

IA1 Consultation Statement

Benenden Neighbourhood Plan 2020 to 2036

Peaceful, Rural, Vibrant

Consultation Statement



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1. Introduction

1.1 Neighbourhood Planning regulations set out the need for a Consultation Statement which explains the steps taken by those creating the Neighbourhood Development Plan to involve the wider community in its construction. Engagement with the community should include setting out a vision for the parish, illustrating key concerns, aims and objectives.

1.2 Benenden Parish Council published the Benenden Parish Plan in 2015. The plan was based on a detailed survey of residents across a number of issues including housing, employment, health & wellbeing and infrastructure. One aspect of the plan concerned future housing supply, lack of affordable housing and the need for a neighbourhood plan. The Parish Council called for volunteers to work on a Neighbourhood Plan. A group of volunteers first met on 25 May 2017.

1.3 Evidence to support the Neighbourhood Plan, particularly Housing Needs Survey (2015), was drawn from the Parish Plan and supplemented through a Business Needs Survey (2017) and input at workshops and exhibitions (Oct 2017 – Jan 2018).

1.4 A series of public workshops were held to obtain contributions from residents. There were four workshops covering Vision & Objectives, Housing & Community, Local Economy & Transport and Landscape & Environment. Each workshop took input from residents on strengths, weaknesses, opportunities and threats. Attendees at the first workshop were asked to work in groups of 6 – 8 people and articulate their vision of the future of Benenden, and in particular important issues for each of the working group to address. Using this input from residents the BNDP Steering Group (supported by external consultants) crafted a draft overall 'Vision' and individual 'Objectives' for the working groups. The Vision and each of the five Objectives were shared at subsequent workshops, with residents of the parish invited to comment. At these workshops drafts were amended and final versions of the objectives agreed. Benenden Primary School pupils also worked on a project in which pupils were asked to contribute to a vision for Benenden in 2033.

1.5 Two public exhibitions took place on 7 April and 29 September 2018. Each exhibition set out progress made by different working groups and invited comment and input from stakeholders.

1.6 On 23 February 2019 the Benenden Neighbourhood Development Plan (BNDP) Steering Committee presented its 'Rough Draft Plan' to residents at a public meeting. The Rough Draft Plan built upon inputs received at workshops and exhibitions but also took into account guidelines from Tunbridge Wells Borough Council (TWBC), the National Planning Policy Framework 2019 (NPPF) and guidance from Locality – a government agency that supports local communities. Consulting on the Rough Draft gave landowners the opportunity to respond on the Local Green Space designation proposals. It also provided an opportunity to consult with the statutory bodies Natural and Historic England and the Environment Agency, meeting the requirements of the Strategic Environmental Assessment at that stage and to test a range of options for sustainability. A scoping report to accompany the Rough Draft was written by AECOM, funded by Locality.

1.7 Public engagement has also extended to regular articles in the parish magazine. The magazine has also published letters raising concerns and other issues related to BNDP.



2. DESIGNATION

2.1 On 10 April 2017 formal notification to formulate a Neighbourhood development Plan was sent by Benenden Parish Council to TWBC following publication of the National Planning Policy Framework 2012. Consultation began on the designation of the entire parish of Benenden and approval was confirmed by TWBC via e-mail on 22 August 2017.

2.2 On 15 May 2017 the Parish Council reported their intention to create a Neighbourhood Plan at the Annual Parish Assembly. Residents of the parish were asked to volunteer to work upon plan development.

2.3 Notification was sent to neighbouring councils and posted in the parish magazine. An e-mail database developed as part of the 2015 Parish Plan consultation was also used firstly to enable people to confirm they wished to receive communications concerning a Neighbourhood Plan, secondly to announce commencement of the planning process and seeking volunteers to work on the BNDP.



Benenden Needs You!

Neighbourhood Plan Village Meeting

Future Housing

How many?

Where?

Who for?

What type?

Benenden Village Hall

Saturday afternoon, 11th November, 1.30

Shape Your Future!

3. Reasoning

3.1 UK population increases, increased life expectancy and continued economic growth in South East England combine to increase housing need, amenities and infrastructure. Benenden Parish Council recognised the need for growth in residential dwellings of an average of 1% per annum in the 2015 Parish Plan. Benenden is a historic Wealden village in which medieval field structures, Wealden iron working and historic parkland feature. The rural charm of the parish and some outstanding views both north and south from the ridge must be cherished and preserved. The existing vibrant community can be enhanced by careful integration of new homes and business.

3.2 The Parish Council considered the best way to meet the aspiration for growth and to preserve the distinctive character for the parish was to embrace Neighbourhood Development Planning. By creating its own Neighbourhood Plan the Parish Council expects residents and local business to be part of the decision-making process.

4. Consultees

4.1 Consultees included:

- Residents of the parish
- Landowners, including farmers
- Small and large businesses
- Tunbridge Wells Borough Council

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Kent County Council
 Adjoining Parish Councils
 High Weald AONB Management Unit
 Statutory Consultees

5. Consultation

Tunbridge Wells Borough Council

5.1 Liaison with Tunbridge Wells Borough Council has taken place regularly from 2017 onwards via workshops, meetings, telephone calls and e-mail. There have been open exchanges of information and challenges between the BNDP and TWBC. Key events and exchanges are listed below:

Consultation with TWBC		
Location	Subject	Date
TWBC Offices	Introduction to Neighbourhood Plans	07/02/18
TWBC Offices	Tunbridge Wells Local Plan - criteria	24/04/18
Memorial Hall	BNDP/TWBC Workshop	19/06/18
Memorial Hall	Site Assessment Training – by TWBC Officers	19/06/18
TWBC Offices	BNDP Allocations Workshop	04/01/19
TWBC Offices	Rough Draft Feedback Review	31/05/19
TWBC Offices	Regulation 14 Feedback Review	21/11/19
TWBC Offices	Regulation 14 Feedback Workshop	07/01/20

6. Public Consultation Events

6.1 All public events have been widely publicised using our extensive (over 500 people) e-mail notification system (the open rate from our e-mail campaign has always been around 50%), via parish magazine, posters in key locations such as the village green, recreation ground and bus stop on Goddards Green Road.

Public Engagement			
Location	Subject	Date	Involved
Memorial Hall	Parish Call for NDP Volunteers	25/05/17	No Record
Village Hall	Vision & Objectives Workshop	28/10/17	No Record
Village Hall	Housing & Community Workshop	11/11/17	62
Memorial Hall	NDP Volunteers Workshop	04/12/17	24
Village Hall	Local Economy and Transport Workshop	09/12/17	31
Village Hall	Landscape & Environment Workshop	13/01/18	36
Primary School	Benenden in 2033 – Primary School Project	30/01/18	No Record
Village Hall	First NDP Exhibition – presenting base data	07/04/18	No Record
Iden Green Pavilion	Second NDP Exhibition – planning criteria	29/09/18	97
Village Hall	Rough Draft Plan Launch	23/02/19	140
Memorial Hall	1-2-1 Surgery – your questions answered	23/11/19	23
Iden Green Pavilion	1-2-1 Surgery – your questions answered	23/11/19	8
Benenden Hospital	1-2-1 Surgery – your questions answered	23/11/19	1

6.2 Vision & Objectives Workshop

Key themes were offered by attendees for creation of NDP Vision and Objectives:

- Rural character and historic beauty of parish to be maintained
- Vibrant feel with many active village organisations to be enhanced
- Traffic congestion a growing issue
- Need to support local small business including farmers
- Provide work for local residents
- Development should be to meet local needs and use local builders

6.3 Housing and Community Workshop

Key themes from the workshop were:

- Affordable housing to stay affordable in the long term
- Downsizing opportunities needed
- Avoid large scale development
- High quality homes with off street parking
- Avoid sprawl into AONB – do we have sites within LBD?
- Infrastructure such as roads, broadband and medical services inadequate

6.4 Local Economy & Transport Workshop

Key Themes from this workshop were:

- Building houses requires improvements e.g. road, signs & speed control
- More houses will require expansion of local infrastructure
- Focus development near key employment centres
- Offer a special Rate for new business start-ups, convert agricultural buildings
- Affordable accommodation for local employees

6.5 Landscape & Environment Workshop

Key themes from this workshop were:

- Funding from builders to protect flora & fauna — targeted conservation
- Density of new developments, risk from large estates
- Large estates will impact on views, create light pollution and risk urbanisation
- Identify and protect the most important and outstanding views within the parish

6.6 Exhibition 1 Data gathering — 7 April 2018

6.6.1 Residents and other stakeholders were invited to an exhibition of the work undertaken by each Working Group at the Benenden Village Hall. The Exhibition took the form of a number of separate stands. Working Group members briefed attendees on progress with gathering the base data for the plan. This included many photographs of Views and Local Green Spaces as well as a presentation of the primary school project 'Benenden in 2033'. The school children

had highlighted the need for green spaces for elderly residents to enjoy as well as a suggestion that the village green could become a go-kart track.

6.6.2 Each stand was well attended. Although it became clear that Housing Supply with its maps showing sites that had been put forward under the TWBC 'Call for Sites' created significantly more interest than all others. The NDP Team concluded that a separate exhibition on planning criteria would be required.

6.7 Exhibition 2 - Planning Criteria — 29 September 2018

6.7.1 The second exhibition held on 29 September 2018 focussed on planning criteria. The NDP Team had not finalised the preferred sites nor had they decided to make site allocations. However, the exhibition did set out the criteria being used by the Housing Supply Working Group and allowed discussion with attendees on outputs of site assessments

6.7.2 Other Working Groups also had stands to update on progress over the summer of 2018, but once again Housing Supply was the main focus for the 97 people who attended the workshop.

6.7.3 A copy of the feedback from this workshop and the NDP response can be found at Annex A to this consultation statement.

6.8 Rough Draft Plan Public Consultation — 23 February 2019 to 8 April 2019

6.8.1 A public meeting was held on 23 February 2019 to launch the first 'Rough Draft' of the Benenden NDP. This was not the formal Regulation 14 Draft, but an early draft of the plan. The intention was to give an early indication of the direction the NDP was taking. Early inputs from residents had favoured small scattered development but had also emphasised the need for affordable housing. 20 sites were made available by local landowners, 17 of them over 1 hectare with only 3 sites under 1 hectare. The plan was therefore a compromise between small scattered sites, sites that could generate significant affordable housing and sites that would protect greenfield and the AONB.

6.8.2 The plan and key concepts were unveiled at the launch workshop. The plan was made available online and in hard copy from that date. Residents had 6 weeks to study the plan, its supporting documents and to provide feedback.

6.8.3 A copy of the feedback from stakeholders and the NDP response is below at Appendix B to this consultation statement.

6.9 Regulation 14 Plan Public Consultation — 25 August to 31 October 2019

6.9.1 After consideration of feedback from the Rough Draft Plan, the Regulation 14 plan was extensively rewritten. Site allocations were not altered, but checks were made to ensure that the Regulation 14 plan complied with planning regulations and guidelines.

6.9.2 A new committee was created to undertake the important task of reviewing feedback on the Regulation 14 Plan. This committee was led by the Chair of Benenden Parish Council and included a number of NDP team members and most important a number of parish councillors who had not taken active roles in development of the NDP. The committee was informed:

- Any comments received by the end of the consultation period must be considered conscientiously by the qualifying body (Parish Council);
- all representations need to be considered, but it is legitimate for the neighbourhood plan body to take a different view;
- a planning judgement needs to be taken;
- decisions on whether or not to amend the plan, and the reasoning behind them, should be recorded. This information will need to be incorporated into the consultation statement;
- the Parish Council will need to agree the modifications and approve the resulting draft of the plan for submission to TWBC.

6.9.3 A copy of the feedback to the Regulation 14 Plan and the Review Committee Response can be found below at Appendix C to this consultation Statement.

6.10 Other NDP Consultations:

6.10.1 In addition to consultation with TWBC and local residents' meetings were held with a number of other key stakeholders, mostly local landowners or their representatives who were interested in offering sites for development. As over 95% of the parish sits within the High Weald AONB, which is regarded as under extreme pressure given the scale of development in South East England, a meeting was also held with their management unit to explore the analysis they undertook on proposed site allocations within the plan.

6.10.2 The NDP Team asked High Weald AONB Management Unit to undertake assessments of the sites under consideration within the parish. In the event they offered comment on all sites within the AONB but did not undertake assessments of the two sites at East End as these are outside the AONB.

6.10.3 The 'Friends of East End' is a pressure group formed following publication of the Rough Draft of the NDP. They are opposed to the scale of development proposed for East End, Benenden. The group met Borough and County Councillors but never asked to meet the NDP Team. One Borough Councillor did arrange a briefing meeting with the NDP team and invited leaders of the Friends of East End to attend. They did attend the briefing but refused to speak, preferring only to observe discussions between the Councillor and the NDP team.

Meetings with Other Stakeholders		
Location	Subject	Date
Oakdale, Benenden	Meeting with owner & architect for site 289 Babbs Lane	01/05/18
Memorial Hall	Meeting with owner and developer site 222 Iden Green Road	15/05/18
The Bull	Meeting with Business Owners including Farmers	14/06/18
Stables, Benenden	Meeting with Almshouse Trust site 277 Walkhurst Road	02/01/19
Benenden Hospital	Meeting with land-agent site LS41 + 424 Benenden Hospital	14/02/19
Iden Green Pavilion	Meeting with owner and developer Site 222 Iden Green Road	25/04/19
Benenden Hospital	Meeting with land-agent site LS41 + 424 Benenden Hospital	25/04/19
Benenden Hospital	Meeting with CEO site LS41 + 424 Benenden Hospital	12/06/19
Memorial Hall	Meeting with Nancy Warne, Borough Councillor and representatives of 'The Friends of East End'	11/10/19
Stables, Benenden	Site 158 (part) Paddock – Meeting with owners and architect	18/11/19
High Weald AONB	Management Unit meeting to discuss their site assessments	04/02/20

6.11 Information Published via the Parish Magazine

6.11.1 Benenden Parish Magazine is a full colour monthly publication. It usually has some 36 pages full of reports and articles of interest to residents of the parish. The magazine is delivered free of charge to every household, further copies are on sale at the Community Shop. Editions of the magazine for 2018, 2019 and 2020 are available online at www.benendenparishcouncil.org/magazine.

Parish Magazine		
Author	Subject	Date
Paul Tolhurst	Neighbourhood Plan	Jan 2018
Paul Tolhurst	Village vision in sharper focus	Feb 2018
Paul Tolhurst	Working Groups get off the mark	Mar 2018
Tom Dawlings	Making the community's voice heard	April 2018
Paul Tolhurst	Two steps forward, one step back	May 2018
Kent Barker	East End housing rumours addressed	June 2018
Paul Tolhurst	Challenging times - Benenden's Neighbourhood Plan	June 2018
Paul Tolhurst	It takes a Neighbourhood Plan Team	July 2018
Steve Simmonds	Growing local business for local people	Aug 2018
Graham Beveridge	Design & the Built Environment	Sept 2018
Tom Dawlings	Housing target falls into line	Sept 2018
Paul Tolhurst	Getting back in the swing	Oct 2018
Paul Tolhurst	Shaping our policies – Residents offer their views	Nov 2018
Kent Barker	Outside the Ticky Tacky Box – discussion	Dec 2018
Minnie Garnier	Drafting the Neighbourhood Plan	Jan 2019
Paul Tolhurst	Site Allocation Criteria	Jan 2019
Residents	No to large housing developments	Jan 2019
Paul Tolhurst	Nearly there ... The end of the beginning	Feb 2019
Residents	NDP cannot ignore planning policy & other concerns	Feb 2019
Paul Tolhurst	Planning the public launch	Mar 2019
Paul Tolhurst	The Plan goes public – Launch of Rough Draft	April 2019
Paul Tolhurst	Rough Draft Consultation Closed	June 2019

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Residents	Concerns raised about unfair allocations & NDP reply	July 2019
Paul Tolhurst	Regulation 14 Consultation	Aug 2019
Paul Tolhurst	Regulation 14 Consultation Extended	Oct 2019
Paul Tolhurst	Feedback from Regulation 14 Consultation	Jan 2020
Hazel Strouts	Shocked that legal document has been ignored	Feb 2020
Paul Tolhurst	The work goes on	Mar 2020
Paul Tolhurst	Regulation 14 review completed	April 2020



6.12 Direct Communications with Subscribers

6.12.1 During creation of the Benenden Parish Plan 2015 a database of subscribers was created to make sure surveys and information on the parish plan could be quickly communicated. The Neighbourhood Plan was one action arising from the village plan and so subscribers were asked to confirm they would like to remain part of the NDP database. Over 500 individuals (567 on 02 January 2020) remain on the database and received updates from the NDP Team.

e-mail Communication to our 500+ Subscriber Database		
Subject	Date	Opened
Housing & Community Workshop - outputs	30/11/17	55.5%
Traffic, Infrastructure and Business Workshop - invitation	02/12/17	42.7%
Traffic, Infrastructure and Business Workshop - Outputs	06/01/18	54.9%
Landscape & Green Environment Workshop - invitation	10/01/18	48.7%
Neighbourhood Plan Exhibition	20/03/18	52.3%
Data Protection Regulations – request for compliance	01/05/18	46.2%
Website Launch Announcement	03/06/18	44.2%
NDP Exhibition - invitation	20/09/18	52.0%
Rough Draft Launch – invitation – plan available on website	28/01/19	51.4%
Regulation 14 Launch – invitation – plan available on website	25/08/19	55.7%
Extension to Regulation 14 Consultation	19/09/19	47.4%
Regulation 14 Consultation Closed – plan available on website	01/11/19	45.4%
Drop in for 1-2-1 Questions and Answers - invitation	16/11/19	50.3%

6.13 NDP Website

6.13.1 Communications via the parish magazine, e-mail and at workshops have always directed those interested to look at the Benenden NDP Website, where they can see how the NDP has been created, the Plan itself with all Supporting Documents, parish magazine articles and many photographs showing the beautiful landscape setting of the parish.

6.13.2 The website was created early in the planning process and has been maintained throughout the three-year planning journey. It can be viewed at:

www.benendenneighbourhoodplan.org/

6.14 Regulation 15 Neighbourhood Plan

6.14.1 The Regulation 15 Neighbourhood Plan will include significant detail describing its development. This will include information on changes to the plan arising from extensive consultations, the basic site assessments undertaken by the NDP as well as conformation that these site assessments align with those undertaken by TWBC and High Weald AONB Management Unit. The plan takes into account issues raised by statutory bodies such as TWBC, KCC, Environment Agency as well as the Strategic Environmental Assessment and reasoned comments from landowners, business, and residents.

APPENDIX A

Appendix A to the Regulation 15 Consultation Statement
Benenden Neighbourhood Plan
Following Exhibition 2 - Feedback 29 September 2018

The Benenden Neighbourhood Planning process has included a significant communications exercise to ensure all stakeholders have access to information and the opportunity to provide input. The following major communication vehicles have been used:

- Initial Parish Meeting seeking volunteers – 25th May 2017
- Workshop 1 - Visioning and Planning Process – 28th October 2017
- Workshop 2 - Housing Supply and Design – 11th November 2017
- Workshop 3 – Business and Local Infrastructure – 9th December 2017
- Workshop 4 - Landscape and Green Environment – 8th January 2018
- Benenden Primary School Project ‘Benenden in 2033’ – 17 to 30 January 2018
- Exhibition 1 – Benenden 7th April 2018
- Exhibition 2 – Iden Green 29th September 2018
- 3 x separate meetings with residents near to Site 158 at their request.
- Monthly Articles in the Benenden Parish Magazine.

Input received includes comments and questions set out in this document where we have tabulated our response to the issues raised. We have also received a ‘Residents SHELAA’ from those living adjacent to site 158 arguing that any development ought not take place on that site.

General Points including Process	
Issue	NDP Comment
Very impressive and clear display. A lot of hard work obviously	<i>Thanks</i>
Well done everyone involved and thank you all for your good work	<i>Thanks</i>

Transport and Infrastructure	
Issue	NDP Comment
Yes to 30mph speed limit as far as Scribbins 7 Burnt House or beyond to cover sharp left bend	<i>Speed limits fall outside the scope of policies within the NDP. We can only propose Projects for the PC to work on alongside Kent County Council.</i>
20mph limit through the village & traffic calming measures at the crossroads would be excellent	<i>Speed limits fall outside the scope of policies within the NDP. We can only propose Projects for the PC to work on alongside Kent County Council.</i>
Very much agree with all proposals especially the crossroads & mobile phone masts	<i>Proposals are that we should use contributions from developers to introduce traffic calming measures at Iden Green and Benenden Crossroads to encourage drivers to slow/stop. Increased traffic volume is inevitable and this will help mitigate increased accident risks.</i>

<p>Proposed Policy 4, which refers to speed restrictions on Walkhurst Road, concerns me very greatly indeed. You may or may not know that, as a result of vandalism in 2016, a 30mph sign was pulled down and subsequently re-erected opposite No 8, Walkhurst Cottages. After many months and representations to the Parish Council (of which I, fortunately, am a member) as well as to Kent Highways and T.W.B.C. it was returned to its rightful place, just beyond the entrance to Rothermere Close. This brings me to my point: I would oppose very strongly indeed, any proposal that could result in the de-restriction signs currently at the top of the lane, being shifted down to the Old Dairy.</p> <p>When I arrived in Benenden, some thirty years ago, our address was "Walkhurst Lane": the sign at each end of the lane read "Walkhurst Lane".</p> <p>The lane has the status of being a "Designated Rural Lane" in an AONB and is shown as such on a number of extant maps and is accepted as such by T.W.B.C. On this basis, I and other residents have able to campaign for (and have finally had reinstated), the width restriction signs at both ends of the lane; they had disappeared at least 10 years ago! All concerned have been delighted to see these in place once more and count them responsible for reducing the amount of heavy goods traffic on the lane. Our next goal is to have the name, "Walkhurst Lane" reinstated, as well.</p> <p>To make the entire top half of the lane a 30mph area would instantly extend the environs of the village by approximately one third of a mile and would possibly result in the "village envelope" (which at the moment provides a safeguard against unsuitable planning applications), being extended down the lane. A 30mph area would certainly assist developers should large housing developments be proposed and may even result in footpaths and street lighting being considered.</p> <p>I cannot, under any circumstances allow such a statement as set out in "Proposed Policy 4" to pass without requesting there be full discussions involving the Transport and Infrastructure group itself followed, if no consensus can be agreed.</p>	<p><i>Clearly this is a comment from an existing Transport & Infrastructure Working Group member who disagrees with the wording of the current policy. We will discuss the issue further and attempt to gain consensus within the group if at all possible.</i></p> <p><i>Key points:</i></p> <ul style="list-style-type: none"> <i>• The 'village envelope' (Limit to Built Development) provides little protection if TWBC has less than a 5-year housing supply... The NPPF and TWBC policy is to provide sustainable development which is interpreted as close to existing amenities or centres of population. At present there is a bias towards development at the edge of existing settlements.</i> <i>• Speed limits are outside the scope of Neighbourhood Plan policies. So we ought to withdraw/reword this policy in any event as any changes to speed limits must be 'Projects' rather than policies.</i>
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Housing Design	
Issue	NDP Comment
Suggest wild life/bird boxes incorporated into house design	<i>Good thought and will be incorporated where sensible to do so.</i>
Whilst supporting the 'dark skies' policy in principle, lighting must be provided in the vicinity of the new school.	<i>Not an NDP issue. The new school has full consent and all infrastructure decisions have been made.</i>

Business & Local Economy	
Issue	NDP Comment

Housing Supply	
Issue	NDP Comment
Site 158 – I feel the problem we have is that the total site remains 5.8 hectares. If the Parish or local residents can firstly buy or eliminate the upper level to protect existing homes, then development at the New Pond Road and including low cost housing can be approved.	<i>The question of creating a buffer between new development and existing houses has been the subject of significant discussion with TWBC. David Scully, Landscape and Environment Officer of TWBC has proposed a significant buffer as a condition of planning consent and this will be included in our Site Specific Policy for Site 158.</i>
Why are the Steering Group basically just looking at the sites suggested by TWBC? Surely we should be proposing the sites the village wants (i.e. small) rather than be led by TWBC.	<i>This question was taken as the subject of the SG Chairman's piece for the November Parish Magazine. Full text of the reply attached.</i>
Any development must protect existing dwellings and take into account the amenity of the local people.	The Steering Committee were not clear on the reasoning behind this comment. Existing dwellings will be protected. That is; they will not be damaged or demolished without consent nor purchased by any compulsory order. New developments will have to provide adequate off street parking and meet all building regulations. However if we interpret the comment a request that any view from an existing property must be protected, and no building should take place on green fields next to existing dwellings the SC considered this to be an impossible promise to keep.
Actually 21 flats in Standen Street. New Development	<i>Not aware of any proposal to develop 21 flats in Standen Street. Maybe this concerns the Pre-application and subsequent full application for 9 dwellings in the orchard at Iden Green. This is</i>

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	<i>not part of the NDP development plan and will not gain NDP support.</i>
Currently too much focus on central Benenden. Need to incorporate Iden Green into the plan, whether housing goes up in Iden Green or central village locations there will be increased pressure on the crossroads.	<i>Few suitable sites have been offered in Iden Green. All sites are being assessed. We are conscious of increased pressure on the crossroads and this is one reason why we are considering sites clear of the Iden Green crossroads to reduce danger of accidents. The NDP and Parish Council are supporting the development of three properties in Parkfield Crescent, Iden Green and will consider other sites if offered and if mitigation for increased traffic using the crossroads can be established. Developments of 12 or more units offer the prospect of developer contributions to improve infrastructure such as the traffic calming on approaches to the crossroads.</i>
<p>We write to thank you for expressing the views of many in last month's parish magazine when you wrote that 'we should stand up and say NO – we don't want large developer led estates in Benenden.' The village has expressed the view that it does not want large scale development and this should be respected in the final NDP. By approving larger estate style houses in the centre of our village we are changing the landscape forever. Fields and orchards cannot be recovered. Brownfield sites should always be preferable, even if they are further away from the centre of the village they are sustainable if close to existing settlements. We are not NIMBYs – but custodians of our backyards who must look out for future generations. There must be a way of fulfilling our quota of houses bestowed by TWBC by looking again at a series of smaller developments. We are not simply driven by self-interest, we want to secure a better future for the whole village.</p> <p>Yours</p> <p>Mr and Mrs A Betts, Mr and Mrs S Collier, Mr and Mr R Mills, Mr and Mrs C Parkinson, Mr and Mrs D Catlin, Mr and Mrs C Dunkley, Mr and Mrs S Raw</p>	<p><i>This is a letter to the editor of the Benenden Parish Magazine prompted by the DEBATE PIECE between Kent Barker and Paul Tolhurst in the November 2018 edition. The DEBATE PIECE is replicated as a separate annex to this document for information.</i></p> <p><i>The writer and other signatories have homes which immediately abut Site 158 'Greenacres'. If the site is developed a former apple orchard, now grazing land and an existing pear orchard totalling 5.8 hectares would be given over to a housing estate. This site was one of two considered for building a new local primary school in 2010. If it were developed TWBC had proposed 174 houses could be built. After a significant level of discussion between NDP and TWBC this was reduced to 'around 50' units.</i></p> <p><i>The NDP is using both the sustainability of developments close to existing settlements AND Previously Developed Land as two of their 5 Key criteria. So although the NDP is not prepared to accept all developments should be less than 5 units per site, it should be able to demonstrate that it has considered 'Brownfield Sites' as requested.</i></p>

Landscape & Green Environment	
Issue	NDP Comment
Develop green space at pond end of Site 222 and create new village amenity. Avoid possibility of large ribbon estates. Do not back Site 158.	<i>The developer who has acquired an option build on Site 222 has already proposed green space around the existing pond as a new village amenity. It is possible the idea has been shared with this resident who approves of the developers plan.</i>
<p>We attended the exhibition on the 29th September which we found very helpful. Clearly a lot of work has been done and we are grateful for the time and effort you have all put in.</p> <p><u>Infrastructure Improvements</u></p> <p>We note the intention to have a 20 mph speed limit by the new school and in the centre of the village but would like to see this extended to the whole village, commencing at each of the Benenden signs. We would also like effective physical traffic calming measures, for instance speed bumps, to be installed where appropriate, in addition to flashing speed signs, etc.</p> <p>The stretch of Cranbrook Road from Benenden School entrance to the crossroads is particularly straight and often used as a race track. We walk into the village this way at least twice a day and it is alarming that so few obey the speed limits, including an increasing number of tractors and lorries; it can only be a matter of time before there is a serious accident. The pavement running alongside this road is used by local residents, some with children, walkers and large numbers of Benenden School pupils during term time and visiting students in school holidays; the road is also used by a growing number of cyclists.</p> <p>The speed warning sign on this stretch was removed some time ago and, after a long and frustrating investigation, we discovered it had been taken to a KCC Highways depot for fault repair at the beginning of 2017, but because of the age of the sign (installed in 2010) it could not be repaired as many parts are apparently now obsolete!</p> <p>The last update we had, in March 2018, was that KCC would not replace the equipment unless there was a crash or speed related incident and</p>	<p>Extension of 20mph zones for entire village of Benenden, Iden Green and East End now feature in our draft plan. The NDP cannot introduce policy on Highways matters.</p> <p>We have proposed a project on traffic calming and speed restrictions to be managed jointly between Parish Council and Kent County Council.</p>

<p>an alternative funding source was found and, in the meantime, it was up to the Parish Council to fund any replacement. At that time we were told that the Parish Council was discussing the issue with Sean Holden and that it would stay on their agenda, although this may have been superseded by Neighbourhood Plan discussions. The post and solar panel have been left in place to minimise future installation costs.</p> <p><u>Housing Supply</u></p> <p>We were delighted that you have successfully negotiated a reduction to 101 new homes and applaud the effort and determination that this must have taken. This outcome indicates that TWBC recognises the particular sensitivity to new developments in and around Benenden and is, of course, a move in the right direction given our relative remoteness in the borough and rural setting.</p> <p>We would have preferred to see a number of small new developments, but understand why this is probably not the best solution. Reluctantly, therefore, we think it makes sense to tie in with the TWBC preference for 3 large developments, particularly if it means we will gain their support in protecting rural sites and fighting off speculative applications to appeal level. However, the sites chosen should have minimal impact both visually and on the natural landscape. They should also not be in positions that would significantly change the character of the village, or increase light and noise pollution which we, as a small village without even street lighting, currently enjoy.</p> <p>It would certainly make sense to use the existing brownfield site at Benenden Hospital and we suggest that a higher proportion of the allocation should be there. The remainder could then be split between 2 smaller sites – possibly Walkhurst Road and Greenacres.</p> <p>We strongly oppose the proposed development on Green Meadow, off Iden Green Road. This is a particularly prominent position within the village and AONB, not near to existing settlements and too close to the already dangerous crossroads. It is also an important rural site, rich in outstanding</p>	<p>The preference for small and discreet sites for development is understood by the NDP. But as mentioned we believe that 15 – 20 sites of up to 6 dwellings would not be acceptable for the following reasons:</p> <ol style="list-style-type: none"> 1. Small developments increase the unit cost to build and this will mitigate against our aim to provide a mix of housing types including affordable housing and starter homes. 2. Many small developments result in more green fields being converted to brownfield. There is a significant risk that a small development in the corner of the field will lead to further creep over a number of years as developers' plans to extend existing sites where no clear boundary exists are attractive to local authorities. 3. The largest sites that we have identified are Previously Developed and outside the AONB so will not affect the character of the existing settlements – except in a positive manner where existing redundant corporate buildings give way to homes and hopefully a community. <p>Noted – Benenden Hospital sites do feature in our plan.</p>
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<p>Wealden landscape views, majestic ancient trees and a huge number and variety of birds and wildlife; precisely the type of countryside we should all be striving to protect. Its value is further demonstrated by the routing of the High Weald Landscape Trail along the west side of the land and a designated conservation area to the east, by the crossroads; these would both be adversely affected by any development here. In addition, this could clearly lead to the possibility of further sprawling development on the remainder of this precious rural site and beyond; something that TWBC and, we believe, the majority in Benenden want to guard against.</p> <p>John & Sue Barker Millers Meadow Cranbrook Road Benenden TN17 4ES</p>	
<p>Interim Response to NDP consultation.</p> <p>Kent Barker</p> <p>1. The NDP as a successor to the Parish Plan</p> <p>1.1 The Neighbourhood Development Plan (NDP) arose from the Parish Plan (PP) published in 2015. The Parish Plan conducted a detailed survey of attitudes in the village and it was to be hoped that the NDP would take full cognisance of them. Unfortunately this does not appear to have happened.</p> <p>1.2 The stated NDP strategy of proposing a number of sites for 40 or more dwellings runs contrary to the survey results for the Parish Plan. This showed that 49.2% wanted small groups of houses - fewer than 5. Only 8% favoured groups of more than 5 houses.</p> <p>1.3. The PP survey showed that 60% of residents thought affordable houses were a priority against 15.5% who wanted luxury houses. It is highly unlikely that developer-led estates would fulfill this wish. Under section 106 agreements developers can avoid building affordable housing in the village by offering a cash payment to TWBC or simply claim that the 'viability' threshold is not achievable.</p>	

<p>1.4. The Parish Plan identified the need for affordable and rental housing as well as houses ‘both large and small’ including some bungalows to ‘accommodate families young and old’. It would seem highly unlikely that developer-led estates would fulfill those wishes.</p> <p>1.5 The Parish Plan raised the prospect that these aspirations could be best achieved by ‘smaller more local builder/s architects’. The Environment section of the Plan specifically recommended consideration of ‘smaller, more friendly [housing] schemes, maybe using local architects and builders rather than the larger housing corporations who are aiming for maximum profits for themselves.</p> <p>1.6 The PP says the Parish Council should ‘engage with the relevant social housing providers to ensure a good mix of new homes both in terms of type, size, and also tenure – renting, equity share and provision for key workers such as teachers police etc’. Has the NDP had any discussions with Housing Associations or other social housing providers? Has the NDP considered key workers or differing tenures? The suggestion of developer-led sites would suggest not.</p> <p>2. LBD, Sustainability and Exceptional Sites</p> <p>2.1 The Borough’s definition of Limits of Built Development (LBD) and Sustainability seems to be drawn extremely narrowly. While the aspiration ‘to prevent the unrestricted sprawl of towns, villages and hamlets into the surrounding countryside’ is laudable there is simply not enough land within the LBDs of Benenden and Iden Green to accommodate the Borough’s housing requirements. Yet the planning authority deems sites unsustainable if too far outside the LBD, without access to shopping facilities or public transport.</p> <p>2.2 There is clearly a set of dual standards operating here. It is acceptable for the Local Authority to designate a site as ‘exceptional’ if it is for social or affordable housing (viz Vyvyan Cottages at Iden Green and the Hospital site at East End). Yet by definition those people likely to require such accommodation are least likely to be able to afford private transport. The reality, however, is that people choosing to live in rural locations almost invariably do have access to private transport and online shopping has greatly</p>	
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<p>altered the need for immediate proximity to shopping facilities.</p> <p>2.3 There is also a chicken and egg argument here. If there were more houses in Iden Green or East End there would be greater likelihood of shopping facilities and provision of public transport.</p> <p>2.3 While encouraging infill development within the LBD, the NDP clearly has to recommend other sites outside it. But it does not have to be on the immediate periphery. Indeed simply extending the LBD or 'tacking on' housing estates on the outskirts of the village just achieves what the Borough says it doesn't want ie a 'sprawl of town and villages". Just look at Sissinghurst and Hawkhurst.</p> <p>3. Development within the AONB</p> <p>3.1 Given that the whole of the Parish of Benenden is within the High Weald AONB boundary, any development whether within the LBDs or outside will necessarily have some impact. It's been argued that spreading development out around the Parish in small clusters would be more detrimental than concentrating development to three or four large estates. This view is extremely controversial and can readily be challenged.</p> <p>3.2 Given a potential of 3 cars per household, an estate of 40 houses could create 120 new vehicle movements in a small concentrated area. Central Benenden – the crossroads and Walkhurst road in particular – area already subject to congestion. However if you added three or four dwellings to various outlying population clusters the impact would be diffused and marginal.</p> <p>3.3 It is clear that three or four estates of 40 or more houses would have a far greater visual impact on the village and on the AONB than small clusters. Architectural styles in the local vernacular would be far easier to achieve with small scale developments.</p> <p>3.4 Housing estates are far more likely to add to light pollution than diffuse clusters.</p> <p>4. Deliverability and Availability of sites</p> <p>4.1 It is understandable that TWBC should want some assurance that anything proposed by the NDP could actually be achieved within the required timescale. It is accepted that handing land over to developers might provide firmer</p>	
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<p>guarantees of the houses being built. However the timescale is fairly relaxed, requiring an average build of only 10–15 houses a year. Housing Associations, which would provide the type of accommodation most urgently needed, would be able to guarantee deliverability.</p> <p>4.2 Currently 19 sites have been identified in TWBC's call for sites, and it is understood that others have been suggested but were not able to be assessed by the NDP.</p> <p>4.3 It would seem likely that other suitable sites could be readily identified if the Parish Council or the NDP were proactively to seek them. Have the owners of Apple Pie Farm and Turks Yard, for instance, been approached? Have any discussions been held with the Cysters partnership or other farmers or land owners about the possibility of freeing up <u>small</u> parcels of land – possibly brownfield – for small cluster development, possibly by housing associations?</p> <p>4.4 If the NDP started from the principles identified within the Parish Plan it would surely be possible to find sufficient suitable cluster sites and work out a timetable for deliverability.</p> <p>5. Historic development patterns in the Parish</p> <p>5.1 Consideration should have been given to the historic development of settlements within the Parish. First were the 'Dens' - original clearings in the forest where groups of buildings arose over time. This gave rise to the clusters of settlements in Dingleden, Eaglesden, Standen, Goddards Green etc. Secondly, unlike other rural Kentish villages, the Parish of Benenden has three population centres as well as the Den clusters. East End and Iden Green grew up because of short-term population movements to avoid disease and subsequently became permanent settlements. These three centres mean that there is scope for adding clusters to them as well as to the Dens. Thirdly, changing farming requirements have meant a number of barns and outbuildings have become redundant. These could be considered brownfield sites and would be ideal for cluster development. The attitude and advice of TWBC planners have dissuaded many landowners from even proposing small-scale development on these sites.</p> <p>6. Future development – planning constraints</p>	
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5.1 It has been argued by members of the NDP that recommending or allowing small-scale development on a site originally identified or offered for a larger estate would 'open up the whole site for future development'. This is wholly fallacious. Normal planning considerations would continue to prevail and there would be absolutely nothing to suggest that TWBC planners would be any more or less likely to allow a large-scale development if a small cluster had already been permitted. Indeed if the NDP specifically came out against large-estates in favour of clusters, then TWBC would be duty and legally bound to give that full consideration.

7. Conclusion

7.1 An innovative NDP plan could use the historic settlement model to persuade TWBC that there is a viable alternative to medium-sized estates.

7.2 The NDP should recognise that the type of housing most needed and wanted in the Parish is LEAST likely to be delivered by large developers and most likely to be provided by Housing Associations and local design/build practitioners.

7.3 It is accepted that some market housing will be necessary to pay for the affordable, social, mixt tenure, small unit and accessible housing that the village requires. However the NDP could and should start from the premise of establishing a plan to deliver low impact largely social housing rather than developer-led market housing.

7.4 The model proposed by the Benenden Arms House Charity would seem an excellent one and if replicated might provide a preponderance of social rather than market housing.

7.4 Cluster developments based on the pattern of Den settlements would have far less impact on the environment and on the appearance and amenity of the Parish.

7.5 The NDP should respect the aspirations of parish residents as expressed in the Parish Plan and formulate the NDP plan to reflect them.

7.6 The NDP, the Parish Council and Benenden's borough councillors should campaign strenuously to persuade TWBC that this approach is both deliverable and desirable and is, above all, the will of the local people. They should remind them that NDPs arose from Localism legislation which was designed to ensure that local people had a far stronger say over the future development of *their* neighbourhoods.

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<p>Heather Cottage Bishopsden</p> <p>Dear Mr. Tolhurst,</p> <p>I have received a letter from Mr. C. Inwood pointing out various viewpoints regarding proposed future development in Benenden. I can understand the residents of Benenden being opposed to development on their doorstep, but understand this is by way of using an overgrown orchard. Surely the extension of an existing village is far more practical than allowing small pockets of development scattered around the surrounding area?</p> <p>The latter could possibly open the flood gates to anyone with a small piece of land to development.</p> <p>A good example of this is Woolpack corner, where a small property has been extensively extended, with a further two properties built on what was previously the rear garden of same.</p> <p>As there has already been substantial development within the grounds of Benenden hospital, I personally feel that any future development would be better placed within the boundary of Benenden Village.</p> <p>Yours Sincerely,</p> <p>R F Raven.</p>	
<p>Dear Councillor Thomas,</p> <p>I refer to the Benenden Magazine December issue and the article on site allocation criteria.</p> <p>There may be some additional ones that you may or may not have considered. These relate to the following NPPF paragraphs:</p>	<p>Dear Mr. Conway,</p> <p>Thank you for your further communication. We are hoping that our Neighbourhood Plan will provide some additional local protection. But as you are aware, both the Localism Act 2017 and the NPPF expect NDPs to conform to</p>

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<p>§158 refers to flood risk and encourages new housing development to be directed away from such areas; and §170(e) covers other issues such as land instability and existing sources of pollution, which may make a site unsuitable for new housing development.</p> <p>The criteria set out in the article relate only to housing development, but for criteria (6), which protects existing business premises from redevelopment into housing.</p> <p>It may be that the Parish Council has determined to focus the NDP on housing only and leave applications for non-housing development to be determined on an ad hoc basis under national and local planning policy and guidelines by TWBC. If so, this approach would seem logical, appropriate and in line with that taken on many other NDP's.</p> <p>However, to the extent that this is not the case, it would be helpful to understand what criteria will be applied to different categories of non-housing development.</p> <p>Kind regards,</p> <p>Gerard Conway Mobile : 07899 925476</p>	<p>National and Local Authority policies. So we have limited freedoms and spend a great deal of our time and effort persuading and encouraging Planning Officers. To answer your specific points:</p> <ol style="list-style-type: none"> 1. We do consider flood risk as part of our overall site assessments although thankfully flood risk is not a major concern in the parish and so it is not one of our key criteria for assessment - almost all sites we have been assessing are well away the areas of highest of predicted flood risk from rivers and other sources. However, we will double check with both TWBC and the Environment Agency before we allocate any site. 2. We are not specifically allocating additional sites for future light industrial or business use. Our focus is on maintaining the availability of existing business sites in the parish, such as those at Apple Pie Farm and Turks Yard, and promoting the concept of purpose designed home-working or live to work units based on the re-use of existing agricultural buildings. <p>I hope this helps your understanding.</p> <p>Regards</p> <p>Paul Tolhurst</p>
<p>Mayfield Benenden 4 January 2019 Paul Tolhurst Chairman NDP Steering Group</p> <p>Dear Paul</p> <p>Further to your request for comments regarding the Neighbourhood Development Plan, I am writing to express my concern, and at the same time to make a request for</p>	<p>Mayfield Benenden 11 January 2019</p> <p>Dear Chris,</p> <p>Thank you for your letter dated 4th January concerning allocation of building plots as part of the neighbourhood plan. I am afraid the guidelines are a little complex and are changing following publication by government of a new</p>

clarification on a very important point that has not been mentioned before.

