

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

**Further Comments of the Independent Examiner dated 31 May 2021**

**Questions relating to the East End allocation sites**

**Benenden Parish Council Ndp Response Prepared For Public Hearing  
Dated 25<sup>th</sup> June 2021**

## Question 1

Examiner's Question:	Benenden PC Response:	Reference/Links:
<p>Are the proposed allocations on the hospital owned land at East End, well located for this level of new housing and will they deliver sustainable development?</p>	<p>There are currently 32 dwellings at the hospital site, with 76 dwellings in the surrounding area and there are currently no amenities at East End, bar one public cash point at the hospital. There is already permission for a further 24 dwellings (on the South site), and there is of course, an existing hospital employing some 500 employees with circa 300 daily out-patients. The proposed allocation of around 50 dwellings will deliver the provision of amenities for everyone in the area through the NDP site-specific policies.</p>	
<p>Do the two allocations meet the criteria which are set out in paragraph 78 of the NPPF, namely that "housing should be located where it will enhance or maintain the viability of rural communities" and is the subsequent NPPF advice that "where there are groups of smaller settlements, development in one village may support services in a village nearby" relevant to the neighbourhood plan strategy?</p>	<p>The two allocations for the proposed new housing, together with the provision of the proposed amenities, will enhance the area and encourage a welcoming and inclusive community. The residents of East End already support the services provided in Benenden village and future residents will continue to do so.</p>	
<p>If the NPPF policy, in para 117, is that objectively assessed housing needs should be delivered in a way that makes as much use as possible of previously developed land, does the development of the two hospital allocation sites "cause harm to designated sites of importance for biodiversity or conflict to an overriding extent with other NPPF policies"?</p>	<p>The Local Wildlife Sites are currently maintained through a voluntary agreement between the current site owners and Kent Wildlife Trust. NDP policies will add weight to the agreement by making ongoing maintenance of the LWS a planning requirement.</p>	

## Question 2

Examiner's Question:	Benenden PC Response:	Reference/Links:
<p>Are the requirements that the social infrastructure needed to mitigate the impact of the development and enhance the sustainability of the location, for example, in terms of requiring a contribution to the provision of a community café/shop, sports facilities, community building and minibus links as well as the provision of an active travel link to Benenden village, as proposed in Policies SSP3 and SSP4, sufficient to meet the reasonable day to day needs of future, as well as existing residents, in this location?</p>	<p>Yes, it is expected that the proposed social infrastructure will be sufficient to meet day to day needs of existing and future residents.</p>	
<p>Is it appropriate that these facilities should be required, for a residential development of this scale, in this location and is it reasonable that they should be expected to be fully funded by the developer, rather than by a <i>proportionate</i> contribution?</p>	<p>These facilities are required to secure the sustainability of the location. There will be further sources of funding for the active travel link from KCC and other grant-funding available to promote walking and cycling initiatives. Nevertheless, the amenities required are reasonable for a residential development of this scale.</p>	<p><a href="#">Cycling and Walking Investment Strategy 2</a></p> <p><a href="#">KCC Walking and Cycling Schemes Article</a></p>

### Question 3

Examiner's Question:	Benenden PC Response:	Reference/Links:
<p>Is it appropriate that affordable housing should be provided <i>on site</i> in this location?</p>	<p>The provision of affordable housing throughout the parish was the top priority set out by parishioners at initial NDP workshops.</p> <p>Benenden village and Iden Green has existing affordable housing of 65 and 21 dwellings respectively, with a further 20 affordable dwellings proposed for Benenden village.</p> <p>The two allocation sites at East End will provide a mix of affordable housing in line with the current TWBC affordable housing policy. Mixed communities are an important part of a balanced village life as already proven in Benenden and Iden Green, and contribute towards the inclusivity of the parish.</p>	

#### Question 4

<b>Examiner's Question:</b>	<b>Benenden PC Response:</b>	<b>Reference/Links:</b>
<p>Can I be satisfied that the two allocation sites at East End can accommodate the necessary quantum of proposed development without adversely impacting on the Local Wildlife Site?</p>	<p>Local Wildlife Sites are not statutory protected sites, but are a voluntary scheme agreed between owners and in this case Kent Wildlife Trust.</p> <p>The NDP site specific policies are clear that Local Wildlife sites must be protected. The NDP will provide further protection of the LWS designations, and proposes development within the curtilage of existing buildings only.</p> <p>Features to encourage wildlife are set out in Policy LE9 of the NDP</p>	

## Question 5

Examiner's Question:	Benenden PC Response:	Reference/Links:
<p>Will the residential development proposed on the two sites, individually or collectively, have an adverse impact on the adjacent AONB and, if it does, specifically in what ways will that harm be manifested, having regard to the existing levels of development, currently on site, or as already permitted?</p>	<p>The proposed residential development will enhance the setting of the adjacent AONB, with the demolition of redundant administrative buildings and a 1960s hotel building, as well as 1950s social housing. This will be replaced with a residential development, including landscaping, providing an integrated variety of housing types, adhering to NDP policies as set out in the Housing Supply and Site Allocation chapter, as well as those set out in the Design and Built Environment chapter and the High Weald AONB Design Guide.</p> <p>The housing density for the two site allocations has been carefully considered, and at 22/24 dph is kept to a far lower density than that recommended by CPRE for previously developed land (40 dph).</p> <p>The NDP will ensure that landscaping features comply with the policies set out in the NDP Landscape and the Environment chapter.</p>	

## Question 6

Examiner's Question:	Benenden PC Response:	Reference/Links:
<p>Will the net increase in the number of homes on the two East End allocation sites, beyond those already committed, have a significant impact on the transport network, either in terms of capacity and congestion or highway safety and if it does, can these be cost-effectively mitigated?</p>	<p>Benenden PC would welcome any improvements to the safety of the crossroads at Castleton Oak, whether or not there is housing development at East End.</p> <p>Benenden Hospital currently generates some 1,000 vehicle movements per day</p> <p>Local Speedwatch volunteers recently recorded 160 vehicles in a one hour period from 7.30am travelling in one direction only from Castleton Oak crossroads towards East End.</p>	
<p>In particular, will the allocation of the two sites via Policies SSP 3 and SSP4 have a severe impact on key junctions in the neighbouring Biddenden Parish specifically at Castletons Oak Crossroads and at Woolpack Corner?</p>	<p>New residents at East End would not predominantly travel to Castleton Oak and then onwards to Woolpack Corner. The rationale for this has already been set out fully in the response to the Examiner's "Initial Comments – Point 47"</p> <p>NDP Transport and Infrastructure Policy T2 "Improving Road Safety and the Impact of Traffic" sets out the requirements for any new housing or commercial development</p>	