Supporting Document HSA1

Process & Background Information for BNDP Housing Group

Parish Plan 2015

The introduction to the Housing chapter in the Parish Plan states:

Housing came up as a major issue in the village questionnaire. With very high land and residential property values, the availability of affordable housing for purchase or rent (especially for younger people and families) was seen as key to the longer term vitality and sustainability of the village.

Subsequently, a local housing needs study was conducted and as a result the Parish Council and English Rural Housing association built 6 affordable homes for local people at Iden Green, and there are currently planning permissions for a further 12 affordable units as part of larger permitted housing developments in the parish.

Existing housing stock in Benenden

Figures below are taken from the TWBC Housing Needs Study (HNS) 2018:1

- The population (2011 Census) of the parish is given as 2374 but this includes around 500 pupils at Benenden School. A more representative figure of permanent population is therefore 1874 which includes staff living at the school.
- There are 827 dwellings in Benenden of which over 46% are detached, 18% semi-detached, 8% terraced, 10% bungalow, 12% flats.
- Of these, 64% are owner occupied, 24% private rented and 12% affordable.
- Average house prices in the High Weald are 142% higher than in the South East. House prices in the Borough have risen 162% since 2000.
- There is significant demand for houses to buy in the parish from families migrating from London and surrounding areas, leading to higher prices (average £600,000); local grammar schools are an added attraction and lead to an additional premium making it virtually impossible for first time buyers in routine occupations to get onto the property ladder.
- The HNS also stresses the importance of the private rented sector in order to facilitate employment and lend economic flexibility.
- An estimated 29% of the population in the High Weald is retired. Estate agents
 consulted in the HNS 2018 recognised that demand from older people will rise
 due to the growing numbers of older people seeking specialised accommodation
 or to downsize.

The scale of the local housing need is reflected in the following two surveys: the Benenden Housing Needs Survey 2015 undertaken by Action for Communities in Rural Kent² identified the 'need for 13 homes for older people and for up to 21 general needs affordable homes. In total there is a need for 24 housing association rented properties (18 general needs, 6 for older people) and 3 shared ownership properties for general needs.' Some of this has been met by the six affordable homes at Vyvyan Cottages, Iden Green opened by HRH The Princess Royal in March 2016.

TWBC's HNS 2018 identified 15 households in need with the net annual affordable housing imbalance in Benenden estimated as 6 small (1-2 bed) affordable units, 2 general

¹ TWBC Housing Needs Study. http://www.tunbridgewells.gov.uk/ data/assets/pdf file/0019/132256/711D8F912E166417E0531401A8C086E8 Tunbridge Wells HNS draftreport May 2018V4.pdf

² HNS 2015 Action for Communities in Rural Kent Executive Summary p. 3.

and 4 for older people.3

Consultation

At the Visioning Workshops (28th October; 11th November 2017) a number of issues were explored including:

- Limiting the size of any one development
- Ensuring 'affordable' stays 'affordable'
- Sheltered housing for the elderly/opportunities for downsizing
- Housing staying in the control of the community
- Community Land Trust
- A variety of different types of housing
- Affordable rental
- Maintaining the rural 'feel' of the parish

The participants then considered possible scenarios or reasonable alternatives via a 'SWOT' (strengths, weaknesses, opportunities and threats) exercise⁴ (see Supporting Document HSA1) as to how the parish could meet future housing needs:

- A single large development
- Two or three 'medium' sized developments
- Scattered development of groups of 10-13 houses
- Scattered development with no more than 4 houses on each site

The feasibility and suitability of these scenarios/options or reasonable alternatives have then been subject to the further work of the Housing Supply Working Group.

Training

BNDP volunteers were trained by Tunbridge Wells Borough Council (TWBC) planning officers to undertake site assessments consistent with Planning Practice Guidance, TWBC and best practice guidance from Locality⁵. Subsequent meetings with TWBC have helped to ensure the working group deliberations were consistent with the Basic Conditions requirements.