At the NDP Meeting at Iden Green, I was talking to a member of your committee and in the course of our conversation I was told that if less than 11 houses were built on a plot of land, those 11 houses were not considered as part of the 100 target we have been allocated! If this is the case, and as Kent Barker mentioned in his 'debate' that he had offered land for three or four houses, and then you add several other small developments of up to 10 houses, you end up with Benenden having built 130 to 140 houses! See November Magazine page 23 "Of the five smaller sites only two are deemed suitable for development (and these offer space for just eight dwellings in total)."

Kent Barker is quite right in saying that the village wants small developments not 'estate-type' plots, but if this ruling does apply then that changes the whole discussion. I feel that if 100 houses are built it should not matter how that number is achieved. It would appear that we have not been given all the information, particularly regarding this point. If this ruling is part of the National Policy, why has this point not been publicised before. I have certainly not seen any mention of this in any articles published in our Magazine.

The thinking behind such a rule, if it is true, is hard to understand unless it is a way of conning communities such as ours into building more houses than we sign up for!

I should appreciate your clarification on this matter. Yours sincerely

Christopher Rhys-Jones

cc. The Benenden Magazine

National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG) in September 2018. I will try to steer you through this!

The new NPPF (a weighty document) was published Sept 2018, and one of the many changes to the previous Framework is material to your question. Windfall sites are typically smaller sites made available / offered for building after the local development plan (in our case our neighbourhood plan) has been established. We had worked on an assumption, based on the previous NPPF guidance, that sites under 11 dwellings would be counted as 'Windfall', and therefore additional to our planning target. This is the probable source of the guidance you were given at the exhibition.

However under the new NPPF they now can be incorporated into our plan numbers, provided the windfall assumption is credible. Our current thinking is that up to 20% of our overall target could be planned in as windfall, and at this stage we are working to agree this percentage with TWBC. We believe 20% is the maximum we could take as 'windfall'. This enables us to meet in part the village's stated aspiration for 'scattered development'.

That still leaves the village with a task in the region of 80 / 90 houses. At this point we need to balance a number of factors; other village priorities, our responsibilities under national planning rules and the AONB, and the likely commercial behaviours of developers.

In the Parish Plan, and in the workshops we undertook as part of the neighbourhood plan the village expressed a preference for building on previously

	<p>developed land (often known as brownfield sites). This helps us protect the environment, and the AONB, and as a result plots offered under the Call for Sites which are previously developed, and / or outside the AONB score well on our site assessment criteria.</p> <p>The village also asked for affordable housing (60% of those responding to the Parish Plan survey). The new NPPF does allow for the allocation of small plots for housing. However, the cost to provide services such as electricity, gas, sewerage etc. to a small plot of land tends to be higher per dwelling. These and other economies of scale mean that small plots tend to attract higher cost executive housing. As a result, Local Authorities have not required developers to provide Affordable Housing for sites of less than 10 dwellings. TWBC are reviewing this policy at present but at the moment if a plot has fewer than 10 units no affordable housing is required. So in order to secure sufficient affordable housing we will need to allocate some larger plots.</p> <p>We intend to publish our considered proposals for future development in Benenden towards the end of February. There will then be a period of four or five months of consultation where all stakeholders can review our entire plan, including our thoughts on how we would spend any developer infrastructure contributions. Following an independent Examination of the plan, the village will vote in a referendum. If the plan is accepted it will form part of the Borough Council's Development Plan and have equal weight in law to the TWBC Local Plan. If the plan is rejected at referendum, then the TWBC Local Plan will take precedence.</p> <p>I hope this helps alleviate your concerns.</p>
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<p>Dear Mr. Tolhurst,</p> <p>Thank you for your letter and further clarification.</p> <p>Regarding (b), you already have my letter dated 2 November 2018 (reattached). As set out in its section (3), I am concerned that live / work schemes may not lead to a successful contribution to the NDP.</p> <p>Furthermore, the inclusion of live / work schemes in the NDP could encourage abuse of the planning system. As you are likely to be aware, new agricultural buildings can be constructed under permitted development rights set out in the General Permitted Development Order (GPDO). The ability to construct such buildings and then change their use, with a consequent uplift in value could lead to an abuse of the GPDO and the NDP, taken together. A proliferation of such development could lead to planning harm. This would be contrary to many of the criteria that the Parish Council has established in relation to housing in the NDP, including landscape impact.</p> <p>Furthermore, unless the 'work' component of such live / work schemes is properly defined, it could lead to the insertion of intensive uses (e.g. B2 (general industrial) or sui generis) in inappropriate locations, where pollution (such as noise, vibration, light or other emissions) could arise with consequent unacceptable environmental impacts. This could be contrary to §180 of the NPPF.</p> <p>Highways issues are a further consideration. For example were the 'work' component to constitute a retail (A1), distribution (B8), or institutional (D1) activity, significant additional volumes of traffic could result. These would be in addition to the traffic resulting from the residential use component of the building. This could be contrary to §108 of the NPPF.</p> <p>The above adverse environmental impacts could (and should, to the extent that the Parish Council is still intent on promoting the work/live concept) be addressed by restricting the 'work' component to B1 use. However, as previously set</p>	<p>Dear Mr. Conway,</p> <p>Thank you once again for your comments.</p> <p>TWBC share your concerns regarding the potential abuse of live/work schemes as a way of bypassing planning regulations. The NDP and TWBC have discussed options for both enabling and limiting this approach to local housing provision.</p> <p>I will ensure both the Parish Council and NDP Steering Committee are briefed on this matter. We should be able to draft policies that limit the ability of landowners to construct agricultural buildings with a view to conversion to live/work units. Any such policy will need scrutiny and approval of TWBC as part of their screening process.</p> <p>I should also add that I will discuss your comments regarding the nature of any 'work' and how we can limit this. Our ambition is to offer artisan trades and crafts an opportunity to create work within the community. You are quite correct to warn that unless tightly drawn we may end up with semi industrial units in locations that are unsuitable.</p> <p>Regards</p> <p>Paul Tolhurst</p>
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<p>out in my letter dated 2 November 2018, that may reduce the universe of occupiers for such properties. That in turn may have an impact on the Parish Council's projections for housing land supply.</p> <p>The Parish Council may also wish to carefully consider the enforcement issues around such 'work/live' schemes. Such issues would be likely to arise, given the very nature of work / live development – it is essentially difficult to control what sort of use actually occurs inside a given premise. In matters of enforcement, it is possible for land owners to claim immunity under certain circumstances (see https://www.gov.uk/guidance/ensuring-effective-enforcement) . In other circumstances, the authority responsible for enforcement (likely to be TWBC/the LPA) may consider that it is not expedient to carry out enforcement action. Planning enforcement is at the discretion of a given LPA, who are having to manage their budgets in an increasingly tight spending environment. The Parish Council may therefore find itself at odds with the LPA.</p> <p>I would be grateful for the Parish Council's further careful consideration of the above issues.</p> <p>Yours sincerely,</p> <p>Gerard Conway Mobile : 07899 925476</p>	
<p>Dear NDP Team,</p> <p>I would just like to respond to the site allocation criteria that were clearly set out for us in the January Parish magazine.</p> <p>I am in complete support of the criteria that have been applied. They seem entirely appropriate for our rural parish and have been well considered to allow for a reasonably objective assessment to made of the various sites under consideration.</p> <p>On a couple of more detailed/minor points;</p> <p>I am slightly confused by reference to sites being in or out of the AONB. My reading of the Tunbridge Wells BC adopted proposals maps is that we are entirely within the AONB. I may of course be misreading the plan or policy.</p>	<p>Dear Mr. Mortimer,</p> <p>Thanks for your e-mail, and your kind words - we are certainly working hard!</p> <p>We will be reviewing all the input that we receive, and concluding our draft plan. Once drafting is complete it will be published to the Parish Council, and made publicly available during a formal consultation process. The consultation is designed to enable all stakeholders (residents, landowners, developers, KCC etc.) to offer their views.</p> <p>We do have a very small part of the parish outside the AONB, it is the curtilage of the</p>

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<p>I agree with your criteria for maintaining local job opportunities. The only exception that I would make is where such land or buildings become redundant with no realistic chance of a fresh business taking over and providing employment again. I think most Borough's are probably better at recognising when this arises now and are probably more willing to re-allocate land which I feel in such circumstances is appropriate.</p> <p>Thank you for your continued hard work.</p> <p>Kind regards.</p> <p>Matt Mortimer</p>	<p>hospital at East End, including around 2 hectares of redundant buildings.</p> <p>I will add your input to that received by the NDP as all contributions will help us shape our proposals.</p> <p>Paul Tolhurst</p>
<p>Dear Paul,</p> <p>Re: - Your article in the Benenden Magazine January 2019. Drafting the NDP, asking for comments.</p> <p>My wife and I own site 66, part of our back garden that has been submitted</p> <p>To TWBC and BPC NDP for inclusion in the new TWBC Local Plan.</p> <p>It goes without saying that all the site owners would like their sites to be included.</p> <p>However the site selection is unfair, because the larger sites have been given a distinct advantage over the smaller sites, in that they will supply some affordable homes, and because of this have been given priority over the smaller sites which do not. These so called affordable homes which are to be built are still beyond the reach of most first time buyers.</p> <p>I would like to offer a few suggestions so that the site selection fair to all and to make the affordable homes more affordable to the first time buyers in Benenden.</p> <ol style="list-style-type: none"> 1. All the sites that approved have to pay the same percentage fee of the value of each house to the Benenden Parish Council. These sums are to be ring fenced and can only be used in building affordable/council houses in Benenden and not cross subsidising any other council costs. 2. Benenden Parish Council would then develop sites at cost only. Should these affordable houses ever be sold on the open market, BPC would receive a proportion of the selling price and 	<p>Dear Mr.Sarton,</p> <p>Thanks for your e-mail, and the input.</p> <p>As you know from discussions with our Housing Supply Group, we are trying to balance many conflicting priorities. Some of our criteria would favour a small site near to the village centre, others favour larger sites.</p> <p>Please be assured we will be reviewing all the input that we receive, and concluding our draft plan. Once drafting is complete it will be published to the Parish Council, and made publicly available during a formal consultation process. The consultation is designed to enable all stakeholders (residents, landowners, developers, KCC etc.) to offer their views.</p> <p>Meanwhile I will add your input to that received by the NDP as all contributions will help us shape our proposals.</p> <p>Paul Tolhurst</p>

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<p>this would be put back into the ring- fenced fund to build more affordable houses</p> <p>3. All the sites submitted would then be judged only on their merits to Benenden and not on how many affordable houses they would supply.</p> <p>4. We also need in Benenden some purpose well build single level dwellings to enable our residents to downsize too, if they wished to, for whatever reason, ability, older age, etc. They would then sell their houses, meaning that fewer large houses would need to be built in Benenden. This might enable them if they wished to release some of the equity locked in their homes to give to their children or grandchildren enabling them to buy their own homes and reduce the demand for more affordable housing in Benenden.</p> <p>Yours sincerely,</p> <p>Edward Sarton.</p>	
<p>Dear Paul Tolhurst,</p> <p>I wish to add my comments to what are probably many regarding the proposed Benenden Neighbourhood Plan.</p> <p>Firstly I am totally against this frantic need to build houses at any cost on any land that local councils deem fit to include in their government imposed quota. It would seem regardless of where they are situated no proper thought is considered as to the long term consequences of loosing our valuable countryside and local communities.</p> <p>We can argue about this till the cows come home but there will soon be no fields for them to graze if Tunbridge Wells Council has its way. Their track record on planning is suspect. What sort of council would desecrate a beautiful park in the middle of the town to build a new town hall and a theatre that very few people want.</p> <p>The proposals for Benenden obviously have to be seen to be in keeping with the governments demands but with an ageing population surely a greater need is for retirement homes/flats in areas where an already established community could absorb retired people. The village of Benenden has plenty to offer people in this way and if each home/flat is</p>	<p>Dear Mr. Redfern,</p> <p>Thanks for your e-mail, and the input.</p> <p>We will be reviewing all the input that we receive, and concluding our draft plan. Once drafting is complete it will be published to the Parish Council, and made publicly available during a formal consultation process. The consultation is designed to enable all stakeholders (residents, landowners, developers, KCC etc.) to offer their views.</p> <p>Meanwhile I will add your input to that received by the NDP as all contributions will help us shape our proposals.</p> <p>Regards</p> <p>Paul Tolhurst</p>

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<p>counted towards the total number required it would reduce greatly the need to build even more larger houses everywhere.</p> <p>More opportunity should also be given to first time buyers and people living alone to purchase smaller affordable homes which could be built in a courtyard style or on a suitably landscaped area in keeping with the area so as not to be squeezed into a corner of a large house development which we don't need. A little imagination is needed!</p> <p>The land around Benenden hospital is very tempting to develop also, but I would point out that it only has a very limited bus service and no other community facilities. It is on Goddards Green Road an already dangerous road with the Castletons Oak crossroads to take your life into your hands everytime you may wish to get anywhere!</p> <p>It is also too far from Benenden's new school to allow children to safely walk to and from independently. The mind boggles as to the chaos at the Benenden crossroads every morning as parents attempt to run their children to the new school assuming it will have enough places for this increase in pupils. Anyone wishing to live in this situation will need to run at least one car which would add possibly 100 to 150 vehicles onto our already over-used local roads.</p> <p>If the proposed quota for Benenden is unavoidable it should be to enhance the village and for the new population to merge into the established so that we are as one and not a 'them and us'.</p> <p>Yours sincerely</p> <p>Graham Redfern (Parish resident for 30 years)</p>	
<p>I am concerned, though not surprised, that many Benenden village residents are very keen to encourage as much of the development of the 100 new houses as possible on the brownfield site of the Benenden Chest Hospital. If I lived in the village and my views etc were under threat doubtless I would do the same.</p> <p>However, while I accept that some building will take place there, it should not become a 'new' village almost equidistant between Biddenden and Benenden and belonging to neither. It has no facilities whatsoever and anyone living there will be totally reliant on their car. Unlike Iden Green, there is not even a convenient footpath to the village. Also, unlike Iden Green there is no sense</p>	<p>Dear Ms Prynne,</p> <p>Thanks for your e-mail, and the input.</p> <p>We will be reviewing all the input that we receive, and concluding our draft plan. Once drafting is complete it will be published to the Parish Council, and made publicly available during a formal consultation process. The consultation is designed to enable all stakeholders (residents, landowners, developers, KCC etc.) to offer their views.</p>

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<p>of community. The Hospital provided that before it became so commercial. Apart from the B road, both Green Lane/Stepneyford Lane and Walkhurst Lane will become rat runs which will damage small country lanes with plant rich verges.</p> <p>I notice that the sizeable developments in Rolvenden and Sissinghurst (how many of those are affordable?) are within walking distance of the shops, pubs, sports facilities, churches etc. East End has none of these.</p> <p>The derelict orchard site was originally earmarked for the new school site - I remember that it attracted more local votes than the existing primary school site, but was ignored by TWBC - and is a possibility surely?</p> <p>I think that people might feel less resentful towards houses being built in an area they love and care for if they were to accommodate local families who have a real investment in the village. It's very hard not to resent land being gobbled up, amenities stretched to breaking point and lanes being churned up by impatient drivers to build houses to make money for the developers. Oh and the owners who buy to let. Are there locally based housing associations who help with locally based developments?</p> <p>Please do not forget the importance of an integrated community and do not allow the great majority of the new building to be sited in a suburb without a heart at the Benenden Chest Hospital, over 2 miles outside the village.</p> <p>Yours sincerely, Catriona Prynne</p>	<p>Meanwhile I will add your input to that received by the NDP as all contributions will help us shape our proposals.</p> <p>Regards</p> <p>Paul Tolhurst</p>
<p>We would like to thank everyone involved in the NDP for continuing hard work and to voice our support for it.</p> <p>Best Wishes Charlie and Shelia Hume</p> <p>23 January 2019</p>	

APPENDIX B

Appendix B – Feedback from the Rough draft Consultation

Benenden Neighbourhood Development Plan issued on 23 February 2019

Summary of feedback received from stakeholders

The first rough draft of Benenden's Neighbourhood Development Plan (NDP) was published on 23 February 2019 as an informal consultation document. As such it does not contain all the detailed analysis used to devise the plan but does outline key aspects such as an indication of the housing numbers outlined by TWBC, Benenden's intention to allocate sites within the plan and details of those sites.

The NDP Steering Group have received feedback from around 30 individuals as well as a petition with some 130 signatures. These inputs will be published in full as part of the consultation process. However, the feedback had some very consistent themes and these have been set out in the table below alongside the NDP Group response arising from each point.

1. Landscape and the Environment	
Feedback	NDP consideration
<i>The NDP fails to state the importance of the Local Wildlife Sites at Benenden Hospital and has ignored the Hospital's extremely poor record in implementing the Landscape and Ecology Management Plan.</i>	The plan recognises the LWS in the disused hospital grounds and recommends that these sites should be designated in any future development as Important Local Green Space. An assessment in May 2019 by Kent Wildlife Trust and TWBC states that the Hospital is fulfilling its obligations.
<i>Development at East End will increase the flooding risk in Green Lane.</i>	The Strategic Environmental Assessment of the NDP has identified minor flood risks in the South of the Parish, between Iden Green and Sandhurst. No flood risk has been identified in Green Lane. If evidence can be provided of flooding in Green Lane this will be taken on board and a policy to reduce flooding from run-off from development will be incorporated into the plan.
<i>Views to preserve include view south from Walkhurst Road towards church (Site 158 lies between the viewpoint and the church)</i>	View to be included from top of Walkhurst road through to village and church.
<i>The Plan should contain a strong locally distinctive countryside/landscape policy which is appropriate and relevant to the Parish</i>	This to be addressed through the Landscape Character Assessment undertaken by AECOM.

<i>The setting of the conservation areas of Benenden and Iden Green is recorded in Conservation Area documents. The wording of the conservation area documents should be used in the NDP as each will support the other. This setting includes views from the conservation areas to open countryside that should be protected.</i>	Conservation Areas have been looked at through the Character Assessment, but this can also be considered by AECOM who will be reviewing the Character Assessment and undertaking a Landscape Character Assessment to support the next draft of the Plan.
<i>The four Panoramic Views cited in the Benenden and Iden Green Conservation Area Appraisal (page 44) should be included as four of the NDP views to add consistency and add weight to the Appraisal.</i>	Will be included.
<i>The importance of Local Green Spaces is undisputed. The NDP can designate LGS and this should include existing public amenities such as Benenden village green, Iden Green recreation ground and other public spaces. Do not rely upon the Local Authority Plan. Any private open spaces (e.g. New Pond Corner) should not be designated as a LGS. Rather they should be protected by strong countryside; conservation and heritage views policies.</i>	This approach for the example given at New Pond Corner as the public doesn't currently have access to this is accepted. However, as a principle, privately owned open spaces could be designated.
<i>Benenden Parish lies almost entirely within the AONB. In which case why prioritise certain views which give weight to development away from these views. Why include this directional policy?</i>	The views that are being designated need a rationale and should avoid 'private views'. However, there are key views that need protecting. We will rationalise the views listed to date so that they are demonstrably special.
<i>There are 27 views listed as worth protection of which 16 are contained in an area of 6.9km² to the South of Benenden village. The remaining 10 being scattered across the Parish. It is not clear what process was used to assess the views or to accept/reject suggestions.</i>	We are working on rationalising the views so that they show as fewer views, with a number of viewpoints. The views are typically going to be from ridges. The views have been shared on a number of occasions and we have invited people to submit their own for consideration, to which we have had a small response.

<i>Why not commission an independent landscape character assessment by a qualified landscape architect to ensure independence?</i>	This will be covered by AECOM in their review of the Character Assessment (including reviewing the views).
<i>The approach to designating green spaces does not follow a coherent methodology. Designated green spaces include private land that have no rights of way, others with rights of way but no parkland. By designating all private land with public rights of way as green space a substantial proportion of the NDP area would qualify for protection. Once again Green Space Allocation need objective criteria and transparent methodology.</i>	Allocation is in line with NPPF and TWBC Local Green Space Designation Methodology. There are subjective choices to be made which is the purpose of having a consultation period. This helps ensure the general consensus of the Parish.
<i>The proposal to record all environmental information gathered by the NDP process is commendable. Be aware the Kent and Medway Biodiversity Records centre already provides similar resource and may offer existing infrastructure to hold any information on an ongoing basis.</i>	This is a reasonable point, and we are not sure of the need to include this as a project. Some feel more strongly about this, and it would encourage more involvement if there were locally led record keeping and sharing.
<i>Please note a required text change. Dogs are only allowed on Hilly Fields if they are on a lead. The land is used as working farmland and the sheep should not be disturbed.</i>	Added.
<i>The views section should include a view from Walkhurst Road south to the Church. This view would be affected if site 158 were developed.</i>	To include view from near top of Walkhurst Road.
<i>Views across site 158 are not currently fully accessible to the public. But site 158 should be added to the Local Green Space allocation for its stunning setting between the conservation area and ancient woodland of the shaw.</i>	This doesn't obviously meet criteria as it needs to be demonstrably special to the local community. It's not easily visible or generally accessible and doesn't have particular wildlife significance.
<i>Iden Green should have more protection in the plan. Views across the orchards could be lost if there is development.</i>	Iden Green has 16 views listed as worthy of protection. The Iden Green development allocation is zero.

2. Housing Supply and Site Allocation	
Feedback	NDP consideration
<i>Development on the Hospital Site at East End is unsustainable as there is no infrastructure such as shops, schools or community facilities within 2 miles.</i>	The NDP has been careful to weigh all considerations and accepts that East End is not an ideal location from the viewpoint of sustainability. However other considerations, Brownfield land (NPPF Paras 117 and 118) weigh in favour of these sites.
<i>There is a clear departure from established housing policies supporting building in village centres.</i>	The site allocations provide two sites adjacent to Benenden village centre; Uphill and Feoffee. In addition, planning consent has been given to a windfall site on New Pond Road and other sites close to Benenden and Iden Green are in the pre-planning stage. These sites offer development close to the village and in line with NPPF Para 78.
<i>No explanation as to why sites were rejected. For example development on sites 158 and 222 would avoid major traffic issues at East End and be more sustainable.</i>	The plan has balanced development by allocating a maximum of 50 new homes at East End in addition to 44 new homes in Benenden village. Both in addition to existing permissions. Windfall sites for a further 8 homes are in process in Benenden village bringing the total new homes in the village to 50. Concentrating all development into Benenden village will reduce pressure on Goddards Green road and Castleton Oak crossroads, by increasing pressure on Golford crossroads and Swattenden Lane.
<i>Benenden NDP Housing policies H8 and H9 argue against development at East End</i>	H8 refers to enhancing the local built environment. The proposal to remove or refurbish existing dilapidated buildings on the former hospital sites at East End will result in an enhanced built environment. H9 refers to market housing being made available for local purchasers in advance of public sale. This policy can apply equally to all sites with market housing.
<i>The plan approves 87 new houses in East End with only 45 in the village, possibly as few as 37</i>	These numbers are incorrect. The plan allocates a maximum of 50 new houses on Brownfield sites outside the AONB at East End. The Plan also allocates a maximum of 44 new houses in the village. Windfall sites of 4 at New Pond Road and 4 at Broughton

	<p>House bring to 52 the planned new houses in the village.</p> <p>These numbers are allocated within the Benenden NDP in addition to existing planning permissions in both East End and Benenden.</p>
<i>The separation of two sites at East End with the same ownership is disingenuous.</i>	The sites are separate and were offered as such by the landowner. They have separate site designators within TWBC documents.
<i>Once planning permission is given the developers will object to conditions made by the NDP and may argue they are unlawful – anticipated infrastructure will not be delivered by Section 106 or CIL as a result.</i>	Previous government guidelines did allow some back sliding by developers on affordable housing levels and infrastructure contributions. The Feb 2019 NPPF has strengthened guidelines to ensure that site specific policies requiring development contributions will be delivered. Paras 34, 54, 55, 56 and 57 of the NPPF refer.
<i>The NDP reasoned justification about East End sites starts by noting the sites are in a relatively unsustainable location.</i>	The NDP has been careful to weigh all considerations and accepts that East End is not an ideal location from the viewpoint of sustainability. However other considerations, Brownfield land (NPPF Paras 84, 117 and 118) weigh in favour of these sites.
<i>The fact that the hospital sites are partly Brownfield is not of itself a justification for disregarding other more relevant housing policies.</i>	<p>These policies are not specified but assumed to be concerning sustainability of location.</p> <p>NPPF Paras 84 and 117 asks Local Planning Authorities to make as much use as possible of previously developed land.</p> <p>All proposed development at East End is on previously developed land.</p>
<i>Extension of East End will lead to a closing of the gap between East End and Benenden merging the two settlements.</i>	<p>The two Brownfield Sites outside the AONB at East End are to the East of the settlement, Benenden village lies to the South West of East End. The proposed allocations will not close the gap between the two settlements.</p> <p>Benenden NDP have agreed re-drawn Limits to Built Development which are published as part of the TWBC Local Plan. The revised LBDs will ensure no coalescence between Benenden, Iden Green or East End.</p>

<i>The centre of Benenden is a safe place to build. Estates built in remote locations are prone to criminal and anti-social behaviour. Density at East End should be reduced and more building should take place in Benenden village.</i>	The CPRE recommend build density of more than 30dph. The NPPF asks LPAs to make efficient use of land to reduce the demand for green field development. The NDP is conscious that East End is a small settlement and that once the 350 plus employees of the hospital have finished work it becomes a peaceful location. In recognition, the NDP has proposed a lower build density of 22dph.
<i>Why has site 222 been rejected? It is a point where natural 'ribbon development' of the village should take place.</i>	Benenden crossroads represents the gateway to the village and site 222 offers panoramic views from the conservation area across the High Weald. Part of the site lies within the conservation area and part of the site has listed archaeological remains.
<i>The two sites at East End are Brownfield Sites. Why are no other Brownfield Sites considered?</i>	Three of the sites allocated by the NDP are Brownfield and the one Greenfield site is for almshouses. Uphill is previously developed land at the edge of Benenden village. It has also been allocated for development.
<i>Proposed density on Hospital sites is too dense and could create slum conditions. We are charged with protecting an area of outstanding natural beauty in our midst. Do our best for the next generation by spreading development across all suitable sites. Negotiate a lower density of each development so each site can cope with new demands.</i>	NPPF Para 123(c) instructs Local Authorities to make the most efficient use of land. The Campaign for the Protection of Rural England recommend housing densities should be increased to protect green fields (CPRE State of Brownfield 2018 section 3.2) and finally the East End sites are outside the AONB.
<i>We support use of Brownfield Sites. We hope the hospital sites can become a viable settlement in its own right.</i>	NPPF prioritises use of previously developed land.
<i>Why must windfall sites be within or adjacent to the village?</i>	NPPF Para 79 suggests development of isolated homes should be avoided. We have assumed this relates to small groups of homes, say 1 – 4 units where there is little chance of appropriate infrastructure or community enhancements. However, we do want to encourage some scattered very small developments on previously developed land such as farmsteads.

<p><i>Windfall allocation has been set at 20%, why not more?</i></p>	<p>NPPF Para 68 states a minimum of 10% of homes should be planned on sites less than 1 hectare. NPPF Para 70 says any windfall allocation must have compelling evidence on the level of supply.</p> <p>TWBC are willing to accept a reduction in planned development and 30% windfall allocation if adequate evidence is supplied by the NDP that windfall development will be delivered and if the consequent reduction in units on planned sites does not adversely impact on site viability.</p>
<p><i>Planning policy that excludes delivering the allocation through small scattered sites (e.g. 10 sites each with 10 properties) should be challenged.</i></p>	<p>NPPF is consistent in expecting financially viable sites. Small sites are less economic to build and often result in developers arguing to minimise Section 106 or Community Infrastructure Levies. As a result, infrastructure is not upgraded and affordable housing levels are minimised. Of the 20 sites offered all but two can accommodate in excess of 15 units (some up to 100 units). Part development of 10 sites will not meet our needs for affordable housing or infrastructure support, will open up land to potential development in excess of our target and will fail to meet initial economic viability criteria.</p>
<p><i>Elimination of 10 x small sites based on a statement 'The impact on the AONB would be much greater' is rather blithe and not accurate. Explain further or remove the statements from the plan.</i></p>	<p>The TWBC call for sites process identified 20 sites within the parish. Only two of these 20 sites could be classed as small (suitable for 10 or fewer houses). All other sites offer scope for 15 – 500 houses. Plan text will be amended to explain further the rationale for selecting fewer medium sized sites.</p> <p>The NDP allocates 3 brownfield Sites (two of which are outside the AONB) and one greenfield site for development of almshouses. Of the remaining 16 sites only one is brownfield currently providing employment opportunities. The remaining 15 sites are inside the AONB and greenfield so offer less justification for development.</p>

<i>Alms-houses will not provide homes for young adults and so do not meet the housing needs survey results.</i>	<p>Almshouses are not restricted to old people and the Benenden Alms House Trust is planning to offer almshouses to families and the elderly.</p> <p>The 2018 TWBC Housing Needs Survey identified a need to build 6 affordable homes per annum (30 homes over 5 years). Of these 4 per annum were required by the elderly and 2 by other families. To offer a 7–10 year supply we need around 50 affordable homes of which around 33 will be needed by the elderly.</p>
<i>The claimed requirement for 12 market homes to support alms House building is contested. The Alms House Trust has a plan to sell existing alms houses and we will not see the level of alms houses as presented in the plan.</i>	<p>The Benenden Almshouse Charities have confirmed their intention is to retain all existing properties, although the process of modernisation at the original Feoffee Cottages may result in the current 6 units being converted to 4 larger units. The Feoffee development will provide funds for renovation and modernisation of the 9 existing almshouses (potentially reducing to 7 units) plus an addition of 12-14 new alms houses.</p>
<i>There is a bias in the plan towards Alms-house development on an assumption the whole village supports Almshouse development. This is far from true.</i>	<p>Feedback from each NDP workshop was clear, those who attended are keen to see sufficient truly affordable houses available to local families.</p>
<i>Feoffee is outside the LBD and within the AONB, with statutory protection of section 85 of the Countryside and Rights of Way Act 2000. Feoffee fails Para 115 of the NPPF and Local Plan Policy EN1(2). Why is this not mentioned?</i>	<p>EN1(2) says development should not cause significant harm to residential amenities in terms of daylight, sunlight and privacy. The plan has single story development behind an existing hedgerow and will not impact on these amenities.</p> <p>This refers to the 2019 NPPF Para 115 which sets out a high level of protection to AONB. Over 95% of Benenden Parish falls within the High Weald AONB so some development within the AONB is almost unavoidable. The plan balances differing pressures by allocating some development inside and some outside the AONB.</p>
<i>Houses opposite the Feoffee development should be acknowledged. There will be a detriment on residential amenities. Local Plan EN1(2) states a proposal should not cause significant harm to the residential amenities of adjoining occupiers.</i>	<p>EN1(2) says development should not cause significant harm to residential amenities in terms of daylight, sunlight and privacy. The plan has single story development behind an existing hedgerow and will not impact on these amenities.</p>

<i>Alms house proposals are to sell 9 existing alms houses. So provision of 12 new ones only offers a net gain of 3 Alms-houses and so plan should be rejected.</i>	The Benenden Almshouse Charities are seeking to refurbish 3 almshouses in Iden Green, refurbish 6 almshouses in the old Feoffee building (including a possible reduction from 6 to 4 larger units) plus build 12 new almshouses. The NDP recognises the loss of 2 almshouses under this plan but still a net gain of 10. And the entire plan, including modernising the existing stock is dependent on a new build in Feoffee field.
<i>Site 277, reference is made to views from Hortons Close.</i>	Agreed, error in document change to Harmsworth Court.
<i>The draft plan is excellent in every way. On the critical issue of housing supply the NDP has got the balance absolutely right.</i>	Thanks!
<i>Development of Brownfield sites should always take priority in preference to unspoilt sites put forward.</i>	The NDP has allocated 3 brownfield sites based on guidance in NPPF Paras 84 and 117. There is a balance to be struck in making the best use of brownfield sites and developing more sustainable sites.
<i>The NDP can allocate sites and draw new boundaries such as Limits to Built Development. There is an absence of reference to village/settlement boundaries and this should be corrected.</i>	This plan does allocate sites – we will amend text to ensure this is clear. Benenden NDP have agreed re-drawn Limits to Built Development which are published as part of the TWBC Local Plan. The revised LBDs will ensure no coalescence between Benenden, Iden Green or East End
<i>The statement 'In order to protect more of the AONB, some sites nearer to built up areas could be developed at a greater density' is inappropriate. It downplays the wording of the Iden Green conservation area document so greater density should not apply to landscape at the edge of Iden Green.</i>	CPRE recommends rural development to be in excess of 30dph. The NPPF Para 123(c) sets out the need for efficient use of land to protect green fields from encroachment. Both Benenden and Iden Green Conservation Areas will be treated the same – taking note of planning policy and ensuring any development is sympathetic to both the conservation area and adjacent development densities.
<i>Housing allocation is unclear within the plan. A table is required to set out clearly the elements expected to contribute to housing supply would be helpful.</i>	The table used at the launch of the Rough Draft NDP will be included in the plan to clarify how we will meet our housing supply allocation.

<i>Is this Neighbourhood Plan allocating housing sites?</i>	Yes.
<i>Why does the plan offer Site Specific Policies to sites which are not being allocated within the plan? Doing so gives unwarranted planning status to all submitted sites by attributing policies to them. This opens the door for negotiation and eventual development.</i>	The NDP will not to provide site specific policies for those sites which are not allocated for development.
<i>Iden Green has no shops, no transport links to Benenden village, no Post Office or Primary School. It is not a sustainable location for housing allocations.</i>	There are no sites allocated for development in Iden Green. However, NPPF Para 84 allows for development in rural locations which do not have shops or public transport, particularly if the level of development exploits any opportunities to make the location more sustainable. In addition, the recent announcement of a Taxi bus service from Iden Green to Tenterden via Benenden and East End will increase the sustainability of the settlement.
<i>Sites south of The Street have not been selected. This should be reconsidered.</i>	The Plan allocates 4 sites from 20 offered by local landowners. 3 of the 4 sites are Brownfield and of these two are outside the AONB. One site is Greenfield, inside the AONB but will be used to provide almshouses. Of the remaining 16 sites only one is Brownfield currently providing employment opportunities. The remaining 15 sites are inside the AONB and Greenfield so offer less justification for development.
<i>A policy to prevent coalescence between Benenden and Iden Green should be included.</i>	Benenden NDP have agreed re-drawn Limits to Built Development which are published as part of the TWBC Local Plan. The revised LBDs will ensure no coalescence between Benenden, Iden Green or East End
<i>Policy H12 in the draft plan should be clarified. It states a landowner would be required to 'cash in' a larger site but you have also stated you do not want parts of large sites developed. H12 needs a redraft.</i>	This policy has been withdrawn.
<i>All locally written SHELAAs and associated comments by Merit Thornton consultants must be published to enable residents to compare site assessments.</i>	The NDP individual site assessments will be published as a Supporting Document to the final plan.

3. Design and the Built Environment

Feedback	NDP consideration
<i>No feedback received!</i>	

4. Business and the Local Economy

Feedback	NDP consideration
<i>There is no reference in the Business and Economy Chapter to Farming and Forestry. A strange oversight.</i>	We will review the chapter and strengthen the text concerning Farming and Forestry.
<i>Live/Work units are a problematic concept in planning terms. They are often abused by occupants who lead to abuse of the planning system and potential planning harm.</i>	We are reviewing plan text on live/work units to place emphasis on using redundant farm buildings or windfall sites for live/work options rather than any new builds.
<i>Mobile phone signals are poor throughout the Parish. Building of unsightly mobile phone masts are problematic and do not always improve coverage. The plan should look to leap frog this technology by seeking improved Broadband speed and connectivity, promoting use of land lines and internet tele-connectivity.</i>	During the workshops held as part of the NDP process a clear and consistent theme was the lack of mobile phone coverage in parts of the Parish. Benenden village centre is particularly poor. Use of land lines and internet connectivity are only a partial solution as text messaging is becoming a major tool for Government, banks and other service providers to connect with customers. Masts are unsightly and problematic, but we cannot ignore the need and have to find workable solutions.

5. Transport and Infrastructure

Feedback	NDP consideration
<i>Castleton's Oak Crossroads is an accident blackspot. Blind bends make it difficult to use and the increase in traffic resulting from any development at east End will worsen the situation. KCC is already concerned by the impact of 24 additional houses, increasing this to 87 houses is unacceptable.</i>	Castleton Oak crossroads is an accident blackspot and KCC have expressed concerns over the impact of development at East End. KCC have also recently undertaken safety works at the crossroads although even more should be done. Golford crossroads has exactly the same issue, a blind bend when crossing the same Cranbrook – Tenterden Road. Any increase in traffic at Golford crossroads has a similar effect. In addition; HGV traffic from Friday's Farm (5 th largest producer of eggs in the UK and

	<p>largest consumer of wheat grain in SE England), Hams Coaches and Shotcrete cement works provide an ongoing hazard along Swattenden Lane.</p> <p>The sites at Uphill and Feoffee will result in additional traffic at Golford crossroads and along Swattenden Lane.</p> <p>The plan identifies our road infrastructure as a major issue wherever development takes place in the Parish. The plan takes a wider view and has spread the impact on traffic movements along all three routes.</p>
<i>Requirement to drive into the village of Benenden from East End will add to traffic congestion and pollution.</i>	<p>All increases in house numbers will result in an increase in road traffic. Benenden is a rural Parish, residents have on average 1.8 cars per household (Census 2011). In practice almost all journeys for shopping, services or doctors will require travel to Cranbrook or Tenterden.</p> <p>AECOM's Environmental Audit of the Draft Plan concludes that additional housing will have no impact on pollution levels which are regarded as very low.</p>
<i>Goddards Green Road is narrow and dangerous and cannot take additional traffic.</i>	<p>The NDP proposals and policies recognise that all roads leading into and out of the Parish are narrow and that traffic growth is a major issue. The crossroads at Castleton Oak, Golford and Benenden village are all under pressure. Swattenden Lane is used for access by HGVs up to 32 tonnes for Shotcrete and Friday's Farm and by Hams Coaches and Buses. New Pond Road involves crossing to the Cranbrook/Tenterden Road at Golford and then joining the A274 at Sissinghurst. Concentrating all building in any one settlement will reduce pressure on some roads by adding pressure to others.</p>
<i>The Parish Council is considering making Walkhurst Road a one-way street. Such a major change should be considered before, not after building 87 homes at East End.</i>	<p>Walkhurst Road is narrow and difficult to use. The NDP is recommending a number of options be considered because of the planned housing growth in Walkhurst Road both by the allocation of site 277 and the existing permission for 12 new houses on the Rydon Homes site.</p>
<i>Walkhurst Road is a narrow country lane which is used as a cut through. It has a 6'</i>	<p>A footpath will be provided to facilitate walking from the new Feoffee site to the</p>

<i>6" restriction and is only 14' wide in places. Additional houses are planned at the Rydon homes site. Yet more houses at Feoffee will add to congestion and be a danger as there are no footpaths. The traffic calming measures proposed are all unacceptable.</i>	village centre. Additional traffic will result from the developments, but these are at the southern end of Walkhurst Road just before it joins the B2086.
<i>There is insufficient parking in Rothermere Close (Hortons Close is wrong) and the Rydon Homes site plans for insufficient parking. The Feoffee development will add to the existing parking problems and there will be on street parking in Walkhurst Road.</i>	NDP Policy HD6 will ensure the new almshouses have sufficient parking. The poor parking facilities offered in Rothermere Close is not a result of the Neighbourhood Plan but a pre-existing issue. The development at Feoffee will not worsen the situation.
<i>The transport chapter should have an objective to minimise traffic by ensuring building only in sustainable locations, ensuring new development is supported by sustainable transport and footpath/safe cycle links. Rural lanes should be protected.</i>	The plan recognises that traffic growth is a major issue. Around 50% of the allocated development will be within walking distance of the shop and butchers. However, NPPF Para 84 allows for development in rural locations which do not have shops or public transport, particularly if the level of development exploits any opportunities to make the location more sustainable.

APPENDIX C

Appendix C to the Regulation 15 Consultation Statement

Benenden Neighbourhood Plan
Regulation 14 Consultation Results Analysis and Comments Log

GENERAL COMMENTS				
REF.	RESPONDENT	COMMENT	BNDP REVIEW RESPONSE/AMENDMENT TO BNDP	COMPLETED
2	Cranbrook & Sissinghurst PC	Intro background does not mention Tenterden or Cranbrook	The BNDP are only specifying larger towns in this text. No amendment required	
36	Susie Smith	Firstly I would like to thank and congratulate all the Committee on the hard work that has gone into producing this village plan. Secondly, I would like to SUPPORT this plan in its current form as I feel it has been well thought through.	Thank you!	
6	Kent County Council	The introduction to the NDP describes, in detail, the extent and importance of Benenden's heritage and the role has played in shaping the Parish. To this end, the County Council recommends that the Plan should include policies for conserving and enhancing this heritage . The Plan provides an opportunity for the PC to describe how Benenden's heritage can contribute to achieving the Vision, as outlined on page 7, by helping to integrate new development into existing community. This can ensure that new build developments contribute to the existing historic character and emphasise the role of the historic environment as a contributor to the "historic beauty" that the Plan wants to preserve, Heritage also has significant role to play in the	Ask TWBC whether BNDP need a historic environment policy? – TWBC advise LP policies comprehensively cover heritage assets. The BNDP have covered the historic environment in policies already incorporated in the Landscape & Environment chapter, as well as the Design & Built Environment chapter. However, suggest further reference is made to the historic environment in the "History" section of the BNDP Amendment to NDP required	May 2020

		health and well-being of residents and visitors. The County Council therefore recommends that there is a specific historic environment policy within the NDP.		
6	Kent County Council	History – The text mentions the Roman roads that cross Benenden and the settlement of Hemsted, but there are numerous other Roman sites in the parish. These include a paved Roman ford near Stream Farm and iron working sites in Spring Wood, Benenden School and Flight Wood. The Benenden School site may have also comprised a small roadside settlement.	Although the BNDP agrees there are many Roman sites in the parish, for the sake of brevity, the BNDP have highlighted the Roman roads of particular importance only. No amendment required	
7	National Grid	An assessment had been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such apparatus with the NDP area.	No amendment required	
8	Natural England	Natural England does not have any specific comments on the draft NDP	No amendment required	
9	Southern Gas Network	Benenden falls on a particularly resilient part of SGN's network and we do not expect any significant reinforcement to occur from development in the area. Therefore SGN have no specific comments to make regarding the BNDP.	No amendment required	
13	TWBC	<u>Formatting/terminology comments:</u> a) Some terms are used once with abbreviations provided, and then subsequently a mixture	a) Agree - all terms with abbreviations used will be amended to first use with abbreviations following in brackets,	

		<p>of the full term or the abbreviation is used. It is suggested that a consistent approach is used throughout.</p> <p>b) It is recommended that the text seeks to avoid terms such as "we".</p> <p>c) There are frequent references to "developers/development". It would be more pertinent to be clearer about what form of development the policy applies to - eg just new build housing, other (industrial/business development, extensions etc.).</p> <p>d) It is recommended that you double check all references to the NPPF and para numbers. EG references on page 29, first para (para 170 and 8 of the NPPF) do not reflect the 2019 version of the NPPF.</p>	<p>and then abbreviations used only. Abbreviations will be listed in the appended glossary.</p> <p>Amendment to NDP required</p> <p>b) Agree, all references to "we" and "our" will be corrected to "the BNDP" or "the" as appropriate</p> <p>Amendment to NDP required</p> <p>c) The BNDP will be more specific about references to "development".</p> <p>Amendment to NDP required</p> <p>d) All references to the NPPF will be checked.</p> <p>Amendment to NDP required</p> <p>However, the comment on page 29 aligns with the NPPF 2019</p>	<p>May 2020</p> <p>May 2020</p> <p>May 2020</p> <p>May 2020</p>
13	TWBC	Page 8 footnote – There is no NPPF in 2017 , should be corrected	Agree – amendment to NDP required	May 2020
13	TWBC	Page 9, second para: suggest would be worded better to state: <i>"how the NDP proposes to protect"</i> rather than <i>"how the NDP team propose to protect"</i>	Agree – amendment to NDP required	May 2020
13	TWBC	Page 9, second para: refers to lift time of the Plan being to	Amend the BNDP to 2035 throughout to align with TWBC Draft Local Plan.	

