities and Leisure**

**5.4** The parish has two village halls (Benenden and Iden Green), two village greens, community recreation areas, sport facilities (bowls, cricket, football, tennis). Meeting places for local clubs include the St. George's Club, the Village Hall, Memorial Hall and the Iden Green Pavilion. Benenden's new Primary School opened in 2019 and Mr Noah's in Iden Green provides pre-school places. More recent community initiatives are the Community Shop & Café and the formation of the Benenden Village Trust (which owns many of the village amenities). There are a number of recreational clubs, ranging from the Benenden Players, Benenden Bonfire Society and bellringing to the Ukulele Band, and village sports clubs (bowls, cricket, darts, tennis). The village has lost two village pubs in the past 20 years, but still retains a pub in the centre of the village (The Bull) and another in Iden Green (The Woodcock). Churches include the congregational church in Iden Green, St George's (CofE) at the top of the village green, and the Catholic chapel in New Pond Road. Limited banking and cash withdrawals can be made through the Post Office associated with the Community Shop, and Benenden Hospital offers an ATM and café which are available for use by residents.

**5.4.1** With new housing there will come increasing demand for sports and other recreational facilities. Continued good provision is recognised as essential for both personal and community health and well-being in both Borough<sup>9</sup> and National Planning<sup>10</sup> guidance.

**5.4.2** BNDP recognises the importance of community cohesion and with increased housing growth, developers should enable the village to build strong, sustainable support networks. Contributions to meeting spaces, community clubs and community transport infrastructure will be required.

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<sup>9</sup> Tunbridge Wells Borough Council Open Space Study: June 2018.

<sup>10</sup> NPPF para. 92.

**5.4.3** The parish supports the provision of safe children's play areas. Benenden Village Trust has refurbished the children's play area in Benenden. There is a smaller playground in Iden Green, but there is currently no provision for younger children in East End. Funding for a play area should be provided by the developer of Sites 424 and LS41.

**5.4.4** East End currently has limited community facilities. Benenden's Community Shop has demonstrated that small, locally led projects can have a positive impact on community cohesion, and this should be replicated with commercial and social facilities provided as an East End Community Hub. Developer funding will be used to finance provision of similar facilities and a meeting place to serve East End.

#### **Policy T3 Community Cohesion and Recreational Facilities**

**Proposals for any new housing or commercial development will be required to contribute to parish projects designed to improve provision for children's play areas in all three main settlements within the parish. Developers will also be required to support 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.**

**5.5** The impact of an increasing population and changing lifestyles on Climate Change<sup>11</sup> is well documented. Ample evidence exists for the adverse impact of air pollution<sup>12</sup> on children's health in particular, as well as adverse impacts on our ecosystem. This Plan supports a focus on clean energy and low-emission technology.

#### **Policy T4 Renewable Energy and Low-emission Technology**

**Proposals for any new housing or commercial development must provide all new properties with a minimum of 1 electric car-charging point and also contribute to projects designed to reduce the impact of pollution emitted by cars, in the following ways:**

- **Supplying and supporting a minibus for the Primary School**
- **Encouraging walking/cycling by providing safe paths**
- **Planting native hedging (see Policies BD4 & LE9) to screen new developments from the roadway and passing traffic and to be designed to shield the public from air pollution**

**Developers will also be expected to contribute to projects that will provide pay-as-you-go electric car-charging points for visitors to the parish in accessible places, such as Benenden Village Hall car park, Iden Green Pavilion car park, and Benenden Hospital car parks.**

#### **Parish Infrastructure: Communications**

**5.6** Mobile data traffic has been growing at a rate of around 60% a year, boosted by technological development, in both handsets and applications, allowing consumers to carry out ever more activities wirelessly. It is clear that online interactions, both personal and commercial will continue to grow. The digital economy offers Benenden opportunities to grow local enterprise and reduce commuting miles.

<sup>11</sup> For example: IPCC Global Warming of 1.5% October 2018 report.

<sup>12</sup> For example: DEFRA's most recent Air Quality Statistics report April 2018.