Assessing the Sites

Individual Site Assessment (ISA) sheets were compiled on each site following TWBC's pro-forma bringing together as much information as possible on every site. The observations of the group were then discussed at the next meeting and the results moderated before the ISA was then produced.

Each site was also scored numerically using a range of criteria which enabled an objective comparison to be made of the sites, the highest scoring being the most suitable for development.

When all the ISAs had been completed, they were shared with TWBC, compared with their own draft SHELAA/HELAAs (Strategic Housing and Environmental Land Availability Assessment/ Housing and Economic Land Availability Assessment) and finally submitted our planning consultant for review (see Supporting Document HSA3).

³ See https://beta-tunbridgewells.gov.uk/_data/assets/pdf_file/0004/291937/711D8F912E166417E0531401A8C086E8_Tunbridge_Wells_HNS_draftreport_May_2018V4-pdf} TWBC Housing Needs Study 2018 — Evidence Studies p. 72-123.

⁴ Supporting Document HSA1 'SWOT' analysis from Visioning Workshop 28th October 2017.

⁵ https://locality.org.uk/

Supporting Document HSA2

'SWOT' Data

Workshops

Visioning workshops were held in the village hall, led by an external consultant, to determine resident's opinion regarding future housing requirements in the parish.

A presentation on the Benenden Parish Housing Needs Survey, undertaken by Action for Communities in Rural Kent (ACRK) in 2015, was given by the consultant, as follows:

The Benenden Parish Housing Needs Survey analysis identified a need for 13 homes for older people of the parish, they were:

- 8 single people
- 5 couples
- 6 of these households want to buy an alternative property
- 6 want to rent from a housing association
- 1 wants an almshouse
- The older people mainly want a bungalow or accommodation suitable for older people without support.
- Two households need extra care housing and one needs sheltered housing. Four want a smaller home.
- They all currently live in the parish.

The survey also identified a need for up to 21 general needs affordable homes for the following households:

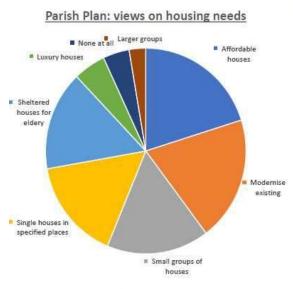
- 7 single people
- 4 couples
- 10 families
- There is a need for 18 rented properties and 3 shared ownership properties
- These households indicated strong local connections to the parish; 16 currently live in the parish and 5 live outside.
- In total there is a need for 24 housing association rented properties (18 general needs, 6 for older people) and 3 shared ownership properties for general needs.

The workshop continued with two sessions—residents working in four groups of approximately 6-10 people at each table to analyse some of the key issues relating to housing in Benenden in the future. The first exercise was to focus on how to deliver housing and the second on how to deliver affordable housing, one of the main priorities identified in the 2015 Parish Plan.

Possible Scenarios to Meet Future Housing Needs

The BNDP Chairman introduced the first workshop session by presenting four possible scenarios to meet future housing needs in Benenden parish. He emphasised that these were theoretical but that they were in part based on the new Local Plan Issues and Options Consultation¹ undertaken by Tunbridge Wells Borough Council in the summer of 2017:

Housing & Community workshop: early thinking



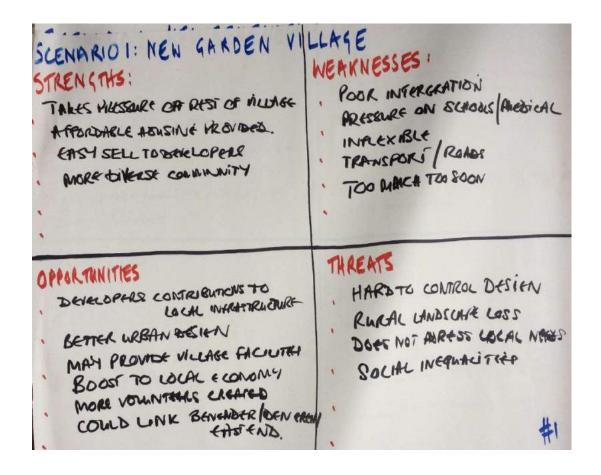
Parish Plan: 2015

Scenarios

Assumption: Every scenario will offer the same absolute number of new properties to build.