		2033, whereas the Vision on page 7 refers to 2035.	Amendment to NDP required	May 2020
13	TWBC	Page 10, first para: "Policies" line: Could add at the end of the line <u>"and by TWBC as the Local Planning Authority when considering planning applications"</u> .	Agree with text – to be added. Amendment to NDP required.	May 2020
13	TWBC	Page 10, first para: "Projects" line - Please note that no decision has yet been made on whether TWBC will adopt CIL. Reference is made to "could be funded by developer contributions". May be worth a line to be clear that if so, there are certain policy/legislative requirements that must be met in order for this to be the case.	Remove the last line of "Projects" beginning "When the....." Amendment to NDP required	May 2020
14	UK Power Networks	There is no immediate impact on our assets. We can see your recommendations for new houses to have EV chargers. When/if you identify a specific need for additional capacity, please do not hesitate to contact our connections department.	No amendment required	
40	Tony Fullwood	"The Vision" Suggest <i>"The Parish of Benenden in 2035 will be a thriving, peaceful and rural place to live, work and rest. The scenic beauty of the countryside will be protected and its village feel and historic....."</i>	"The Vision" has emerged from the contribution and input from residents attending the workshops. No amendment required	
40	Tony Fullwood	Planning Strategy For clarity and to provide a spatial focus for the remainder of the Plan, it would be helpful to add a brief Planning Strategy towards the	The BNDP is set out with references to these suggested policies throughout the separate chapters.	

		<p>beginning of the Neighbourhood Plan.</p> <p>Example Planning Strategy Section:</p> <p>The planning strategy for Benenden Parish is to focus well designed development within the defined Local Plan Limits to Built Development and generally to limit development in the countryside beyond.</p> <p>In order to achieve sustainable development which is well aligned to national planning guidance; the Local Plan and local opinion, the planning strategy is to provide for limited development focused on Benenden to help meet local needs whilst conserving and enhancing the scenic beauty and tranquillity of the High Weald Area of Outstanding Natural Beauty; preserving and enhancing the character of the Benenden and Iden Green Conservation Areas and their setting and protecting views from public areas, formal and informal recreational amenities as well as biodiversity.</p> <p>This does not mean that all development within the countryside should be prevented and policies in the Neighbourhood Plan recognise that there may be potential for the following types of development provided certain criteria are met:</p> <p>Policy BE1 – Supporting development related to farming and forestry for which a rural location is demonstrated to be necessary.</p> <p>Policy BE2 – Redevelopment and regeneration of existing business sites and redundant buildings for business use</p>	<p>However, agree that the overall planning strategy could be set out more clearly, and suggest amendments made to the Introduction to include this.</p> <p>Amendment to NDP required</p> <p>See review of Business and Local Economy chapter.</p>		May 2020
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		<p>Policy BEx – given their economic importance, you may wish to consider an additional policy which allows for the expansion of Benenden Girls School and Benenden Hospital provided certain criteria are met.</p> <p>Nevertheless, the Neighbourhood Plan seeks to protect the designated countryside from inappropriate development and to ensure that, where development is appropriate, it conserves and enhances the landscape and scenic beauty of the High Weald Area of Outstanding Natural Beauty and distinctive, locally important characteristics.</p> <p>This Plan has been discussed with the infrastructure providers to test whether proposed development can be supported by sufficient infrastructure to ensure the quality of life of existing and future residents. Any development permitted will be expected to ensure provision of the necessary social, physical and green infrastructure needed to support the proposed development.</p>		
40	Tony Fullwood	<p>Conservation Areas - whilst the Iden Green and Benenden Conservation Areas are mentioned in the NDP, their importance in planning the future of the parish is certainly underplayed.</p>	<p>Conservation Areas are given their own high degree of protection through local and national planning policies.</p> <p>No amendment required.</p>	
33	Russell Cruse	<p>A great many of the statements and even the policies use language that is not robust enough. I would suggest that throughout the document, equivocal words such as</p>	<p>If the NDP can replace equivocal words with more forceful terms, then it will do so. However, given that the NDP cannot be entirely prescriptive, this will be</p>	May 2020

		"should" need to be replaced with the words "shall" or "will" and statements such as "be encouraged to" (HS5 para 2.4.1) need to be removed.	considered particularly for policy wording. (HS5 para 2.4.1 is not a policy.) Some amendments to NDP required, if appropriate		
33	Russell Cruse	Nowhere does it appear to say who exactly will be responsible for ensuring policies are adhered to. One imagines it's the Parish Council but this is never actually stated. If the PC is to be heavily involved, then perhaps the policies of the PC itself, with respect to quora, vetoes and communication need to be addressed.	The NDP is a planning document and carries weight as part of the planning process when considering planning applications in the parish. No amendment required		
33	Russell Cruse	One understands the importance of evidence-based policy-making but why, after a substantial preamble, must each policy section itself include a preamble which, in many cases, merely repeats statements made earlier? Surely both are not needed.	Agree — The essence of this is logical — and in so far as possible the NDP will ensure that the explanatory text precedes the policy. But please note that the policy may repeat some of the text for completion and emphasis. Amendment to NDP required	May 2020	
33	Russell Cruse	It is obvious that development of the kind and amount envisaged will have an impact on many of the aspects of Benenden as an AONB. The stated aims of parishioners in this regard will need to be identified as not merely aspirational but as lines they do not wish to cross. Does anyone truly believe, for example, that "views, dark skies and tranquility" can be maintained in the face of such substantial developments outside those on brownfield sites?	Views, dark skies and the AONB will be protected by the NDP policies LE1 and HD5, TWBC LP policy EN8 (DLP policy EN10) and the AONB Unit Management Plan 2019-24 No amendment required		

28	Peter Nuttall	Referenced documents as numbered in the text to be included in list on the website for ready access.	A check will be made on the ease of access to documents on the BNDP website.		
28	Peter Nuttall	A general piece on the Parish Plan could be included in the up-front introduction and only specific data included in the main text.	Review mentions of the Parish Plan and its relevance throughout the NDP. Amendment to NDP required		May 2020
28	Peter Nuttall	Introduction to have a summary of SWOT analyses to highlight the overall big topics.	To be reviewed		
28	Peter Nuttall	I think a section on development timing is required to cover the entire plan period. Actual development will be driven by real demand. This would therefore allow development of green field land to be deferred to the future. This is consistent with 2.11 of the TWBC Infrastructure Development Plan.	The specific timing of housing development is outside the remit of the NDP. However, the BNDP envisage that the housing will be developed over the plan period. No amendment required		
28	Peter Nuttall	Has there been consideration of providing health care within Benenden Hospital especially as their housing developments will be providing a significant number of potential patients?	Yes, consideration has been given to this, but the housing numbers within the parish are not sufficient to justify provision of GP services. However, Benenden Hospital does offer private GP appointments.		

LANDSCAPE and the ENVIRONMENT

REF.	RESPONDENT	COMMENT	NDP REVIEW RESPONSE/AMENDMENT TO NDP	COMPLETED
40	Tony Fullwood	Page 3 first para: Objective: Suggest "To protect valued environmental assets and support our peaceful, rural way of life. Recognising that the parish of Benenden is one of the most unspoilt parts of the High Weald AONB, our policies will enable villagers and visitors to continue to enjoy the countryside ,....."	Will add in suggested text. Amendment to NDP required	May 2020
13	TWBC	Page 16 Figure 1 - Figure overall is unclear. a) Suggest having small scale of map, and much larger version as appendix. b) Viewpoint designations are not clear in defining the potential extent of the view as the blue (and to a lesser extent the red) indications used in LEA7 - please see further comments on LVIAs. c) Panoramic viewpoints are also not clear on this figure, although are more so in LEA7 - please see comments on LVIAs.	The appendix LEA8 includes separate view assessments, with larger scale maps and photos. However, all maps and images are to be reviewed for clarity and standardized throughout the Plan, if possible. Amendment to NDP required	May 2020
	Mr Barnes	Page 17 Fig. 3	Replace view with another view. Amendment to NDP required	May 2020

13	TWBC	<p>Page 18, Policy LE1 - NPPF/NPPG and other legislation specifically requires conservation and enhancement of the AONB. May be that wish to use such terminology rather than "adversely impacted". Unclear what reference to "inappropriate development" relates to? May be clear to just refer to "development". Perhaps a very technical point, but if development is proposed outside the parish, then would this policy be applicable in the assessment of any particular application? Is a possible area of challenge by a developer - perhaps requires further thought. LVIAs can be very helpful in assessing the impact on views. In particular this would assist in defining the extent of the view, they are likely to be able to be more refined through an LVIA. Having regard to the above, potential wording along the following lines may address these points (together with the use of blue/red indications to better define the exact views): <i>1.3.2. The broad extents of the views are indicated in Figure 1. Landscape and Visual Impact Assessments (LVIAs) submitted as part of planning applications will be able to provide a more defined/refined extent. Policy LE1: Proposals for development within the broad extent of the identified special views should demonstrate that this development will conserve and enhance the landscape and scenic beauty: including potentially through the submission of a LVIA. Development which does not, will not be supported.</i></p>	<p>Agree to strengthen policy: Proposed changes to LE1 - Ensure that the identified special views 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.</p> <p>Amendment to NDP required</p>		May 2020
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6	Kent County Council	<p>The text rightly notes the historic nature of the landscape and some of its components in the form of field boundaries, footpaths and routeways. KCC recommends that the Neighbourhood Development Plan should make clear the role the Historic Landscape Characterisation (HLC) for Tunbridge Wells Borough that was developed by the Borough Council in 2017¹. The HLC examined the Borough's landscape in detail and is an important tool for helping developers and planners assess the impact of their proposals. An assessment of proposals against the HLC should be considered as a requirement, where appropriate, for development proposals in rural areas.</p> <p>The Plan does not specifically mention development within farmsteads but it is likely that development proposals of this type will come forward. It should be noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. Historic England, KCC and the Kent Downs AONB Unit have published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character².</p> <p>Whilst it is recognised that a large percentage of the Public Rights of Way (PRoW) network in Benenden consists of Public Footpaths, there is a Public Bridleway and Restricted Byway passing through the Parish, providing higher rights of access for equestrians and cyclists. In addition to footpath enhancements, there is also an aspiration to improve access</p>	<p>The NDP agrees that this is an important document and the NDP have referenced in text, but the NDP is confident this is covered by TWBC policies.</p> <p>No amendment required</p> <p>The BNDP is relying on the TWBC Local Plan and the AONB Management Plan to cover these areas.</p> <p>No amendment required</p> <p>The BNDP will amend the plan by replacing "footpaths" with Public Right of Way "PRoW".</p> <p>Amendment to NDP required</p>		May 2020
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		for cyclists and equestrians across the region. With these points in mind, it is requested that the term 'Footpaths' is replaced with the wording 'Public Rights of Way', as this would encompass the full range of different classifications of PRow.			
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6	Kent County Council	<p>Open Space and Recreation:</p> <p>It is important to ensure that any development takes account of the Sport England Guidance³. Sport England's strategies for sport are very much focussed on tackling inactivity and supporting/encouraging under-represented groups to be active. Through the national Active Lives Survey, approximately 25% of people nationally (24% now in Kent - 26% two years ago) are inactive and this is having knock on effects on physical and mental health, as well as individual and social/community development. Therefore, the plan should specify that any development proposals should consider this and, where appropriate, incorporate a mix of formal and informal areas/spaces (indoor and out) where people can be active, including walking and cycling routes and open spaces.</p>	<p>The NDP has included Site Specific Policies for the creation of play areas, and an active walk/cycle way.</p> <p>No amendment required</p>		
33	Russell Cruse	<p>Policy LE1 - 1.3.1 Identifying and protecting views. It would appear that not all such views have been considered. The document mentions a desire to "maintain the view of (sic) (i.e. currently afforded to) residents of Harmsworth Court..." and then goes on to outline how that view will be entirely obstructed by an "enabling development" of up to 22 dwellings (page 40). Despite this, the desire is repeated on P41 under "Constraints".</p>	<p>The NDP policy LE1 does not cover views that are unavailable to the general public.</p> <p>No amendment required.</p>		

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35	Gerard Conway	<p>Policy LE1 -The current assessment for P4 does not mention that National Cycle Route 18 runs east along the Rolvenden Road, and north up to Stepneyford Lane. The High Weald Country Tour also travels along the Rolvenden Road from Benenden to Rolvenden. The south end of Stepneyford Lane is therefore of considerable amenity value to countryside uses, including walkers and cyclists.</p> <p>Recommendation: the southern boundary of panoramic view P4 should be extended south to the intersection of Stepneyford Lane and the Rolvenden Road (B2086).</p>	<p>To be reviewed and included if appropriate.</p> <p>Amendment to NDP required</p>		May 2020
28	Peter Nuttall	<p>Policy LE1 - A piece on views to be included in the developers Environmental Impact Assessment.</p>	<p>TWBC will decide whether an EIA is required.</p> <p>No amendment required</p>		
28	Peter Nuttall	<p>Policy LE1 - Access to enjoy not to be precluded by developments and ideally enhanced.</p>	<p>The policy wording will be changed (see above amendment to LE1).</p> <p>Amendment to NDP required</p>		May 2020

79	Gladman Developments	<p>Policy LE1 - This policy identifies 17 views which the plan makers consider are important for the setting and character of Benenden and its surrounds and goes on to state that developments will have to demonstrate they will not adversely impact upon them. Identified views must be supported by evidence and ensure that they demonstrate a physical attribute elevating a view's importance beyond simply being a nice view of open countryside. The evidence base to support the policy does little to indicate why these views are important and why they should be protected, other than providing a view of the settlement and surrounding fields and woodland. It therefore lacks the proportionate and robust evidence required by the PPG. Gladman consider that to be an important view that should be protected, it must have some form of additional quality that would "take it out of the ordinary" rather than selecting views which may not have any landscape significance and are based solely on community support. Gladman therefore suggests this element of the policy is deleted as it does not provide clarity and support for a decision maker to apply the policy predictably and with confidence. It is therefore contrary to para 16(d) of the Framework.</p>	<p>The NDP is satisfied that the evidence base is sufficient.</p> <p>No amendment required</p>		
13	TWBC	<p>Page 19, Figure 6: Again, worth having a larger scale plan (in addition) as an Appendix?</p>	<p>The map is for identification purposes only. The detailed maps are included in Appendix LEA9.</p> <p>No amendment required</p>		

13	TWBC	<p>Page 19, Policy LE2 and paras 1.5.1. and 1.5.2: Inconsistency between "identified significance": In LEA9 seems to refer to "beauty", "historical significance" "recreational value", "tranquillity" and "richness of wildlife"; however in para 1.5.1 does not refer to historical significance and instead refers to green space. Furthermore in para 1.5.2 it refers to amenity value (not mentioned previously), talks about the "beauty of the setting" whereas elsewhere it refers to "beauty" only and does not refer to historical significance or recreational value.</p>	<p>LE2 - Local Green Spaces: protect and respect ...Development on these areas only be permitted under very special circumstances. See TWBC DLP 2019 - Policy EN17...Delete Para.1.5.2...</p> <p>Amendment to NDP required</p> <p>LE2 - policy needs to be aligned with wording in LEA9.</p> <p>Amendment to NDP required</p>		<p>May 2020</p> <p>May 2020</p>
13	TWBC	<p>Page 19, Policy LE2 and para 1.5.2: Importantly, as para 1.5.2 is supporting text and NOT part of the policy it does not form part of the policy. Appeal Inspectors are clear that unless a matter is part of the policy, it is not directly applicable. Suggest referring to policy EN17 of the TWBC Draft Local Plan (page 405) as an example of how a "general presumption policy against, unless there are exceptional/very special circumstances" can be worded.</p>	<p>See above – Important consideration should be made to TWBC comments that supporting text does NOT form part of the policies. The NDP Review committee recommends that ALL policies are reviewed to ensure text incorporates all relevant wording. (NB – this is contrary to the NDP policy wording training given to the NDP, when it was stated that policies should be as short and precise as possible.)</p> <p>Amendment to NDP required</p>		<p>May 2020</p>

6	Kent County Council	<p>Policy LE2</p> <p>Studies have shown that green spaces provide considerable health and well-being benefits for the public, but these spaces will face increasing pressures from new developments and a growing population. There is a risk that the quality of green spaces will deteriorate, unless appropriate steps are put in place to protect the sites and manage access. To cope with the increasing demands of a growing population, it is recommended that Neighbourhood Plan policy seeks to protect and increase open space provision. It is imperative that open spaces can be accessed through sustainable modes of transport. To encourage active travel, the wording of this policy text should be strengthened to ensure that visitors can walk or cycle to open spaces. Alternatively, good public transport links with open spaces should be made available, so that the public are not dependent on private vehicle use to visit these sites.</p>	<p>The NDP have allocated a number of LGS all of which are accessible to the public. There are 27.5 miles of PRow within the Parish. The NDP does not believe these comments are relevant to a rural parish.</p> <p>No amendment required</p>		
38	Ian Russell	<p>LGS -</p> <p>Please confirm that Standen Street Orchard is no longer being considered as a LGS.</p>	<p>Agree - Standen Street Orchard is no longer being considered by the BNDP as a LGS.</p> <p>No amendment required</p>		
33	Russell Cruse	<p>Policy LE2 1.9.1 - No street lighting and preferably artificial lighting whatsoever need to be central to the Environmental policies. There is no such thing as a "dark sky-friendly lighting"</p>	<p>The NDP Dark Skies policy HD5 provides the necessary constraints.</p> <p>No amendment required</p>		

35	Gerard Conway	<p>Policy LE2 - as noted the land at Hole Park is registered parkland. In addition the land at Hemsted Park/Benenden School, Pympne Manor, the Grange and Field Farm is also registered parkland. Consequently the parkland in these locations is of significant amenity value. Recommendation : the land at Hemsted Park/Benenden School, Field Farm, the Grange, Hole Park and Pympne Manor should also be included as local green spaces.</p>	<p>Local Green Spaces should ideally be accessible to the public and located within close proximity to the community it serves (NPPF 2019 Para 100). Hemsted Park/Benenden School; The Grange and Hole Park are all protected under their listing as Historic Parks and Gardens. Pympne Manor is a privately owned estate, therefore not accessible to the public, as is Field Farm in Iden Green.</p> <p>No amendment required</p>		
79	Gladman Developments	<p>Policy LE2 - Local Green Spaces - Gladman do not believe that BNP supporting evidence is sufficiently robust to justify the proposed allocation of Hilly Fields and New Pond Corner as LGS, given that they form extensive tracts of land.....In terms of meeting the second test there is no evidence base to support these designated LGS being "demonstrably special to a local community". In relation to their beauty, they are of no particular scenic quality.</p>	<p>Hilly Fields (1.9ha) and New Pond Corner (0.8ha) do not form extensive tracts of land.</p> <p>Justification: NPPF 2019 Para. 99 and 100.</p> <p>No amendment required</p>		

6	Kent County Council	<p>Footpaths The inclusion of paragraphs 1.6 and 1.6.1 regarding footpaths is welcomed by the County Council.</p> <p>However, there is no specific policy for footpaths or the wider PRow network. To address this matter, it is requested that a specific policy for the protection and enhancement of PRow is included within the Neighbourhood Plan.</p> <p>The PRow network provides significant opportunities for active travel and outdoor recreation across the parish. The increased population will undoubtedly add to the pressure on, and importance of, the surrounding PRow network. It is critical therefore that some wording is included within this new policy to secure funding from new development to ensure these highly regarded links are not degraded and where possible are enhanced.</p> <p>Considering the value of the PRow network, it should be expected that section 106 contributions (or CIL should it be introduced) will be sought to fund PRow improvements across the parish, in preparation for the expected increase in path use. Developer contributions could be used to upgrade existing routes and create new path links that address existing network fragmentation issues highlighted by the public.</p> <p>In addition to footpath improvements, new development should, where appropriate, contribute towards PRow enhancements that also benefit cyclists and equestrians. The KCC PRow and Access Service would welcome engagement with the Parish Council to consider local aspirations for access</p>	<p>1.6.1 to be made into a new policy (LE3). NDP amendment required. New wording to be agreed.</p> <p>New Policy LE3:</p> <p>The network of footpaths/PRowS within the parish are to be protected and enhanced. Any new development must preserve, enhance and maintain existing PRowS. New footpaths and cycle paths are to be created to increase connectivity. Funding to be provided by CIL/Section 106 contributions.</p> <p>Amendment to NDP required</p> <p>The PC are happy to welcome engagement.</p>		May 2020
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		<p>improvements, the delivery of these schemes and potential sources of funding for these projects.</p> <p>It is requested that applicants for new developments engage with the County Council at the earliest opportunity. This is to allow for reviews of access improvements to be carried out and consider appropriate developer contributions for PRow network enhancements, which would ensure there are sustainable transport choices available that provide realistic alternatives to short distance car journeys.</p> <p>The reference to the National Planning Policy Framework (NPPF) on page 21 of the Plan is welcomed. The KCC Rights of Way Improvement Plan (ROWIP) should also be referenced within this section, as it is a statutory policy document for PRow, setting out a strategic approach for the protection and enhancement of PRow. This will enable successful partnership working to continue and deliver improvements to the PRow 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 would welcome future engagement with the Parish Council to consider local aspirations for access improvements and the potential delivery of these schemes.</p>	<p>Add to reference to new LE3 policy.</p> <p>Amendment to NDP required</p>		May 2020
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13	TWBC	<p>Page 23, Policy LE3: We understand the intention of this policy.</p> <p>However: Clarification is needed as to whether this applies to just new residential properties, or to commercial premises, or indeed to extensions to properties.</p> <p>Also, raises issues as to how this will be proved. Is it through conformity to the Building Regulations, or through the submission of a pre-development noise survey at the boundary edges, and then details as to how the design of the property will mean that noise transmission from within the property to the edges will not be materially greater?</p> <p>To prevent noise from activities in the garden (children playing etc.) will be difficult to achieve without acoustic fencing.</p>	<p>Agree, difficult to enforce and covered under HD3 d).</p> <p>Delete Policy LE3 (LE3 to be replaced by PRoW policy at line 22 above)</p> <p>All references will need to be checked and cross referenced as a result.</p> <p>Amendment to NDP required</p>		May 2020
28	Peter Nuttall	<p>LE3 - This policy could be expanded to include light pollution in accordance with our requirements for Night Skies.</p>	<p>Covered under BNDP Policy HD5.</p> <p>No amendment required</p>		
77	Charlotte & Helen Mortimer	<p>LE3 - better to seek enclosure or separation of private gardens and parking areas from public areas, by siting of dwellings to create a physical barrier between public & private zones for privacy, amenity & security</p>	<p>The NDP agree and have deleted the content of the existing LE3. This is already addressed in Policy HD3.</p> <p>Amendment to NDP required</p>		May 2020
13	TWBC	<p>Page 23, Policy LE4: There is the potential that biodiversity net gain (e.g through NPPD and Environmental Bill) will be more exacting than this policy as currently worded.</p>	<p>Agree, and have added wording to LE5.</p> <p>Amendment to NDP required</p>		May 2020

6	Kent County Council	<p>Environmental aspects of new development:</p> <p>The Neighbourhood Development Plan considers that development should seek to protect and enhance the biodiversity of the site and the surrounding and sites must be surveyed prior to development, in order to ensure important natural features are identified. The County Council would like to highlight that Ecological Surveys and mitigation strategies for habitats and protected/notable species must be submitted to demonstrate they are following the mitigation hierarchy to “avoid, mitigate and compensate” any impact.</p> <p>The Plan also highlights the importance of biodiversity and the need for a provision for the creation of new wildlife habitats, the joining up with existing biodiversity rich areas and net gain. The County Council is supportive of this approach and advises that where green spaces are proposed, they ideally should be located within the areas where there are existing habitats, rather than creating new habitat.</p>	<p>Agree – expansion of LE5 required to include wording from KCC final paragraph.</p> <p>Amendment to NDP required</p>	May 2020
39	Peta Grant	<p>Policy LE4 - could be construed as serving the purpose of the identification of natural features and thereafter protecting and maintaining them, but should be more specific in the retention of trees/hedgerow to reflect the TWBC draft LP policies; perhaps an extension of the policy or new policy could be inserted beneath say para 1.10.</p>	<p>Policy LE4 rewritten as below.</p> <p>Policy LE4:</p> <p>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</p>	May 2020

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			<p>tree growth where appropriate.</p> <p>The relevant references to support this policy are EN1 and EN14 of TWBC DLP 2019.</p> <p>Amendment to NDP required</p>		
33	Russell Cruse	<p>Policy LE4 1.10.2 - More should be made of the value of lichen as an indicator of the quality of environment. The numbers of rare lichen to be found in the churchyard is evidence of the quality of our environment.</p>	<p>Lichen is referred to in 1.10.1.</p> <p>No amendment to NDP required</p>		
28	Peter Nuttall	<p>LE4 - EIA to be taken into account at all stages of the project ie. Design, construction and long term occupation.</p>	<p>See new wording for policy LE4.</p>		
77	Charlotte & Helen Mortimer	<p>LE4 - Retention & protection of mature trees, hedgerows and water courses should be specifically mentioned. Designs should be shaped around these features to make them the focus and amenity for the new development. New development need landscape to remain dominant in order to fit the local character. Surveys for protected species have to be completed in the correct season, so can delay development by up to a year. They should be in place before an application is made.</p>	<p>See new wording for policy LE4.</p>		

13	TWBC	Page 23, Policy LE5 and Para 1.11.1: Could go further and state that is for the developer to cover the cost of this and to provide information at particular stages of the build?	Agree - See new wording for policy LE5.		
39	Peta Grant	Policy LE5 - Policy HD4 Landscaping (page 58) is currently the only mention of trees specifically "Existing mature trees should be retained to provide open spaces within the proposed development and are considered essential to maintain the rural character of the area...." I think it appropriate that the Landscape & Environment chapter should address this fundamental part of our landscape with its own policy. Perhaps something along the lines of TWBC draft LP policies.....EN1; EN14 etc.	See new wording for policy LE4. Replace Policy LE5 with the following words: Environmental site surveys must be conducted and submitted 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, rather than creating new habitat. Amendment to NDP required		May 2020
33	Russell Cruse	Policy LE5 - This states that developers "should" ... minimise the impact to existing trees...." This needs to be changed to "will not, as a first principle, remove any trees from any site but should incorporate most, if not all, existing trees in their designs.	Agree - See new wording for Policy LE4. Amendment to NDP required		May 2020
77	Charlotte & Helen Mortimer	LE5 - This policy only works if there is adequate enforcement throughout the construction phase.	Agree - See new wording for policy LE5 above. Amendment to NDP required		May 2020
77	Charlotte & Helen Mortimer	LE6 - calls for 50m buffer to AW. About 20m would be reasonable	This policy already allows some flexibility. No amendment required		

28	Peter Nuttall	LE6 - Buffers shall be provided to not only the natural environment but also the built environment including other dwellings, footpaths and roads.	Not required under the NPPF. No amendment required		
13	TWBC	Page 23, Policy LE7: Does this apply to all new housing proposals? Single houses as well as larger proposals? What is the timescale for the monitoring? Has resourcing implications for TWBC, at a time when the income from planning applications/pre-app fees does not cover the cost of running the Planning Service. Would a possible way forward be to state <i>"If TWBC introduces a monitoring charge, the development should incorporate rules that include provision....or its representatives. In the absence of such a charge, the development should set out how this monitoring will be undertaken by an independent consultant, the monitoring reported to TWBC and steps taken to rectify any shortcomings in this management"</i> .	Amend wording to LE7: BNDP expect sites of 10 or more dwellings to set up an environmental management service contract to maintain public areas and particularly LWS. Amendment to NDP required		May 2020
28	Peter Nuttall	LE7 - Developments shall provide for long term integration and enhancement of the environment.	The NDP will enhance LE7. Amendment to NDP required		May 2020
77	Charlotte & Helen Mortimer	LE7 - All land had to be owned & maintained by the owner. Small patches of communal landscaping will always be a problem where shared in small developments as residents will not pay additional charges for maintenance. Who will pay for TWBC oversee? This policy may be making problems for the future and needs to be reassessed.	The NDP will enhance LE7. Amendment to NDP required		May 2020

6	Kent County Council	<p>LE8 - It would be beneficial if this policy includes consideration of the following:</p> <p>a) Ordinary water courses may often be impacted significantly with new development. These drainage channels should be incorporated into drainage design for any new development reflecting the value they provide for amenity and biodiversity. Appropriate setbacks should be provided to ensure maintenance can be undertaken.</p> <p>b) It would be recommended that a clear statement to the effect that drainage should incorporate surface water features which promote multi-functionality including amenity, biodiversity and water quality benefits.</p> <p>c) Through Benenden Parish does not suffer from extension areas of fluvial flood risk, local flood risk may occur along the lengths of ordinary watercourses. Any development should give due consideration to Surface Water Floor Maps as produced by the Environment Agency. KCC has a Drainage & Planning Policy Statement (2017, currently out for consultation 2019) which provided direction as to incorporation of surface water drainage with new development. We would recommend that reference is made to this document to ensure that surface water management is considered appropriately.</p>	<p>Add following wording to LE8 Policy to strengthen:</p> <p>Developers should refer to KCC Surface Water Floor Maps as produced by the Environment Agency. KCC has a Drainage & Planning Policy Statement (2017, currently out for consultation 2019) which provided direction as to incorporation of surface water drainage with new development.</p> <p>Amendment to NDP required</p>		May 2020
77	Charlotte & Helen Mortimer	<p>LE8/9 - Emphasis retention of existing features. Allocations need to take into account the additional land required to provide sustainable drainage and wild life landscape features in order to comply. Current densities will have to be reduced. Will the Council maintenance teams</p>	<p>Agree and refer to enhancement to LE4 and agree with the last sentence. However, it is not within the remit of the NDP to dictate strimming times.</p>		

		stop strimming the wildlife borders and rendering neatly mown?			
33	Russell Cruse	Policy LE8 1.12 - No one can expect there not to be issues arising from so much disruption to landscape and existing drainage of such a substantial amount of housing. The wording must be tightened up to ensure that any detrimental effect on drainage and run-off must be remedied by the developers up to 5 years after completion of works.	Agree and policy LE8 enhanced. Amendment to NDP required		May 2020
40	Tony Fullwood	Additional Countryside Policy It is usual for Neighbourhood Plans covering rural areas to include a policy/ policies which cover the countryside area of the parish. I believe that Neighbourhood Plans for surrounding Parishes contain such a policy and I consider that Benenden would be severely disadvantaged without one. The Neighbourhood Plan should contain a strong locally distinctive countryside/ landscape policy which is appropriate and relevant to the Parish. The policy should highlight the distinctive qualities of the Benenden countryside (including the quiet tranquillity and dark skies); the hierarchy of settlements (including the historic 'dens'); the local views and Local Green Spaces and the distinctive rural lanes which are prevalent in the parish and are in danger of traffic overload (see TWBC Supplementary Planning Document – Rural Lanes which identifies the prevalence of rural lanes in the Parish). This would help support the statement in Para 1.5 of the Plan that some Local Green	The BNDP is set out in a style that includes policies covering these aspects in separate chapters. No amendment required The BNDP is to focus the housing allocation required on brownfield sites and		

		<p>Spaces are not included as they are considered to have sufficient protection by virtue of other designations.</p> <p>I would suggest that such a policy be inserted immediately following Para 1.9.1.</p> <p>Example Reasoned Justification The planning strategy for the Parish is to focus development within the Limits to Built Development as defined in the Local Plan and to restrict development in the countryside in order to conserve and enhance the High Weald Area of Outstanding Natural Beauty; views from public areas; formal and informal recreational amenities as well as biodiversity.</p> <p>Example Policy - Protect and Enhance the Countryside</p> <p>Outside of the Limits to Built Development, as defined in the Local Plan, priority will be given to protecting and enhancing the countryside from inappropriate development. A proposal for development will only be permitted where:</p> <p>a) it would conserve and enhance the landscape and scenic beauty of the High Weald Area of Outstanding Natural Beauty including the tranquillity and dark skies of the countryside and would have regard to the High Weald AONB Management Plan.</p> <p>b) It would not have an adverse impact on the character or landscape setting of Benenden; Iden Green, (including the designated Conservation Areas) or other historic 'dens';</p>	<p>previously developed land which have been submitted under the TWBC Call for Sites consultation process.</p> <p>No amendment required</p> <p>There is adequate provision within the policies included in the Landscape and Environment chapter to cover these areas.</p> <p>No amendment required</p>		
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		<p>c) It would maintain the distinctive views of the surrounding countryside from public vantage points, in particular those defined on Fig 1, and</p> <p>d) It would protect and, where possible, enhance the following features:</p> <p>i) Local Green Spaces, in accordance with Policy LE2</p> <p>ii) ancient woodland, and</p> <p>ii) rural lanes which have an historic, landscape or nature conservation importance.</p>			
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HOUSING and SITE ALLOCATION

REF.	RESPONDENT	COMMENT	BDNP REVIEW/AMENDMENT TO BDNP		COMPLETED
2	Cranbrook & Sissinghurst PC	Affordable housing is not defined	Affordable housing will be provided in line with adopted TWBC policy. No amendment required		
5	Historic England	We note there are areas where site allocation could have effects for the Benenden Conservation Area and recommend discussing these potential impacts and any necessary mitigation to avoid or minimise potential for harm with the District Council's Conservation Officers.	TWBC Conservation Officer will be involved with any application affecting the Conservation Areas. No amendment required.		
13	TWBC	<p>Page 27, 4th para:</p> <ul style="list-style-type: none"> o The standard methodology is Borough wide, rather than Parish wide; o It may be worth altering this sentence to reflect that the standard methodology identifies the housing need for the Borough; <p><i>"The NPPF (para 65) explains that strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The TWBC Draft Local Plan does this in Strategic Policies STR1 and STR/BE1, although it should be recognised that the DLP is still draft".</i></p>	<p>Change paragraph to read:</p> <p>"Housing need in the parish is relatively low. The NPPF (para 65) explains that strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The TWBC Draft Local Plan does this in Strategic Policies STR1 and STR/BE1, although it should be recognised that the DLP is still draft."</p> <p>Amendment to NDP required</p>		May 2020
40	Tony Fullwood	<p>Housing Supply and Allocations – Page 27</p> <p>Given the planning context and strategy, as worded the objective appears over-welcoming to housing development in the Parish and</p>			

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		<p>should be amended to include reference to the small scale of development expected in the Parish over the Plan period.</p> <p>Example housing objective: To support limited 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.</p>	<p>The NDP seeks to deliver housing development to support local need.</p> <p>No amendment required.</p>		
40	Tony Fullwood	<p>Conservation Areas Whilst the Iden Green and Benenden Conservation Areas are mentioned in the Neighbourhood Plan, their importance in planning the future of the parish is certainly underplayed.</p> <p>Page 28: Policy context/justification This section does not refer to the constraints of the designated Conservation Areas and their setting in selecting suitable housing allocations. This may be simply rectified:</p> <p>Potential for new housing in the parish is highly constrained</p> <ul style="list-style-type: none"> Over 98% of the parish is in the High Weald AONB Access within the parish is constrained by the width of the roads 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) Benenden Parish contains two conservation areas and over 150 listed buildings, Roman roads, medieval field systems, an SSSI and much ancient woodland 	<p>4th bullet point — add after 'Benenden Parish contains two Conservation Areas then continue.</p> <p>Amendment to NDP required</p>		May 2020
77	Charlotte & Helen Mortimer	<p>Fig 2 - LBD boundary to exclude large part of existing settlement.....page 30 of feedback</p>	<p>It is not within the remit of the BNDP to set the LBD. The new LBD is proposed by TWBC in the DLP – see Policy STR10. The new LBD map is for guidance purposes only.</p> <p>No amendment required</p>		
40	Tony Fullwood	<p>Limits to Built Development The Neighbourhood Plan explicitly supports the TWBC approach to Limits to Built Development (LBD) for the Parish.¹ However, this is 'tucked away' on Page 29 in the Housing Supply and Site Allocation chapter. Firstly, the adopted and emerging Local Plan policy on the LBD applies to all development (not just housing) and the reference to LBDs is therefore inappropriately included within the housing section. Secondly, LBDs distinguish in law between the built up area and the countryside and therefore help determine the most appropriate and sustainable</p>	<p>Suggest moving explanation of current LBD and proposed DLP LBD to the new Introduction.</p> <p>Amendment to NDP required</p> <p>However, as stated and defined by the Local Plan, TWBC already sets out clear policies for the LBD.</p>		May 2020

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		<p>location for development. For this reason the section should be promoted alongside the planning strategy. The section The Form and Distribution of Past Development section should be similarly promoted. However, in order to conform with the adopted Local Plan, amendment will be required to this text.</p> <p>For me, a fundamental issue of the Neighbourhood Plan is the failure to apply this clear spatial distinction between development which is supported within the LBD and the more limited development which is supported within the countryside beyond the LBD boundary.</p> <p>1 The adopted Local Plan, to which the Neighbourhood Plan must be in general conformity, states:</p> <p><i>3.39 There are long-established, nationally-recognised and county-based policies for protecting the countryside of the Plan area because of Metropolitan Green Belt, Area of Outstanding Natural Beauty and Special Landscape designations, and for its own sake. Once taken for built development, the countryside cannot be easily replaced or restored. Clear Limits to Built Development will direct development to the appropriate locations within the Borough. Consequently, this Local Plan defines the Limits to Built Development around all the principal settlements and Local Plan allocations, in order to restrict the encroachment of built form into the surrounding area and to meet the strategic objectives within the Plan to ensure sustainable development patterns. The Plan's strategy is to concentrate most development within the built up area whilst limiting development in the surrounding countryside. The Limits to Built Development are shown on the Proposals Map.</i></p> <p>POLICY LBD1 <i>Outside the Limits to Built Development, as defined on the Proposals Map, development will only be permitted where it would be in accordance with all relevant policies contained in this Local Plan...</i></p> <p>The emerging Local Plan is also clear:</p> <p><i>4.80 Limits to Built Development (LBDs) are used to differentiate between the built up areas of settlements and areas of countryside beyond. Generally, and subject to compliance with other policies in this Plan, there will be a presumption that proposed development such as infilling, redevelopment, and/or changes of use will be acceptable inside the LBD, while land and buildings outside the LBD will be considered as countryside where there is much stricter control over development.</i></p>		
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		<p><i>4.81 The definition of LBDs is an established policy tool to provide both certainty and clarity to residents, landowners, developers, and other interested parties on where new development would generally be acceptable in principle. By drawing LBDs around settlements (including land to meet growth needs), LBDs help focus growth to sustainable locations/settlements, while protecting the surrounding, more rural areas from inappropriate and intrusive development.</i></p> <p><i>There are a number of circumstances, recognised by specific policies in the Local Plan, where development outside of LBDs may be acceptable, such as that associated with agricultural, woodland, equestrian uses, certain tourism activities, and affordable housing 'exception sites'.</i></p> <p><i>Emerging Local Plan Policy STR 10 states: Limits to Built Development Boundaries</i> <i>The proposed Limits to Built Development for all settlements are shown on the draft Policies Map.</i> <i>New development shall be focused within the Limits to Built Development, where proposals accord with other relevant policies of this Plan. Outside the Limits to Built Development, development will normally be limited to that which accords with specific policies of this Plan and/or that for which a rural location is demonstrated to be necessary.</i> <i>In my view, the Neighbourhood Plan should ensure that all policies clarify whether they apply to</i> <ul style="list-style-type: none"> • sites within the LBD (currently Benenden and Iden Green) • sites in the countryside outside the LBD • both of the above </p>			
28	Peter Nuttall	<p>Further to the above the report indicates that "TWBC have adopted a policy of redrawing the LBD tightly around the village centre" The current LBD achieves this ambition already. What this re-drawing of the boundary seems to mean is that green field Countryside in the AONB is to be lost which is contrary to our overall objective of protecting the scenic beauty of the countryside. I appreciate that this was probably done with the Alms house Charity in mind and I'm aware they have been doing a lot of work to deliver their core objective of building new Alms houses. My concern is that to achieve this we could have a small estate of private houses to provide finance when there are houses available elsewhere. I would therefore like to see more consultation, review of options including financing options so that we can satisfy all of our objectives in a good way. I believe we have sufficient time to do this.</p>	<p>The LBD is defined by TWBC.</p> <p>No amendment required</p>		

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5	Historic England	Site allocations discussions. A lot of text is included that describes the community's preferred approach to the development of each of the sites allocated within Policy HS1 (Pages 39 – 52) . If the requirements set out in this description are what is necessary to make the development of these sites acceptable to the community and can be justified on the basis of demonstrable need and policy, such as the need to provide good design that contributes positively to local character and sustains the significance of heritage assets, we recommend that the requirements relating to each set is more clearly expressed as a policy using the same text box style as policies elsewhere in the plan. It isn't clear at present what is allocation policy and what is supportive, discursive text or guidance. The latter receives a significantly different weighting in planning decisions.	Site Specific Policies will be highlighted as suggested. Amendment to NDP required.		May 2020
28	Peter Nuttall	Whilst I acknowledge that significant improvements have been made compared to earlier housing allocation numbers we do seem to be bearing a disproportionate number compared with other similar character villages.....134 for Benenden vs Frittenden 28, Goudhurst 24, Sandhurst 24 and Iden Green 0. As written in the report "the 2018 TWBC Housing Needs Survey identified Benenden as having the second lowest housing needs within the borough"	Housing numbers for Benenden parish were influenced by the number (20) and size of sites put forward in the TWBC Call for Sites by Benenden landowners. No amendment required.		
33	Russell Cruse	Policy HS1 The re-drafting of the LBD appears somewhat arbitrary. The Plan should make clear why exactly it was felt to be a good thing to re-draw the boundary in this manner, along with assurances that, should other sites become "available" such a convenient "re-drafting" will not recur.	The LBD is defined by TWBC and explained in the final paragraph on page 29. No amendment required.		
77	Charlotte & Helen Mortimer	HS1 - It is noted that the 1% growth requires 150 new dwellings. The 4 site allocations are for between 85-95 dwellings which is below the 100 stated. Even with 36 unimplemented approval units, this is only 121-131, still below the 150 required. The density of development will be key to the delivery of adequate number of dwellings on allocated sites to meet these targets. The densities required appear to be significantly higher than the current average across Benenden, which would result in developments that are completely out of character with their surroundings and as a result, could not be in accordance with most of the policies in this plan. If the Parish is serious about these policies, then it has to match them with a realistic allocation of site areas, to meet the housing required.	1% growth is 150 dwellings over the Plan period (up to 2035) including existing permissions and windfall sites. The NDP anticipates that windfall sites will allow the growth to be maintained at 1% per annum over the plan period. Densities have been agreed in context with neighbouring sites, and influenced by CPRE policy and High Weald AONB unit guidance. <i>Nevertheless, the BNDP review group recommends that Policy HS1 is strengthened by including the proceeding paragraphs 2.1.2 and 2.1.3 within the policy wording. This would highlight the preference for the use of brownfield sites and protection of the AONB and greenfield sites as follows:</i>		