**5.6.1** However broadband speeds and mobile phone signals continue to be poor: infrastructure needs to be enhanced to cope with both an increase in individual use and the increase in the local population.<sup>13</sup> The quality of mobile signal in particular is an evident source of frustration (see Parish Plan 2015, BNDP Business Survey 2018 — Supporting Document BEA3).

**5.6.2** Improving rural connectivity aligns with Government policies for local businesses and communities and Benenden aspires to meet Ofcom targets for broadband and mobile coverage across the UK.

**5.6.3** The Ofcom target for broadband is for every household and business to have ‘the right to request a broadband service capable of a download speed of at least 10 megabits (Mb), and an upload speed of at least 1 megabit (Mb).’ The Government’s target is for 95% of premises to have access to superfast broadband.

**5.6.4** Developers of the four allocated sites will be required to provide or fund an extension of existing broadband access to hubs at each development, with speeds acceptable to a small, home-based business. They will also be required to install boosters at each site to improve mobile phone reception and enable 5G connectivity.

#### **Policy T5 Infrastructure, Broadband and Mobile**

**Proposals for any housing or commercial development will be required to contribute to appropriate new amenities, new infrastructure and public transport provision as agreed with the Parish, Borough and County Councils in order to improve connectivity within the parish and the wider community. Specifically, developers will contribute to parish projects designed to enhance broadband speed and also to enable the centre of East End to be connected to superfast broadband.**

#### **Parish Infrastructure: Essential Services**

**5.7** Research underpinning the BNDP suggests that core essential services are generally considered to be adequate within the village. Wastewater and sewerage capacity is something that will need careful attention from developers in order not to impact the environment (see Policy LE10) but current systems have been assessed as adequate<sup>14</sup> for the additional housing under consideration.

**5.7.1** The whole parish has access to mains electricity, however much of the parish does not have a mains gas supply and many residents therefore use either wood, electricity or oil-fired heating.

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<sup>13</sup> Ofcom Mobile Data strategy 2016.

<sup>14</sup> AECOM Sustainability Scoping Report April 2019.

# Transport and Infrastructure

## Projects

These projects have been identified by the BNDP team and recommended to the Parish Council as priority infrastructure improvements. They may be facilitated by the Community Infrastructure Levy (CIL), Section 106 contributions and other grants or donations made via Tunbridge Wells Borough Council or direct to Benenden Parish Council. These funds will be used to enable the projects listed below. Each project will require oversight by the Parish Council and require engagement with other organisations such as Kent County Council, BT and mobile phone providers. Volunteers from within the community should be encouraged to help the Parish Council deliver each project. Initial scoping for each project should be led by the Parish Council, funded by developer contributions.

Each Project should be formulated prior to review and assessment by the Parish Council to prioritise and determine which proposal(s) should be taken forward.

### 1. Support Car-free Connectivity

The Parish Council to identify an active route (see Fig. 50) and work with Sustrans/KCC to create a combined Cycle Lane and Footpath linking Green Lane (East End) with Walkhurst Road (Benenden). The outline report is available in Supporting Document TA2.