- 1. New Benenden: create a single new contiguous settlement within the parish boundary to fulfil housing demand for the next 20 years in one place.
- New Benenden Lite: create three smaller new settlements across the parish to meet housing demand for next 20 years.
- 3. Localised Development: Allocate sufficient sites for developments of 8 12 properties at a time.
- 4. Spread it Thin: No more than 4 properties in any one place

In groups, residents were encouraged to brainstorm the pros and cons of the different scenarios, and then to translate these into: Strengths, Weaknesses, Opportunities and Threats (SWOT) on a grid set out on large flip chart sheets. Here is an example SWOT:



The SWOT tables resulting from each group are recorded below, and on following pages:

Scenario 1: New Garden Village (250+ homes) #1

Strengths:	Weaknesses
 Takes pressure off rest of the 	 Poor integration
village	 Pressure on schools / medical
 Affordable housing provided 	 Inflexible
 Easy to sell to developer 	 Transport / roads
 More diverse community 	 Too much too soon
Opportunities	Threats
 Developers' contributions to local 	 Hard to control design
infrastructure	 Rural landscape loss
 Better urban design 	 Does not address local needs
 May provide village facilities 	 Social inequalities
 Boost to local economy 	
 More volunteers created 	
 Could link Benenden / Iden Green / East End 	

Scenario 2: New Benenden(s) Lite (each of 70-90 homes) #1

Strengths	Weaknesses
 Infrastructure potential Concentrated disturbance More affordable housing due to more houses on that site / mix Might attract local services e.g. doctor, dentist 	 Worry about developer building executive houses primarily Lack of control on the number, therefore impact on provision of infrastructure Transport links Connectivity to centre of village (pub, shop, etc.)
Opportunities Money to local community / parish council (CIL / Section 106) Capitalise on increased use / footfall for shop and pub	Threats Not sufficient infrastructure Impact on landscape – lighting, dark skies Change character of the village Disproportionate impact on 3 areas

Scenario 3: Localised developments (8-12 homes) #1

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- Would not destroy character of village
- Less traffic congestion / concentration
- Sustainable / eco houses easier to build in smaller clusters
- Lower impact on immediate area if development is smaller
- Local services will cope better with smaller increases in population (?)

Opportunities

- Opportunity to provide a variety of designs
- More potential sites available for 8-12 properties
- Hopefully locally sourced materials and local contractors could be used

Weaknesses

- More traffic
- More widespread light pollution
- Biased towards executive homes
- Higher infrastructure costs

Threats

- Not enough affordable housing
- Poor / inappropriate design
- Good for developers (executive houses), BAD for us (villagers – not enough 1-2 bed)

Scenario 4: Spread it thin (<4 homes) #1

Weaknesses Strengths Maintains the village feel More expensive to build Reduces traffic density Less likely for affordable houses Housing for older people nearer Possibly further away from village village centre centre - worse for older people Better / more varied architecture May require a lot of individual Retain large green spaces outside developments in order to fulfil our housing quota the village Opportunities **Threats** Encourages new people to Multi-national builders prefer to integrate into the community build large houses whereas we require more affordable houses / Uses local builders not multihomes nationals Lose the small pockets of green Conversion of disused buildings spaces in the village