			<p>Policy HS1 Number of new dwellings</p> <p>The selection of the most suitable sites for allocation for housing development has followed all relevant national guidance and best practice. All sites 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 protection of the AONB with a preference for brownfield sites.</p> <p>Where a site is within the AONB, it should be demonstrated that the proposal will make a positive contribution towards achieving the objectives of the most recent 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 other policies in this Plan for the High Weald AONB landscape.</p> <p>Sites outside the AONB but within the High Weald National 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;</p> <p>In addition to...(insert original table and text from Policy HS1)</p> <p>Delete 2.1.2 and 2.1.3 and renumber subsequent paragraphs.</p> <p>Amendment to NDP required</p>		
13	TWBC	<p>Page 32, Policy HS2:</p> <ul style="list-style-type: none"> ○ Please note that current policy approach is for 35% affordable housing on sites of 10+. ○ Policy H5 in the DLP proposes: <ul style="list-style-type: none"> ▪ 40% affordable housing for greenfield sites of 10+ dwellings (where this percentage is not a whole number, it will be rounded up to the next whole number), with sites comprising predominantly brownfield land delivering a net increase of 10+ dwellings will be expected to 	<p>To strengthen policy HS2:</p> <p>Move para. 2.2.1 to last sentence of first paragraph...."Each site should include an integrated variety of housing types – such as flats, maisonettes and bungalows, In addition to family houses, and should include:".....</p>		May 2020

		<p>include a minimum of 30% (gross) affordable housing;</p> <ul style="list-style-type: none"> For sites of one to nine dwellings will be expected to provide a financial contribution towards the provision of off-site affordable housing (land and build costs) based on 20% (gross) number of residential units to be provided; <p>It may be pertinent to re-word to state that affordable housing should be provided in line with adopted TWBC policy (without specifying a percentage), as this will future proof policy if/when the TWBC policy position changes;</p> <ul style="list-style-type: none"> See comment on Page 19, Policy LE2 and para 1.5.2: <ul style="list-style-type: none"> 10% requirement for single storey or accessible and designed with elderly or disabled occupants in mind would be stronger if included in policy rather than as supporting text; Has thought been given to specifying a particular standard of accommodation for the elderly (e.g. Building Regs M4(2)/M4(3)? 	<p>Policy HS2 a) To read “Affordable housing in line with TWBC policy.”</p> <p>Add to HS2 f) wording from 2.2.2 “Given the anticipated rise in the ageing population...with elderly or disabled occupants in mind.”</p> <p><i>So suggest strengthen policy HS2 as follows:</i></p> <p>Policy HS2 Delivering a balanced community</p> <p>Housing developments will be required to provide balanced communities by meeting the Tunbridge Wells Borough Council’s Strategic Housing Assessment mix, and take note of the Local Housing Needs Survey. 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. Each site should include an integrated variety of housing types such as flats, maisonettes and bungalows. Each site should include:</p> <ul style="list-style-type: none"> a) Affordable housing in line with TWBC policy. b) Suitable property for older local residents who wish to downsize within the parish. c) Mixed sizes of market housing for parishioners and new residents. d) Affordable and market housing should be well integrated within each development to help to establish and maintain a strong, mixed and balanced community. e) Given the anticipated rise in the age of the population of Benenden highlighted in the 2018 HNS; developments of 10 dwellings or more shall include a minimum of 10% single storey or accessible units. These will be designed to support elderly or disabled occupants. 		
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			Then delete 2.2.1; 2.2.2; 2.2.3 and renumber subsequent paragraphs. Amendment to NDP required. All development will need to comply with current Building Regulations. No amendment required.		
40	Tony Fullwood	<p>I suggest the following minor spatial Policy clarifications:</p> <p>Policy HS2 Delivering a balanced community</p> <p>Housing allocations Developments will be required to provide balanced communities with the following mix of properties. New housing should meet the Tunbridge Wells Borough Council's Strategic Housing Assessment mix, and take note of the Local Housing Needs Survey, to ensure suitable and affordable housing is available for individuals and families and, in particular, housing to meet the needs of an ageing population. Each allocated site should include</p> <ul style="list-style-type: none"> a) Affordable housing in line with TWBC policy of 35% of dwellings. b) Options to include low cost rental/shared equity/Help to Buy equity loans. c) Suitable property for older local residents who wish to downsize within the parish. d) Mixed sizes of market housing for parishioners and new residents. e) Affordable and market housing should be well integrated within each development to help to establish and maintain a strong, mixed and balanced community. 	<p>Strengthen HS2 by inserting "Housing" before "Developments" (see above amendment to policy HS2).</p> <p>Amendment to NDP required.</p> <p>This policy applies to all housing developments not just the four allocated sites.</p> <p>No amendment required.</p>	May 2020	
77	Charlotte & Helen Mortimer	<p>HS2 - The plan favours small developments and only allocates sites up to 25 units, with windfall developments on unallocated sites limited to 4 units. Does the 35% affordable provision get applied to all small developments, eg 3 houses must include 1 affordable, or does it have a cut off limit, eg 9 units? If the policy is to be interpreted as providing 1 bungalow for every 9 houses, then this should be specifically stated in the policy, not lost in the explanatory notes, 2.2.2. Densities will also have to be adjusted down as bungalows take up more site than houses with a similar floor space. Historically the pattern of development rarely incorporated mixed developments. Where multiple units were built, they were usually of one type, for example alms house groups. To try to get all types of dwelling into all developments may appear artificial and be less effective than specialisation.</p>	<p>Para. 2.2.2 will be incorporated into Policy HS2.</p> <p>Affordable housing provision will be in line with TWBC policy.</p> <p>No amendment required.</p>		
40	Tony Fullwood	I suggest the following minor spatial Policy clarifications:			

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		<p>Policy HS3 Partnership schemes The Parish Council will encourage partnership-based locally-led housing schemes initiatives, on allocated sites that</p> <ul style="list-style-type: none"> a) Satisfy national policy requirements. b) Are designed to maintain an appropriate demographically mixed and balanced community. c) Respects the local environment. d) Upholds village services. 	<p>This policy relates to all housing development sites.</p> <p>No amendment required.</p>		
33	Russell Cruse	<p>Policy HS3 <input checked="" type="checkbox"/> Other than a need for more low-cost accommodation, there has, to my knowledge, been no local requirement for housing. If the Plan is to make mention of “Locally-led housing delivery” <i>[why the word “delivery” is used here, one can’t imagine]</i> then it must be clearly stated that the only developments upon which the parish would look kindly are those that fulfil a clear local need. The amount of housing imposed upon Benenden by TWBC has nothing whatsoever to do with local need.</p>	<p>This policy is not about local need but about locally led housing delivery.</p> <p>Housing numbers have been influenced by the amount of land put forward by local landowners (20 sites).</p> <p>No amendment required.</p>		
77	Charlotte & Helen Mortimer	<p>HS3 - While it is a reasonable desire for communities to seek affordable housing that is for the benefit of local residents, the nature of the demographic and the rules that RSL normally have to apply is that the housing is allocated to those with the greatest needs, usually from outside the immediate community. Is it appropriate to mention by name a specific provider in this non-partisan document?</p>	<p>ERHA is mentioned specifically because of its established association with the parish council.</p> <p>No amendment required.</p>		
13	TWBC	<p>Page 33, Policy HS4: Perhaps would be stronger with specific reference to definition of affordable housing as set out in the NPPF?</p>	<p>Considered to be sufficiently robust.</p> <p>No amendment required.</p>		
40	Tony Fullwood	<p>I suggest the following minor spatial Policy clarifications:</p> <p>Policy HS4 Almshouses The Parish Council will give priority to schemes on allocated sites in the parish applying the almshouse principle. Benenden’s almshouses are administered by the Benenden Almshouse Charities (see Feoffee site 277) and, where appropriate, this principle should be followed to provide a supply of ‘affordable housing’ in perpetuity.</p>	<p>This policy should not be restricted to allocated sites alone.</p> <p>No amendment required.</p>		
77	Charlotte & Helen Mortimer	<p>HS4 – Alms houses are a good means by which local community can have some control over the allocations, as well as being exempt from right to buy. There is still a moral imperative that Benenden should take its responsibility for housing those in greatest need within society as a whole, not just their own people.</p>	<p>The NDP provides for a substantial increase in Benenden housing stock including all types of affordable housing on other allocated sites in the parish.</p> <p>No amendment required.</p>		
33	Russell Cruse	<p>Policy HS4 (cf Site Specific Policy 1) <input checked="" type="checkbox"/> Benenden is fortunate to have an Alms house Charity but there are a number of points arising from the desire to build more. Chiefly is the so-</p>	<p>The Benenden Almshouse Charities needs to be able to fund the development of almshouses through the sale of market housing.</p>		

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		<p>called “enabling development” by which the funds for alms houses are to be raised. The Plan should indicate far more strongly, (and consistent with comments on page 41) the desire that this development include more, if not a <i>predominance</i> of low-cost housing and express a strong desire to exhaust other ways of raising capital before resorting to sale to a private developer.</p> <p>☐ Some parishioners are of the understanding that this site will be entirely comprised of houses fulfilling a parish need and it would be good to see this misunderstanding addressed more prominently in the Plan.</p>	<p>This is a matter for the charity and not the NDP.</p> <p>No amendment required.</p>		
13	TWBC	<p>Page 33, Para 2.4.1 and Policy HS5:</p> <ul style="list-style-type: none"> ○ Is there a particular internet connectivity speed that the NDP would wish to specify? Policy ED 3 Digital Communications and Fibre to the Premises (FTTP) of the DLP (page 465) specifies internet access speeds in excess of 24Mbps; ○ Would the NDP wish to include the 25% figure in the policy (to strengthen it)? If so, may be worth having some evidence to support this figure as a requirement...perhaps from the surveys undertaken? 	<p>To strengthen Policy HS5 - Include 25% figure (para. 2.4.1) in Policy HS5 — Evidence to be gathered to justify.</p> <p>Insert specific internet access speed in excess of 24Mbps to policy HS5.</p> <p>Policy HS5 Working from Home</p> <p>The Parish Council is supportive of an increased amount of working from home. With appropriate support and facilities home working will improve local employment, health and personal well-being and is environmentally friendly. Homes must have appropriate telecommunications and internet connectivity, and developers are encouraged to provide specific office space and to contribute to the provision of community level facilities to support home working.</p> <p>Developers shall provide in at least 25% of new housing, designated space for a home office.</p> <p>Internet access speeds of at least 24mbps should be provided in line with Policy ED3 of the TWBC Draft Local Plan 2019.</p> <p>Amendment to NDP required</p>		May 2020
77	Charlotte & Helen Mortimer	<p>HS5 - Working from home is an existing circumstance which is outside the scope of planning policy to encourage or restrict. It takes place regularly regardless of planning controls, so this policy may be largely redundant. Residences with specific commercial spaces are hard to control as the space can be converted back to residential use at any time. The NDP</p>	<p>Policy HS5 has been amended.</p>		

		may benefit by having policies for improved data infrastructure and internet connectivity to assist home working. There may also be additional policies to specify the sorts of activity that can be intergrated within residential areas and which ones would cause a nuisance. Should supporting a sustainable community include policies on energy targets, renewables, car sharing & electric car charging points?			
13	TWBC	<p>Page 34, Policy HS6:</p> <ul style="list-style-type: none"> ○ Similar comment as above about specifying the internet speed? ○ Worth specifying (perhaps in supportive text) that conditions would be imposed to ensure that the “work” element remained as such in the long-term 	<p>Use same amendment as policy HS5.</p> <p><i>Insert wording as for HS5 above:</i></p> <p>HS6 Live/Work units Live/work units can improve local employment and are environmentally friendly.</p> <p>Premises should have appropriate internet access speeds of at least 24mbps in line with Policy ED3 of the TWBC DLP 2019.</p> <p>Units will only be considered appropriate if they are conversions of redundant farm buildings or are on brownfield sites.</p> <p>Amendment to NDP required.</p>		May 2020
40	Tony Fullwood	<p>I suggest the following minor spatial Policy clarifications:</p> <p>HS6 Live/Work units Live/work units can improve local employment and are environmentally friendly. Premises should have appropriate internet connectivity. Units will only be considered appropriate if they are on allocated sites or conform with our Windfall Policy HS7, are conversions of redundant farm buildings or are on brownfield sites.</p>	<p>The policy is specifically intended to include the use of redundant farm buildings, brownfield sites and the policy will be amended accordingly.</p> <p>Delete reference to windfall sites to strengthen protection of land outside the LBD.</p> <p>See revised Policy HS6 above</p> <p>Amendment to NDP required.</p>		May 2020
35	Gerard Conway	<p>Policy HS6 - Live/work units are in my view a problematic concept that does not sit comfortably within the construct of today's planning system. The vast majority of requirements for working at home are provided by carve outs that permit home working in units designated as have C3 residential use. My concerns remain that proposals will essentially be C3 in character as opposed to mixed residential/business use. This may encourage abuse of the planning system by way of use of PDR to convert agricultural buildings to B1 use buildings and then onwards to "live/work" units. Use conditions attached to live/work units may be hard to enforce. Separately, it is unclear what work element is considered appropriate</p>	<p>The policy is specifically intended to include the use of redundant farm buildings, brownfield sites and the policy will be amended to reflect this accordingly.</p>		

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		for such units. More intensive business uses such as B2 general industrial, could lead to undesirable environmental effects (eg noise, vibration). That may prove unacceptable in terms of residential and general amenity. The NDP contains no provisions for ensuring that undesirable environmental impacts do not occur as a result of developments. Recommendation: Policy HS6 should be deleted.		
77	Charlotte & Helen Mortimer	HS6 - This policy provides a route by which rural buildings can be converted to residential use, starting as live work units and then transitioning to purely residential use. It is hard for planning enforcement to keep the work element tied to the property. If the resident wants to retire, do they have to lose their home? Does the NDP need specific policies on this matter?	The policy is specifically intended to include the use of redundant farm buildings, brownfield sites and the policy will be amended to reflect this accordingly.	
13	TWBC	Page 34, Policy HS7 and Para 2.5.1: consider that further justification is required as to why there is a limit of 4 houses on windfall sites.	<p>Historic data shows 38 new dwellings within the parish in the last 20 years. Average 1.5 dwellings per year.</p> <p>Small windfall sites have historically been delivered (38 dwellings) over the last 20 years but are increasing in number. The NDP will seek to codify this process.</p> <p>From text (Para 2.5.1) delete final bullet stating: "Small sites of 4 houses or fewer will be delivered through windfall sites."</p> <p>Then Policy HS7 to read:</p> <p>Policy HS7 Windfall sites</p> <p>It is expected that a number of windfall sites will come forward during the life of this plan, each will be assessed on their own merits, conforming with National and TWBC planning policies.</p> <p>Windfall will normally be sites for four dwellings or fewer, although larger sites would be considered subject to the following criteria:</p> <p>(1) Within the Limits to Built Development, as defined in the Local Plan, where such proposals do not conflict with other policies in the Plan;</p> <p>(2) outside the Limits to Built Development, as defined in the Local Plan, on brownfield sites which are not currently in business use</p>	

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			<p>3) The scale, design and appearance comply with BNDP design policy.</p> <p>4) Development proposals should be designed to a high quality; respond to the heritage assets, the AONB, and the distinctive rural landscape characteristics.</p> <p>5) Minimise the impact on biodiversity and the environment.</p> <p>Amendment to NDP required</p>		May 2020
40	Tony Fullwood	<p>As worded, Policy HS7 Windfall Sites is imprecise and unclear about where windfall development would be supported and relies on cross reference to national and Local Plan policy:</p> <p>The Policy should be more precise and locally distinctive. As written, there are no criteria which specify where windfall development would be supported within the Parish. In order to comply with the Local Plan, this would generally need to be within the defined LBDs. In addition, there may be exceptions to the usual planning restrictions in the countryside such as windfall development on brownfield sites not in business use or sites which support the specific needs for key workers at Benenden School or Benenden Hospital).</p> <p>I have not seen evidence which justifies the limit of the size of windfall sites at 4 dwellings. If the Policy is made more spatially precise, there may not be a need to quantify the maximum capacity of windfall sites.</p> <p>Example Policy HS7 – Windfall residential development</p> <p>Windfall residential development such as infilling; redevelopment, conversion or extension will be permitted</p> <p>(1) within the Limits to Built Development, as defined in the Local Plan, where such proposals do not conflict with other policies in the Plan</p> <p>(2) outside the Limits to Built Development, as defined in the Local Plan, on brownfield sites which are not currently in business use</p> <p>(3) outside the Limits to Built Development, at Benenden Girls School and Benenden Hospital to meet the specific needs for key workers at the site</p> <p>Development proposals should be designed to a high quality; respond to the heritage and distinctive characteristics and comply with BNDP design policies.</p>	<p>Policy HS7 Windfall sites.</p> <p>See above amendments.</p> <p>Amend Policy HS7 to that suggested in 1 & 2 but omitting point 3, retaining points b) and c) using suggested wording or as is.</p> <p>Windfall policy needs to be fulfilled.</p> <p>Amendment to NDP required.</p>		May 2020
77	Charlotte & Helen Mortimer	<p>HS7 - It is unclear if windfall sites will be restricted to the LBD. The allocated numbers are well below the targets for development, so some windfall development will be required if these are to be achieved, but in the policy it is</p>	Policy HS7 to be amended.		

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		not clear what are the criteria that have to be met. What policy will be applied if someone wants to subdivide a property, or to build in the garden? Many existing properties within the LBD have space, but the character would be changed. Does the plan promote inward intensification to deliver windfall development, or external expansion? Will affordable housing and bungalow targets be applied to developments of 4 or less?			
33	Russell Cruse	<p>Policy HS7</p> <p>☐ This is very problematic. It contradicts the policies on the LBD and seems to indicate that, somehow, four is an acceptable number. This is not the case.</p> <p>☐ Windfall sites should be acceptable only on brownfield sites! Indeed, a hierarchy of need should be specified prominently in the Plan, to the effect that: no green spaces of agricultural land is to be built upon before all suitable infill and brownfield sites have been used. The hierarchy should be: 1) Infill 2) brownfield 3) greenfield.</p>	Policy HS7 to be amended.		
16	Alex Betts	<p>NDP Policy HS7 Windfall Sites</p> <p>Now that the village has a fantastic new primary school, I wonder what happens to the redundant buildings. I assume they will be converted to residential units – does this change of use count as a windfall site? If so, then surely that is potentially another 4 or so units – or do they not count as they are not new build?</p>	<p>The conversion of the former primary school site to residential units would count as windfall.</p> <p>No amendment required</p>		
13	TWBC	<p>Page 34, Para 2.7.1: There is no specific guidelines from TWBC as to density, and each site must be assessed on its own merits. However, 30dpha has long been recognised in national policy (e.g. former Planning Policy Statement 3, which was replaced by the NPPF) as striking a good balance between making efficient use of land and protecting character.</p>	<p>Page 36, 2.7.1. The NDP recognises the national average of 30dph and has agreed a lower density with TWBC to reflect the character and rural locality, together with existing lower than average density taking into account the context of the site.</p> <p>No amendment required</p>		
77	Charlotte & Helen Mortimer	<p>HS8 - It is vital that this policy is enforced and informs development and housing allocations, so inappropriate standard developer schemes can be avoided. The plan has to identify the characteristics that make Benenden special and that need to inform any development so that it feels particular to this location. If the design guidance is to inform this policy, then the documents listed need to be clear and detailed, but also made part of the policy.</p>	<p>Agree.</p> <p>No amendment required</p>		
13	TWBC	<p>Page 35, Policy HS9: On very small sites which propose small houses (e.g. semi-detached cottages) there is conceivably the chance that some sites may be at higher densities than 25dpha. Would it be better to phrase it as “<i>only in exceptional circumstances will densities greater than 25dpha be permitted</i>”?</p>	<p>Page 37 Policy HS9:</p> <p>To strengthen policy:</p> <p>Delete ‘where possible’ from first sentence. Delete final sentence.</p>		

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			<p>Policy HS9 Housing density</p> <p>While being aware of the need to make efficient use of land, as expressed in the NPPF and endorsed by CPRE, nonetheless the density of new housing should where possible be consistent with existing densities in the adjacent parts of the parish in order to maintain the character and distinctiveness of the settlement. Density at no time to be greater than 25 dwellings per hectare.</p> <p>Amendment to NDP required</p>		May 2020
40	Tony Fullwood	<p>Policy HS9 on housing density repeats the content of the Built Environment Chapter. How is density to be measured (eg dwellings per hectare/ persons per hectare/ footprint coverage)? The density of development within the built confines of Benenden exceeds 25dph. As the Plan supports development within Beneden LBD, the policy as written is therefore likely to lead to development which is incompatible with the character of the Benenden Conservation Area.</p> <p>Policy HS9 Housing density While being aware of the need to make efficient use of land, as expressed in the NPPF and endorsed by CPRE, nonetheless the density of new housing should where possible be consistent with existing densities in the adjacent parts of the parish in order to maintain the character and distinctiveness of the settlement. Density at no time to be greater than 25 dwellings per hectare.</p>	<p>Agreed.</p> <p>Policy HS9 will be amended.</p>		
77	Charlotte & Helen Mortimer	<p>HS9 - The density of sites is key to the character of places. If a site is in the centre of a settlement it should have a higher density than one at the periphery. Benenden has a very low density and dispersed nature that gives it its specific green character. Allocations for sites, which rely on densities higher than the immediately surrounding areas, will only damage the character of the area, or fail to deliver the required number of dwellings. By limiting development to a few small sites, the plan is putting too much pressure on these to deliver the target number of dwellings. The allocated densities are too high to maintain the established character. Policies in the plan, for green spaces, sustainable drainage, retained features and bungalows, all reduce the number of dwellings that be accommodated by each site. If the plan is to be realistic, more space must be allocated for the housing targets to be delivered.</p>	See revised HS9 policy wording.		

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33	Russell Cruse	<p>Policy HS9</p> <p>☐ One of the more egregious examples of perceived lack of resolve appears in this section. "...the density of housing should, where possible, be consistent with..." Replace "should" with "shall" and omit "where possible".</p>	<p>Agreed.</p> <p>Policy HS9 will be amended.</p>		
13	TWBC	<p>BNP Proposed Site Allocations - General Comment</p> <p>Would be clearer to present site allocation requirements/criteria within a policy box?</p> <p>AL/BE1 Walkhurst Road – has planning approval & conditions being discharged; not included as an allocation in BNP.</p>	<p>Site Specific Policies will be highlighted as suggested.</p> <p>Amendment to NDP required</p> <p>Walkhurst Road — query with TWBC — meaning? <i>TWBC confirmed that likely this site would be removed as an allocated site in the LP.</i></p>		May 2020
3	Environment Agency	<p>As 3 sites allocated are brownfield, a preliminary site investigation report should be submitted to support any application, thus protecting underlying groundwater from contamination. Ensuring the developments foul drainage can connect to mains drainage with only clean uncontaminated surface water drainage goes to ground.</p>	<p>Part of the planning process to refer to statutory consultees.</p> <p>No amendment required</p>		
5	Historic England	<p>Site 1 - land adjacent to Feoffee Cottages - the site specific allocation policy requirements needs to provide an approach to minimising the impact on the setting of the cottages, to ensure this allocation has met the requirements of the NPPF at para 190. Given the position and orientation of the cottages, their visibility in views along the road and outlook over the allocation site, we would suggest it is appropriate to consider whether an area of public open space fronting the road should be required to maintain views of the listed buildings and provide a green to their fore that both sustains their significance and the rural quality of the lane. This could potentially also provide an attractive focus for the alms house development.</p>	<p>Change paragraph 2 on page 42 to:</p> <p>In first line after village insert 'and the nearby Listed Feoffee Cottages.' The density...</p> <p>...and the AONB landscape and heritage setting of the Benenden Conservation Area.</p> <p>Insert line re: LVIA/Heritage assessment.</p> <p>Amendment to NDP required</p>		May 2020
33	Russell Cruse	<p>On page 41 under "Constraints" remove the contention that Walkhurst Rd is "well used as a cut through". This clearly contradicts the assertion that it's a "narrow, characterful rural lane" mentioned in the first clause of the sentence. The statement needs to make reference to the fact that Walkhurst Road is the only rural lane directly linked to the village of Benenden and is well used by agricultural traffic and by walkers and other pedestrians. The developments along this lane and in East End are very likely, unless a desire to stop it is strongly articulated, to destroy the character of the lane within a very short space of time. A policy needs to be included that makes it clear</p>	<p>Agree — full stop after pavement. Then delete words as suggested.</p> <p>Amendment to NDP required</p> <p>PC project to claim Quiet Lane status for Walkhurst Road to restrict traffic flow and retain rural lane. See page 81 of BNDP.</p> <p>No amendment required</p>		May 2020

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		that the desire of the parish is for traffic flow to be restricted along Walkhurst Rd. (as intimated in Section 5 (page 73) under “Principal aims”.												
13	TWBC	<p>Page 40 Site Allocation ‘Site 277 Land adj to Feoffee Cottages, Walkhurst Road, Benenden (ref AL/BE3 in TWBC draft Local Plan, Page 271)</p> <ul style="list-style-type: none">Site Plan does not include open space/landscape buffer as indicated on Map 73 of TWBC Local PlanJustification refers to 22-25 dwellings: proposed site allocation AL/BE3 has a capacity of 23-25	<table><tr><th>Policy requirement TWBC AL/BE3</th><th>Included in BNP (numbers are ref to policy numbering on Page 42 of BNP Plan)</th><th>Comment</th></tr><tr><td>Type of development – 23-25 C3 dwellings</td><td>Policy requirements Page 42 1. 22-23 residential; at least 12 units for almshouses</td><td><p>☐ TWBC quantity is 23-25</p><p>☐ State ‘C3’ for clarity</p><p>☐ 50% almshouses higher than TWBC affordable requirement – to be cross subsidised from other sites. This should be stated in the policy? (NB: under Opportunities, states ‘majority being local needs affordable almshouses’ – but RJ refers to a quantity of 50% almshouses, so not a majority)</p></td></tr><tr><td>1. Single vehicular means of access from Walkhurst Road</td><td>6. ‘provide vehicle access link’</td><td>Recommend that this needs additional information as per TWBC</td></tr></table>	Policy requirement TWBC AL/BE3	Included in BNP (numbers are ref to policy numbering on Page 42 of BNP Plan)	Comment	Type of development – 23-25 C3 dwellings	Policy requirements Page 42 1. 22-23 residential; at least 12 units for almshouses	<p>☐ TWBC quantity is 23-25</p> <p>☐ State ‘C3’ for clarity</p> <p>☐ 50% almshouses higher than TWBC affordable requirement – to be cross subsidised from other sites. This should be stated in the policy? (NB: under Opportunities, states ‘majority being local needs affordable almshouses’ – but RJ refers to a quantity of 50% almshouses, so not a majority)</p>	1. Single vehicular means of access from Walkhurst Road	6. ‘provide vehicle access link’	Recommend that this needs additional information as per TWBC	<p>Site layout plan from application to be inserted to show buffer and landscaping.</p> <p>Amendment to NDP required</p> <p>Change NDP to reflect total of 25 units throughout.</p> <p>State C3 for clarity.</p> <p>Change figures to 23-25, at least 12 will be almshouses.</p> <p>Amendment to NDP required</p>	<p>May 2020</p> <p>May 2020</p> <p>May 2020</p>
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1. Single vehicular means of access from Walkhurst Road	6. ‘provide vehicle access link’	Recommend that this needs additional information as per TWBC												

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4 29	Robert and Lynne Mills Sara Rowan and Peter Stennett			policy requirement			
		2. Provision of a pedestrian footway from site entrance...(more details included)	6. details follow those within TWBC policy except for reference to sensitive edge of settlement	Recommend to add in reference to "having regard to sensitive edge of settlement character" to inform design of footway.	Footpaths already referred and covered by Policy HD7. No amendment required		May 2020
		3. Requirement for landscape buffer	4. Refers to protecting Ancient Woodland/buffer	Recommend that landscape buffer should be indicated on site plan (as per Map 73 TWBC AL/BE3)	New layout map will be inserted. Amendment to NDP required		May 2020
		5. Layout & design of scheme must reflect location of site on edge of settlement, taking account of sensitive topography (ref to DM policies incl AONB)	2 & 7 Largely follow requirement of TWBC policy requirements	5. Layout & design of scheme must reflect location of site on edge of settlement, taking account of sensitive topography (ref to DM policies incl AONB)	See also changes to para. 2 page 42. Insert last sentence "...and the AONB landscape and heritage setting of the village." Add to end of "LVIA and Heritage assessment". Amendment to NDP required		May 2020
		3 Provision of on-site amenity/natural green space, improvements to existing allotments, parks, rec, playspace	No specific reference	Recommend that should be added to policy requirements	Refer to Policy HD4 – Green spaces etc. No amendment required		
		4 Development to be informed by an LVIA & heritage assessment	2. Reference to local character /heritage setting	Policy requirement could be more robust; no specific requirement for a LVIA/heritage assessment	To strengthen policy: Insert new para to para 2. "Any proposals for housing development must be accompanied by a LVIA and Heritage Assessment." Amendment to NDP required		
		7. Design shall be	7. reference to design	Recommend that policy	Insert in para 2. "Conservation Area". Amendment to NDP required		

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		<p>sensitive to the approach and setting of the Benenden Conservation Area (with ref to DM policy EN7)</p> <p>List of Contributions</p>	<p>requirements within other BNP policies</p> <p>Not included</p>	<p>requirements should include reference to approach and setting of CA</p> <p>Should be included to ensure contributions for off site enhancements etc are provided by development</p>	<p>The contribution being sought is the provision of affordable housing in perpetuity by the Benenden Almshouse Charities.</p> <p>No amendment required</p> <p>Queried with TWBC — <i>TWBC confirmed only note to themselves – no response required.</i></p>		
		<p>NDP Policy also includes (criteria 3) details of on-site parking requirements and (5) details of gardens and landscaping within site/site boundary treatment/removal of permitted development rights for fences & garden structures.</p> <p>Site 277, Land Adjacent to Feoffee Cottages, although not a brownfield site is fully supported with regard to its location, almost an infill area along with being near to Rothermere Close and existing affordable housing.</p>			<p>Thank you!</p>		
39	Peta Grant	<p>SSP1 Page 43 - suggest add paragraph 9 under the expectation of development proposals: 9. The parish is a dark skies area and any proposals for the outdoor lighting of new developments must comply with Policy DB5.</p>			<p>Amendment to NDP required</p>		May 2020
39	Peta Grant	<p>SSP2 - Uphill page 46 - add above paragraph as para 10.</p>			<p>Amendment to NDP required</p>		May 2020
39	Peta Grant	<p>SSP3 - Hospital sites page 52 - add above as para 11.</p>			<p>Amendment to NDP required</p>		May 2020
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13	TWBC	Page 43 Site Allocation ‘Site LS16 Uphill, New Pond Road, Benenden (ref AL/BE2 in TWBC draft Local Plan, Page 269)			NB: Suggest align all NDP SSPs with TWBC SSPs if in agreement and contributions (pages 269-271 TWBC DLP) and listing contributions required separately at end of SSPs for clarification. See all of the following revisions to SSP2 as appended to the end of this table (pages 133 - 134) Amendment to NDP required Queried with TWBC need to quote C3 — TWBC confirm important to state C3 in SSPs only. <
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		6. Outcome of MAGIC website	Criteria 5			Queried with TWBC — <i>Added TWBC para. 5 to SSP.</i> <i>Amendment to NDP required.</i>
		7. Design sensitive to approach and setting of CA	2. Ref to character/local distinctiveness/heritage	No specific reference to CA		Amendment para. 2 as for Feoffee. <i>Amendment to NDP required</i>
		8. Archaeological investigations	Not included			Asked TWBC for evidence — <i>Yes-included as TWBC para. 7 in SSP.</i>
		9. Layout – not to prejudice future provision of access to site to north	Not included			The NDP does not consider access to the north of the site a consideration for the development of the Uphill site. <i>No amendment required</i>
		10. Ref to TWBC Affordable Housing Policy H5	Not included			Amended to be in accordance with TWBC policy. <i>Amendment to NDP required</i>
		11. Provision of on-site amenity/natural green space, improvements to existing allotments, parks, rec, playspace	Not included			Covered in para 6. <i>No amendment required</i>
		List of Contributions	Not included except for reference to improvements to crossroads within (8)	Should be included to ensure contributions for off site enhancements etc are provided by development		Covered in para. 7 & 8 page 46? <i>But need to align with TWBC - Add “and other contributions identified through pre-app and planning application process”.</i> Clarification from TWBC — <i>TWBC confirmed just notes to themselves – NDP can remove from this document if necessary – ditto on other SSP tables.</i> <i>NB: Suggest align NDP SSPs with TWBC SSPs and contributions (pages 269-271 TWBC DLP) and listing contributions required separately at end of SSPs.</i>
		NDP Policy also includes (criteria 3) details of on-site parking requirements and (6) details of gardens and landscaping within site/site boundary treatment/removal of permitted development rights for fences & garden structures.				

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77	Charlotte & Helen Mortimer	<p>We propose that the land adjacent to Uphill, which is outlined by the red edging on the attached plan (see supporting documents for 77), be included within the scope of the Local Plan in order to help contribute towards the development for the parish. This piece of land will help to improve the suitability of Uphill, for the reasons listed in the representation, for development to help to ensure that the target housing for this area is met with greater ease later in the process.</p> <p>The land was originally submitted in the Call for Sites 2018 but, because it was linked to another larger site, 158, it was not selected. The site was considered suitable and available and the assessment recognised that this site could be separated from the larger site to the east. The report states <i>"should the Parish decide to pursue a policy of smaller scattered sites, it might be advantageous to consider developing only the smaller, western part of the site nearest New Pond Road"</i>.</p> <p>The site owners now wish to promote the site for housing allocation in conjunction with Uphill site, to ensure that the objectives of the plan are deliverable and see the site as a natural extension of the existing village.</p>	<p>This is a greenfield site within the AONB, adjacent to Ancient Woodland. The NDP has assessed this site under an ISA. Site ref. 22.</p>		
16	Alex Betts	<p>With regards to LS16 Uphill I agree that this is a suitable site in that it is a brownfield site, and am happy that it has been added to the redrawn plan of LBD of the village.</p> <p>Tunbridge Wells Local Draft Plan Policy AL/BE 2</p> <p>However, I urge the committee to lobby TWBC who have seen fit to add the next door fields in the map on the SHELAA published July 2019 (including site 158), and have also added in clause 8 to policy AL/BE2 (site LS16 Uphill) page 267:</p> <p><i>The layout, including hard and soft landscaping, to be designed so as not to prejudice the future provision of a suitable vehicular access with appropriate visibility splay(s) to the land located to the north, which may be allocated for development as part of a future Local Plan;</i></p> <p>This is without doubt contrary to the wishes of our NDP and we must protest – we are leaving ourselves open to further development on top of the 100 new homes already put forward. This clause should be removed from the TW Local Dra] Plan, and the SHELAA redrawn.</p>	<p>The NDP and Parish Council have already sought for this paragraph to be removed from the TWBC DLP.</p>		

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21	Jim Newman	Just to confirm my support for the Development Plan. However I am against the proposal to allow road access to the area adjacent to Uphill which could encourage possible unwanted future development on 158.	The NDP and Parish Council have already sought for this paragraph to be removed from the TWBC DLP.		
22	Stuart Collier	<p>I am writing to express my support for the Benenden Neighbourhood Development Draft Plan.</p> <p>As a Benenden village resident, having looked extensively at the proposals, I feel it strikes a good balance between the need to ensure a reasonable supply of housing for the future of our community and protecting the green spaces around us so crucial to the character of the village.</p> <p>With Benenden being set in large part within the AONB, I feel the decision to identify and earmark brownfield sites with potential for development is preferable to building on greenfield sites, which would only end up putting more pressure on the countryside and our environment.</p> <p>The plan has clearly been well thought through with a significant amount of work going into assessing the available sites by the teams of volunteers undertaking what is a difficult and time-consuming task.</p> <p>In situations such as these, there is never going to be a perfect solution but I feel this approach makes best use of the sites available while striving to keep the impact on the AONB, countryside and the community as a whole to a minimum.</p>			
23	Olivia Collier	<p>In general I have concerns about opening up large areas of our AONB countryside to potential development and would like to ensure that seemingly small entryways into sites such as Site 158 do not lead to large scale development stretching across the rear of the village from New Pond Road right across to Walkhurst Road, which I feel would completely change the character and identity of our community. Any initiatives to ensure that this does not happen are to be welcomed.</p> <p>I wanted to write in order to express my support for the current Benenden Neighbourhood Development Draft Plan. I am a resident in Benenden and having been bought up in Cranbrook/Benenden I feel that we are at a critical crossroads in the future of the village - it is critical that the integrity and beauty of the village is preserved for future generations. Having looked at the various proposals, I feel it strikes the right balance between the need to ensure a decent supply of housing for the future of our community as well as protecting the green spaces around us, so crucial to the character of the village.</p>	The NDP and Parish Council have already sought for this paragraph to be removed from the TWBC DLP.		