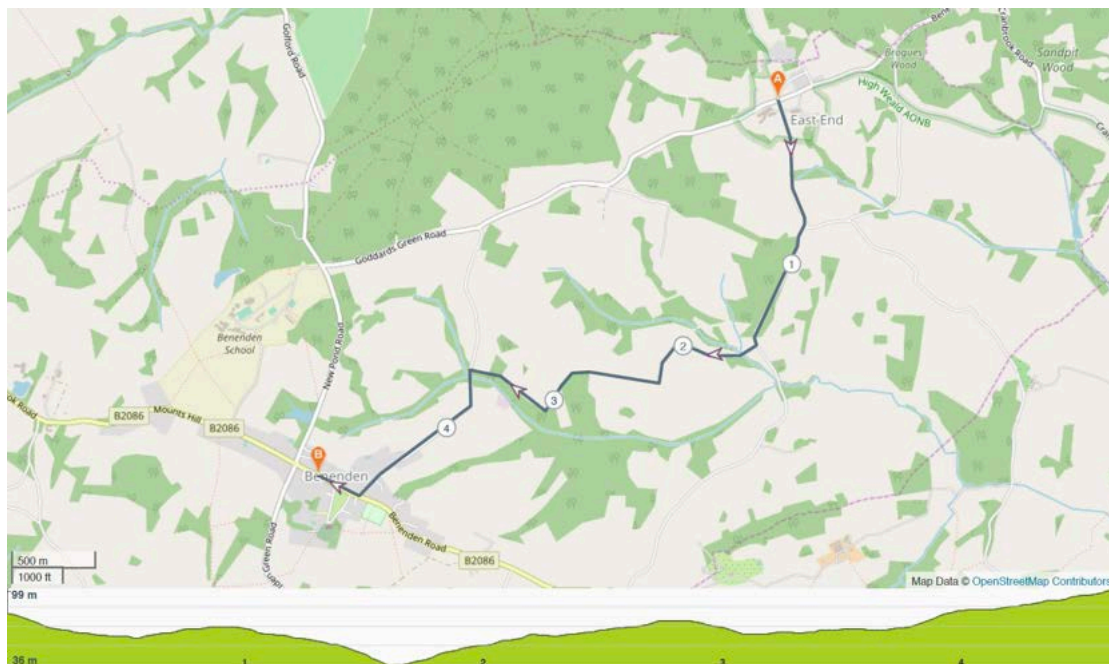


Fig. 50 MAP of potential cycle/footpath between East End and Benenden.

To facilitate the foot/cycle lane and in recognition of the existing national cycle route 18, introduction of 'quiet lane' status is required on:

- Walkhurst Road
- Green Lane
- Stepneyford Lane
- Mockbeggar Lane

Each quiet lane would have speed limits of 20mph and appropriate signage.

## 2. Traffic Mitigation

The Parish Council will lobby and work with KCC Highways on the specific proposals resulting from the development of this Plan listed below:

- Reduction of maximum speed limit to 20mph on B2086 from Benenden Crossroads to Pullington Farm
- Reduction of maximum speed limit to 20mph on Goddards Green Road from East End Chapel to Mockbeggar Lane
- Reduction of maximum speed limit to 20mph on Mill Lane from Little Weavers to Cotton Cottage on Iden Green Road
- Extension of 30mph zones on the approach to the three main settlements of Benenden village, East End and Iden Green to encourage drivers to slow before reaching residential areas and rural crossroads
- Traffic calming scheme for Benenden Crossroads and Iden Green Crossroads and further measures at Castleton Oak Crossroads
- Introduction of 'Access Only' restrictions on designated quiet lanes

## 3. Additional Car Parking

The Parish Council will arrange and manage meetings between landowners with a view to improving both public and residential car parking provision; specifically looking at:

- Providing additional car parking spaces in Rothermere Close. Working with the housing association and Benenden Almshouse Charities to see if additional car parking can be designed to reduce congestion for residents
- Providing additional car parking spaces at Benenden Village Hall. Working with the Benenden Village Trust to extend existing car parking, reducing the adverse impact on village streets (see Figs. 51 & 52) when large events are held at the hall



Fig. 51 Traffic Congestion, The Street, Benenden.



Fig. 52 Traffic Congestion, The Street, Benenden.

#### **4. Support Health & Community Cohesion**

The Parish Council will identify means of providing a designated space for 'medical use', such as roving GP/nurse/physio/podiatrist/dentist, which will be funded by developer contributions.

#### **5. Enhancing Play and Recreation Facilities**

Existing playgrounds and recreational fields in Benenden village and Iden Green are owned and maintained by the Benenden Village Trust (BVT). They are available for use by the community. The Benenden playground underwent extensive renovation in 2019. The BVT is currently fund raising for refurbishment of the Iden Green playground. In addition, land at East End will be made available for recreational and playground facilities arising from site specific policies within the NDP. The Parish Council will work with developers, BVT and other community groups to enhance recreational and play facilities.

#### **6. Public Electric Charging Points**

As part of our commitment to embracing green technology the BNDP recommends that pay to charge facilities are introduced in car parks at Benenden Village Hall, Iden Green Pavilion and Benenden Hospital. The Parish Council will work with developers, the Benenden Village Trust (BVT) and utility providers on projects to provide recharging points in each location.