Scenario 1: New Garden Village (250+ homes) #2

Strengths	Weaknesses
 Preserves the centre 	 Unsuitable in centre of village
 Centralised infrastructure 	 Danger of becoming
 Opportunity for more 	dormitory town
affordable housing	 Planning delay in process
 More attractive to developers 	 Traffic congestion
 Economy of scale 	 Destroying character of AONB
Opportunities	Threats
 Ability to demand 	 Non-organic growth
centralised support	 Environment impact
services	 Hasting influx of population
 Better landscaping / eco demands 	 Divisive for community
Better layout	 New village school is inadequate
Better traffic controls	-

Scenario 2: New Benenden(s) Lite (each of 70-90 homes) #2

Strengths Opportunity for social housing Improved infrastructure (waste / utilities) Allows phased development Help to preserve character of the village Diversity of housing (1 / 2 bedroom etc.)	 Weaknesses Choosing attractive site Disruptive for more local residents Quality of build – less appealing to local builders More disruptive for local natural environment – wildlife Unless close to centre of village, lanes can't cope with resulting traffic
 Opportunities Builders and farmers with land Local businesses / work opportunities Paths between settlements Local GP / dental services Young people and families to stay within village 	 Threats Out of scale with size of village Area of outstanding beauty Traffic congestion Small lanes and high banks Overwhelming local infrastructure very difficult to improve Development creep

Scenario 3: Localised developments (8-12 homes) #2

Strengths	Weaknesses
Social mix	 Urbanisation
 Village facilities 	 Can we find sufficient sites and
 Services easier to provide 	with services?
(affordable)	 Expense of providing services –
 Attracts developers 	increased prices
Enforces quota of affordable	 Land bank requires substantial funds from Land Bank Trust – can village afford this
Opportunities	Threats
 Attractive to developers 	 If we have exhausted availability of
 Fewer impactful sites 	large enough sites within current
 Reduces ribbonisation of 	limits to built development
Benenden Iden Green core	Encroach into AONB / countryside
 Providing for employees of local employers near to employment 	 Developer will try to minimise provision of parking (off-street) garages, storage
	 May not be adjacent to facilities
	 Loss of rural character

Scenario 4: Spread it thin (<4 homes) #2

Strengths	Weaknesses
 Opportunities Re-development of redundant farm buildings Opportunity for smaller more sympathetic developers Older people in larger properties can downsize 	 Threats Developers unreliable on 'affordable housing' Indiscriminate sales of excess garden land etc. Village can sprawl and lose identity

How to provide affordable housing to meet local needs:

The next session focussed on the Parish Plan priority of providing affordable housing. Again, at tables and in small groups, residents considered the Strengths, Weaknesses, Opportunities and Threats (SWOT analysis) of four approaches to providing new affordable housing:

- I. Local needs and key worker housing
- II. For older people (particularly downsizing)
- III. Standard housing development (with 35%² affordable housing)
- IV. Community Land Trust

Topic 1: Local Needs and key worker housing #1

Strengths	Weaknesses
 Close to employers More integration More smaller units available Freeing market homes 	Too remote from villageLack of available land in centre
• Freeing market homes Opportunities	Threats
 To engage with school / hospital Availability of land on site Encourages people to remain in village To create warden assisted private housing 	 Lose employment opportunity if not provided Visual impact of low cost housing

Topic 2: Housing for older people including downsizing #1

Strengths	Weaknesses
 Free up existing properties Good design Keeping residents in the community Keeping families close by Tapping into talent of older generation 	 Free up wrong type of property Specific facilities for the older population; doctors etc not available locally No transport provision Access to pharmacy
Opportunities	Threats
 Provision of extra care Specific design for infirmity or disability More volunteers in the community People using shop and pub in the village 	 Do not fill the properties – need availability for all age groups If empty, is it right for properties to be available to people from outside the community Need for good balance of age group in the village (could also be an opportunity)

 $^{^2}$ This was given in error as 25%. The TWBC Core Strategy 2010 p. 50 states Point 5: 'Developments on sites providing affordable housing will generally provide 35% of the total number of dwellings as affordable dwellings.' **September 2020**