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		<p>With most of Benenden being situated within the AONB, I feel the decision to identify and earmark brownfield sites with potential for development is preferable to building on greenfield sites, which would end up putting considerably more pressure on the countryside and also our environment. The plan has clearly been well thought through with a significant amount of work going into assessing the available sites by the teams of volunteers undertaking what is a difficult and time-consuming task.</p> <p>In times such as these, there is never going to be a perfect solution but I feel this approach makes best use of the sites available while striving to keep the impact on the AONB, countryside and the community as a whole to a minimum.</p> <p>I do hope that the Benenden Neighbourhood Development Draft Plan is passed successfully.</p>			
24 29	Robert and Lynne Mills Sara Rowan and Peter Stennett	<p>We are writing to confirm our support for the above BNDP Regulation 14 Draft.</p> <p>The sites that have been put forward for development and take account of the need to preserve the overall attractiveness of Benenden and the surrounding area with its stunning views, areas of outstanding beauty (AONB), ancient woodland and the wildlife that lives in and around our village.</p> <p>The four sites offer a good balance for the supply of new houses which we are told by the Government and in turn the Local Tunbridge Wells Borough Council are required for the future of our community, although where all the people are going to come from to buy these properties we really do not know, especially if you look around the majority of county and see new building sites are occurring in abundance. However, we must at all costs protect the character of Benenden village, the green spaces, beautiful countryside and vistas in our parish. Site LS16 Uphill, a brownfield site is suitable for development and it is noted that this area has now been included within the revised Limits to Built Development. However we are extremely concerned that in the TWBC Local Plan for this site AL/BE2 page 267 the wording under Section 8 reads: <i>The layout, including hard and soft landscaping, to be designed so as not to prejudice the future provision of a suitable vehicular access with appropriate visibility splay(s) to the land located to the north, which may be allocated for development as part of a future Local Plan.</i> This comment appears to be contrary to the Benenden NDP and would leave the Uphill site open to further ribbon development stretching unchecked across a massive swathe of countryside running the entire length of Benenden to the north and through to Walkhurst Road and Goddards Green Road. This would completely change the</p>	<p>The NDP and Parish Council have already sought for this paragraph to be removed from the TWBC DLP.</p>		

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26	Simon and Shane Raw	<p>character of our community and is completely unacceptable. Clause 8 must therefore be removed from the TWBC Local Plan before it progresses any further. It is also noted that the SHELAA published in the TWBC Local Plan July 2019 for Site 158 includes Site 16 which is incorrect and should be amended so that Site 16 is shown as an individual Site. Again this appears to be contrary to the Benenden NDP. Both these comments are being made directly to TWBC.</p> <p>Thank-you for all your work on the latest NDPReg14. We are writing to give our support to the Benenden NDP. It is vital that we protect the AONB for the future of the village character. You have identified the brownfield sites which should be developed before any greenfield are interfered with. We feel that the discrepancy between your plan and the TWBC version should be addressed, namely that Clause 8 within Policy AL/BE2 should be removed. Perhaps a new clause Inserting a "Ransom" strip between "Uphill" site and the original site 158, but extended to include the adjacent site to the north. This would stop the possibility of development running away across 158 and the area to the north of the village almost up to East End, Benenden!</p>	The NDP and Parish Council have already sought for this paragraph to be removed from the TWBC DLP.		
33	Russell Cruse	<p>On page 50, the language is again, far too passive conciliatory. The second paragraph under "Reasoned justification" in particular, needs to be much more robust. This entire section needs to be substantially rewritten, in order to ensure that the strong views of parishioners are correctly represented.</p>	<p>The NDP considers this language to be suitably robust.</p> <p>No amendment required</p>		

13	TWBC	<p>Page 50 Site Allocation North of Goddards Green Road/Site South of Goddards Green Road, East End (ref AL/BE4 in TWBC draft Local Plan, Page 273)</p> <p>Site Plans:</p> <ul style="list-style-type: none">- BNDP splits site out into north & south areas (separate maps) but with one overall policy- BNDP does not include hospital development to north west and north east- Southern site plan in BNDP (Page 47) does not follow the south east part of TWBC Site Plan on Page 273- BNDP site plan omits landscape buffers indicated in TWBC Site Plan	<p>Regarded as two sites by the NDP (as in the TWBC Call for Sites), with the view to limit construction of the north site until the south site is completed.</p> <p><i>Masterplan to include the WHOLE of the Benenden Healthcare Society Land Ownership holding map</i></p> <p><i>Then TWBC agree should be kept as two sites for the sake of site allocation. But if two sites then 2 sets of SSP's required – so there may be duplication but better to be specific for each site.</i></p> <p><i>See comments on Uphill above and align SSPs and contributions and clarify list of contributions required at end – see TWBC DLP for ref.</i></p> <p>See all of the following revisions to SSP3 and additional SSP4 appended to the end of this table (page 135 to 141)</p>																				
		<table><tr><th>Policy requirement TWBC AL/BE4</th><th>Included in BNP (numbers are ref to policy numbering on Page 50/52 of BNP Plan)</th><th>Comment</th></tr><tr><td>Type of development – net increase 44 - 50</td><td></td><td>State 'C3' for clarity</td></tr><tr><td>Comprehensive proposals for whole site; phased timetable indicating land to south of GG Road to be developed first</td><td>Requirement for Masterplan included under 'Our Approach' on Page 50</td><td>Currently 'whole site' in BNP is smaller than for AL/BE4 – not incl western parts of Hospital Site</td></tr><tr><td>Requirements (i) and (ii): if part of site is subject to planning application</td><td>Not included</td><td></td></tr><tr><td>1. Active Travel link</td><td>3 (top Page 51) foot/cycle paths 5 support for KCC Hopper Bus Trial /other initiatives</td><td></td></tr><tr><td>2 No development in hatched areas: no</td><td>1 (Page 51) refers to design/massing.</td><td>BNP Plans do not include any hatched areas</td></tr></table>	Policy requirement TWBC AL/BE4	Included in BNP (numbers are ref to policy numbering on Page 50/52 of BNP Plan)	Comment	Type of development – net increase 44 - 50		State 'C3' for clarity	Comprehensive proposals for whole site; phased timetable indicating land to south of GG Road to be developed first	Requirement for Masterplan included under 'Our Approach' on Page 50	Currently 'whole site' in BNP is smaller than for AL/BE4 – not incl western parts of Hospital Site	Requirements (i) and (ii): if part of site is subject to planning application	Not included		1. Active Travel link	3 (top Page 51) foot/cycle paths 5 support for KCC Hopper Bus Trial /other initiatives		2 No development in hatched areas: no	1 (Page 51) refers to design/massing.	BNP Plans do not include any hatched areas			
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		new buildings in AONB	character, building heights			
		3 development to incorporate tennis courts, similar level of hospital parking, access to sports pavilion – unless it can be shown that facilities no longer required	6 (middle Page 51) requires area for sport & rec for use by local community			
		4 garage block to north to be demolished before occupation of 50% of resi units – land used for benefit of LWS/sports pitch	Not included			
		5 means to secure public use of hospital café	Not included	See comment below		
		6 provision of retail outlet in existing buildings	1 (Page 50) Covers this but gives opens for retail, café, or commercial enterprise	1 could result in just a café or shop, not both. Criteria 5 & 6 of TWBC policy could deliver more facilities than BNP policy.		
		7. minibus to coincide with primary school start/finish	4 (Top Page 51)	But BNP criteria not as comprehensive as that included in TWBC policy criteria		
		8 long term management for LWS	7 (page 52) and 8 (Page 52)			
		9 existing hedgerows/ mature trees within site	10 (page 52)	Site area smaller than AL/BE4		

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				No reference to layout and design protecting hedges/trees. Could be made more robust	Again, these are notes by TWBC for their own record to align SSPs.		
		10 existing trees/hedges; topography	10 (page 52)	Site area smaller than AL/BE4 See comment above			
		11 affordable housing as 35% of net increase in dwellings - % could be to cross subsidise Feoffee site	3 (bottom page 51) requires contribution to be made to Almshouse Trust				
		12. Provision of on-site amenity/natural green space, improvements to existing allotments, parks, rec, playspace	Not included				
			2 (Page 50) provide community space for events – possible use of existing old chapel?	Note – chapel not within BNP site areas			
		List of Contributions	Not included	Should be included to ensure contributions for off-site enhancements etc are provided by development			
		BNP Policy also includes (criteria 2, Page 51) details of on-site parking requirements (criteria 4 bottom Page 51) requires 25% work/office space (criteria 5 bottom page 51) refers to design/materials					

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		(criteria 6 bottom page 51) details of gardens and landscaping within site/site boundary treatment (criteria 9 Page 52) disposal of earth redistributed as part of wider landscape remodelling			
17	Andrew and Kate Westcott	We would like to voice our support for the proposed development at Benenden hospital on the existing brown field site. We strongly feel that any development needs be undertaken in areas which are already built on as we need to conserve as much of our beautiful countryside as possible. We also feel that developments should be small and with great individual character. We drive past the newly built houses in Rolvenden and look on with despair at the poorly designed boring boxes.	No amendment required		
20	Jan and Christopher Dunkley	I support the draft plan and think that brown field sites should be used whenever possible. I would like to see the AONB and the environment of the village protected for many years into the future.	No amendment required		
29	Sara Rowan and Peter Stennett	We fully support the two sites at Benenden Hospital for development, both being existing brownfield sites and particularly Site 424/LS40 which currently is a complete eyesore, with derelict buildings surrounded by unsightly hoarding. With sympathetic development this area would be improved and bring a much needed balance to the area surrounding the existing large hospital complex. It does however seem a great shame that the pavilion building ,which is a rare example of British Modernism is doomed to be demolished , when surely this could be converted in to flats or apartments ? We question the need for a cycle track being created through to Benenden village, as, in our opinion, most people do NOT cycle anywhere, let alone walk, they will use their cars. As a large part of Benenden is within the AONB , the decision to develop on brownfield sites has to be preferable to building on greenfield sites, to us that is just common sense. Putting together this Plan must have been no easy task, taking into account the many sensitive issues and conflicting interests , we feel that the best possible compromises have been made and therefore fully support it.	No amendment required		
30	Rolf Bakker and Corinne Corbett-Thompson	We like the specific policies that are designed to limit the overall outward development of Benenden village as this would permanently change and devalue the character of the parish. In particular the considerations towards and policies in relation to the Weald AONB, Local Green Spaces and the newly drawn Limits to Built Development. This will go some way to achieve retention of the village character.	No amendment required		

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		<ul style="list-style-type: none"> • It goes without saying that existing brown field sites should be selected as a priority over new green field sites. • We support the current site selection as it is in line and supports the adopted policies to retain the village character. 			
24	Robert and Lynne Mills	<p>The two sites at Benenden Hospital are fully supported for development, both being existing brownfield sites and particularly Site 424/LS40 which is currently a blot on the countryside with derelict buildings surrounded by unsightly hoarding. With sympathetic development this area would be improved and bring a much needed balance to the area surrounding the existing large hospital complex. Though we do question the emphasis for a cycle track being created through to Benenden village, how many people are really expected going to use this given the poor potholed road surfaces in and around the village?</p> <p>A large part of Benenden is within the AONB and the decision to propose development of brownfield sites offers far more potential and is preferable to building on greenfield sites. We understand and take into account that the Plan you have created has not been an easy task but does take account of all of the above in assessing the sites that are available and is therefore fully supported.</p>	No amendment required		
31	Rod and Karen Lebon	<p>I am advised by a neighbour that this is the closing date for consultation submissions, and therefore am submitting this.</p> <p>I understand that there have been representations from East End residents recommending that the site called by the owner "Green Meadows" in the southwest quadrant of Benenden crossroads, be developed instead of the East End brownfield sites recommended in the draft Neighbourhood Plan. "Green Meadows" is a totally unsuitable site for development and would be in the most flagrant breach of the High Weald AONB Management Plan. Development of any kind on this most outstanding scenic site, one of the finest in the entire AONB, would render the entire thrust and intention of AONB's, stated by Govt. in law to have the same protected status as a National Park, utterly worthless.</p> <p>I have nothing to add to my original submission concerning "Green Meadows" of a year ago, which remains equally valid and which is attached here.</p> <p>I wholly support all the recommendations of the draft NP, which was drawn up with the utmost care and in my opinion got it absolutely right in their key recommendations for development sites. It is entirely understandable that some East End residents would seek to move development to another site; but the simple</p>	No amendment required		

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		fact is, that the proposed East End sites are largely brownfield, already developed, whereas Green Meadows would be a development in total breach of all AONB policies and the High Weald Management Plan.			
34	Polly Hardwick	<p>As a resident of Benenden, I would like to write in support of the Neighbourhood Development Draft Plan that has been researched and written on behalf of villagers to shape future planning development of our rural village.</p> <p>This is clearly a carefully researched and through document who's authors have grappled hard on villagers' behalf with how to best accommodate necessary future development in the village, while maintaining the wonderful natural setting that Benenden enjoys and that enhances our lives as villagers. The decision to focus future development on brownfield sites, ie the unused hospital site in the East End of the village, appears wholly sensible and, in addition, achieves the primary objective of the purpose of an Area of Outstanding Natural Beauty (AONB), which is to "conserve and enhance natural beauty" because it will enable greenfield sites, such as Site 158 and Site 222, to be preserved thereby preventing unnecessary development of the AONB. The fact that the form and objectives of the NDP is underpinned by the village's previous Parish Plan evidences the strength of villagers' long standing wish to protect, whenever possible, Benenden's countryside and to minimise impact on the AONB.</p> <p>I believe it is, whenever possible, our duty as villagers to act as custodians and protect the rural landscape we are lucky enough to live within and I therefore strongly support the NDP's decision to target future development in the village on the East End's brownfield site. I am very grateful for the extensive work that has been undertaken by the Steering Committee on our behalf.</p>	No amendment required		
15	Adrian Betts	<p>Thanks to all those who have put in time and effort to produce the NDP .I am fully supportive of the NDP as I feel it is very well balanced , using the parish as a whole rather than just the village .</p> <p>The brownfield sites at East End are an absolute eyesore and have to be developed in some shape or form. Residential development would probably be the most sensitive form of development on those sites as any commercial use will probably result in greater daily traffic movements.</p> <p>The sites within the village are not of any great landscape significance and could almost be described as infill sites.</p> <p>It can never be right to build on greenfield sites in areas of outstanding natural beauty when there are available brownfield sites. I think this follows national planning policy.</p>	No amendment required		

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		<p>The village centre itself cannot accommodate a large number of new dwellings which would destroy the character of the village forever and result in traffic chaos.</p> <p>I think the plan has found the right blend and hope it is adopted.</p>			
16	Alex Betts	<p>I am writing to give my comments on the Neighbourhood Plan produced by Benenden NDP.</p> <p>Firstly I commend them for their sterling efforts over many months, and wholeheartedly support the plan.</p> <p>In particular I support the following 4 sites:</p> <p><i>Policy HS1 Number of new dwellings</i></p> <p><i>In addition to existing planning permissions, this Plan allocates four sites to accommodate around 100 additional new homes in the parish.</i></p> <p><i>Ref LS16 Uphill 18-20 units</i></p> <p><i>Ref 277 Feoffee 22-25 units</i></p> <p><i>Ref 424 Hospital South 22-25 units</i></p> <p><i>Ref LS40 Hospital North 23-25 units</i></p> <p>I am delighted that the committee have satisfied the need for choosing brownfield over AONB whenever possible, within the confines of the number of houses bestowed on us by TWBC. The 2 sites at Benenden Hospital are an eyesore and will be developed whether we agree or not, and if they are not residential units it could be light industrial or worse.</p>	No amendment required		
18	Derek and Mary Catlin	<p>Having closely followed the Councils progress from the outset, in the production of a development plan to meet the needs of TWBC, We would like to congratulate them on finally producing a draft plan which distributes the 95 houses which Tunbridge Wells asks for, over 4 sites. These are mostly "Brownfield sites" where development meets the needs of the village without ruining the historic village environment. Building a large estate on land which enjoys fabulous Views and is moreover protected by AONB status would have been disastrous for the village as a whole. We refer of course to the original site 158 the whole of which lays in an area of outstanding natural beauty.</p> <p>Benenden is a beautiful village remote from major towns, and is capable of taking small development of special design quality. This plan surely meets these needs.</p>	No amendment required		
19	Jack Martin and Emma Gale	<p>We would like to show our support to the Benenden Neighbourhood Development Draft Plan.</p> <p>As residents of the village, we much enjoy the surrounding area of Benenden as an AONB. It would be a shame to lose this due to the proposed housing developments suggested at the two greenfield sites.</p> <p>Our concerns are that these developments will impact local biodiversity and cause unnecessary pollution (noise and traffic) to the local area.</p>	No amendment required		

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		<p>We understand that there are advantages to using a greenfield site, however we feel that the negative impacts far outweigh these. Making use of a brownfield site will cause less disruption to both the community and the environment.</p> <p>We acknowledge that it is a difficult decision and an awful lot of planning has gone into this development but we hope that you will consider the thoughts of us and fellow residents that support the Benenden Neighbourhood Development Draft Plan.</p>			
26	Mark Glubb	<p>I am writing to express my support for the current neighbourhood plan with the proposed additional development of 100 dwellings on the following sites: Ref: LS16 Uphill Ref: 277 Feoffee Ref: 424 Hospital South Ref: LS40 Hospital North</p> <p>This fulfils the requirement that Brownfield sites be used where possible as 3 of the 4 fall into this category. This helps to minimise the negative environmental impact on the rural environment. Also, the traffic through the village Conservation area can be very heavy, and the positioning of the intended development helps to minimise the impact on this area.</p> <p>I do feel that the plan could have been bolder regarding the environment/transport infrastructure, particularly as we will see an increase in the village population. It would be good to increase the number of open green spaces, suggest a site for allotments, and develop a network of cycle paths connecting all parts of the village, not just East End and Walkhurst Road.</p> <p>Infrastructure is key to the success of the plan and although it falls outside the immediate scope of the plan, there needs to be action to have good quality mobile and internet connectivity, a good bus service and quality provision to encourage people to walk and cycle.</p>	No amendment required		
27	Amanda Glubb	<p>I would like to voice my support for the current Plan, with particular and specific reference to the proposed sites for additional housing. It is very important that, wherever possible, land is "recycled" through the redevelopment of brownfield sites rather than by developing greenfield sites. The current plan fulfils this. In addition, the adoption of the proposed sites will minimise the negative impact of additional traffic through the village conservation area that additional housing will bring.</p> <p>I would also like to comment on the following points in the Plan which are closely linked to the issue of new housing and the environment:</p> <ul style="list-style-type: none"> any potential developer should acknowledge and respect Benenden's 	No amendment required		

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		<p>status as a "dark skies" village to ensure unsuitable lighting plans are not submitted</p> <ul style="list-style-type: none"> • additional open green spaces and community amenities need to be provided close to any new development, if they do not already exist, to cater for the increased number of residents in the area. • for community cohesion and the physical and mental well-being of residents and visitors alike, safe, off-road cycle routes should be created linking all parts of Benenden together. • although outside the remit and control of the Neighbourhood Plan, a properly-functioning, low cost public transport service that operates not in seeming isolation, but with proper regard for connecting services and timings for local schools, is urgently required <p>Finally, I would like to thank those involved in preparing the Benenden Neighbourhood Plan for their time, effort and commitment. It is appreciated.</p>			
37	Tim and Deana Maw	<p>We understand comments are invited for the Benenden Neighbourhood Development Draft Plan. The requirement for land to be allocated for housing is the key concern for villagers and decisions taken in the coming period of policy making are of the utmost importance if the character of the village is to be preserved for future generations.</p> <p>We consider the Draft Plan has shown consideration for this and as a result the draft receives our support.</p> <p>We appreciate the need to fulfil Government requirements for new housing provision and sustain a thriving community and the draft seeks to do so without unnecessary harm to the villages green spaces; Benenden has a classic layout with the green, church and pub at the heart of the community but it also has other green spaces that make the village so special by giving it superb views and vistas across the adjacent rolling farmland on the numerous approach roads and within the village itself. The location within the High Weald AONB is also exceedingly important and the draft seeks to develop well screened sites rather than what might be considered 'obvious' land in Benenden itself and Iden Green. The latter settlement could so easily be damaged by inappropriate development. Areas 158 and 222 are of particular concern and we support the drafts objection to these areas being developed. The Benenden crossroads are a local landmark and the view to the west across the pasture has great significance.</p>	No amendment required		

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		Development of these green spaces would have a grave impact and would carry no logic when brown field sites are available such as those in nearby East End. It is not just the views that are important but also the countryside and the wildlife it supports also. It must be remembered that if these green spaces are developed, they are gone forever. We appreciate the hard work of the volunteers who have drafted the plan and will continue to give support through the continued development of the policy.			
41	Robert Todd	I just wanted to email my approval at present to the NDP - particularly the use of brownfield sites. Living in AONB means that we need to protect it and protect the green fields around our village whether Iden Green or Benenden. The village is not set up for the huge build being proposed and the building development of Benenden needs to stop. I hope that the Parish Council will listen to most villagers who are against these developments.	No amendment required		
42	Robert Moser	I am writing to indicate my support for the Benenden Neighbourhood Development Draft Plan. The plan is all encompassing and appears to have been well considered with balanced scrutiny and assessment of all potential sites by an extensive team from within the local community. Under challenging circumstances a sensible compromise appears to have been reached between the need for a reasonable amount of additional housing supply to sustain the future growth of the community whilst protecting the unspoilt countryside and the AONB which is of course such a quintessential characteristic of our parish. Earmarking brownfield sites with potential for development is clearly preferable to building on greenfield sites which would only serve to exert greater pressure on the countryside, wildlife and our environment and I feel this approach makes best use of the sites available whilst striving to minimise the impact on the AONB, countryside and the community as a whole.	No amendment required		
43	Andrew Marks	As a long term resident of Benenden Parish, I have several objections to the Neighbourhood Development Plan which I shall list below. Before this however, I would like to point out that, despite the Parish Council's claim to have "consulted widely", very little communication has reached the East End. It would appear that the wide consultation was only within the Village and this is the first real opportunity that I, and apparently many of my neighbours have had to make comments. My objections;	The BDNP Review Committee comments set out below are in response to the main issues raised by the following Respondent nos. 43 to 73 concerning the proposed housing allocation for the two sites at East End and do not directly correlate with the comments listed to the side. See also Appendix IA1 – Rough draft consultation feedback. Safety of roads in and around East End;		

	<p>Firstly, the proposed development intended to be imposed on the East End is out of all proportion to the existing community and an unreasonably large proportion of the total intended for the Parish. The addition of 50 new houses to the 24 currently permitted plus the resurrection of 18 small largely uninhabited properties, making 92 new dwellings in all, will create an unsustainable burden and a strongly adverse environmental impact on the local community. I am aware that there is some argument about what the total increase in dwelling numbers actually is but even the lowest interpretation of 74 is still unacceptably high.</p> <p>Page 8 of the NDP states that, as a rural situation, the Village centre has a housing density of less than 10 dpHa yet the plan notes a proposal for 22dpHa across the East End. Why this is acceptable in an area more rural than the village centre has not been addressed and is not at all clear.</p> <p>As noted in your own supporting documents, "The East End in any case has very few facilities, low employment prospects and poor transport links." (Ref. Document HSA5). These observations do indeed apply to all of the sites at the East End and have been put forward as reasons to reject one proposal however, for sites 40,41 and 424 owned by the Hospital, these drawbacks can apparently be mitigated by cycle lanes to the Village, hopper buses and the expectation that the Hospital will provide a shop, community centre etc. This, unsurprisingly, creates a suspicion of prejudicial bias and the fact that the current hospital administration previously closed the shop that was already serving the administration previously closed the shop that was already serving the community does not lend credibility to this plan; Benenden Hospital is a private trust and can only be expected to take actions according to its own best interest. There are several other examples of "selective observations" within the supporting documents; for instance, the assertion that development of site 222 would create "fears of creeping suburbanisation" and "Ribbon development linking the two distinct settlement (sic.) of Iden Green and Benenden" while at the same time asserting that, when rejecting site 437 at Iden Green itself, the area is "unsuitable for building development due to the undulating and steep land."</p> <p>This argument also applies to any development linking Iden Green from site 222 but in that case it was ignored. In addition, the statement that there are no buildings on the west side of Iden Green Road is not strictly true, to the west of the cross roads there is already a string of ribbon development along the road towards</p>	<p>KCC Highways have confirmed they have no comment to offer on the BNDP (see KCC feedback to BNDP Regulation 14).</p> <p>However, KCC Highways did express concern on the previous application for 24 houses at East End and requested a Traffic Impact Study.</p> <p>The BNDP to add TIS required in SSP.</p> <p>Amendment to NDP required</p> <p>Pollution caused by increase of traffic as a result of new housing at East End:</p> <p><i>AECOM's Environmental Audit of the Draft Plan concludes that additional housing will have no impact on pollution levels which are regarded as low.</i></p> <p>No amendment required</p> <p>Increased traffic in and around East End and Benenden village as a result of new housing at East End:</p> <p><i>The NDP recognises that all roads in and out of the parish are narrow and that traffic growth is a major issue.</i></p> <p><i>Any increase in housing numbers in the parish will result in an increase in road traffic.</i></p> <p><i>Benenden is a rural parish, and residents have on average 1.8 cars per household. In practice almost all journeys for shopping, services or doctors will require travel to Hawkhurst, Cranbrook or Tenterden, whether housing development is situated throughout the whole parish.</i></p> <p><i>Concerns raised regarding car journeys to Benenden Primary School from East End are mitigated by the provision of a mini-bus as a SSP for housing development at the</i></p>	May 2020
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	<p>Hartley which is already, effectively part of the Village. Far from creating ribbon development, site 222 would be utilising space around that which already exists.</p> <p>The Limit to Building Development line is, I understand, only a drafted proposal and will only be finalised after an overall Local Plan has been approved. The NDP is using the draft proposal to prematurely exclude development of otherwise suitable sites. The Local Plan should define the LBD, not the other way round.</p> <p>The proposed cycleway is not a practical suggestion to connect the development with the Village; neither relying on a third party to provide a free taxi service nor expecting a 5 year old to cycle every day to the newly-built school 3 miles away in the Village is realistic.</p> <p>In practice, the needs of employment, shopping and schooling would result in a large increase in traffic – predominantly motor traffic, all of which would be avoided or reduced by development within the Village or close by at Iden Green; which would also be a better, more practical way of meeting the aims of the Borough Council's Cross-Party Committee on Climate Change and Biodiversity. To this end, sites 66,158 and 222 within the Village, should be reassessed as should the three parts of site 437, at Iden Green, which may actually be more suitable for a smaller amount of development than the 60 dwellings considered in the NDP. As noted above, a presumed LBD should not be used to exclude otherwise suitable sites.</p> <p>We happen to live within the AONB but within sight and hearing of the Hospital and its grounds. The AONB will be affected by the proposed development at East End which, being at one of the highest points in the Parish will be highly visible to me and many others as the hospital site is actually an enclave intruding into the boundary of the AONB.</p> <p>The present local community at East End exists from an original need for accommodation for hospital employees. The proposal to add some new 90 houses would alter the whole character of this community and contravenes the Borough Council's planning policy by creating, what would in fact be, a substantial new satellite community within the Parish.</p> <p>In addition to the environmental concerns already expressed, the large increase in traffic resulting from the proposal would create a significant safety hazard along the Goddards Green/Benenden Road to the Castleton's Oak crossroad. In its assessment of rail links from the East End, the TWBC Local Plan has omitted Headcorn station (closer than either Staplehurst or Etchingam which it has</p>	<p><i>Hospital sites. Mini-buses are already widely utilised by private schools in the area, and parents are happy to use this facility.</i></p> <p><i>The NDP welcomes the suggestion that children from new homes at East End will attend Benenden primary school, as opposed to children from outside the parish. This would reduce the amount of traffic entering the parish from other areas.</i></p> <p><i>No amendment required</i></p> <p>Sustainability and lack of services and amenities at East End:</p> <p><i>See NPPF 2019 Para 8:</i> <i>"...sites to meet local business and community needs in local areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances 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 (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."</i></p> <p><i>The BNDP sets out that Benenden Hospital is a major employer in the Parish and currently has around 300-350 employees. The hospital already has a café for staff and visitors. The hospital currently allows pre-arranged community meetings to be held in the Quinlan Centre on the hospital site. The BNDP views the above, together with the existing housing located at East End, as a starting point to create a thriving and sustainable community at East End. The BNDP proposes that housing development on the two sites will provide the following; a minibus for use by the primary school to transport pupils to and from East End; provision of a space for a small shop, café, or other commercial enterprise to serve the locality; provision of a</i></p>	
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		<p>listed). Many of the new residents would be employed in either London (via Headcorn) or locally in Ashford or Maidstone. All of these destinations require traffic to pass along the GG/Benenden Road and over the, already dangerous, crossroad at the Castleton's Oak. The Highway Authority has spent a lot of time and money over the years improving the safety of this crossroad and has recently carried out a large resurfacing and signage exercise. It is worth noting that further reference to the Crash Map used on P76 of the NDP gives a figure of 2 slight accidents at Benenden crossroads in the last 5 years. A comparable statistic for the Castletons Oak crossroads is 10 slight and one serious accident. (The severity rating appears to represent the extent of injury sustained).</p> <p>It is clear that exacerbating the existing problem by increasing the traffic loading by building the proposed development at the East End would be a retrograde step to road safety.</p> <p>I understand that these and other objections have been made collectively by the Friends of East End group and I also endorse their objections.</p>	<p><i>community space for events and amenities (such as a pre-school or play group); contributions towards an active travel link between East End and Benenden village; an area for sport and recreational use, in part repurposing existing tennis courts and sports pavilion.</i></p> <p><i>The BNDP Review Committee believes that the above criteria improves the sustainability of the area and conforms with NPPF 2019 para 84 as set out above and NPPF para 79 c) "the development would re-use redundant or disused buildings and enhance the immediate setting".</i></p> <p><i>No amendment required</i></p>		
44	Judith Marks	<p>I wish to register my objections to the Regulation 14 Draft Benenden Neighbourhood Plan dated July 2019 as follows:</p> <p>There is an unequal allocation of the development around the parish. More than half of the up to 100 new dwellings proposed for Benenden under Policy HS1 are allocated to East End.</p> <p>East End has always been a scattered collection of farms and houses rather than a discrete village or hamlet, and any clustering has been due to Benenden Hospital building its own staff housing. On the other hand, Benenden village and Iden Green are already distinct settlements. Benenden Hospital has already obtained planning permission for 24 new houses on their land (formerly hospital buildings and surrounding landscaped site made redundant by the hospital's new wing, developed on a greenfield site). The Draft Neighbourhood Plan proposes to create a whole new settlement at East End by allocating up to a further 50 houses. Added to those already approved, this means doubling the number of households in East End and overwhelming it. As a comparison, if you doubled the number of houses in Benenden village that would mean adding 250. I am not suggesting this should be done, but it gives an idea of the impact.</p> <p>The current approved permission for 24 dwellings is as much as East End can absorb, and other opportunities within the parish should be re-examined (see below), including those in Iden</p>	<p>Effect on AONB of two sites allocated for housing at East End:</p> <p><i>Over 98% of the parish falls within the High Weald AONB so some development within the AONB is unavoidable. The BNDP balances differing pressures by allocating some development inside and outside the AONB. The BNDP has proposed housing development at East End to make use of two brownfield sites which are outside the AONB, as opposed to development on greenfield sites within the AONB. NPPF 2019 paras 84 and 117 asks that LPAs make as much use as possible of previously developed land. All proposed development at East End is on previously developed land.</i></p> <p><i>In November 2018 The High Weald AONB unit was asked by BNDP to assess the sites submitted in the TWBC Call for Sites for Benenden parish. The HW AONB unit did not assess or give feedback on the two hospital sites because they are outside the AONB (see Appendix HSA4).</i></p> <p><i>However, the HW AONB unit are providing advice on the two hospital sites (March 2020). They have offered to provide suggested</i></p>		

	<p>Green, which is less remote from Benenden, has more existing facilities than East End, and is already connected to the village by a metalled footpath of around one mile.</p> <ul style="list-style-type: none"> - In particular, Site 158 within Benenden village is within walking distance of all facilities, including the primary school, and would not lead to the same increase in car journeys assisting development out at East End. Development of this site would not overwhelm the character of the village, which we all appreciate. - Similarly, Site 222 is highly sustainable, and the assertion that it is beyond the western border of the village is incorrect as both sides of the road towards Mounts Hill are lined with houses, and the proposed development would be behind these. It would also open up an attractive green space which would add to the charm of the village. <p>Sustainability should be a priority in planning decisions in order to support environmental policies. The proposed sites along Goddards Green Road are not sustainable in planning terms. Benenden village with its shop, primary school and pub is almost three miles away, and an hour's walk using the existing lanes and footpaths. None of these facilities exist in East End, and there is little access to public transport, apart from the current pilot of a twice-daily Hopper service to Tenterden which also serves Benenden village and Iden Green. It is inevitable that the proposed development would generate a huge increase in car journeys on the following routes:</p> <ul style="list-style-type: none"> - Primary school traffic from East End to Benenden along Goddards Green Road and Walkhurst Lane (narrow single-track country lane), or via New Pond Road and Benenden crossroads - East End to Headcorn Station, with increased traffic at the notorious accident black spot - East End to Headcorn Station, with increased traffic at the notorious accident black spot at Castleton's Oak junction - East End to Tenterden, again increasing traffic at Castleton's Oak. <p>The "crash map" provided at 5.1.2 does not extend to the Castleton's Oak junction, but Crash Map shows 15 reported accidents at Castleton's Oak compared with 5 at Benenden Crossroads over the same period. Incremental improvements and traffic calming by KCC at Castleton's Oak over many years have not succeeded in cutting the number of accidents at this junction. This is not something that can be addressed by requiring developers to improve road safety (Policy T2).</p> <p>The increase in car journeys required by siting development outside the village is works against</p>	<p><i>improvements to site specific policies so that adverse impacts to development at East End can be mitigated.</i></p> <p><i>No Amendment to NDP not required at this stage</i></p> <p>Should the BNDP allocate housing development on greenfield sites closer to Benenden village centre as opposed to allocating approximately 50 new homes at East End?:-</p> <p><i>Greenfield sites within the AONB should be given the highest protection against development. This conforms with NPPF 2019 Para 172:</i></p> <p><i>"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues".</i></p> <p><i>The number and size of sites submitted by Benenden landowners In the TWBC Call for Sites has been substantial compared to other TWBC rural parishes. For example, Bidborough Parish had no sites submitted, and their allocation for new housing development is, therefore, zero.</i></p> <p><i>After careful and considered discussions about the sites with TWBC, taking into account the rural and isolated nature of the parish, and that 98% of the parish is within the HW AONB, the BNDP agreed with TWBC that the acceptable amount of new housing to be allocated throughout the period of the plan would be in the region of 100 new homes, with existing permissions for 34 dwellings and windfall sites bringing the overall total over the length of the plan to 2035 to around 150 dwellings.</i></p> <p><i>The BNDP policy HS1 (with proposed strengthening amendments), backed by TWBC policy, states that preference will be given to brownfield sites outside the AONB. As a starting point, therefore, the</i></p>	
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	<p>the ambition to be carbon neutral. It is in no way mitigated by the projects suggested on Pages 80-81 of the Draft Neighbourhood Plan. The proposed cycle route between East End and the village including the existing footpath from Green Lane to Walkhurst Lane is around 3 miles, and the route crosses three steep-sided valleys. It would not improve connectivity in any practical way and tarring or otherwise hard surfacing the existing footpath where it passes along the old green lane through undeveloped woodland and farmland would be detrimental to the landscape and environment within the AONB.</p> <p>Benenden Hospital and the proposed development sites at East End lie along the ridgeway and watershed between the Rother and the Medway. As such they occupy an elevated position and are highly visible from within the AONB. In fact the boundary of the AONB appears to have been drawn round the Hospital site so it impacts the views in many directions. The Hospital and its extensive car parks are already highly lit at night, despite apparent representations from the Parish. Further development on the watershed will intrude even more into the views from within the AONB, counter to the AONB Management Plan, which the Borough Council has adopted.</p> <p>You do not explain what is meant by East End Community Hub (5.3.1), other than proposing that commercial and social facilities should be replicated, and a children's play area provided. There is no "hub" at East End and Benenden Hospital does not offer an ATM and cafe for residents as stated in 5.4. A shop and post office that was once provided for long stay hospital residents and staff, and could be used by local residents, has long been withdrawn. The polling station was closed some years ago. Benenden Hospital Trust may be a charity but it is also a limited company and a commercial enterprise, and it is naive to consider it as part of the community, or expect or rely on it to act in other than its own interests.</p> <p>I would like to propose that the 18 semi-detached houses in Wood Lane and along Goddards Green Road, which the hospital no longer requires for its own staff, be offered as affordable housing to local people, who could refurbish them themselves. Alternatively, they could be offered to a housing association for refurbishment. These houses may be outdated and no longer required to meet the Hospital's accommodation needs, but their current dilapidation is overstated. Rather than standing empty for a longer period and deteriorating further, these</p>	<p><i>BNDP has allocated 50 new dwellings on the two hospital sites, both brownfield sites and outside the AONB, as well as 18-20 dwellings on site LS16 Uphill which is also making use of previously developed land, albeit within the AONB. The only greenfield site within the AONB which the BNDP have allocated for 23-25 dwellings is site 277 Feoffee Cottages. This is due to the exceptional circumstances of the Benenden Almshouse Charities being able to provide 12+ dwellings built in accordance with the existing almshouse principle of providing low cost affordable rental dwellings in perpetuity, with the remaining dwellings on site to be market housing, thus financially enabling the development of the 12+ almshouses.</i></p> <p><i>Both site LS16 and site 277 are sites close to Benenden village centre, adjacent to existing development.</i></p> <p><i>The BDNP Policy HS1 (as amended) will emphasise the preference for new housing development within the parish being: a) the use of brownfield sites outside the AONB and b) the use of brownfield sites within the AONB (although not at the expense of losing existing employment sites).</i></p> <p><i>No amendment required</i></p>	
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		<p>empty homes could meet an immediate housing need and the Hospital could realise immediate benefit from their sale.</p> <p>I fully subscribe to the objections put forward by the Friends of East End.</p> <p>Finally, I wish to add that I have not found the consultation process in any way inclusive. I completed a questionnaire 2-3 years ago, but have not been contacted in any other way. In common with other residents of East End, I do not have any reason to come into Benenden regularly so do not see village noticeboards. As your proposal impacts our neighbourhood so regularly so do not see village noticeboards. As your proposal impacts our neighbourhood so profoundly, I would have hoped to have been made aware of it, other than by hearsay late in the day.</p>			
45	Arianwen Neve	<p>Please may I reaffirm my concerns about the unnaturally large proposed development in Benenden's East End (sites 424/LS40 a+b) and the effect such all-in-one expansion will have on the surrounding roads?</p> <p>Would it not be possible to divide the obligatory number of houses between the East End, Benenden centre (site 158) and perhaps Iden Green?</p> <p>Simplistic view, I expect, and with the greatest respect for all your work on the NDP, but I do think the present proposals need re-thinking.</p>			
46 47 50 59 65 66 69	Bernard Phillips Hazel Strouts John Collingwood Elizabeth Shapiro Trevor Hunt Valley Kemp Bridget Hawley	<p>Benenden Neighbourhood Plan Regulation 14 objections</p> <p>I object to the Benenden Neighbourhood Plan because its site specific policies often undermine and/or are inconsistent with its stated environmental objectives and policies, housing supply objectives and policies, and transport and community infrastructure objectives and policies. Further, the justifications for site assessments are often inconsistent one with another.</p> <ul style="list-style-type: none"> The Neighbourhood Plan's suggestion that 50 new houses are planned for sites LS41 and 424 at the East End while 45 are planned for the village is misleading because it ignores 24 houses already approved for the hospital but not yet built, as well as the 18 new houses planned to replace 9 buildings containing 18 semi-detached homes with no garages and mostly uninhabited. That's 42 new houses with 42 new families, plus another 50 which makes a total of 92 new houses for the East End. This number is disproportionate to the number planned for the village and disproportionate for the East End which is a rural area of only 76 households. The 42 planned houses are already a challenge to the locality. 50 new houses on top of that 42 will totally overwhelm it. The 	<p>Old sanatorium at southern site at East End - a good example of British Modernism architecture will be lost:</p> <p><i>Due to significant alterations made to the fabric of the building during its use as a hospital, the old sanatorium was not considered by English Heritage to be of significant value to become a listed building, therefore does not have protection against demolition. However, the BNDP are hopeful that the new housing development design will in some way replicate the former sanatorium building to reflect the site's heritage.</i></p> <p><i>No amendment required</i></p>		

	<p>proposal is contrary to Policy HS8 that “housing... be well integrated into and enhance the local built environment” (p.36)</p> <ul style="list-style-type: none"> • The East End is a remote site, three miles out of the village, with no nursery school, no bike path link to the village (the route proposed in the plan is opposed by all concerned landowners), and no community hall. Site LS41 and 424 undermine the Housing Supply objective of supporting “sustainable and economically viable sites” (p.27) • Iden Green is only a mile from the village, has a long established and highly successful nursery school, a popular pub/restaurant at the Woodcock, a well-used community hall and a paved footpath used by children attending the primary school in the village (and which leads through a roadside nature reserve and through Hilly Fields), and yet it is rated as being too remote for development. See the site review of LS8 (behind the Congregational Church in Iden Green). This is inconsistent with the assessment of sites LS41 and 424 which are more remote and less sustainable yet put forward for development. • In the Site Assessment paper, Site 158 is recommended for development on a restricted scale because “the village only consists of 250 houses so the scale of development should be restricted to avoid overwhelming the scale and facilities of the existing settlement” yet the Steering Committee disregards the need not to overwhelm in relation to site LS41 and 424. This demonstrates confirmatory bias and inconsistency. • Site 158 and site LS8, among others, are dismissed for being greenfield and within the AONB yet sites AL/BE1 (in the TW Local Plan) and site 277 (AL/BE3) are both greenfield and within the AONB. So being greenfield is not a consistent reason for dismissal. Nor is being within the AONB. Further, Sites LS41 and 424 are allocated because they are brownfield but in fact they include greenfield areas (a field) and 2 Local Wildlife Sites. The LWS are described by the High Weald AONB (see their submission on the TW draft Local Plan) as being “rare and vulnerable acid grassland which should form a core area for unimproved grassland as part of a High Weald nature recovery network.” Sites LS41 and 424 also include land within the AONB, a fact which is more easily discerned in the Tunbridge Wells Local Plan than in the map on page 38 of the Benenden plan. In short, Sites LS41 and 424 have greenfield and AONB land within them, yet these elements are ignored in the Benenden Plan. There is confirmatory bias in the use of the term “brownfield”. Benenden planners are turning a blind eye to the greenfield areas in sites LS41 and 424. • By allocating sites LS41 and 424, the plan disregards the High Weald AONB’s views clearly 	<p>Lack of consultation on allocation of sites at East End:</p> <p><i>The BNDP Consultation Statement for Regulation 15 will set out details of who was consulted on the draft Neighbourhood Plan, how they were consulted, the main issues and concerns raised, and how these have been addressed in the Neighbourhood Plan.</i></p> <p><i>All correspondence received by the BNDP dedicated email address has been acknowledged and replied to.</i></p> <p><i>The BNDP acknowledges that from the initial consultation workshop there was a preference for small scattered development. After assessment of the number and size of sites submitted by landowners in the TWBC Call for Sites, only two small sites for 10 dwellings or less were submitted (sites 66 and 295). It was decided that these sites could be put forward as windfall sites if the landowners were minded to do so.</i></p> <p><i>See BNDP para 2.5.1 for justification of the further site selection process.</i></p> <p>No amendment required</p> <p>Housing density at East End:</p> <p><i>See BNDP para 2.7; 2.7.1 and 2.7.2 for explanation of housing density.</i></p> <p><i>The CPRE recommend a build density of more than 30 dph. The NPPF requires LPAs to make efficient use of land to reduce demand for greenfield development.</i></p> <p><i>NPPF 2019 Para 118 “d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively”</i></p> <p><i>NPPF 2019 Para 119 “Local Planning Authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for development needs, including suitable sites on brownfield registers..”</i></p>	
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	<p>stated in their comments on the Tunbridge Wells draft Local Plan. The HW AONB objects to hospital development on the following grounds:</p> <ul style="list-style-type: none"> o The High Weald AONB Management Plan (to which all councils with AONB land have subscribed) says councils should “seek to prioritise the delivery of new housing primarily through small scale development” ((Objective S2), not by building new satellite settlements of 92 new houses which will overwhelm the locality. o Land immediately adjacent to AONBs (or indeed land virtually surrounded by AONB designated land as in the case of LS41 and 424), contributes to the maintenance of the natural beauty of the AONB. This is especially true of sites where there are long views. The hospital site was originally a sanatorium sited on a ridge running west to east across the northern part of the parish to take advantage of long views to the south, the clean air and the remoteness. The site, being on a high ridge, will be visible for miles, though out of sight of the village centre. o The sanatorium which was established in 1906, foreshadows the aims of the 1949 National Parks and Access to the Countryside Act under which the AONBs are designated. This aim is to provide a healthy, natural environment with clean air and a tranquil setting. This plan disregards the goals of the AONB by assuming that land on one side of the AONB boundary has no effect on the natural environment, clean air and tranquility on the other. <p>The redundant hospital pavilion building, a rare example of early British modernism, provides an important contribution to the cultural history of the High Weald (see the September 2019 issue of the Royal Institute of British Architects’ Journal. By allocating site 424, the plan disregards this fact and undermines the plan’s professed objective of protecting the environment. It also disregards Policy HS8 that development “be well integrated into and enhance(s) the local built environment”.</p> <ul style="list-style-type: none"> • Under the Site allocation review, site 158 is recommended for “development.. .(which) could offer the opportunity for a sensitively designed scheme that could potentially be integrated into the existing village centre.” However, the Plan eventually recommends against such development because the parish has been offered large brownfield sites, two of which lie adjacent to each other at the hospital, LS41 and 424. This argument, where it is applied to an area 3 miles distant from the village, undercuts the plan’s stated Environmental Objective of protecting the landscape because landscape and wildlife habitat are best protected where housing is developed organically, growing outward from an existing developed centre, not spotted at 3 miles 	<p><i>The BNDP has recognised that even though the hospital is a major work location, at evenings and weekends it becomes a peaceful location. The BNDP has proposed a lower build density of 22 dph on the two hospital sites.</i></p> <p><i>No amendment required</i></p> <p>Allocation of sites in the NDP is “not correct”</p> <p><i>It is true to state that Neighbourhood Plans should not allocate sites that are already allocated through strategic plans such as a Local Plan.</i></p> <p><i>However, the TWBC Draft Local Plan 2019 has yet to be adopted. Therefore, having the same sites in the draft plans is acceptable. Should the BNDP be successful at referendum before the TWBC Local Plan 2019 is adopted, the BNDP takes precedence over the current TWBC Local Plan (2006). TWBC then remove the BNDP site allocations from their Draft Local Plan (2019) but will refer to the BNDP containing the housing site allocations as forming part of their Local Plan, and giving the BNDP precedence for the term of the Local Plan to 2035.</i></p> <p><i>If, however, although extremely unlikely, the TWBC Local Plan 2019 is adopted before a successful referendum is held on the BNDP, then the TWBC Local Plan will take precedence, and the BNDP would then take the site allocations out of the NDP.</i></p> <p><i>The BNDP have worked, and will continue to work, closely with TWBC on this matter to ensure that both the BNDP and LP are in alignment on policies, site allocations and site specific policies, and both plans will conform with national planning policy.</i></p> <p><i>No amendment required</i></p>	
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		<p>distance from the centre so that travel links between the two have to be established. Such links invariably eat into wild life habitat and degrade the natural landscape. By allocating sites LS41 and 424, the plan puts at odds the two objectives of “enhancing connectivity within the parish” (page 71) and the objective of protecting “valued environmental assets” (page 13). Connectivity presumably means wider roads, better junctions (such as at Walkhurst and Goddards Green Road which is now adjacent to a Green Space) paved bike paths and pavements. None of these, when they take place outside the built-up area, enhance the landscape and improve wildlife habitat. Further, a large housing site of 92 houses set in a rural part of the parish of itself diminishes the natural environment.</p> <ul style="list-style-type: none"> • By allocating sites LS41 and 424 for so many houses, the plan directly challenges Tunbridge Wells Borough Council’s Task Force on reducing carbon emissions. Recognising the expense of living at such a distance from village facilities, and the need for at least two family cars, the plan recommends little affordable housing at the hospital site. Children will be driven to school, parents will drive to work and to all village amenities such as the village shop, the church, the pub/restaurant and community gatherings of all kinds. There is no possibility, as there would be at Iden Green or at sites 158 or 222, of walking children to school. At a time when the country, the TW Borough Council included, is especially aware of the issue of climate change, this plan deliberately turns a blind eye. By so doing, the plan fails to meet its stated objective of enhancing the environment. • I also, of course, subscribe to the arguments put forward by the Friends of East End. 		
47	Hazel Strouts + signed petition for 133 additional signatures	<p>We, the undersigned, object to the Neighbourhood Plan (NP) in so far as it relates to housing supply allocation. In essence, our case is first, that it is unnecessary and undesirable for this plan to contain any provisions for housing allocation, and that they should be omitted; secondly, if there is good reason to do so, the proposed development at the East End is excessive, inappropriate and unsustainable, and it contravenes well-established policies. The housing allocation can readily be met on sites nearer to the village centre which are consonant with common sense policies.</p> <p>1. <u>The need for an allocation at all</u></p> <p>The Tunbridge Wells Borough Council Local Plan is subject to consultation at present. A copy of our objections to that plan is supplied as a</p>	<p>Active travel link proposed between East End and Benenden village:</p> <p><i>The NPPF 2019 para 91 states that “Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</i></p> <p><i>“a)...layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods...”</i></p> <p><i>And NPPF 2019 para 102 c) “opportunities to promote walking, cycling and public transport use are identified and pursued”. There is no avoiding the Government’s promotion of health</i></p>	