#### **7. Superfast Broadband in East End, Benenden**

The Parish Council will work with Benenden Hospital Society, developers and BT Openreach to ensure the existing Broadband infrastructure which serves the Hospital complex is enhanced. The scope of any service extension to local dwellings will be determined via a feasibility study, but it is expected that dwellings within 1000m of the hospital site should have access to superfast broadband.



## **Supporting Documents**

TA1 'SWOT' data

TA2 Cycle route report

## 6. Plan Review Process

6.1 Following final consultation with the Local Planning Authority (TWBC) and local residents, formal examination and a referendum held within the parish, the BNDP is expected to come into force in spring 2021.

The Parish Council will monitor the BNDP, as necessary, and will formally review the BNDP, to ensure that the Plan Policies remain unaffected following:

- Local Plan adoption or review
- major changes in National Planning Policy
- the receipt of updated evidence of housing need

6.2 At review stage the Parish Council will also assess the progress of the Plan, and identify improvement opportunities using the following criteria:

- Seeking input from TWBC — assess changes to regulation and policy since adoption of the Plan
- Assess the effectiveness of Plan policies
- Whether housing development has taken place
- Whether assessed housing needs are being addressed

6.3 In addition, using an evidence-based approach the Parish Council will monitor strengths and weaknesses of Plan deployment taking each Plan Objective to structure their assessment:

- **Landscape & the Environment:** To protect valued environmental assets and support Benenden's peaceful, rural, way of life. Recognising that the parish of Benenden is one of the most unspoilt parts of the High Weald AONB, the policies will enable villagers and visitors to continue to enjoy the countryside, important Local Green Spaces, Public Rights of Way (PRoW), views and dark skies.
- **Housing Supply:** To support modest-scale housing 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.
- **Design & the Built Environment:** New buildings shall 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.
- **Business & the Local Economy:** 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.
- **Transport & Infrastructure:** To prioritise infrastructure improvements, minimise and 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.

6.4 Where a substantive change to the Plan is required, the Parish Council will follow the procedure laid down by the legislation in force at the time.

## Glossary of Terms (in alphabetical order)

AONB	Area of Outstanding Natural Beauty
Allocated Site	A site which has been allocated by the BNDP for housing development
BNDP	Benenden Neighbourhood Development Plan
BPC	Benenden Parish Council
BVT	Benenden Village Trust
Call for Sites	TWBC's request to Landowners to put forward land for possible housing development
C3 Class	Planning Class C3 Residential use class
CIL	Community Infrastructure Levy
CLT	Community Land Trust
CPRE	Campaign for the Protection of Rural England
DLP	Draft Local Plan — TWBC (2019)
DPH/dph	Dwellings per hectare
ha	Hectare
HELAA	Housing and Economic Land Availability Assessment
HNS	Housing Needs Study (TWBC)
ISA	Individual Site Appraisal
KCC	Kent County Council
LBD	Limits to Built Development
LGS	Local Green Space
LPA	Local Planning Authority
LS	Late (submitted) Site in the TWBC 'Call for Sites'
LWS	Local Wildlife Site
NDP	Neighbourhood Development Plan
NEQ	The north east quadrant of the Benenden Hospital Site LS41
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need (for housing)
PDL	Previously developed land
PPS	Government Planning Policy Statement
Section 106 (s106)	Developer contributions required as a planning requirements
SEQ	The south east quadrant of the Benenden Hospital Sites 40b & 424
SHELAA	Strategic Housing and Environmental Land Availability Assessment
SPD	Supplementary Planning Document
SSP	Site Specific Policy produced by the BNDP Housing Supply Group
SSSI	Site of Special Scientific Interest
Submitted Site	A site put forward for development by Landowners under the TWBC 'Call for Sites' programme
TPO	Tree Preservation Order
TWBC	Tunbridge Wells Borough Council
TWBC LP	TWBC Local Plan
Windfall Site	A site for new housing development which gains planning approval, in addition to the agreed sites detailed in the BNDP