	<p>matter of courtesy and relied upon in relation to the NP. The Local Plan (LP) takes precedence over the NP, so that any case put forward in the NP will be of no effect, if it is at odds with the LP, and tautologous if it is not. No other neighbourhood plan, so far as we are aware, has set out provisions on housing allocation, plainly because it is unnecessary. The Parish council does not acquire any planning powers or influence by including such matters. See PPG Neighbourhood Planning paragraph 07 (https://www.gov.uk/guidance/neighbourhood-planning--2): “A neighbourhood plan can allocate additional sites to those in a local plan (or spatial development strategy) where this is supported by evidence to demonstrate need above that identified in the local plan or spatial development strategy. Neighbourhood Plans should not reallocate sites that are already allocated through these strategic plans.”</p> <p>2. <u>The allocation at the East End</u></p> <p>2.1 There are currently about 74 households in the section of the parish known as East End, at a density of less than 1 per hectare. It is proposed to more than double that number by allocating an extra 45 to 50 houses at the hospital sites in addition to the 24 houses on the south side for which permission has been given, but which are not yet built and a further 18 houses to replace semi-detached dwellings no longer fully in use on the north side, see page 31, policy HS1.</p> <p>2.2 This provision contravenes policy HS8, page 36, since housing on this scale does not “enhance the local built environment” nor “respect the local landscape”. Far from it, it creates a whole new village where none existed before with no sensible provision for the facilities which are necessary. It is on a prominence and is visible from the south for a long way, and is almost surrounded by the AONB (constraints page 48).</p> <p>2.3 Policy HS9 requires the density of new housing where possible to be consistent with existing densities in the <i>adjacent</i> parts of the parish. This site is not adjacent to any part of the centre of Benenden, but to rural scattered houses, at probably less than 1 per hectare, and so the proposal clearly contravenes this policy.</p> <p>2.4 There is already provision at most for 42 new houses on this site, overall. That should be regarded as sufficient, if one stands back and looks at the overall picture, as we invited the proponents of the plan to do in our previous objections to the original draft of the plan. Clearly this has not been done. The existence of permission for 24 houses on the south site is described as an opportunity, page 48, when it is</p>	<p><i>and wellbeing and encouragement is given on all levels to support local communities to work effectively with LPAs to promote healthy and inclusive communities and support health infrastructure.</i></p> <p><i>The BNDP do not expect that the proposed cycle/footpath link between Benenden village and East End will be used to take children to and from the primary school on a daily basis but are hoping that this link will encourage some to do so during summer months. However, there will be a minibus provided to mitigate car journeys for that purpose.</i></p> <p><i>Rather the BNDP sees this travel link as a welcome community asset that will provide a safe and environmentally sustainable alternative to the use of public roads.</i></p> <p><i>It is proposed that this link will be used as an extension to Cycle Route 18 as part of the National Cycle Network.</i></p> <p><i>TWBC are very supportive of this project, and are actively researching the possibility of extending this proposed cycle path using the disused rail-line linking through to Tenterden and to Headcorn station as an alternative means of commuting. The BNDP Supporting Document TA2 states “In 2008 Sustrans carried out a feasibility study for Kent County Council looking at establishing a “Headcorn to Tenterden Cycleway along the route of the old railway line. The potential for linking into this providing a safe, predominantly off road, route into Tenterden (approx. 10km/6.2 miles) and the mainline station at Headcorn (approx. 10.5km/6.5 miles) from East End is hugely attractive”.</i></p> <p><i>It is true to say that the proposed route would need permission for the conversion of current public rights of way to a cycle route. However, the proposed route does extend along existing roads, tracks and public rights of way, and therefore KCC/TWBC would strongly encourage landowners to support</i></p>	
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	<p>no such thing. There is no basis for the argument that the existence of some permission opens the land up for further development. If the Local Plan is sufficiently definite about the maximum number of houses to be allowed over the whole site, that should be a sufficient safeguard, bearing in mind that under the Local Plan, the whole of the hospital site, including that part which is in current use, is considered as site BE4. The part in current use is also shown coloured purple on page 38 of the NP without explanation.</p> <p>2.5 There will inevitably be a vast increase in traffic on an already dangerous road that leads to the accident black spot of Castleton's Oak crossroads. There will also be a significant increase of traffic in the other direction and along Walkhurst Road, a narrow single track lane towards the village, especially if the occupants of the new houses have small children to take to the primary school.</p> <p>2.6 Goddards Green Road, (GGR) which divides the site, is a narrow rural lane with one lane in each direction, but with barely room for two lorries to pass. There is no other practical route which traffic can take between the site and the village centre. At present, the hospital accounts for some 400 traffic movements per day. The average number of cars parked there is about 250 per day, almost all of which get there and back on GGR, which will continue whatever the outcome of the consultation. At present the traffic movements emanating from sites 41 and 424 are virtually nil. 424 is boarded off. So the development of these sites will necessarily add to traffic movements on the inadequate road. 80 to 90 new houses will produce at least 240 traffic movements, and more likely 300, especially as these sites include only limited affordable housing and are built almost three miles from the school, shops and meeting places in the village. This is an increase of 75%. There is no proposal to widen GGR, with or without s.106 contributions or CIL payments, if that system is adopted.</p> <p>2.7 The expectations set out on pages 50 and 51 show how lamentably deficient the site is as a sustainable entity, since it has none of these features. There is no basis for supposing that an independent shop or cafe could survive as a viable business. This part of the NP is at odds with the Local Plan which works on the basis that the shop and cafe will be in the hospital itself, see page 274 of that document. That is of course equally unlikely. The proposed cycle path has no prospect of coming into effect without the consent of the landowners, one of whom has already refused. It is in any event nothing more than a recreational project.</p>	<p><i>the conversion of these paths to enable use by cyclists.</i></p> <p><i>Also, this proposal is supported by Kent County Council's (KCC) Active Travel Strategy which aims to "make active travel an attractive and realistic choice for short journeys in Kent. By developing and promoting accessible, safer and well-planned active travel opportunities, this Strategy will help to establish Kent as a pioneering county for active travel."</i></p> <p><i>Refer to Supporting Document TA2 Cycle route report.</i></p> <p><i>No amendment required</i></p> <p><i>This is not stated in the BNDP.</i></p> <p><i>This is not stated in the BNDP.</i></p> <p>Site allocation process for the sites:</p> <p><i>The BNDP followed a methodical assessment of sites submitted in the</i></p>	
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	<p>2.8 It has emerged in discussions with the promoter of the NP that there are two more reasons behind the allocation of such a large number of houses to the East End, neither of which has been put into the Plan or associated documents. One is that since the hospital trust has charitable status it is obliged to maximise the value of its assets by developing as much of its unused land as it can. That is of course not a planning reason, since the planning system does not exist to assist organisations, however worthy, to make money. Rather it is a reason to be firm in setting limits to development which can be sustained. It was the hospital's choice to move westwards on to a greenfield site, thereby releasing land which had previously been used for its main function. The planning system is there for the benefit of the community, not one individual organisation.</p> <p>2.9 The second matter relied upon is that the hospital is likely to, or may threaten to, apply for planning permission in any event on the basis that these are brownfield sites, and will if necessary take the matter to court. However, section 38(6) PCPA 2004 says that planning applications must be determined in accordance with the development plan. If there is no allocation in the development plan, it makes it less likely that (i) permission would be granted and (ii) an appeal would be successful against refusal of permission (from those considerations alone). Clearly therefore 'fear of litigation' is permitting development which would not otherwise be allowed. Fear of litigation is not a valid planning reason. In any application for permission or appeal the Local Plan and Neighbourhood Plan carry considerable weight. The fact that a site has become a brownfield site does not override every other factor, and a strongly argued local and/or neighbourhood plan can be effective. Sustainability is a far more relevant factor.</p> <p>2.10 For these reasons, and those set out in individual submissions, the hospital site should be limited to the permissions in existence at present. Standing back, it is as much development as the East End can absorb.</p> <p>3. <u>Alternative Sites</u></p> <p>There are several alternative sites which are capable of taking up the numbers of houses required to meet the target, if the dwellings allocated to the hospital site are left at the present number, that is, 24 new houses on site 424. These sites are 158, next to site 16 and combined with it in the LP SHELAA document, site 222 and site 66 in Benenden centre; sites 8 and 437 East in Iden Green.</p>	<p><i>TWBC Call for Sites. See criteria/SHELAA Supporting Document.</i></p> <p><i>The overlying principle of the site selection conforms with NPPF 2019 Para 172:</i></p> <p><i>"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues".</i></p> <p><i>Together with NPPF 2019 Para 118:</i></p> <p><i>"d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively".</i></p> <p><i>There are two such sites that conform with both these policies, LS424 and LS41. Both sites are outside the AONB and are on previously developed land.</i></p> <p><i>The BNDP agreed with TWBC that due to the rural and isolated nature of the parish, and taking into consideration the landscape constraints, that despite the large number of sites put forward for development, the housing number for new dwellings for the period of the plan would be around 100 new houses allocated on sites put forward in the Call for Sites, with an additional 34 existing permissions and windfall sites up to around 150 new dwellings over the period of the plan to 2035. This would also fulfil the requirements of the 2018 TWBC Housing Needs Survey identifying a need for 6 affordable dwellings per annum over the next five years. This plan will provide approximately 40 affordable homes.</i></p> <p><i>After individual sites had been assessed the 3 sites that meet as many suitable criteria for housing development are LS41; LS424 and LS16. Being a greenfield site within the AONB Site 277 (Feoffee) did not meet as many suitable criteria, but special consideration has been given</i></p>	
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	<p>3.1 The Limit to Built Development (LBD) is an artificial line drawn where the planners want to exclude some sites and include others. The decision on inclusion of sites comes first, and the line is drawn round to include them. In fact the LBD line should reflect what is on the ground, see LBD Topic Paper paragraph 7.1 (a). Benenden's does not. It extends eastwards beyond the primary school on Rolvenden Road, but stops at the crossroads going west. In fact the built development extends westwards well beyond the crossroads – as far as the public school gates on both sides. Excluding this part of the built development has the effect of preserving the houses along the B2086 west of the crossroads from unwelcome infilling. There is clearly no prospect of infilling in the suggested tightly drawn LBD to the east of the crossroads. Sites 222 and 158 are outside the LBD, as currently drawn, but are adjacent and could as well be in it had it been drawn fairly. There is a deficit in process here, in failing to include the obvious built development. Site 158 is adjacent to site 16, Uphill, which was outside the LBD before the re-drawing. The process is therefore to allocate a site, and then draw the LBD line round it and say "Look, it is fine because it is in the LBD."</p> <p>3.1.1 Similarly, the proposed removal of a LBD entirely from Iden Green prevents the allocation of housing to infill sites, see page 4, paragraph 7.5, item 2 and page 7, paragraph 8.1(b) of the Limit to Built Development Topic paper, which says: <i>The removal of two LBDs at Iden Green (Benenden) as both of these settlements are considered to be unsuitable for further development as they have limited key facilities and bus services making them unsustainable in this context.</i> As has been done in the centre of Benenden village, the LBD could so easily be drawn to include sites LS8 and 437 East, since they are clearly suitable for development and because the reasons given for their exclusion do not add up.</p> <p>3.2 At page 36, paragraph 2.7.2 it is said that average density in the parish is 10 dwellings per hectare. This can only be achieved by taking into account spaces which are not and never would be built upon. If we look at the area within the LBD, density is relatively high, as is usual in local village centres where the old terraced houses are close together. Density at the East End on the other hand, is much lower since there was never any hamlet main street lined with workers' cottages. The outstanding rural nature of the East End is why it was chosen as a site for a sanatorium.</p> <p>3.3 Site 158. This is next to Uphill, site 16, which was included within the LBD by adjusting the boundary. Page 270 of the LP, item 8,</p>	<p><i>to the provision of 12+ almshouses on this site.</i></p> <p><i>In consequence, the above 4 sites allows the NDP to fulfil the housing numbers required by TWBC for the parish over the length of the plan, as well as providing in excess of the number of affordable housing needs required over the next five years.</i></p> <p><i>The BNDP has taken an overall view of the entire parish, and sets out that the best use of land available has fulfilled the housing allocation required.</i></p> <p><i>Protection of greenfield sites within the AONB has been given the highest priority as set out in NPPF 2019 para. 172 above.</i></p> <p><i>No amendment required</i></p> <p><i>Site 66 is for 3 dwellings. The BNDP would welcome the development of this site as a windfall site.</i></p> <p><i>All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.</i></p>	
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		<p>requires the layout not to prejudice the provision of vehicular access to site 158 <i>“which may be allocated for development as part of a future Local Plan.”</i> It is not needed now only because of the over-allocation of houses at the East End. The SHELAA aggregates sites 158 and 16. The potential yield of the two sites together is given as 50-65 houses. The site is within walking distance of the village amenities. And so the sustainability assessment, which refers to lack of services and facilities including public transport is misconceived. The reason given for the rejection of the area outside of site 16 (that is 158) does not bear examination and is vague. This site is regarded as suitable for allocation in a future Local Plan. Its landscape impact is the same as it is on 16. This site was originally one of two sites considered as a site of the new village primary school and was earmarked in early discussions with the TWBC planners as suitable for housing. The TWBC proposed 174 dwellings for this site in 2018.</p> <p>3.4 Site 222. This site on the southwest corner of the crossroads apart from the area around the pond which is directly on that corner and which is to be left as a green space for future village use (it is not currently open to the public) is only outside the LBD because that line has been perversely drawn to exclude the built development to the west. The experience of sites 16 and 277 show that the LBD can be adjusted to enclose an allocated site or it can be ignored, as in the case of the hospital site. The SHELAA report is basically wrong. It is within walking distance of all village amenities so the alleged lack of services and facilities, including public transport is plainly wrong.</p> <p>3.5 Site 66. This site is analysed in the NP HSA3 sheets, pages 9 and 10. It is regarded as suitable and achievable. The reasons given for its suitability are valid. There is on the face of it no reason to reject it.</p> <p>3.6 The Iden Green sites. The reasons given for rejecting them are that there are no amenities, but Iden Green is in fact only a mile from the village, and has a pub/restaurant, a nursery school and a community hall. There is a paved footpath link to the village giving access to the primary school, church and village centre. This path follows a Roadside Nature Reserve for less than half a mile and then becomes a paved footpath through fields to the church and adjacent primary school. Compare this with the sites in the East End, three miles from the village centre, which has no such facilities nor a direct link with the village except by car.</p> <p>3.6.1 Iden Green has had several parcels of</p>		
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		<p>land offered in the call for sites yet each has been rejected. Site LS8, for example, a site for 26 houses lying between Chapel Lane and Iden Green Road and surrounded by houses in the heart of the hamlet, has been rejected on the grounds that it:</p> <ul style="list-style-type: none"> (a) is in “a remote location relative to services and facilities and public transport” (SHELAA; a misguided objection identical to those made in relation to sites 158 and 222); (b) would increase the traffic (HSA) ; (c) is outside the LBD (true, but capable of being remedied); and (d) has “no amenities” (untrue). <p>These points would, on the other hand, all be perfectly true if they were spoken of in relation to the East End site.</p> <p>Site LS8 is a greenfield site and within the AONB but this is also true of the two sites on Walkhurst Road, the primary school and the hospital site which includes Local Wildlife Sites and, as seen on the map on page 38, overlaps into the AONB.</p> <p>3.6.2 Other sites in Iden Green have been rejected, such as 437, a very large site, as if it were only available in one piece for a very large number of houses. In fact, a small group of houses could be considered in a small, suitable section of the whole, for example, that part of this site which lies to the east of Iden Green Road and in the centre of the hamlet, adjacent to an existing housing estate and close to the pavement which connects the hamlet to the Village centre.</p> <p>4. <u>General</u></p> <p>Our comments made to the draft plan promulgated in February 2019 and signed by 127 people, noted that our objections will be submitted at each stage of the consultation process until we come to a satisfactory conclusion. Regrettably, we have not reached such a conclusion since the principal objections raised in that document have not been put into effect. No attempt has been made to stand back and look at the overall picture in the East End, nor to acknowledge and deal with confirmation bias. Instead, the NDP Group has chosen to set out its interpretation of some of our objections and its justification for disregarding them, from page 85 onward, appendix IA 1. In the light of this, the original objections should be taken as continuing to apply at this stage of the consultation, except where items disputed have been removed. These objections should therefore be read as incorporating the relevant arguments in that document.</p> <p>The effect of this Plan would be to create an unsustainable satellite village in the East End</p>		
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		where there are currently no amenities requiring greatly increased vehicle movements on unsuitable roads. The fact that it has been made into a brownfield site is not sufficient to override these objections, nor to exclude more suitable sites in the village centre, where the complicated and probably unattainable conditions suggested for this site will not be needed.		
48 49	Anne Ludlow G Ludlow	<p>I the undersigned object to the above plan on the following grounds:-</p> <ul style="list-style-type: none"> * The total imbalance of property proposed in the East End, 45 in the village, none in the area of Iden Green and 87 in the East End. This takes into account 24 on the south side that appear to have planning and 18 on the north side being redeveloped. * It is contrary to planning policy to build outside of the village on this scale and would create a satellite village. * Building on the hospital will affect the landscape of an AONB. * Iden Green has a bus service and is approximately 1 mile from the village centre, East End is approximately 3 miles from the village centre. * Iden Green also has an established footpath to the village. * Sites 158 and 222 are not being considered, why? In the case of 158 this was considered a possible site for the new Primary School, why not for housing? * To increase the traffic on Goddards Green Road is irresponsible. More traffic on this narrow country road leading to the black spot of Castleton Oak crossroads would lead to more accidents at this site. The recent traffic calming measures installed DO NOT WORK. I know, I use these crossroads almost daily. 	All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.	
51 52	Amanda Petch Robert Petch	<p>I object to the Draft Plan Regulation 14 and my objections are as follows:</p> <p>The East End is a very rural area. We have 74 households as opposed to about 840 in the village and in Iden Green. Why despoil the landscape by creating new traffic links between a satellite village and the village proper?</p> <p>The plan is without balance. You wish to build 87 houses at the East End and only 45 in the village. Why allocate to only one area more than half the total of new houses to be built in the parish?</p> <p>Unlike Iden Green, which is a mile from the village, we are almost three miles away. Unlike Iden Green, we have no pub/restaurant and we have no footpath link to the village. Iden Green is linked to the primary school, church and village centre with a footpath less than half of which follows a</p>	All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.	

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		<p>Roadside Nature Reserve while the remainder runs through fields to the church and primary school. The East End has no direct link with the village except by car. Landowners I believe, refuse your cycle path proposals.</p> <p>Your housing numbers mislead. You should include the numbers of those already approved but not built (24) and the houses “replacing” the 9 existing buildings, largely unoccupied and each containing two small semi-detached houses without garages. You now plan 18 large, separate new houses with garages which will not keep to the footprint of the previous 9 buildings and which will, presumably, be occupied. This is a real change for the community.</p> <p>It is contrary to planning policy to build outside a village. On this scale, it creates a satellite village (albeit with no services or infrastructure). A satellite village created in the shadow of an enormous hospital.</p> <p>For the residents to be fully part of the village (of Benenden) they will be constantly driving backwards and forwards (to the shop, church, village events, pub etc etc) polluting the countryside.</p> <p>The lanes between East End and Benenden, eg Walkhurst Road or Stepneyford Road, are not suitable for any extra traffic as they are narrow and there are many blind corners. Equally, they should not be changed to accommodate more traffic; they are beautiful country lanes and should stay that way. They are part of the rural community that we live in.</p> <p>You have made brownfield sites your priority at the expense of sustainability and the environment. This contravenes TWBC policy (see its new cross-party Task Force on climate and biodiversity which aims to make the borough carbon neutral by 2030).</p> <p>The hospital is a bubble of non-AONB bulging into the AONB which covers the rest of the East End. Building there <i>does</i> affect the landscape of an AONB.</p> <p>Iden Green has similar bus services to the East End and is far closer to the village, yet no building is planned there. On the contrary, the plan is to remove the Limits to Built Development line so there will be no in-filling either. Once more, one considers the absence of balance in your plan.</p> <p>You continue to refuse to use site 158 north of the village Street while you approve site 16 (Uphill) on New Pond Road which is immediately adjacent to 158. Why the one and not the other, especially as the TW Local Plan asks for an access route through Uphill to serve</p>		
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		<p>the development expected at a later date on 158. 158 was considered a possible site for the new primary school. It was considered by TWBC planners in early 2018 as a possible site for 174 new houses. Why is it <i>not</i> a possible site now?</p> <p>Please reconsider Benenden's Regulation 14 Neighbourhood Plan in the light of all these comments.</p>			
53	William MacPherson	<p>1. The plan as drafted still proposes that virtually all the new housing in the Benenden parish should be sited in the East End. It states (page 88) that it balances "a maximum of 50 new homes at East End in addition to 44 new homes in Benenden village". However, there is already permission for c40 new homes on the same sites in East End, and it is not reasonable to ignore these when counting the number of new houses. In effect, (if I understand it correctly), two thirds of all the new houses are to be built in the East End. This is despite it being the smallest settlement.</p> <p>In other words, the NDP proposes a fundamental change to the East End with it being converted into a separate, modern satellite village, but one without local services. While there is justification for some housing on the sites in the East End, this should be at the density presently proposed (and approved). There is no sensible room for more housing beyond the already approved levels. The plan claims to have "balanced" these factors. But the plan is drafted (as I understand it) by villagers from Benenden village centre, who cannot possibly be able to balance dispassionately.</p> <p>2. The discrete nature of the three communities (Iden Green, Benenden village and East End, ought to require each to construct their own plan. Otherwise it is too easy for the majority to saddle the housing on the smallest settlement. The East End residents are under-represented in the planning committee, and outvoted by the largest settlements. Their interests are not taken account of in this plan.</p> <p>3. However, even worse, the effect of building a satellite village at East End will have a deleterious effect on quality of life of Benenden village residents, as East End residents rely on car journeys to get to the village. There will be more traffic and more parking problems when the residents of the new houses from the East End come to the shop, drop their children at school or attend village events.</p> <p>4. There is an effort to claim there will be a reduction in car use by promising a new cycle lane (TA 2) and school minibus. As the owner of the agricultural land of Pypme Manor, I can</p>	<p><u>All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.</u></p> <p><i>On the contrary, the BNDP Steering Group committee is made up of eight volunteers from the Parish, four live in or nearby Benenden village centre, one nearby to Iden Green, and three live in or around East End.</i></p> <p><i>It is the Parish Council policy, and therefore BNDP policy, to give the whole of the parish equal importance and consideration, and to encourage inclusivity across the parish.</i></p>		

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		<p>confirm we would have no intention to agree to change the rural footpaths that run through our land (both proposed options) into cycle lanes. This would disturb the agriculture and urbanise a country environment. It is important this mistaken impression in the supporting documents is removed because it suggests something which would be impossible. Both routes proposed are footpaths in the definitive map, and we own the land. It is astonishing to make such a proposal; and use it as evidence to support the plan, without having made any effort to contact the evidence to support the plan, without having made any effort to contact the farmers/land owners involved.</p> <p>5. A school minibus is not sufficient mitigation to avoid thousands more car journeys each year. This is a deeply environmentally hostile plan which is wholly inappropriate in the current climate.</p> <p>6. As a final point, I would just note how difficult it has been to access documents; to know by when, to whom, or where to submit feedback; and that much of the detail around additional housing seems to have been made obscure (for example not counting the approved, but unbuilt, housing in the East End, in the totals of new houses, and for example proposing a cycle path over a route that will be impossible to build). In my opinion this fails the basic tests of consultation.</p> <p>Please confirm receipt of this email. As you know I objected in the summer and my comments were not acknowledged (at the time or subsequently) nor addressed in your new draft.</p> <p>Please advise of the next steps in your process.</p>	<p>All emails addressed to the NDP mailbox have been acknowledged and replied to.</p>		
54	Sarah Macpherson	<p>I am writing to object to the Benenden Neighbourhood Plan for new housing because I am concerned about the distribution of houses on the various sites proposed. It seems the majority are possibly to be built in the East End. This does not seem sensible.</p> <p>East end is some distance from the heart of the village meaning that residents would have to drive to reach amenities such as the shop, pub, butcher, church and most importantly the school. This would significantly increase the numbers of cars on the road and therefore carbon emissions. It seems to go against government guidelines to "grow from the heart of the village outwards" and reduce carbon in the atmosphere. I can't imagine the houses would be very attractive to buyers when they are almost a satellite development from the centre of the village and it seems</p>	<p><u>All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.</u></p>		

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		<p>a great shame that those living there are not able to walk their children to the local school or use the other amenities central to the community other than by driving.</p> <p>I really feel the quota of houses for Benenden should be more evenly distributed than is currently put forward in the Benenden Neighbourhood Plan.</p>			
55	Colin Czapiewski	<p>We have lived in Benenden for 27 years. I am very surprised that Benenden Hospital grounds have been proposed for a large number of new houses. It seems very clear that it is one new proposed site and not two.</p> <p>I have read through the papers produced by the NDP group. Although there has been considerable good work performed in the production of the papers, the conclusions do not follow on from the information produced, and they are not logical. Conversely, the underlying information within the NDP seems to indicate that the Hospital is NOT the best place for new houses. Both the existing residents of Benenden and those living in the proposed new houses at the Hospital would be adversely affected, and significantly so. Personally, we are not directly affected as we live about a mile from the proposed development, but we care deeply about our village and the adverse implications that this proposed new development would have on existing residents of Benenden as well as those occupiers of the proposed new houses. Some of the other sites in the NDP are far more logical, sensible and reasonable, but seem to have been rejected with no good reasons provided.</p> <p>Having a wider distribution of building, and within reasonable and safe walking distance of the village, would seem to be far more sensible. It would also be much more in line with the NDP's for other villages.</p> <p>I have a number of reasons why the Hospital site is not appropriate:</p> <p>1. Safety is a major issue for any NDP and is highlighted in most NDP's.</p> <p>This seems to have been given a very low profile in the NDP for Benenden. Anyone walking or cycling from the proposed new Hospital development to Benenden village will be doing so on extremely narrow, windy and dangerous roads. Although driving is the only effective means of getting to Benenden village, if a car has a problem or does not start, walking along this dangerous route may be the only option. This is especially so for children going to and from the Benenden village Primary School.</p>	<p>All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.</p>		

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		<p>2. Services and amenities at East End basically do not exist.</p> <p>There was a church there, St Margaret's, until about 20 years ago.</p> <p>The Hospital shop closed perhaps 10 years ago. The Hospital choir does not sing at the Parish Church any more, and I am not sure whether it still exists. There was a crèche and pre School at the Hospital, but I am not sure whether it still exists. The tennis courts are for Hospital use only, I believe. Hence, everyone at the new proposed Hospital site would have to travel to the village for the services and amenities that exist there.</p> <p>3. Transport effectively means driving only; not an environmentally suitable proposition. The roads adjacent to the proposed development are single track roads, being Green Lane and Mockbeggar Lane. Cars need to stop to pass each other and these narrow lanes are certainly not safe for pedestrians. Goddards Green Road divides the single Hospital site, and it is narrow and windy. Although cars can pass each other, lorries often have to stop to do so. Goddards Green Road has a history of black ice and flooding. Walkhurst road, which is on the direct route to Benenden village, is again a single track road. It can only become a "rat run" if the houses are built at the Hospital. The northern end of Walkhurst Road is particularly difficult in winter when there is ice and snow. Cars often have to be assisted by pushing. Those living in Walkhurst road would seem to be those most adversely affected by the proposals.</p> <p>Clearly, the combination of such small roads means that Transport is a major issue and the cost of widening the above roads would be exorbitant, as would a cycle path. I would expect that the Kent County Council Highways department would object to the NDP proposal on these grounds.</p> <p>4. Pollution would be an increasing problem with the significant increase in vehicular traffic, most especially in the centre of Benenden village. This is not just on the route from the proposed site to Benenden village, but also as cars wait for parking spaces and at the far more congested junctions. I would expect that the Kent County Council Environmental department would object on these grounds.</p> <p>5. Parking is becoming a major problem in Benenden now, especially around the village shop. As I am disabled, and I cannot walk far, even on crutches, this is particularly noticeable to me. This parking problem, with increased traffic, would worsen and I cannot see where the new parking spaces, that would certainly be needed, could be situated. New houses built</p>		
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		<p>nearer to the village shop would result in safer and easier walking, and would hence alleviate this to a considerable extent.</p> <p>6. Further development in the future is an issue that should be considered. If the proposal was to go ahead, there would be a great temptation to develop more houses on the Hospital grounds, and these could only be on AONB land. The preferable alternative of more small scale development nearer to the village would be far less tempting for yet more housebuilding.</p> <p>7. Community spirit is essential in a village such as Benenden. The result of building a substantial number of new houses about 2 miles from the village would most certainly create a “them and us” situation, especially given the resultant transport, pollution and parking issues that will emerge.</p> <p>I would be delighted to discuss the above further. Also, I would appreciate any balanced argument for the Hospital site and especially why the other clearly preferable sites within walking distance of Benenden village were not put forward. This was not discussed properly in the NDP.</p>		
56	Linda Czapiewski	<p>My husband and I have lived in Benenden for 27 years and raised our family here. I am extremely surprised that Benenden Hospital grounds have been proposed for such a large number of new houses.</p> <p>It is quite clear that both the existing residents of Benenden and those living in the proposed new houses at the Hospital would be adversely affected, and significantly so. Personally, we are not directly affected as we live about a mile from the proposed development, but we care deeply about our village and the adverse implications that this proposed new development would have on existing residents of Benenden as well as those occupiers of the proposed new houses.</p> <p>Some of the other sites in the NDP are far more logical, sensible and reasonable, but seem to have been rejected with no good reasons provided. Having a wider distribution of building, and within reasonable and safe walking distance of the village, would seem to be far more sensible.</p> <p>There are a number of reasons why the Hospital site is not appropriate:</p> <p>Safety is a major issue but given a low profile in the Benenden NDP. Anyone walking or cycling from the proposed new Hospital development to Benenden village will be doing so on</p>	<p>All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.</p>	

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		<p>extremely narrow, windy and dangerous roads. This is especially dangerous for children going to and from the Benenden village Primary School.</p> <p>Services and amenities at East End basically do not exist. There was a church there, St Margaret's, a shop long closed, a pre School that may no longer exist. So everyone at the new proposed Hospital site would have to travel to Benenden village for the services and amenities that exist there.</p> <p>Transport means driving only. The roads adjacent to the proposed development are single track roads and are certainly not safe for pedestrians. Goddards Green Road is narrow and windy and it has a history of black ice and flooding. Walkhurst road is again a single track road. Clearly, the combination of such small roads means that transport is a major problem if the proposed new houses are built at the Hospital.</p> <p>Pollution would be an increasing problem with the significant increase in vehicular traffic, most especially in the centre of Benenden village. Parents and children will be affected considerably, most especially at times when the Parents and children will be affected considerably, most especially at times when the school starts and finishes.</p> <p>Parking is becoming a major problem in Benenden now, especially around the village shop. As my husband is disabled, and I often take my grandchildren into Benenden, this is particularly noticeable to me. This parking problem, with increased traffic, would worsen and I cannot see where the new parking spaces, that would certainly be needed, could be situated. New houses built nearer to the village shop would result in safer and easier walking, and would hence alleviate this to a considerable extent.</p> <p>Community spirit is essential in a village such as Benenden. The result of building a substantial number of new houses about 2 miles from the village would most certainly create a "them and us" situation, especially given the resultant transport, pollution and parking issues that will emerge.</p> <p>We would appreciate any balanced argument for the Hospital site and especially why the other clearly preferable sites within walking distance of Benenden village were not put forward. This was not discussed properly in the NDP.</p>		
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57	Lorraine Millen	I object to the Draft Plan Regulation 14 as follows:	All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.		
58	David Millen	<p>The hospital is a bubble of non-AONB bulging into the AONB which covers the rest of the East End. Building there <i>does</i> affect the landscape of an AONB.</p> <p>You have made brownfield sites your priority at the expense of sustainability and the environment. This is contravenes TWBC policy (see its new cross-party Task Force on climate and biodiversity which aims to make the borough carbon neutral by 2030).</p> <p>90 houses at the East End and only 45 in the village. Why?</p> <p>We have no pub/restaurant and we have no footpath link to the village. Your cycle path proposals are nonsense. As I am sure you know.</p> <p>As for the Cafe...do you really imagine the general public would choose to eat at a hospital unless they were visiting a patient!</p> <p>You are intending to demolish 9 perfectly adequate houses to be replaced with 18 houses with garages. Nobody uses garages - why not off road parking for the existing houses.</p> <p>It is contrary to planning policy to build outside a village.</p>			
60	Marco Giannangeli	<p>I object to the Housing Allocation section of the draft Regulation 14 plan on the grounds of:- Highway safety and Traffic management. I live on Castletons Oak Crossroads, approximately one mile from the proposed site for 87 houses at East End. This is an important local crossroads, intersecting the Tenterden/Cranbrook Road with Benenden Road. The Tenterden/Cranbrook Road is the only direct artery linking both towns. It is a notoriously fast road.</p> <p>Benenden Rd is the direct route between East End and Headcorn station, the closest mainline station to the proposed development site. Castletons Oak crossroads are already well known by Kent County Council and the Highways Agency. Biddenden Parish Council has written to the chair of Benenden Parish Council to express our concerns, especially centring on safety issues at the crossroads</p> <p>Over the last five years there have been 15 crashes at this intersection.(See list below) and on June 11 2018, a car loured into my living room.</p> <p>The current new traffic calming measures are ineffective. Three more accidents have occurred this year involving motorists approaching from the direction of Benenden and proceeding, after</p>	All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.		

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		<p>failing to notice oncoming traffic from Tenkterden.</p> <p>Car ownership in Benenden is already above the national average and the East End site is not for affordable housing because it is too far from any amenities. People living there will have at least two cars. Possibly one to drive to work and one to take the children to school and perform errands in.</p> <p>The cross roads is unable to cope with existing traffic. Why add a further 180 cars a day?</p> <p>I am aware of the pressures on housing in Kent and the south east, and it is not my intention simply to object to the necessary building of more homes but please spread the building across the parish rather than siting most of it in the East End.</p> <p>Iden Green has similar bus services to East End and is far closer to the village (one mile as opposed to two and half to three miles). It also has a roadside pavement leading through a Roadside Nature Reserve to a paved foot path through fields connecting directly to the new school.</p> <p>There are sites offered in Iden Green (Sites 8 and 437) which have not been taken up. 8 is criticised for being remote and having no amenities, but these criticisms apply all the more to the East End which actually has no amenities (Iden Green has nursery school and a pub/restaurant)</p> <p>Site 158, north of the village street, once considered a suitable location for the new primary school is also a good location yet it continues to be ignored even though site 16 (Uphill) on New Pond Road (immediately adjacent to 158), is to be developed</p> <p>The advantages of the Iden Green sites and Site 158 are clear:</p> <p>Safety: with the nearest town now Cranbrook, and nearest mainline station Staplehurst, the necessity to use Castletons Oak Crossroads on a daily basis would diminish. In addition Staplehurst is closer to London and therefore more appealing to commuters</p> <p>Adherence to current planning policy which favours adding new developments to sites where existing development already exists</p> <p>Environmental impact: The current proposals favour the building of a new and remote enclave, necessitating car/ motorcycle ownership. While new and costly cycle paths to link it to the village are proposed, there is no guarantee that they would be utilised and, even if they were, that such utilisation would mitigate car/motorcycle ownership. Iden Green is within walking distance of the village. The East End is not.</p> <p>List of road traffic collisions Castletons Oak Crossroads 2014-19</p>		
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		<p>09/19 - 2 vehicles, 1 casualty, large people carrier flipped on its side after driver from Benenden village direction failed to spot oncoming traffic from</p> <p>08/19 - 2 vehicles, no casualties.</p> <p>02/18 - 2 vehicles, no casualties. Driver from Benenden village direction crosses without noticing oncoming car from Tenterden. At least one car was written off.</p> <p>11/06/18 - serious - 2 vehicles, 1 casualty. Car ploughed through window of sitting room at Castletons Oak Cottage. Fortunately the room was not occupied at the time.</p> <p>06/06/18 – 2 vehicles 1 casualty</p> <p>21/01/18 - 2 vehicles 1 casualty</p> <p>23/02/17 - 3 vehicles 2 casualties</p> <p>31/01/17 - 2 vehicles 1 casualty</p> <p>03/09/16 – 2 vehicles 2 casualties</p> <p>15/12/15 - 3 vehicles 2 casualties</p> <p>11/11/15 - 3 vehicles 3 casualties</p> <p>20/01/15 – 2 vehicles 1 casualty</p> <p>22/10/14 - serious 2 vehicles 2 cars</p> <p>18/07/14 - 2 vehicles 3 casualties</p> <p>07/03/14 - 2 vehicles 1 casualty</p> <p>Thank you for considering my objections which, I feel, underline genuine and evidence-based safety concerns.</p>			
61	Marion & Edward Stevenson-Rouse	<p>We would like to put on record our objections to this plan</p> <p>The scale of development is inappropriate for the East End, Benenden. The land is surrounded almost totally by an AONB. The rest of the surrounding area is, we believe, a Kent Special Landscape area. There are about 840 homes in the parish of Benenden yet only about 74 of these are in the East End. Therefore the figures of 86-92 homes in the East End are disproportionate.</p> <p>We understand that the figure mentioned for new houses in the plan is a total of 44-50 (page 39 BNDP) BUT ...There is an existing planning permission for 24 houses to replace 2 uninhabited ones and there are 18 old houses which no doubt will be demolished and rebuilt. The figure of 44-50 new homes (in the BNDP) is therefore confusing. It is not 44-50 but in reality it is a total of 86-92 new houses planned. The draft BNDP of July 2019 mentions in several places that the figure of 87 is incorrect. In reality it could be 92 homes to replace 20 old small houses of which many have long been unoccupied.</p> <p>The development of the site will result in a very high level of car-dependency. This means that unless houses have adequate parking for all the cars required by each family the country lanes will become clogged up with parked cars. There is no useful public transport. The idea of a minibus to take primary school children to school is unrealistic. Modern families will not</p>	<p>All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.</p>		

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		<p>favour this. Families do not tend to even car share nowadays due to seat requirements in cars and children doing different activities after school. People having children at the primary school will be driving them through Benenden Village. Parking at the primary school is already a problem especially in the afternoon when families are forbidden to use the village hall car park.</p> <p>There are no facilities in the East End. People will have to drive to Benenden, Cranbrook or Tenterden for everything. Contrast this with the centre of Benenden where there is a school, church, butchers, pub, shop and post office, café, hall and a huge community spirit with lots of activities, clubs and groups. We note that (p50 BNDP) it is expected that the Hospital trust will be expected to provide a space for various facilities for new residents. It is not just a matter of providing these things but finding people to run and manage them.</p> <p>The roads around East End are not suitable for a vast increase in traffic. Much will pass over the accident prone Castleton's Oak crossroads. Kent Highways has recently improved this slightly. We know of accidents since the improvements. On pages 96-97 of the BNDP it mentions that ALL roads out of the parish are narrow and that traffic growth is a major issue why not then build more houses in the centre of Benenden when at least people can walk sometimes rather than having to get the car out for everything except a walk in the country! Walking is good exercise for everyone able to do it. Why not build more houses nearer to the village and school to encourage more people to do it?</p> <p>In Policy AI/BE2 paragraph 8 of the TW local plan it mentions that the layout of the Uphill site should be designed to allow vehicular access to the land to the north as this may be allocated for development as part of a future local plan. It is not inevitable that we will need more houses built in the future so why not build there now instead of more houses on the hospital sites? We understand that this land to the north, site 158, was one of the 2 sites for the new primary school. If it is suitable for a primary school why is it not suitable for houses?</p> <p>Site 222 Land West of Iden Green road (crossroads) seems also to be a suitable site for more houses as it is land very close to the village centre. It has been rejected mainly because it offers panoramic views. This reason also applies to the hospital south side development.</p>		
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62	Mark Wells	<p>I object to the Benenden Neighbourhood Plan because its site-specific policies undermine and are inconsistent with its stated environmental objectives and policies, housing supply objectives and policies, and transport and community infrastructure objectives and policies. I am particularly concerned about the proposal for 92 residences for East End. I live on Benenden Road - a few hundred metres away from the proposed development, and where Benenden Road becomes Goddards Green Lane -</p> <p>and this is already a busy road, most notably in the mornings and late afternoons. Over four hundred vehicles travel along this road every day, often at high speeds. The junction with Cranbrook Road at Castleton's Oak is a regular site of serious road accidents - within the last twelve months there have been at least three major incidents at this junction, including one car becoming embedded in the bay windows of the cottage that sit on this junction. It is already a major accident blackspot, and the increased traffic from such a high number of proposed residences served principally by this road will only serve to worsen what is already a dangerously unsafe junction. Every time an accident occurs at this junction, the motor insurance premiums for anyone living in this postcode rise.</p> <p>The 42 planned new residences in East End are already going to be a challenge to the immediate infrastructure of East End, which regularly suffers from burst water mains and electricity power cuts on a fairly frequent basis. A further 50 residences on top of that is going to be totally overwhelming - and clearly contrary to Policy HS8 which states that "housing..will be well integrated into and enhance the local built environment". I cannot see how that can possibly be the case.</p>	<p>All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.</p>		
63	Paul Chapman	<p>I would like to put on record my objections to this part of the Plan:</p> <ol style="list-style-type: none"> 1. The plan almost doubles the area of the land to be developed at the Hospital Site and specifies 90 houses to go into this Site. 2. The East End is an isolated part of the Parish and almost 3 miles from the centre of the village. 3. Unlike Iden Green, it has no main street, no nursery school, no Community Hall, no shop and no pub. 4. The road system around the East End is currently inadequate without major redevelopment. 5. Why put 90 houses in the East End and only 57 in the village itself? 6. Surely it is contrary to Planning Policy to build so far out of the village itself and create a satellite village? 	<p>All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.</p>		

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		<p>7. Because of its distance from the village, it is unlikely that there will be any affordable housing.</p> <p>8. A Local Plan exists to control housing development not to benefit any particular organisation such as a non-profit Hospital.</p> <p>9. The NDP shows little regard for what is mainly an AONB.</p> <p>10. As far as I can determine Site 158, which is more suitable, has not been considered.</p>		
64	Euan Burrows	<p>Introduction</p> <p>1. These representations are made on behalf of Euan Burrows, Mockbeggar Lane, and a group of residents who all live in East End, Benenden.</p> <p>2. The focus of these representations is on Site Specific Policy 3 Site North of Goddards Green Road, East End; Site South of Goddards Green Road, East End.</p> <p>3. We have also submitted a consultation response to the regulation 18 Tunbridge Wells Local Plan which focusses on Policy AL/BE4. Much of this applies to the draft Benenden Neighbourhood Plan ('the Neighbourhood Plan') and, rather than repeating those representations verbatim here, have included that response as Appendix 1. The comments below should be read alongside our representations to the Local Plan.</p> <p>The Principle of the Neighbourhood Plan</p> <p>4. Whilst it is open to a neighbourhood plan to seek to allocate sites for development, neighbourhood plans should not re-allocate sites that are already allocated through strategic plans (para 044 PPG Neighbourhood Planning¹).</p> <p>5. The current wording of the Neighbourhood Plan is extremely unclear with regards to the nature of the plan – namely, whether it is seeking to make site allocations. Paragraph 2.1.1 of Policy HS1 states that:</p> <p>¹ https://www.gov.uk/guidance/neighbourhood-planning--2 <i>"Our allocation, made in close co-operation with TWBC, would meet the Government's requirement for sustainable and deliverable new housing."</i></p> <p>6. This clearly indicates that the Neighbourhood Plan is making allocations itself. This cannot be correct. Site Specific Policy 3 solely relates to sites that are sought to be allocated through the emerging Tunbridge Wells Local Plan ('the Local Plan'). This is apparent from Policy HS1, which states that 45-50 units will be provided at site 424 and late site 40. This mirrors Policy AL/BE4 of the Local Plan. As such, it must be made clear in the Neighbourhood Plan that it is not an allocations document. If it were allocating site 424 and late site 40 it would be inconsistent</p>	<p>All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.</p>	

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		<p>with Planning Practice Guidance. Any duplication should be removed.</p> <p>7. At present, the Neighbourhood Plan is imprecise and inconsistent with the PPG.</p> <p>Approach to Brownfield Land</p> <p>8. Whilst the sites are allocated in the Local Plan and not the Neighbourhood Plan (see above) it is clear that the selected sites have been chosen between Tunbridge Wells Borough Council and Benenden Parish Council (pg. 39).</p> <p>9. Of the 4 allocated sites, 3 of the sites are on brownfield land. The Neighbourhood Plan states that these selected sites clearly meet the requirements of the NPPF in that they prioritise previously developed land (pg. 39). However, this is a misapplication of the NPPF.</p> <p>10. Paragraph 118C of the NPPF provides that: "Planning policies and decisions should: <i>give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land</i>"</p> <p>11. There are two points to note. First, paragraph 118C does not require brownfield sites to be prioritised over other locations. Rather, it states that substantial weight should be given to the value of using suitable brownfield sites. The statement that priority should be given to brownfield sites is therefore a clear misapplication of national planning policy.</p> <p>12. Second, when properly applied paragraph 118C does not support development in the East End. This is because, as detailed in the response to the Local Plan, this site unsustainable and therefore not suitable for development. Whilst the site could be made sustainable, at present the allocation of this site for up to 50 residential units is in fact contrary to national policy rather than in accordance with it.</p> <p>13. Third, the 'brownfield' nature of the land extends to limited historic development that was strictly ancillary to the hospital use. This legacy cannot be used as a basis to now promote the use of the site for an altogether different purpose, namely a large scale residential scheme (also including greenfield land) that vastly exceeds the scope and purpose of the historic land use in terms of its physical impact (including on the abutting AONB) and clear conflict with the requirements for the sustainable land usage policies.</p>		
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Numerous examples can be found of brownfield land being used for housing development, whether being former airfields, docklands, light industrial sites, garages, and indeed hospitals.

And as opposed to using greenfield land for residential development as an alternative? The protection of a brownfield site, using this criterion, over greenfield sites within the AONB is not sound or pragmatic planning.

No amendment required

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	<p>14. For this reason, the Neighbourhood Plan is inconsistent with national policy.</p> <p>Inconsistency with Local Plan</p> <p>15. The individual site assessments for the East End (document HSA3) note that access is limited to the narrow Goddards Green Road which is unsuitable for high volumes / rush hour traffic, that there is poor public transport and that there are few facilities / amenities. The East End is isolated from any settlement and is an unsustainable location at present.</p> <p>16. Development at an unsustainable location is contrary to Policies STR2 and TP2 in the draft Local Plan. Furthermore, there is no infrastructure planned in either the Neighbourhood Plan or the Local Plan. There is no plan to make the isolated East End a sustainable settlement.</p> <p>17. This site is incompatible with the draft Local Plan and therefore the Neighbourhood Plan does not meet the basic conditions² as required.</p> <p>2 Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990</p> <p>Site Specific Policy 3 ('SSP3')</p> <p>18. As made clear above, the marked problem with the East End site is that the location is unsustainable. The proposed site specific policies are plainly inadequate in addressing this fundamental issue.</p> <p>19. The site specific policies are, at present, broken down into four sections. The first two relate to all of the site whereas the last two are specific policies for the south site and north site. The distinction between the first two set of policies is, in fact, that the first set of policies applies solely to the Hospital Trust and the second to development proposals more generally across the two sites.</p> <p>20. This is a deeply problematic policy approach. Planning applications can be made by any party, regardless of land ownership. Any party, and not just the Hospital Trust, could apply for permission to develop land at the East End. As such, policies must apply equally to all parties. Confining policies to only the Hospital Trust means that any other applicant wouldn't be expected to comply with the first set of policies in SSP3. This is clearly contrary to the public interest in planning and, arguably, discriminatory.</p> <p>21. Furthermore, in light of this it is a fair reading of SSP3 that it is assumed that the Hospital Trust will be granted planning permission, or, only applications from the</p>	<p><i>SSPs to be rewritten to emphasise that the South East and North East quadrants are distinct and separate sites.</i></p> <p>Amendment to NDP required</p> <p>Site Specific Policies relate to the site, not the landowner or applicant.</p> <p>Replace throughout SSP3 "Hospital Trust" with applicant/ developer.</p> <p>Amendment to NDP required</p>	<p>May 2020</p> <p>May 2020</p>
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		<p>Hospital Trust will be entertained. This clearly amounts to an unlawful predetermination of planning applications.</p> <p>22. In the event that it is only the Hospital Trust who apply for permission to develop this site, the current policies are clearly inadequate to address the unsustainable nature of the site. The only facility proposed for future residents to buy essential goods is only one of a small shop, café or other commercial enterprise. This is plainly inadequate to meet the needs of upwards of up to 72 houses (Policy AL/BE4 of the Local Plan) in an isolated location. Residents will be reliant upon other, more developed settlements on a day to day basis, which fails to make the East End a sustainable settlement. The other proposed facilities are highly specific in their application and therefore lack the substance required to address the lack of sustainability of the site.</p> <p>23. The attempts to address transport to and from the East End are inadequate. The proposals are the provision of a foot and cycle path and promoting and supporting a Kent County Council Hopper Bus trial. Neither is sufficient to make the settlement sustainable. The former fails to have regard to the fact that it is roughly a 4km journey from East End to Benenden. Given there are not any shops at East End, and nor are there forecast to be from SSP3, the use of this path would require residents to walk or cycle a round trip of 8km. This clearly will be ineffective. The second does not guarantee to make East End more sustainable, given it relates to a trial which may, at any point, be terminated by Kent County Council.</p> <p>24. No other policies seek to address the sustainability of the site in terms of services and facilities. As such, SSP3 is plainly inadequate to make East End an acceptable location for sustainable development. It is therefore inconsistent with the Local Plan and the NPPF.</p> <p>Local Consultation</p> <p>25. Local consultation carried out in advance of the publication of the Neighbourhood Plan clearly favoured smaller units with good links to the village. However, this response forms no part of the Neighbourhood Plan, instead favouring the approach set out by the Local Plan of focusing development in the East End.</p> <p>26. It is a legal requirement for a consulting body to conscientiously take into account the product of consultation.³ That has not been done here. Rather, the Neighbourhood Plan has ignored this consultation response in favour of locating development away from settlement</p>		
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		centres in the unsustainable East End. This is unlawful. 3 R v North and East Devon Health Authority, <i>ex parte</i> Coughlan [2001] QB 213		
67 68	Maureen Inwood Colin Inwood	<p>I object to the Draft Plan Regulation 14 as follows:</p> <ul style="list-style-type: none"> * The plan is without balance. You wish to build 87 houses at the East End and only 45 in the village. Why allocate to only one area more than half the total of new houses to be built in the parish? * The East End is a very rural area. We have 74 households as opposed to about 840 in the village and in Iden Green. Why despoil the landscape by creating new traffic links between a satellite village and the village proper? * Unlike Iden Green which is a mile from the village, we are almost three miles away. Unlike Iden Green, we have no pub/restaurant and we have no footpath link to the village. Iden Green is linked to the primary school, church and village centre with a footpath less than half of which follows a Roadside Nature Reserve while the remainder runs through fields to the church and primary school. The East End has no direct link with the village except by car. Landowners I believe, refuse your cycle path proposals. * Your housing numbers mislead. You should include the numbers of those already approved but not built (24) and the houses "replacing" the 9 existing buildings, largely unoccupied and each containing two small semi-detached houses without garages. You now plan 18 large, separate new houses with garages which will not keep to the footprint of the previous 9 buildings and which will, presumably, be occupied. This is a real change for the community. * It is contrary to planning policy to build outside a village. On this scale, it creates a satellite village * You have made brownfield sites your priority at the expense of sustainability and the environment. This is contravenes TWBC policy (see its new cross-party Task Force on climate and biodiversity which aims to make the borough carbon neutral by 2030). * The hospital is a bubble of non-AONB bulging into the AONB which covers the rest of the East End. Building there does affect the landscape of an AONB. * Iden Green has similar bus services to the East End and is far closer to the village, yet no building is planned there. On the contrary, the plan is to remove the Limits to Built Development line so there will be no in-filling either. Once more, one considers the absence of balance in your plan. 	All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.	

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		<p>* You continue to refuse to use site 158 north of the village Street while you approve site 16 (Uphill) on New Pond Road which is immediately adjacent to 158. Why the one and not the other, especially as the TW Local Plan asks for an access route through Uphill to serve the development expected at a later date on 158.158 was considered a possible site for the new primary school. It was considered by TWBC planners in early 2018 as a possible site for 174 new houses. Why is it not a possible site now?</p>			
70	Catriona Prynne	<p>I object to the Benenden Neighbourhood Plan for the following reasons: The proposed development at the East End is excessive, inappropriate, unsustainable and it contravenes well established policies.</p> <p>At present there are only 74 households in the East End. The proposed development (including the 24 houses which already have planning permission and 18 new houses to 'replace' 9 buildings, currently semi-detached houses,) comes to up to 92 new houses for the East End. The 42 new homes will significantly affect the area, more than doubling that number will completely change the rural nature of the locality and turn it into a 'satellite' village in an AONB area. The Hospital site is a brownfield site but what happens to it impacts on the surrounding AONB. The hospital's redevelopment was partially on a greenfield site thereby leaving more of the brownfield site available. Was this a clever ruse which passed the TW planning department by or was it passed on the nod to provide more of a land bank?</p> <p>The proposed development is contrary to Policy HS8. The housing would not 'be well integrated into and enhance the local built environment'.</p> <p>East End is 3 miles from the village and has no facilities such as shops (Benenden), schools/nursery schools (Benenden/Iden Green), churches (Benenden/Iden Green), pubs/places to eat (Benenden/Iden Green), community buildings (Benenden/Iden Green). Apart from driving by car, there is no practicable route to the village.</p> <p>Site LS41 and Site 424 do not support 'sustainable and economically viable sites'.</p> <p>Site 158 is recommended for limited development because its scale should not overwhelm the the scale and facilities of the village, which has 250 houses as compared to the East End's 74. So why does this consideration not apply to Site LS41 and Site 424?</p>	<p>All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.</p>		

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		<p>This suggests confirmatory bias and inconsistency in the reasoning.</p> <p>There are only 33 AONBs in England and they merit protection. The Sites LS41 and 424 are a bubble within the AONB, and overdevelopment on them will impact on the AONB. At the moment the site is open with fine specimen trees and mixed hedges. Presumably most of these will go to ease the developers work. More traffic, more light pollution, more destruction of natural habitat.</p> <p>This will not protect the 'valued environmental assets' supported in the Benenden Neighbourhood Plan.</p> <p>Finally, the Hospital Pavilion building falling into disrepair is not only a noteworthy example of early 20th century architecture but also an important part of Benenden's social history and should be converted for use rather than destroyed.</p> <p>Site 424 risks making Philistines of us all.</p> <p>I do urge a reconsideration of the scale of the proposed development at Sites LS41 and 424 and a redistribution of the required numbers of houses between the 3 areas within Benenden - the village itself, Iden Green and East End.</p> <p>I also subscribe to the more detailed arguments put forward by the Friends of East End.</p>			
71 72	Sam Andrews Christina Andrews	<p>I write with regard to the proposed housing plan and its impact on East End, Benenden.</p> <p>As has been pointed out repeatedly, the current plans disproportionately impact East End with a planned 87 houses at the East End and only 45 in the village. East End is the most rural part of the parish with only 74 households and absolutely no services whatsoever. This will mean a massive increase in vehicle traffic, with a likely average of three cars per household all using roads that, in many cases, a little more than tarmac cart tracks and will increase flow through the dangerous Castleton's Oak crossroads.</p> <p>The proposal, which more than doubles our population, I believe is contrary to planning policy to build outside a village. On this scale, it creates satellite village and while I understand you have made brownfield sites your priority, it is hardly delivers on sustainability or helping the environment.</p> <p>It is not as though the houses will be for people who work at the hospital. They clearly do not want to live close to their work and drive in</p>	<p>All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.</p>		

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		<p>every day in large numbers. The hospital, which now concentrates on day treatment, is generating significant amounts of traffic on a daily basis to the extent that the small paddock that was next to the chapel has not been returned to grass as was originally planned. Everyday, it is full with staff cars, as are the other two staff car parks.</p> <p>The hospital is a bubble of non-AONB bulging into the AONB which covers the rest of the East End. Building there does affect the landscape of an AONB.</p> <p>In addition, your housing numbers mislead. You should include the numbers of those already approved but not built (24) and the numbers for replacing existing small semidetached houses without garages, with large separate new buildings with garages (18)</p> <p>Perhaps you should look again at Iden, which has the same bus services and is far closer to the village (one mile as opposed to two and half to three miles). It also has a footpath, most of which goes through fields and connects directly to the new school, yet no building there and removal of the Limits to Built Development line so no in-filling either.</p> <p>I would also question the continued refusal to use site 158 north of the village Street, although site 16 (Uphill) on New Pond Road (immediately adjacent to 158), is to be developed. 158 was considered a possible site for the new primary school, why is it now not a possible site?</p> <p>The overwhelming impression is that the proposal does not fully think through the impact on local education provision, health services, traffic management or the environment. Please reconsider.</p>			
73	Neil Bell	<p>May I thank everyone involved in the work which has gone into the Benenden Neighbourhood plan and the Tunbridge Wells Local Plan – I know these activities all take a good deal of time and effort and are hugely stressful.</p> <p>Nonetheless, I would like to register my opposition to the number of new houses proposed in the East End of Benenden in these two plans.</p> <p>This is not a sustainable location for new housing and will result in many more car journeys than would be the case if the housing were instead abutting a village such as Benenden or a town such as Cranbrook or Tunbridge Wells.</p>	<p>All further and following comments and representations received concerning East End have been reviewed and covered in the responses listed above.</p>		

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		<p>Residents will need to travel by car to either Benenden, Biddenden or Cranbrook to access primary schools, secondary schools, basic shops, pubs, restaurants, village halls, leisure facilities, children's play activities or clubs and more.</p> <p>Most public services such as the police, adult education, social services, emergency and maternity hospital services are even further afield (despite the existence of Benenden hospital!)</p> <p>A number will also travel to by car to either Headcorn or Staplehurst rail stations for work.</p> <p>In practical terms, buses take too long and are unreliable and the roads are too dangerous for cycling particularly at busy times of day.</p> <p>The consequences of this are twofold: Firstly, the car journeys will have a negative impact on the goal of reducing carbon and other emissions. Secondly, it will increase the traffic going through Castleton Oaks crossroads, which has a long history of serious accidents and continues to have accidents today despite a ramping up of safety measures by KCC. This is likely to increase the number of accidents at this crossroads. Traffic lights or a roundabout would greatly impact on the rural nature of the area and are not welcome.</p> <p>I fully understand the need for new housing, and acknowledge the East End sites as being brownfield, whilst sites close to Benenden are in the AONB – however I would assert that it is more important to reduce car travel and serious accidents than it is to preserve the AONB at Benenden.</p> <p>Please do not hesitate to contact me if anything is unclear.</p>		
76	Herbert Boxall	<p>I write as a former resident of Iden Green and as an owner of land there to object to the draft Benenden Neighbourhood Plan as follows:</p> <p>First, your numbers imply that 50 new houses are allotted to the East End discounting the 42 new houses also planned for that site. In fact the plan actually allows 92 new houses in the East End, 45 in the village and none in Iden Green. I submit that new housing should be distributed much more evenly and fairly around the parish.</p> <p>Second, one reason given for rejecting sites in Iden Green, in particular the site that I own (LS8) behind the Congregational Church is that they are located within the High Weald AONB</p>	<p><i>Site LS8 is a greenfield site within the AONB. See above responses regarding "Site Allocations...", and "Should greenfield sites..."</i></p> <p><i>No amendment required</i></p>	

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		<p>(as is 98% of the parish) and is greenfield land. This despite the fact that there are already two sites being developed in the village (site AL/BE1 and AL/BE3 on Walkhurst Road) which are both within the AONB, as is the new primary school, a very large development. All three of these lie on greenfield land. I therefore object to exclusion of site LS8 on AONB/greenfield grounds.</p> <p>Third, LS8 being higher than the cottages on Chapel Lane is seen as reason for its exclusion although the plan makes no objection to developing the sites at the hospital (421 and 424) where the land is actually on a high ridge, dominating the northern landscape of the parish. Further development there will thus be visible for miles around – a stronger reason than that against LS8.</p> <p>Fourth, it is claimed Iden Green lacks amenities. It has the Nursery School and tennis courts immediately adjacent to LS8. Also, the community hall and The Woodcock, a well established pub and restaurant, are within easy walking distance – all excellent amenities. Others, such as the village shop and the primary school are easily accessible by footpath, which is safe for schoolchildren and pleasant to walk particularly through Hilly Fields. By contrast, the hospital site at the East End has no such amenities and no suitable footpath linking it to the village. It is, moreover, three times further from the village centre than Iden Green so too far to walk, especially for children. Again, therefore, the extensive extra housing envisaged for the East End would be better provided by LS8 and other sites at Iden Green and in the village centre.</p> <p>Fifth, it is said that LS8 is outside the Limits to Built Development as presently drawn. If your plan and the Tunbridge Wells Local Plan are adopted unamended then Iden Green's LBD will no longer exist. Removing LBDs prevents infill. I contend that sites such as LS8, which provide modest infilling offer housing to help meet needs with minimal impact upon visual amenities. Site LS8 is worthy of inclusion in a development plan. Building within a long-established settlement contributes much more to conserving our landscape and protecting wildlife than building three miles outside it, as proposed for the East End hospital area.</p> <p>Finally, Tunbridge Wells Borough Council has recently established a cross-party task force aiming to reduce carbon emissions to make a positive contribution to climate change. To respect this, allocation of sites such as LS8, within feasible walking distance of the village</p>		
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		<p>should take precedence over sites where every family would require at least two cars.</p> <p>I request that these objections are given full consideration in the review of the draft plan.</p>			
75	Gerald Conyngham	<p>I am writing with comments about the draft Neighbourhood Plan, especially in relation to plot 158. Within the plan, plot 158 has been placed outside the Limits to Built Development. We think this is the wrong decision for the following reasons:</p> <ul style="list-style-type: none"> • This site was considered as a possible site for the new primary school and later TWBC officers considered it as a possible site for 174 houses. Yet now it has been dropped as a place for development. • In the draft Neighbourhood Plan, it states that 'the sustainability credentials of this site are high'. • We are open minded about the number of houses that might be built on the site and do not have any particular number in mind at this time. We would be happy with a more modest development than 174. We would want a high proportion to be affordable, be open to local people, and meet the needs of elderly people and people with disabilities. And to be built in ways which fit into the local environment in terms of building design. <p>We would seek a developer who could meet these criteria.</p> <ul style="list-style-type: none"> • In relation to Limits to Built Development it appears that sites were chosen first and then a line drawn round them to exclude other sites. Thus it appears that the line is somewhat arbitrary. • The site lies at the heart of the village and building here would prevent ribbon development or development in random sites in the rural parts of the parish. In that sense it would preserve the rural nature of the parish in making it less necessary to build houses outside the parish. • It is a very good site from the point of view of sustainability and reducing pollution. People living there could walk to the village school, village shops, church and local meetings. There is no need for an extra car and the extra carbon emissions which would be a consequence of people living 3 miles from the heart of the village. Pedestrian access is already available to the site. • It doesn't make good planning sense to plan a large development at the East End and leave the village centre for development at some later time. It goes against the environmental interests of everyone. • Using brownfield sites is said to be a priority yet the plan being proposed eats into the countryside since travel links, and the pollution 	<p><i>Site 158 is a greenfield site within the AONB. It is a topographically challenging site, adjacent to Ancient Woodland, adjacent to the Conservation Area.</i></p> <p><i>The site is currently an open field which provides a welcome visual break from the village settlement and the surrounding countryside. Development on this site would be harmful to the AONB, it would neither conserve nor enhance the character and appearance of the surrounding area.</i></p> <p><i>See above responses regarding "Site Allocations...", and "Should greenfield sites..."</i></p> <p><i>No amendment required</i></p> <p><i>The NDP and Parish Council have already sought for this paragraph to be removed from the TWBC DLP.</i></p>		

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		<p>associated with them, would be needed between the new settlement at the East End and the village. We believe that sustainability should be considered as the primary goal.</p> <ul style="list-style-type: none"> • In the comments on the original Neighbourhood Plan It was agreed that site 158 is not a site of particular wildlife significance. And it is not highly visible, thus reducing its attractiveness as a green field site. • It does not block views and is discreetly hidden behind the Street, as are the current recent developments at St George's Close. • . Development here supports the Borough Council's recent commitment to make the District carbon neutral by 2030. • As far as access is concerned, we have noted the sentence in the piece about site 16 as follows: 'The layout, including hard and soft landscaping, to be designed so as not to prejudice the future provision of a suitable vehicular access with appropriate visibility splay(s) to the land located to the north, which may be allocated for development as part of a future Local Plan.' Site 158 is the land to the North. 		
74	<p>Woolf Bond Planning, on behalf of Millwood Designer Homes, on behalf of Emily Pettit, landowner of Site 222</p>	<p>Introduction</p> <p>We refer to the above Regulation 14 Neighbourhood Plan ("NP") consultation document and write on behalf of our client, Millwood Designer Homes, setting out a number of comments upon the policies and proposals contained therein.</p> <p>As set out in our earlier representations upon the 'Rough Draft' NP consultation in April 2019, our client, a Kent-based developer of long standing repute for high quality residential schemes, has a controlling interest in land to the west of Iden Green Road, and south of Cranbrook Road (Site Ref: 222), which is not proposed as a housing allocation. Accordingly, our representations are seeking an allocation of the land for approximately 28 dwellings. Details are set out below.</p> <p>As an overarching comment, and general observation, Millwood Designer Homes is supportive of the plan-led approach to place-making and this includes in relation to neighbourhood planning.</p> <p>We generally commend the Steering Group's endeavors and collaborative approach to preparing the NP, and offer our comments on a positive basis in order assist the NP Team in preparing a Plan that is fit for purpose having regard to satisfying the basic conditions.</p> <p>We note that the NP as drafted proposes to allocate four sites for housing (Policy HSA1 refers), of which only two are located at Benenden, comprising (i) Land adjacent to Feoffee Cottage; and (ii) Uphill, New Farm, Road. 2</p>	<p><i>Site 222 is situated south of Benenden crossroads, which represents the rural gateway to the village.</i></p> <p><i>Site 222 currently offers panoramic views from the Conservation Area across the High Weald. Part of the site lies within the Conservation Area, and part of the site has listed archaeological remains.</i></p> <p><i>Site 222 is a greenfield site within the AONB. The site is currently an open field which provides a welcome visual break from the village settlement and the surrounding countryside. Development on this site would be harmful to the AONB, it would neither conserve or enhance the character and appearance of the surrounding area.</i></p> <p><i>See above responses regarding "Site Allocations...", and "Should greenfield sites..."</i></p> <p><i>No amendment required</i></p>	

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		<p>We remain of the view that allocating Land west of Iden Green Road for housing would assist in delivering additional new housing on a sustainably located site to support the village, and will provide new public open space and secure a future for the pond, thus improving its contribution to the Conservation Area. This will meet the objectives and aspirations for the NP area. In particular, it is:</p> <ol style="list-style-type: none"> 1. Sustainable (grows the village rather than a remoter outpost of it). 2. Deliverable (provision of services of water and electricity already in place). 3. Logical (location in the heart of, and accessibility by foot to, the village; the logical location facilitates inclusiveness and the promotion of community through the new green space) <p>It also delivers on small-scale development, affordability and quality as set out by the NPG: <i>'To support development, wherever possible locally-led, to meet local needs with a mix of well-designed, high quality, sustainable and affordable housing that enhances the existing built and natural environment.'</i></p> <p>Millwood Designer Homes Ltd are a local developer that has won awards for its high quality scheme designs. They remain committed to working with the Steering Group in order to deliver a NP that secures the best development for the village, identifying the most appropriate locations for growth for existing and future residents of the Parish.</p> <p>It is in this spirit of cooperation that we set out our comments which are intended to assist in the ongoing preparation of the NP. Accompanying particulars comprise as follows:</p> <ul style="list-style-type: none"> ☐ Site Location Plan No. P318/LP/1001 ☐ Figure 3 – Landscape Strategy <p>Assessment of the Neighbourhood Plan against the Basic Conditions:</p> <p>General</p> <p>In terms of assessing the appropriateness of the consultation draft Neighbourhood Plan ("NP"), it must meet the "Basic Conditions" set out in Law [paragraph 8[2] of Schedule 4B of the Town and Country Planning Act 1990].</p> <p>In order to meet the Basic Conditions, the NP must:</p> <ul style="list-style-type: none"> ☐ Have regard to national policy advice contained in guidance issued by the Secretary of State; ☐ Contribute to the achievement of sustainable development; 		
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		<p>☑ Be in general conformity with the strategic policies of the development plan for the area; and</p> <p>☑ Be compatible with EU obligations.</p> <p>3</p> <p>As set out in the National Planning Practice Guidance¹ ("PPG"), Neighbourhood Plans can come forward before an up to date Local Plan (as would be the case here in so far as Tunbridge Wells is only at the early stages of preparing its replacement Local Plan).</p> <p>1 Paragraph: 009 Reference ID: 41-009-20160211 refers.</p> <p>2 ibid</p> <p>In this context, the PPG sets out helpful guidance as follows²:</p> <p><i>"Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area. They can be developed before or at the same time as the local planning authority is producing its Local Plan. A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft Neighbourhood Plan or Order is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development. Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:</i></p> <p><i>The emerging neighbourhood plan</i></p> <p><i>The emerging Local plan</i></p> <p><i>The adopted development plan</i></p> <p>with appropriate regard to national policy and guidance."</p> <p>The above approach includes the need to ensure that the NP has regard to the policies in the adopted development plan. This is particularly relevant in the case of the preparation of the Benenden Parish NP. It also allows for NPs to be prepared having regard to emerging Local Plans. However, and in relation to the latter, as set out at paragraph 29 of the NPPF, NPs should not promote less development than set out in strategic policies for the area. Moreover, and as made clear at paragraph 48 of the NPPF, whilst LPAs may give weight to relevant policies in emerging plans the amount of weight to be applied will depend on the stage of preparation of the emerging plan</p>		
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		<p>(the more advanced its preparation, the greater the weight that may be given).</p> <p>The NP frequently references the emerging Tunbridge Wells Borough Local Plan ("TWBLP") and the suggestions for Benenden contained therein. This includes the inclusion of the suggested revised settlement boundary for Benenden at Figure 2 on page 30 of the NP. This is not the settlement boundary in the adopted Development Plan, rather, it is a proposed change as part of the Regulation 18 draft TWBLP. It carries only limited weight. The actual boundary and extent of site allocations will not be determined until after the TWBCLP Examination is complete and the TWBCLP is adopted. 4</p> <p>However, and importantly, the emerging TWBLP is only at the Regulation 18 stage. As such, the policies and proposals contained therein are yet to be tested at Examination. Accordingly, the weight to be attached to the TWBCLP is very limited. Accordingly, the Authors of the NP must allow for the TWBCLP process to be complete before relying upon the policies and proposals in that document.</p> <p>For example, the draft TWBCLP includes suggested changes to the settlement boundary for Benenden and also suggests certain site allocations. However, the NP then refers to these suggested changes as if they were part of the Development Plan. They are not. They remain to be assessed through the plan making context having regard to the tests of soundness at paragraph 35 of the NPPF.</p> <p>On the basis of the foregoing, it follows that an emerging NP must be consistent with the development plan. As such, the emerging NP will need to be in general conformity with the strategic policies of the development plan for the area.</p> <p>In terms of the actual quantum of development to be met at Benenden, this can only reasonably be determined through the TWBCLP process, which will need to have regard to the sustainability appraisal process, including an assessment of the role of Benenden in the overall settlement hierarchy and its function in relation to the overarching spatial strategy.</p> <p>Tunbridge Wells Council is in the early stages of preparing a new Local Plan and the Council is consulting on the Draft Local Plan (Regulation 18) from 20 September to 1 November 2019. The draft Plan accepts the Standard Method housing requirement for the Borough of 13,560 dwellings 2016 – 2036, with an annual requirement of 678 per year.</p> <p>This represents a significant increase on the current Borough requirement of 300dpa. It therefore follows that additional housing sites will be required at each of the Borough's settlements in order for the increased housing need to be met. Benenden will need to play its</p>		
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		<p>role in helping to provide for sustainable growth patterns.</p> <p>The NPPF advocates identifying a sufficient range and mix of sites to ensure flexibility and deliverability within the planning system of homes to meet a variety of needs.</p> <p>It is understood that the Feoffee Cottages site is to be developed as almshouses for local needs, which whilst supported, will not contribute towards the need for additional general market homes. In turn, additional housing will help to support the local economic and social function of Benenden village.</p> <p>If the NP plans for too few dwellings it could find it is out of date soon after it is 'made', which position would of course be subject to the outcome of the Local Plan Review process. On the basis of the foregoing, any locally derived need figure to be met within the Parish of Benenden will be a function of the total requirement to be met across the District. It is expected this will be in excess of the figure currently suggested in the Rough Draft NP. 5</p> <p>Housing Supply and Site Allocation (Policy HS1)</p> <p>General</p> <p>Our comments are intended to assist the NP Team in preparing a Plan that satisfies the basic conditions (see above).</p> <p>We comment as follows:</p> <p>☐ The amount of housing to be met during the plan period is yet to be confirmed.</p> <p>☐ As such, Benenden's role in the overall settlement hierarchy and spatial approach to meeting development needs during the plan period is yet to be confirmed.</p> <p>☐ Moreover, given the amount of housing currently planned to be met during the TWBCLP period (some 13,560 dwellings as a minimum), the 4 no. sites identified under Policy HS1 fail to provide for the most sustainable development options.</p> <p>☐ Land at west of Iden Green Road should be allocated as an additional site for housing and/or in preference to the sites currently proposed.</p> <p>☐ The site assessment in relation to the site at Iden Green Road comments that the Parish has decided to adopted a 'previously developed land first' approach. However this is clearly not the approach which has been followed with the two allocated sites within Benenden, the Feoffee Cottages site is currently undeveloped land, and the New Hill Road site is partly PDL as it contains one house, however the garden land to the rear is not previously developed land (in accordance with the definition in the NPPF).</p>		
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		<p>❑ We question the merits of providing for additional housing allocations at East End on the basis that they are not as sustainable as providing for growth at Benenden. The sites at East End are located well outside the village boundary and are unlikely to support the function of the village.</p> <p>❑ If the Parish is taking a greenfield land approach, as it appears to be doing so in this iteration of the Plan, it would be prudent to consider what additional benefits particular housing sites can bring about in addition to the provision of housing.</p> <p>❑ It is in this context that we continue to promote land west of Iden Green Road as a housing allocation (see below).</p> <p>Land West of Iden Green Road, Benenden (Site Ref: 222)</p> <p>General</p> <p>The Site is edged red on Plan P318/LP/1001 and extends to approximately 2.5ha.</p> <p>We have undertaken a thorough assessment of the character of the site and surrounding area and consider that it affords a sustainable development opportunity for approximately 28 dwellings, to include the creation of a larger publicly accessible area of green space and reinstatement of the pond in the north east corner of the site.</p> <p>We consider this would enhance the public realm and would enabling a high-quality scheme for a small number of dwellings to be located within walking distance from local services and facilities, helping to further sustain and support local businesses. 6</p> <p>It is noted that the site has been assessed in the supporting Individual Site Assessments, as having capacity for 17-18 dwellings. This figure has been derived from a density calculation and net developable area based on an unknown multiplier.</p> <p>This is contrary to the approach taken in the NPPF with regards to balancing density which respects the character and form of development in the area, and making the most efficient use of land in order to deliver the homes that the country needs. We therefore challenge the Parish Council's calculation of capacity for this site and assert that the site is capable of delivering approximately 28 homes on the basis of Millwood's own site capacity work.</p> <p>The potential to provide for the development of the site has been considered in relation to heritage, landscape and ecology, which matters can be summarised as follows:</p> <p>❑ Development of the site for housing and a large publicly accessible area of green space provides an opportunity to enhance the appearance of part of the Conservation Area</p>		
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		<p>through the creation of an attractive and sensitively designed residential extension to the village.</p> <p>☑ A scheme can also be designed in relation to the desirability of preserving the setting of the listed buildings considered to be affected and the special character and appearance of the Benenden Conservation Area.</p> <p>☑ Figure 3 has been prepared following a detailed review of the landscape character of the site and surrounding area and enables the retention of substantial trees on the site, most notably the lime trees along the frontage.</p> <p>☑ A suite of ecological surveys has been undertaken across the site throughout spring and summer 2018, including an Extended Phase 1 Habitat survey, bat surveys, reptile surveys and great crested newt surveys.</p> <p>☑ The majority of the site comprises semi-improved grassland of limited ecological value. Several semi-mature trees, principally oak, are present in and around the site. These have some ecological value, offer potential bat roosting opportunities, as well as sites for nesting birds.</p> <p>☑ The pond on the northern boundary is relatively small and although it contains water, is becoming choked with sediment and debris. It also contains a large area of the highly invasive New Zealand pygmy weed.</p> <p>☑ There are ample opportunities within the site to provide ecological enhancement measures. These will need to include improvements for the slow worm population as well as improvement to the newt pond – possibly dredging it out and removing the pygmy weed.</p> <p>☑ The Parish has highlighted in their assessment of the site, the potential benefit of developing this site is enhancing the pond, which would have not only an ecological benefit, but would improve the Conservation Area, thus positively supporting the local heritage value. These benefits are unique to this site in being able to deliver environmental benefits in addition to the social and economic benefits brought about through the provision of new housing.</p> <p>7</p> <p>In addition, and for the avoidance of doubt, if the land were to be allocated for housing (and planning permission subsequently granted), it is not our client's intention to promote and/or seek development of the western land parcel beyond Site 222 in future years as a phase II development.</p>		
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		<p>Rather, that land is to be retained by the owners for recreation and amenity use. With that in mind, and in order to demonstrate our commitment to that approach, our client would be willing to sign an undertaking to that effect; to include, should the Parish require further comfort, transferring a strip of land to the Parish Council's ownership in order to prevent any future access being created to serve development of that land for housing. Overall, we consider that the Site affords a sustainable location in helping to meet identified housing needs and should be identified as a housing allocation in the final NP.</p> <p>Landscape and Built Environment</p> <p>We note the suggested inclusion of the northern part of the Site west of Iden Green Road as an important green space and we continue to be willing to engage with the NP Team in order to realise an appropriate vision for this land. One such approach could be to allocate the land to the south for housing in order to provide an integrated form of development. The northern part of the Site could thus be transferred to the Parish Council's control as part of any s106 agreement funded through the grant of planning permission. The land is currently in private ownership and securing its future as publicly accessible open space could be realised as part of a sensitively designed housing scheme which would enable the land to become an integral part of the public realm. Again, we welcome the opportunity to discuss matters with you as part of the ongoing plan making process.</p> <p>Summary and Suggested Changes</p> <p>Paragraph 29 of the NPPF states that the neighbourhood plan making process should be aligned with the strategic needs and priorities of the wider local area. It is further added that NPs must be in general conformity with the strategic policies of the Local Plan and that they should not promote less development than set out in the Local Plan or undermine its strategic policies. In this context we propose the following changes to Policy HS1:</p> <p>☐ Land at west of Iden Green Road should be allocated as an additional site for housing and/or in preference to the sites currently proposed.</p> <p>We welcome an opportunity to work collaboratively with the NP Team in relation to the form and content of the NP and would be pleased to assist where necessary, including in relation to the sharing of technical information for land to the west of Iden Green Road.</p>		
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74	Emily Pettit, Victoria Pettit	<p>BENENDEN NEIGHBOURHOOD PLAN: REGULATION 14 CONSULTATION</p> <p>Deliverability and sustainability are the key tenets of your work.</p> <p>Deliverability is clear as set out in The Ministry of Housing, Communities and Local Government's National Planning Policy Framework, with which you will be familiar (page 66, Annex 2).</p> <p>I would like to focus on sustainability as the more multi-faceted topic for analysis, quoting first the government's policy; unpacking the objectives; examining how a sense of place and community can be achieved; and concluding with its practical application within the specific context of Benenden.</p> <p>Background Clauses 7 and 8 of The Ministry of Housing, Communities and Local Government's National Planning Policy Framework cite:</p> <p>"7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs."</p> <p>"8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <ul style="list-style-type: none"> a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy." 	<p><i>Site 222 is situated south of Benenden crossroads, which represents the rural gateway to the village.</i></p> <p><i>Site 222 currently offers panoramic views from the Conservation Area across the High Weald. Part of the site lies within the Conservation Area, and part of the site has listed archaeological remains.</i></p> <p><i>Site 222 is a greenfield site within the AONB. The site is currently an open field which provides a welcome visual break from the village settlement and the surrounding countryside. Development on this site would be harmful to the AONB, it would neither conserve or enhance the character and appearance of the surrounding area.</i></p> <p><i>See above responses regarding "Site Allocations..." and "Should greenfield sites..."</i></p> <p><i>No amendment required</i></p>	
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		<p>Analysis of the objectives and their interdependence</p> <p>In meeting economic objectives, smaller, 'flat' organisations are equally important to large, hierarchical corporations and are proven in terms of competitiveness, productivity and the facilitation of home working that is so key to non-urban centres. Such structures, and sectors of employment complementary to existing local ones, notable examples being e-commerce and the Arts, could be encouraged by parishioners of expertise and means with local interests by re investing resources and mentoring/ stewardship. In the interdependence of objectives, this enhances social bonds through the transmission of knowledge, while the link between economic and environmental objectives will become increasingly important over time, both in terms of support of national initiatives in green tech and reducing the carbon footprints of employees. The only form of employment that does not require any vehicular transport whatsoever is home working/ internet-based, and farm-based work on a moderate scale. Therefore, sites for development can and should be supported that minimise reliance on cars by providing walking distance access to services.</p> <p>In meeting the social and environmental objectives and their interdependence, sustainability through new developments could be defined thus:</p> <ol style="list-style-type: none"> 1. conserving the balance between ecology and the built environment 2. providing nuanced, vernacular design that reflects the eclecticism of the built environment as it exists 3. meeting green credentials in building and encouraging greener habits of residents 4. access to amenities and services, e.g. school, shop/cafe, church, hall 5. growing the village that makes it attractive for younger families 6. providing homes that people will actually want to live in and, just as importantly, providing a sense of connectedness. <p>In development terms, the practical implementation of the above may be reasonably applied in the above order as follows:</p> <ol style="list-style-type: none"> 1. achieving spatial balance between green space and built develop-ment, including protection of existing landscape and provision of new landscaping 2. engaging developers who have actual knowledge of regional, vernacular architecture and have a track record of follow-through on investing in and executing the designs they propose 		
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		<p>3. engaging developers who use sustainable energy in a location that doesn't require a car for every activity outside the home</p> <p>4. proximity to an existing social ecosystem</p> <p>5. proximity to schools</p> <p>6. quality, sensitive design in proximity to existing housing</p> <p>A Sense of Place</p> <p>The government papers time and time again mention the future.</p> <p>The future of every rural village relies at its core on three components:-</p> <ol style="list-style-type: none"> 1. attracting young families through affordable homes that give a sense of place and community 2. providing easy access through a close commute, or better still, walk-ing distance, to schools 3. facilitating home-based jobs to stay-at-home mums and dads through existing infrastructure of mentoring and places to meet (shop, hall) and enjoy outdoor spaces (green spaces, walks). <p>What does a sense of place mean for the future?</p> <p>The same things that it has meant for hundreds of years: good design in a community setting.</p> <p>I am very fortunate to work with respected artists and architects in my job and have learnt over the past two decades first-hand how the natural environment can be enhanced through sensitive design and seen how it enriches everyday lives. We are lucky to enjoy a part of the world that is naturally beautiful and at the same time, have moved beyond unsightly housing developments of the 1970's through the possibility of affordable housing that is also sustainable and appealing. In my work I have seen many projects where spoken ideals are never executed in reality due to maximised margins. As you will be aware through your process, not all developers are the same. Every thinking parishioner would concede that development is required, but that development needs to be balanced proportionately, i.e. spread across the parish, and consist of smaller-scale developments that respect the need to evolve. The majority of our area sits on AONB. Protecting it and growing the village responsibly need not be mutually exclusive concepts.</p> <p>It is therefore of grave concern if ribbon development will effectively be enabled by granting development on site 16 with relatively higher density of 18-20 dwellings on 2 acres and most crucially: "The layout, including hard and soft landscaping, to be designed so as not to prejudice the future provision of a suitable vehicular access with appropriate visibility</p>		
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		<p>splay(s) to the land located to the north [site 158], which may be allocated for development as part of a future Local Plan". As you are familiar, site 158 is a costly site to develop and therefore developers could run away with economies of scale to achieve an ROI on it, if numbers are not proportionately spread on the strength of your recommendations. It will ruin Benenden village forever if this is condoned by the Benenden Neighbourhood Plan Team now. I therefore object to the Benenden Neighbourhood Plan in its current form.</p> <p>Conclusion Responsible development should not purely exist to serve the interests of large, hierarchical corporations, nor should it be about putting development largely away or out of sight of the village to jeopardise social cohesion, and certainly should never be about protecting the interests of a few in positions of authority to the loss of the wider community.</p> <p>You have as you know an opportunity to provide a final plan of balanced development that grows the village in a sustainable way, providing well-designed housing that is the recipe for a quality of life for its residents and a sense of connectedness, the essential ingredient in that quality of life, especially important for younger and older parishioners. The most responsible development should take into account the lives of those who will inhabit that development.</p> <p>The solution to this that can provide proportionality and enriched community for the parish of Benenden can be told in numbers:</p> <p>low density 28 dwellings on site 222 (as has been proposed by its developer); maximum 20 dwellings on site 16; cap 42 dwellings on the lower portion of site 158 by a responsible developer as site 222 has, and, as we have proposed for site 222, a strip of land to be handed to the Parish to prevent future ribbon development. This then achieves parity and prevents kicking the can down the road for disproportionate development in Benenden in future plans. Conservation areas do not need to be touched. Ancient woodland can be left in peace. Panoramic views of existing residents may be kept.</p> <p>With privilege comes duty of rationality, proportionality and objectivity. Beyond targets, we are discussing the quality of life of all parishioners and you will be standing the village in the best stead for future generations in application of your privilege.</p>			
13	TWBC	<p>Page 54, last para: Reference to 2018 NPPF – should be 2019 NPPF.</p>	<i>Amendment to NDP required</i>		May 2020

DESIGN and BUILT ENVIRONMENT

REF.	RESPONDENT	COMMENT	BNDP RESPONSE/AMENDMENT TO BNDP	COMPLETED
28	Peter Nuttall	General - from the most recent developments that are lessons learnt available and have these been incorporated in our policies? A few pictures of award winning schemes could perhaps give some inspiration.	Award winning schemes for design may not be appropriate to this locality. Design needs to be in character and keeping with the location. Many developers use off-the-shelf designs used throughout the country. Satisfied that the BNDP gives sufficient information and detail to guide developers. NDP cannot be prescriptive; it can only guide. NDP will review sample design photos. Amendment to NDP required	May 2020
77	Charlotte & Helen Mortimer	More specific images or details to identify and promote exemplar design etc.	NDP will review sample design photos. Amendment to NDP required	May 2020
13	TWBC	Page 54, last para: Reference to 2018 NPPF -should be 2019 NPPF.	Will be corrected. Amendment to NDP required	May 2020
13	TWBC	Page 55, first para: reference is to "new housing developments", but then policies and subsequent paras discuss all development. Suggest being clear on what development the policies are appropriate to: new build housing, residential extensions etc.	First para beneath The Policies title — delete the word 'Housing' and replace HD9 with HD8 before 'inclusive'. Add the following para after the 1st sentence under Policies on page 55: "Any proposed extensions or additions to existing residential properties must be designed in accordance with this NDP Design Policies HD1, HD2, HD3d), HD5 & HD6." Beneath this para add the following para: "Any proposed new, or extensions to existing, commercial developments must be designed in accordance with this NDP Design Policies HD1, HD2 a), b), e) & g), HD4, HD5, HD6 & HD8" .	May 2020

			Objective (page 53) 1st line, change 'dwellings' to ' buildings '. Amendment to NDP required		
77	Charlotte & Helen Mortimer	HD1 - If the High Weald Design Guide is to be the key guidance, then extracts from this which are judged to be most relevant to Benenden should be reproduced or quoted. More photos required of what is considered local distinctiveness.	Design guidance is available from various sources, including KCC Design Guide and the National Design Guide. The HWAONB Design Guidance must be consulted by developers and designs must reflect the guidance. It isn't necessary to reproduce it in the BNDP. No amendment required		
13	TWBC	Page 55, Policy HD2/Para 3.2/Policy HD3/Para 3.4/Policy HD4: question whether it would be worth including Supporting Documents HDA3, 4 and 5 as appendices and making specific reference to these in the Policies, or just specific reference to the supporting documents in the Policies (rather than the supporting text).	To strengthen HD2: Include text of 3.2 in Policy HD2 rather than in supporting text. Amendment to NDP required		May 2020
6	Kent County Council	Policy HD2 The draft policy states that materials should be used that are similar in appearance to those used in Benenden's historic buildings. The County Council supports this requirement but would note that this may be dependent on such materials being available. KCC recommends that a clause be added to state that development proposals will not be accepted if materials required for their appearance leads to the destruction of natural resources.	Noted. HD2 Move c) to d)* — new c) Developers must demonstrate that materials are from sustainable sources. *clarification needed: is c) to be added to d) or is it replacing d)? Amendment to NDP required		May 2020

7	Charlotte & Helen Mortimer	<p>HD2 - needs to emphasise the need for new developments to be integrated into landscape & urban settings, ie. with points of connection, delineating and enclosing public spaces, shielding private spaces from public areas. Layouts must not be dominated by cars & roads. Too much modern design follows cul-de-sac plans with huge turning heads. The low density character of Benenden is dominated by landscape and all new development needs to create a strong landscape setting, keeping mature features. Be more specific about local sustainable materials.</p> <ol style="list-style-type: none"> 1. Green oak and sustainable timber frame. 2. Clay plain tile and steep roofs with open eaves. 3. Tile hung or mathematical tile upper storeys. 4. Timber windows not upvc. Flush casement or sash. 5. Clay stock bricks orange/red with blue/grey patina. <p>If the pallet of materials is controlled designers will work hard to produce original work that fits into the setting. If materials are natural, local and breathable then designs will be sustainable, low carbon and healthy. Policy (e) leaves a door open for incongruous designs that do not contribute to the local character. What is the policy on solar panels?</p>	<p>— covered by the first para of HD2.</p> <p>— covered by HD3</p> <p>— covered by HD4 and revised policy LE4</p> <p>— cannot be any more specific/prescriptive about materials.</p> <p>— renewable energy is covered by supplementary planning guidance and proposals must be compliant. The impact of siting solar panels in any development scheme would be considered as part of the planning process.</p> <p>No amendment required</p>	
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79	Gladman Developments	<p>Policy HD2 General Appearance - sets out a list of design principles that development proposals will be expected to adhere to.</p> <p>Whilst Gladman recognise the importance of high-quality design, planning policies and documents sitting behind them should not be overly prescriptive and need flexibility in order for schemes to respond to site specifics and the character of the local area.</p> <p>There will not be a "one size fits all" solution in relation to design and sites should be considered on a site by site basis with consideration to various design principles.</p> <p>Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could impact on the viability of proposed residential developments. We suggest that regard should be had to para 126 of the Framework .</p>	<p>Policy HD2 is a set of guidance principles for developers to work with and is considered to have sufficient flexibility without being prescriptive.</p> <p>No amendment required</p>		
77	Charlotte & Helen Mortimer	<p>Fig 1 - These images are poor. They are standard developer boxes and do not reflect the quality of materials or design to which this document aspires. They could be anywhere, with nothing to reflect the character of Benenden, in particular:</p> <ol style="list-style-type: none"> 1. Deep plans resulting in wide gables. 2. Stick on fussy gables and bays are not integrated. 3. Crude heavy porches and brackets. 4. No base plinths or timber trim to tile hanging. 5. Hard landscape & roads dominate, without space for planting to soften the spaces. 	<p>Photos to be reviewed.</p> <p>Amendment to NDP required</p>		May 2020

77	Charlotte & Helen Mortimer	<p>HD3 - Developer layouts follow the dictates of Highway standards handed down by County Council, hence the standard width roads, turning heads speed control turns & other features that stop them looking like the rest of the village. Lower density developments have more scope to adapt to local conditions, than high density.</p> <p>Item e) needs to be rewritten as it makes no sense.</p> <p>If public open space is required then parameters need to be set to determine how much. 10% of site area? Is this all development or just sites above a certain size of number of units? It is usually limited to major developments, ie developments with 10 or more houses.</p> <p>If preservation of the AONB is of primary importance to residents of Benenden, then they will have to accept more windfall sites within the existing LBD, with an inevitable intensification of existing sites, by infill development among existing houses.</p>	<p>— Not sure if there is a question within the first para of this?</p> <p>Delete whole of Item HD3e) and re-number accordingly.</p> <p>— HD3 c) delete existing text and replace with first sentence of Para. 3.4 below.</p> <p>Amendment to NDP required</p> <p>The BNDP cannot prescribe the area of space.</p> <p>— not sure if there is a question within this last para?</p>	May 2020
32	Mary Cruse	<p>Policy HD5 - many references within the document to desirability of dark skies, but no clear indication of what this means and no clear policy by which it should be achieved. HD5 is not a policy but a series of suggestions. It needs far greater clarity. Suggest a clear dark skies policy to include: Use of dark sky meter readings at "Rural Sky" level as being the absolute indicator. Existing residents encourage to subscribe to Dark Sky policy with aim being to reduce existing light pollution...we need a parish commitment to reducing light pollution (see Cranborne Chase for example of how this can be achieved).</p>	<p>Para 3.5 explains the current position of artificial lighting and dark skies. The 'list' under Policy HD5 sets out the parameters for lighting to preserve the rural dark skies.</p> <p>b) refers to a Sky Quality Meter which is the equipment to be used to measure the quality of the night sky.</p> <p>The BNDP applies to any/all types of development in the parish.</p> <p>There is a PC commitment to reduce existing light pollution and this will be undertaken.</p> <p>No amendment to NDP</p>	

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		as parking spaces, as they are rarely used as such.	Justification: Average of 2 cars per household in the parish. Amendment to NDP required		
77	Charlotte & Helen Mortimer	HD6 - Benenden is relatively isolated, resulting in high levels of dependence on cars for residents. This makes the level of car ownership per dwelling higher than better connected locations, resulting in parking stress if adequate off road parking is not provided. This can lead to developments that are dominated by cars and roads. If the character and quality of the environment are to be maintained, new development must provide sufficient space on each plot, not only for the necessary cars, but also to enable them to be screened from view. Electric cars policy required.	Covered by line 18 above. HD6 has been rewritten. T&I Policy T5 covers electric car charging points. No amendment required		
77	Charlotte & Helen Mortimer	HD7 - County Highways need to be in agreement	Not necessary. The layout is adopted from the character of the parish and is just one of a number of layout options contained in the KCC Kent Design Guide. No amendment required		
13	TWBC	Page 59, Policy HD8: Policies EN2 - EN5 (pages 370-375) of the TWBC DLP propose a raft of new policies around sustainable design and construction: It may be that the wording to Policy HD8 makes reference to developers being expected to refer to " ...and subsequent update, or policy in the emerging/adopted TWBC Local Plan " in order to future proof the NDP.	Noted. Amend BNDP as follows: Insert in Footnote 16 after 'Aims para 13', 'and subsequent update, or policy in the emerging TWBC Local Plan' then continue to end re: NPPF. Amendment to NDP required		May 2020
77	Charlotte & Helen Mortimer	HD8 - With so many existing buildings either listed heritage assets, or in Conservation Areas, is there a danger that the appearance and character of these may be damaged by adding solar panels to buildings.	Renewable energy must be considered. Insert the following to Policy HD8 after ...'supported.' and before 'Developers...': Any impact on the setting/appearance/character of heritage assets/conservation areas by the installation of solar		May 2020

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			panels to be considered at the planning stage. Amendment to NDP required		
11	South East Water	HD8 - materials & technology? South East Water is keen to know which water efficiency measures will be part of this plan in order to preserve water.	The NDP cannot be overly prescriptive. Policy HD8 refers to the inclusion of measures to help conserve water, etc. Not necessary to expand on this policy. See TWBC DLP EN27 Conservation of water resources. Add reference in footnotes. Amendment to NDP required		May 2020
13	TWBC	Page 60, Policy HD9: Whilst TWBC very much welcomes this policy, as a general rule planning legislation should not overlap with other legislation, and this would be the case here. It may be more appropriate that this is changed to supporting text.	Delete policy HD9. Move para. 3.9 and part of the text of the policy to a separate paragraph <u>below</u> the inserted (see line 13 above) paras before 3.1 on Page 55. To read: 'The BNDP strongly supports the use, by developers [...] to the end of the sentence.' Omit remainder of text and bullet points. Check ALL references to HD9 are removed from text of document. e.g. the first paragraph under the title policies HD1-HD9 needs changing to HD1-HD8. Check for more examples. Amendment to NDP required		May 2020
32	Mary Cruse	Projects Page 60 - I note commitment made to have active and regular liaison with major light polluters in the parish - Benenden Girls School and Benenden Hospital - has it happened? NDP needs assertive liaison to ensure that any developments at these major sites are light pollution compliant.	The PC is committed to reduce existing light pollution and this will be undertaken. No amendment required		
	PG & GB request.	Refer line 7 above on page 2.	Change the Policy numbers in this chapter from HD to BD to remove the inference that the design chapter only relates to housing and to bring it into line with the referencing of other chapters. Design and the Built Environment should become BD		May 2020

			for building design rather than housing design. Amendment to NDP required		

BUSINESS and LOCAL ECONOMY

REF.	RESPONDENT	COMMENT	BNDP REVIEW RESPONSE/AMENDMENT TO NDP		COMPLETED
13	TWBC	Page 65 BE1: Whilst the intention of the last line of the policy is understood, the latter sentence will potentially be problematic. It can be extremely difficult for a LPA where there are differing views within a community as to whether a matter is of benefit to that community...it can be the case that both parts claim to represent the community. Would the following be more appropriate: <i>"so long as they fit the rural, social and environmental principles of the parish, as set out in other policies of the NDP"</i> ?	Agree new wording required to strengthen Policy BE1: "Support will be given to maintaining farming and forestry as a significant business in accordance with the AONB policies above. The NDP recognises the contribution of major employers such as Benenden Hospital and Benenden School towards the community and local economy, and will continue to work with them on various projects that will uphold the rural, social and environmental principles of the parish, as set out in other policies within the NDP." Amendment to NDP required		May 2020
35	Gerard Conway	Policy BE1 - The plan is a long range plan. It is therefore quite possible that over this period new types of business may grow up due to changes in technology, working practices and other factors. Others may decline. Consequently, no specific industries or employers should in my view be singled out for			

		<p>favourable treatment under the BNDP. The criteria for which businesses have been singled out for favourable treatment under this policy are furthermore unclear. For example <i>"farming and forestry"</i> is one of these. However out of the 979 employees included in the Benenden employees survey (supporting document BEA2) only 20 (i.e. 2%) are employed in farming and forestry. Policy BE1 goes on to state that they will be supported as long as they fit <i>"the rural and environmental principles of the parish"</i>. This statement is clearly open to interpretation and thus carries a significant risk of exploitation. In particular, business related development can lead to significant environmental impacts, such as noise, vibration, dust and other forms of pollution. Such environmental impacts may not be acceptable, where the development site is located in the vicinity of other types of development, such as residential or heritage assets.</p> <p>Recommendation : Policy BE1 should be deleted.</p>	<p>The NDP disagree that it should be removed, as the NDP have agreed amendments to Policy BE1.</p> <p>No amendment required</p>		
40	Tony Fullwood	<p>Policy BE1: Suggest supporting development related to farming and forestry for which a rural location is demonstrated and necessary</p>	<p>This is covered in the revised Policy BE1.</p>		
40	Tony Fullwood	<p>Policy BE? Given their economic importance, you may wish to consider an additional policy which allows for the expansion of Benenden Girls School and Benenden Hospital provided certain criteria are met.</p>	<p>This is covered in the revised Policy BE1.</p>		
13	TWBC	<p>Page 68, para 4.10.1 - May want to refer to paras 6.443 - 6.459 and</p>	<p>The NDP should refer to these paragraphs.</p>		

		Policy ED5 of the TWBC DLP to future proof the NDP.	Amendment to NDP required		May 2020
13	TWBC	Page 68, Policy BE2: If the intention is to ensure that buildings are re-used mainly for economic purposes rather than residential, it may be relevant for this policy to be strengthened.	Agree – strengthen policy by deleting wording “ and sustain the balance between housing and commercial provision ”. Amendment to NDP required		May 2020
35	Gerard Conway	Policy BE2 - The conversion of previously developed land and redundant buildings and / or their change of use for business purposes can equally lead to significant environmental impacts, such as noise, vibration, dust and other forms of pollution. Such environmental impacts may not be acceptable, where the development site is located in the vicinity of other types of development, such as residential or heritage assets. Furthermore, this draft policy BE2 is subject to a similarly loosely worded caveat, which states that development will “ <i>sustain the balance between housing and commercial provision</i> ”. It is not clear what this is intended to mean. Consequently it may be prone to exploitation. For example, it could mean that the redevelopment of brown field sites may occur to provide housing and/or business premises. Alternatively it could imply that the plan favours the loss of residential amenity to allow brown field sites to be redeveloped for an intensive business use (that for example generates noise). Recommendation : Policy BE2 should be deleted.	The NDP disagree that Policy BE2 should be removed but have revised the wording of this policy. No amendment required		

40	Tony Fullwood	Policy BE2: Suggest redevelopment and regeneration of existing business sites and redundant buildings for business use.	Agree, and amended policy as above.		
13	TWBC	Page 68, Policy BE3: As it can be problematic if a business closes down and there isn't appetite by others to purchase the site, the usual approach in planning policy is set out that residential development of such sites would only be permitted if a series of criteria have been met. Such an approach has been applied to tourist accommodation under Policy ED7 on page 475 of the DLP; it may be pertinent for the NDP to follow a similar approach.	Disagree – the BNDP believes the wording suggested would weaken the plan, and act as a guide to reduce local employment, as opposed to maintain local employment as per the BNDP policy. No amendment required		
13	TWBC	Page 69, Policy BE4: Will be necessary to define "significant"; suggest provide more details (e.g. in supporting text) on what a "detailed infrastructure impact assessment and a plan to deliver requirements" involves; this is a very interesting and potentially very useful approach and really puts the emphasis on the applicant. As it stands, it is considered that significant additional justification is necessary for this policy, but (as above) is potentially very important.	Discuss re-wording with BE committee members and the BNDP are encouraged that TWBC highlight the potential importance of Policy BE4. <i>TWBC to provide a template for an "infrastructure impact assessment" to be included and to strengthen this policy.</i> Amendment to NDP required	May 2020	

TRANSPORT and COMMUNITY INFRASTRUCTURE

REF.	RESPONDENT	COMMENTS	BNDP REVIEW RESPONSE/AMENDMENT TO NDP		COMPLETED
6	Kent County Council	The County Council as Local Highway Authority has no comments on the Neighbourhood Development Plan as currently drafted.	Noted. No amendment required		

IA1 Consultation Statement

1	Biddenden Parish Council	Concerns about impact of increased traffic as a result of proposed housing development in East End.	<p>Justification: BNDP identifies road infrastructure as a concern wherever new housing takes place in the parish. The plan takes a wider view and has spread the impact of traffic movements along the three main routes in/out of the parish. These being:</p> <ul style="list-style-type: none"> • New Pond Road to Golford crossroads • Goddards Green Road to Castleton Oak crossroads • Swattenden Lane to Hartley junction <p>Benenden residents have on average 1.8 cars per household (Census 2011). In practice almost all journeys for work, shopping, services or doctors will require travel to Staplehurst, Hawkhurst, Cranbrook, Tenterden.</p> <p>KCC Highway Authority have confirmed they have no comment to offer on the BNDP. (Feedback to Regulation 14 Plan).</p> <p>No amendment required</p>		
33	Russell Cruse	In general – This section should stress far more forcefully that car traffic is not something the parish should be recommending.	<p>Justification: Benenden residents have on average 1.8 cars per household (Census 2011). In practice almost all journeys for work, shopping, services or doctors will require travel to Staplehurst, Hawkhurst, Cranbrook, Tenterden.</p> <p>KCC Highway Authority have confirmed they have no comment to offer on the BNDP. (Feedback to Regulation 14 Plan).</p> <p>No amendment required</p>		

IA1 Consultation Statement

30	Rolf Bakker and Corinne	Embayments should be proposed for buses (e.g. at the new school and in the high street) so that stationary buses don't cause congestion and stagnation of flow throughout the village.	<p>Justification: Congestion within The Street is an issue and buses stopping at existing bus stops can block traffic flow. BNDP considers reduced traffic flow caused by parked cars and bus stops to be a reasonable contribution to reducing speeding along The Street. This addresses a major safety concern in the absence of 20mph speed limits.</p> <p>No amendment required</p>		
28	Peter Nuttall	<p>As I understand the current status, the Infrastructure Development Plan is still very much a work in progress. I therefore think we need to include in the NDP the village wish list which can then be transferred and worked with TWBC very much like the Local Plan....items from my perspective that need to be included are increased mini van/hopper bus and ultimately AVs, to serve trips to Cranbrook and Hawkhurst as well as Tenterden.</p> <p>In addition a similar bus service to support commuting, school/college attendance etc to be commenced to Staplehurst Station.</p> <p>Centre of Benenden landscaped to facilitate safe and comfortable walking around the village as well as providing traffic management measures to slow down vehicular traffic.</p> <p>The policies as written generally have a high expectation of provision from developers. I would have thought that the key stakeholders are HMG, KCC, TWBC and PC.</p>	<p>The NDP has a projects list acting as a 'wish list'.</p> <p>The recent trial of a hopper bus service was withdrawn from Benenden, Iden Green and East End because of a lack of use by residents.</p> <p>Commuters would invariably wish to rely on their own transport.</p> <p>Some calming measures have been introduced with the opening of the new primary school. The PC ensured that the level of signage and road markings was appropriate to the rural village location.</p> <p>The level of expectation on developers to provide/contribute to infrastructure is the best method to ensure that projects can be funded, and is usual practice.</p> <p>No amendment required</p>		

40	Tony Fullwood	Objective: In order to ensure the objective carries forward the sustainable approach from other chapters and takes account of the NPPF, the following additions area proposed to the Transport and Community Infrastructure Objective: To prioritise infrastructure improvements, minimise and mitigate the impact of traffic growth, ensure that new development is well located and supported by sustainable transport links , enhance connectivity.....	P. 71 Objective. Agree in part. Agree insertion of words ' minimise and '. Amendment to NDP required		May 2020
40	Tony Fullwood	Principal Aims: No other chapter of the NDP contains a Principal Aims section and it is unclear how they relate to the objective. Perhaps this section is already covered by the Objective and projects already contained within the chapter.	P. 73 Justification: Remove the Principle aims section as it is covered within the text of the chapter and adds nothing to the BNDP. Amendment to NDP required		May 2020
40	Tony Fullwood	Reasoned Justification: The following paragraph appears to be out of date now that the distribution of development has been concluded in the NDP. Either the development to be considered will be the housing allocations (which have already taken into account the transport impacts and requirements of each site) or will comprise windfall development which is likely to be minor in scale (and certainly not of a scale where the residual cumulative impacts on the road network would not be severe (the NPPF test at Para 109). As written the paragraph appears to envisage further development beyond that supported in the NDP. I would suggest the following amendment be included: <i>However, the Plan could highlight localised traffic capacity and safety issues, or infrastructure deficiencies that</i>	This refers to page 74, para. 4 above Fig. 2. Agree — delete text as suggested. Amendment to NDP required		May 2020

		would need to be addressed. Strike through remaining text.			
13	TWBC	Page 73, third para: reference to NPPF 2018 - should be NPPF 2019	Agree. Drafting error in Reg 14 NDP. Amendment to NDP required		May 2020
40	Tony Fullwood	Parish Infrastructure: Transport - The analysis of infrastructure deficiencies should extend across all transport modes: Roads: <i>eg Benenden and Iden Green crossroads; increasing and inappropriate traffic on rural lanes; poorly maintained roads including the "switchback" between Benenden & Iden Green.</i> Pedestrians: <i>eg Well connected links in Benenden; incomplete footways in Iden Green; no suitable footpath connection between Iden Green & Benenden.</i> Cycles: <i>eg speeding traffic and constricted roads and lanes make cycling dangerous.</i> Public Transport: <i>from existing Para. The hopper service is a pilot scheme which appears to run a restricted service around midday and 3pm on weekdays only, and is therefore limited.</i> The road map should be expanded to include the Public Rights of Way.	Justification: Bullets under heading of Roads and byways do not fully set out conditions across all transport modes. However, BNDP does not expect increase creation of footpaths except where associated with significant residential development. Amendment to NDP required Justification: It would be useful to add bridleways and footpaths for information. BNDP will attempt to replace the map of parish roads with one that includes other public rights of way. Amendment to NDP required		May 2020 May 2020
6	Kent County Council	Policy T1 The inclusion of this policy is supported, as it would ensure that new developments provide opportunities for walking and cycling, enabling active lifestyles.	Noted. No amendment required		
13	TWBC	Page 76, Policy T1: suggest inclusion of wording along lines of " subject to meeting relevant national policy or legislative requirements ".	Justification: Important to emphasise need for active travel routes to meet legislative requirements. Amendment to NDP required		May 2020

78	Savills on behalf of Benenden Hospital	Policy T1 - The Society suggest that the clause " subject to viability considerations " is added to the end of draft Policy T1	Disagree. New developments should have connectivity to existing settlements; this is a NDP requirement. Developers should strive to achieve routes under the planning process. BNDP policy aligns with TWBC policy TP1. No amendment required		
13	TWBC	Page 77 Policy T2: Suggest rewording as such: "road access to/from developments provides safe access to, and transit past, new housing: this may include slowing the flow of traffic "	Justification: Improves clarity of the BNDP intention. Amendment to NDP required		May 2020
6	Kent County Council	Policy T2 Rural lanes provide useful connections for Non-Motorised Users (NMUs) travelling between off-road PRow. The potential for additional vehicle traffic along these country lanes is therefore a concern, as increased movements could introduce safety concerns for NMUs and potentially deter public use of the PRow network. With this in mind, Policy T2 should include wording that requires developers to submit traffic impact studies in support of their applications. Where negative impacts on NMUs are identified, developers should provide or contribute towards appropriate mitigation measures.	Justification: Developers will be required to undertake a Transport Assessment as set out in TWBC Policy TP1 (Draft Local Plan 2019). However, this could be made clearer within the BNDP policy. Amendment to NDP required		May 2020
78	Savills on behalf of Benenden Hospital	Policy T2 - The Society request that the wording of Policy T2 is altered to read "Developers will be required to demonstrate that road access to/from developments acts to slow the flow of traffic where possible and provide safe access to, and transit past, new housing".	Traffic Impact Study and Transport Assessments required by KCC Highways and TWBC (Draft Local Plan 2019) both call for managed traffic flows where required rather than ' <i>where possible</i> '. No amendment required		

33	Russell Cruse	Policy T2 5.2.2 Remove “without risks to other road users”.	Justification: Removes unnecessary words. Amendment to NDP required	May 2020
13	TWBC	Page 77, Policy T3: As detailed before, there is some conflict between emerging TWBC parking policies and NPD parking policies: therefore suggest that this policy only refers to NDP policy. As the test for requiring contributions is whether that it is necessary to mitigate the impact of new development, the occasions where a contribution towards a parish project of increased parking could be justified are fairly limited, although such examples could include: On-site parking being is provided at less than the minimum standards; being necessary to ensure there was adequate visibility through the removal of on-street car parking.	Justification: Policy does not meet planning conditions and cannot be sustained. Remove Policy T3 and renumber other policies. Amendment to NDP required	May 2020
78	Savills on behalf of Benenden Hospital	Policy T3 - The Society request a clause is added to the end of draft Policy T3 which reads " subject to not adversely affecting the viability of the proposed development. "	Justification: Policy does not meet planning conditions and cannot be sustained. Remove Policy T3 and renumber other policies. Amendment to NDP required	May 2020
40	Tony Fullwood	Policy T3: There is no evidence which indicates the need for additional public car parking in Iden Green. Almost all properties are served by off-street parking within the plot with little evidence of on-street parking. The limited community facilities are all supported by adequate car parking. In any event the emphasis should be on improving provision for sustainable transport, not additional public car parking. There are no allocated car parking sites within the NDP. The policy as written is not justified and would	Justification: Policy does not meet planning conditions and cannot be sustained. Remove Policy T3 and renumber other policies. Amendment to NDP required	May 2020

		fail the tests included within Circular 11/95: Use of conditions in planning permission. Reference to providing increased parking in and around Iden Green should be deleted from Policy T3.			
32	Mary Cruse	Policy T3 - There should be no mention of car-parking spaces in either Benenden or Iden Green. Emphasis should always be upon the convenience of pedestrians, cyclists and riders.	Justification: Policy does not meet planning conditions and cannot be sustained. Remove Policy T3 and renumber other policies. Amendment to NDP required		May 2020
33	Russell Cruse	Policy T3 – This policy should not be here. The principle should be that car use should be minimised and the provision of more parking will encourage more cars. This policy should be removed.	Justification: Policy does not meet planning conditions and cannot be sustained. Remove Policy T3 and renumber other policies. Amendment to NDP required		May 2020
13	TWBC	Pages 77, 78 & 79, and Policies T4, T5 and T6: As above, as the test for requiring contributions is whether that is necessary to mitigate the impact of new development, it will be necessary to indicate why a particular contribution is necessary, and to have costed and implementable schemes to justify the amount sought; Whilst the matters sought are very commendable, having this justification will be key. In terms of policy T5 - it is recommended that the NDP Group liaise with the electricity suppliers to ensure that there is sufficient capacity in the sub-stations to deal with the additional use from electric vehicle charging points at the rate required through the policy.	UK Power Networks have studies the BNDP and conclude they have no issues with provision of Electric Vehicle charging points. No amendment required		

77	Savills on behalf of Benenden Hospital	Policy T4 - The Society suggest that draft Policy T4 is reworded to read "Developers should strive to contribute to parish projects designed to improve provision for children's play areas in all three main settlements within the parish where possible . Developers should also strive to support projects designed to meet the health and well-being needs of residents where possible ".	Justification: Making the changes as suggested would weaken the policy to the point where these infrastructure investments become optional for developers. No amendment required		
6	Kent County Council	Policy T5 The County Council recommends that the Plan has a focus on energy and low emissions as opposed to climate change within this policy.	Agree — this would make more sense. Review of T5 and subject generally, to be undertaken. Amendment to NDP required		May 2020
79	Gladman Developments	Policy T5 - Gladman acknowledge the need to accommodate private vehicles in new development proposals, however, the requirement for electric charging facilities alongside new dwelling needs to be balanced against the practical ability of the local grid to supply sufficient baseload. Before any such policy is pursued, engagement with the main energy suppliers should have been undertaken in order to determine network capacity to accommodate any adverse impacts ...	UK Power Networks have studied the BNDP and conclude they have no issues with provision of Electric Vehicle charging points. No amendment required		

77	Savills on behalf of Benenden Hospital	Policy T5 - The Society consider that draft Policy T5 should be reworded to read "Developers will aim to provide 1 electric car charging point per dwelling and will endeavour to contribute to projects designed to reduce the impact of pollution emitted by cars such as providing a payment towards a mini-bus for the Primary School, encouraging walking/cycling by providing safe paths and planting native hedging (see also Policies HD4 and LE9) to screen new developments from the roadway and passing traffic and will be designed to shield the public from air pollution. Developers will also be expected to provide additional electric car-charging points for visitors to the parish in publicly accessible places such as Benenden Village Hall car park, Iden Green Pavilion car park, and Benenden Hospital car parks, where this does not adversely affect the viability of the proposed development ".	Justification: Making the changes as suggested will weaken the policy to the point where these infrastructure investments become optional for developers. No amendment required		
77	Savills on behalf of Benenden Hospital	Policy T6 - The Society also has no objection to draft Policy T6 in principle and would be willing to provide a commensurate contribution towards superfast broadband as part of the development of the North East and South East quadrants.	Thank you!		
35	Gerard Conway	Policy T6 - Mobile telecommunications is covered by existing national and district policy/guidelines. It is a complex and evolving area (both in terms of technology & policy)...	Yes, it is! But it remains important to include mobile/broadband services as a high priority regardless of HMG's announcement. No amendment required		
28	Peter Nuttall	Throughout the report the mobile/broadband issue is given quite rightly high priority. Given the recent announcements from HMG to address this issue is it still	It remains important to include mobile/broadband services as a high priority regardless of HMG's announcement. No amendment required		

		appropriate to give this issue such prominence??			
33	Russell Cruse	Page 71 under “Road and byways” – don’t limit the speed limit 20mph limits to outside schools. Many areas of the parish would benefit from such measures and this desire should be stated.	Agree. Delete ‘immediately outside schools’ across the main settlements. Amendment to NDP required		May 2020
33	Russell Cruse	Page 80 – Please remove the terms “scoping” and “scoped out”; they are not English.	Justification: These terms are now in regular use within commercial and government organisations within the UK. No amendment required		
32	Mary Cruse	Page 81 - Traffic Mitigation - Walkhurst Road must, with other rural areas, apply for Quiet Lane status, and must also, prior to the building of the hospital sites, be made Access only and/or 20mph. There is no possible way that it can safely maintain its Rural Lane status otherwise. The immense increase in traffic flow already makes it hard to walk, cycle or ride safely along the lane. If the NDP it to promote NPPF 2018 Para 102 regarding cycling, Walkhurst Road needs protection from excess volume and speed of traffic. It can otherwise never be used as a safe route to the village for non-motorised travellers.	See line 17 re: amendment to Policy T2 above. Amendment to NDP required NDP supports the aspiration but the implementation of quiet lane status and/or speed limits is outside its remit. This would be covered under KCC Highways policy. This is a commitment under projects.		May 2020

30	Rolf Bakker and Corinne Corbett-Thompson	<p>We all agree the need for additional housing but the burden that small villages have to carry is disproportionately heavy. In 2017 or so the demand for housing in Benenden was put at 8 dwellings or so. Now we are getting ca 100 additional houses, meaning a ca 20% increase. Clearly, this is a lot. With that, traffic is one of the biggest issues. In the 7 years we have lived here, we have seen a steady increase in traffic, largely due to new developments in surrounding towns and villages. This is set to continue with development in Benenden, no matter where the new developments ultimately will be. All traffic will make use of the main roads that meet at the cross roads and we welcome traffic calming measure at the cross roads. The infrastructure policies could be drawn up a bit more specifically. Whilst the 20 mph zones are welcomed, we believe the 30 mph should be pushed further back as well. The 30 mph limits are currently far too close too close to the cross roads (nobody slows down at the 30 mph signs)</p>	<p>See Policy T2. In addition, there are site specific policies for the allocated housing sites which set out contributions required to traffic calming measures to be put in place.</p> <p>Although the implementing of speed limits is beyond the remit of the NDP – the Parish Council has the reduction of speed limits throughout the Parish as a priority for infrastructure improvements – see pages 80/81 of the NDP.</p> <p>No amendment required</p>		
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Suggested amendments to BNDP Site Specific Policies - incorporating relevant policies and correlation with Policy AL/BE2 from TWBC DLP 2019

SITE	SUGGESTED TEXT AND AMENDMENTS	COMPLETED
<u>Site Specific Policy 2 - Uphill, New Pond Road, Benenden (ISA reference: Site LS16)</u>	<p>Approach</p> <p>To support a modest scale development on a relatively enclosed and sustainable site close to village amenities. A suitable design can minimise harmful impacts and improve the character and quality of Benenden village and the way it functions in the future.</p> <p>Achieved by</p>	May 2020

	<p>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.</p> <p>Proposals shall:</p> <ol style="list-style-type: none"> 1. Provide a residential development of around 18-20 C3 dwellings, with 35% 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 and the landscape and heritage setting of the village. 3. Include the provision of adequate parking facilities to avoid on-street parking beyond the development site. Reference should be made to Design & Built Environment chapter para 3.6 and Policy HD6 BD6 for determining the quantity of vehicle parking, in the context of the generally high reliance on private cars in this area of relatively poor public transport provision. If provided, attached garages will not count towards the required quantity of parking spaces. 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 environmental survey (Policy LE4) for the health of the trees, their contribution to 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. 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 EN 11: Net Gains for Nature: biodiversity and EN 12: Protection of designated sites and habitats); 6. The MAGIC web site⁽⁴¹⁾ 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 EN 12: Protection of designated sites and habitats); 	
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	<p>7. Demonstration through the submission of relevant and proportionate archaeological investigations (as part of any planning application) that the proposal will not have a materially harmful impact on the archaeological environment (see TWBC DLP Policy EN 7: Heritage Assets);</p> <p>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 to reduce the impact of development both during construction, and from housing, increased traffic/people.</p> <p>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 HD4). Permitted development rights to erect fences and garden structures should be removed.</p> <p>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);</p> <p>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. Contribution must be made to improving the safety of the Benenden crossroads.</p> <p>12. Design and materials should comply with the design requirements specified in the Benenden Neighbourhood Plan under the Design and Built Environment chapter and the policies contained therein.</p> <p>13. The parish is a dark skies area and any proposals for the outdoor lighting of new developments must comply with Policy BD5.</p> <p>It is expected that contributions will be required towards the following to mitigate the impact of the development:</p> <ul style="list-style-type: none"> • Works to the junction between New Pond Road and the B2086; • The designation of a 30 miles per hour speed limit along New Pond Road to the north of the site; • Contribution towards children's play areas within the parish; • Any further contributions identified through the pre-application and planning application process. 	
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<p><u>Site Specific</u> <u>Policy 3 -</u></p> <p><u>Land at</u> <u>Benenden</u> <u>Hospital –</u> <u>South East</u> <u>Quadrant (SEQ)</u> <u>(ISA reference:</u> <u>Site 424)</u></p>	<p>Approach</p> <p>To support development on a brownfield site outside, but adjacent to, the High Weald AONB. A suitable development should minimise impact 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.</p> <p>Achieved by:</p> <p>This site is allocated for residential development (C3) to provide an increase in the number of residential units of approximately 22 - 25. Given that 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.</p> <p>It is expected that there will be a masterplan to include comprehensive proposals for the Benenden Healthcare Society Land Ownership whole site. The masterplan shall be delivered in accordance with a phased timetable, which indicates land to the south of Goddards Green Road will be developed first prior to any other phases.</p> <p>Proposals shall:</p> <ol style="list-style-type: none"> 1. Provide a residential development of an additional 22-25 dwellings, with 35% affordable housing 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. Building heights should generally be restricted to two storeys. 3. Include the provision of adequate parking facilities to avoid on-street parking. Reference should be made to Housing Design para 3.6 and Policy BD6 for determining the quantity of vehicle parking in the context of generally high reliance on private cars in this area. Houses to be provided with electric car- charging facilities. 4. (REMOVE LINK TO ALMSHOUSES) As a significant part of the affordable housing contribution, make a specified financial contribution to The Benenden Almshouse Charities to enable provision of additional almshouses/affordable housing near to facilities in Benenden village in exchange for a reduced requirement for affordable housing on the two sites at the former hospital. Require a minimum of 25% of the new build houses to have a purpose designed 	<p>May 2020</p>
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	<p>designated working/office space to enable home working thus aiding sustainability. (Removed as this is already stated in Generic policy HS5)</p> <ol style="list-style-type: none"> 5. Have close regard to the design and materials requirements specified in the Benenden Neighbourhood Plan under the Design and the Built Environment chapter and the policies contained therein. 6. 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). 7. Regard to be given to existing hedgerows and mature trees on site, 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 EN 14 : Trees, Woodlands, Hedges, and Development and criterion 3 of TWBC DLP Policy EN 1: Design and other development management criteria); 8. Reflects 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 EN 1: Design and other development management criteria); 9. 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 LE6. <i>(Can the two LWS policies be combined into one policy?)</i> 10. Ensure the LWSs be conserved and enhanced as wildlife sites with a management plan adopted to achieve this, and the sites to not be used for recreational purposes. 11. 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. 12. The Construction Management Plan should address how to minimise the impact of construction work on existing flora and fauna, in particular retaining the hedging which borders the site/mature trees on the site (see Policy LE5). 13. Any planning application shall include a Traffic Impact Study detailing expected growth in traffic volumes, mitigations required for road and pedestrian safety to include: 	
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	<ul style="list-style-type: none"> • Measures to control the speed of traffic within and around East End; • Suitably designed crossing points across Goddard's Green Road; • Relevant works to highway junctions as necessary; • Improvements to the public realm at the centre of Benenden; • Other highway related works. <p>14. The parish is a dark skies area and any proposals for the outdoor lighting of new developments must comply with policy BD5.</p> <p>It is expected that contributions will be required towards the following to mitigate the impact of development:</p> <ol style="list-style-type: none"> 1. Provision of an active travel link between the site and Benenden village (see Supporting Document TA 2 and Policies T1,T2 & T5); 2. 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; 3. 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; 4. 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 which has in the past been used as a nursery school. 5. Provide a mini-bus 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. 6. 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. 	
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	7. Any further contributions identified through the pre-application and planning application process.	
<p><u>Site Specific Policy 4 -</u></p> <p><u>Land at Benenden Hospital - North East Quadrant (NEQ) (ISA reference: Site LS41)</u></p>	<p>Approach</p> <p>To support development on a brownfield site outside, but adjacent to the High Weald AONB. A suitable development can minimise harmful impacts and improve the character and quality of the location while providing an opportunity to improve amenities at East End.</p> <p>Achieved by:</p> <p>This site is allocated for residential development (C3) to provide an increase in the number of residential units of approximately 22 – 25.</p> <p>It is expected that there will be a masterplan to include comprehensive proposals for the Benenden Healthcare Society Land Ownership whole site. The masterplan shall be delivered in accordance with a phased timetable, which indicates land to the north of Goddards Green Road 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</p> <p>Proposals shall:</p> <ol style="list-style-type: none"> 1. Provide a residential development of an additional 22-25 dwellings, with 35% affordable housing 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. Building heights should generally be restricted to two storeys. 3. Include the provision of adequate parking facilities to avoid on-street parking. Reference should be made to Housing Design para 3.6 and Policy BD6 for determining the quantity of vehicle parking in the context of generally high reliance on private cars in this area. Houses to be provided with electric car- charging facilities. 4. (REMOVE LINK TO ALMSHOUSES) As a significant part of the affordable housing contribution, make a specified financial contribution to The Benenden Almshouse Charities to 	May 2020

	<p>enable provision of additional almshouses/affordable housing near to facilities in Benenden village in exchange for a reduced requirement for affordable housing on the two sites at the former hospital. Require a minimum of 25% of the new build houses to have a purpose designed designated working/office space to enable home working thus aiding sustainability. (Removed as this is already stated in Generic policy HS5)</p> <ol style="list-style-type: none"> 5. Have close regard to the design and materials requirements specified in the Benenden Neighbourhood Plan under the Design and the Built Environment chapter and the policies contained therein. 6. 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). 7. Regard to be given to existing hedgerows and mature trees on site, 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 EN 14 : Trees, Woodlands, Hedges, and Development and criterion 3 of TWBC DLP Policy EN 1: Design and other development management criteria); 8. Reflects 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 EN 1: Design and other development management criteria); 9. 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 LE6. <i>(Can the two LWS policies be combined into one policy?)</i> 10. Ensure the LWSs be conserved and enhanced as wildlife sites with a management plan adopted to achieve this, and the sites to not be used for recreational purposes. 11. 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. 12. The Construction Management Plan should address how to minimise the impact of construction work on existing flora and fauna, in particular retaining the hedging which borders the site/mature trees on the site (see Policy LE5). 	
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	<p>13. Any planning application shall include a Traffic Impact Study detailing expected growth in traffic volumes, mitigations required for road and pedestrian safety to include:</p> <ul style="list-style-type: none"> • Measures to control the speed of traffic within and around East End; • Suitably designed crossing points across Goddard's Green Road; • Relevant works to highway junctions as necessary; • Improvements to the public realm at the centre of Benenden; • Other highway related works. <p>14. The parish is a dark skies area and any proposals for the outdoor lighting of new developments must comply with policy BD5.</p> <p>It is expected that contributions will be required towards the following to mitigate the impact of development:</p> <ol style="list-style-type: none"> 1. Provision of an active travel link between the site and Benenden village (see Supporting Document TA 2 and Policies T1,T2 & T5); 2. 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; 3. Provision of premises that would be available as a publicly accessible café and small retail outlet . 4. 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 which has in the past been used as a nursery school. 5. Provide a mini-bus 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. 6. Promote and support the Kent County Council Hopper Bus trial and other DRT initiatives. It is intended to serve the 	
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	<p>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.</p>	
	<p>7. Any further contributions identified through the pre-application and planning application process.</p>	