Topic 3: Standard housing (>10 homes³ and 35% affordable) #1

Strengths	Weaknesses
 Guaranteed 25% affordable housing 	 More traffic density
 Helps more towards our quota for 	 More infrastructure required –
new homes	roads, sewage, etc.
 Mixed community of people within 	 More difficult to maintain village
development	feel
Opportunities	Threats
 If less than 20 homes it could be 	 No upper limit of number of
built by local builder	homes stated
 Should include bungalows 	 This changes the character of the
	village

Topic 4: Community Land Trust #1

Strengths	Weaknesses
 Ongoing affordability 	 Need benefactor
 Potential to provide otherwise unaffordable land Community experience e.g. shop 	 Would this provide a mix of housing for young and old or only for their workers
Take back control at all levels	 Difficulty in sourcing appropriate volunteer trustees with appropriate skills and experience
Opportunities	Threats
 Local benefactors possibly local employers e.g. Benenden School / Hospital Land already in trust 	 Danger of transfer being those with vested interests Lack of continuity
e.g. Harmsworth Trust	Domination of scheme by same people with lack of new blood
 To inspire new talent to get involved 	 Risk of conflict / division in village over siting

 $^{^3}$ The TWBC Core Strategy 2010 p. 50 states Point 4: 'Affordable housing will be provided as a proportion of the total number of dwellings to be delivered in the Borough and will be required on sites capable of delivering 10 dwellings or more.' September 2020

Topic 1: Local needs and key worker housing #2

Strengths	Weaknesses
 Affordable housing for teachers and other key workers Landbank - more control over housing Older people can remain in community Families kept together 	 Few work opportunities No public transport Few leisure facilities
Opportunities	Threats
 Builders – local Local employment Family support between generations Diverse population 	 Communities not integrated People moving away for lack of work or accommodation Loss of village character Loss of environment

Topic 2: Housing for older people including downsizing #2

Strengths		Weaknesses	
•	Releases larger house for families	 Danger of ghettoising 	
•	Purpose built (can cater for	 Bungalows take up more land 	
	disability)	 Only useful if in the village centre 	
•	Ready market		
•	House share – divide / rent part of		
	larger house		
Oppor	tunities	Threats	
•	Can be nearer shop etc	 Age imbalance in village 	
•	? gain medical / dental facilities	 Isolates older residents in 	
•	More alms houses	community	
Support network			
•	Things to do / entertain - art club,		
	bridge, village lunch club (?), over		
	60s, Street Cruiser		

Topic 3: Standard housing > 10 houses including 35% affordable #2

The group stated: 'We have assumed development of 40 homes'

Strengths • Improved medical services / part of the deal – new surgery	 Weaknesses Village will have little control over development Urbanisation
Opportunities • Must explore opportunities with Community Land Trust • Retirement homes / sheltered housing	Threats

NB: There were insufficient numbers to complete a table for Topic 4: Community Land Trust #2.

Feedback from each Group:

Each group then fed back one each 'biggest opportunity' and then 'biggest threat' from their SWOTs:

	Opportunity	Threat
New Benenden / Garden	Significant developer	Built quickly, sudden
Village (250 + homes)	contributions; village	impact and problems [of]
	facilities and business /	integration
	economy	
New Benenden(s) Lite	Capitalise [on] number to	Disproportionate impact on
(70-90 homes)	use facilities	rest of village
Localise development (8-	Less impact of sites.	Encroachment into areas
12 homes)	Reduction of urbanisation	(AONB) and countryside,
	of Benenden and Iden	availability of adjacent
	Green.	facilities, loss of rural
		character.
Spread it thin (<4 homes)	Local builders could build	Tendency to build large
	them / local employment	rather than small homes

	Opportunity	Threat
New Benenden / Garden Village (250 + homes)	Ability to demand central support services, better landscape and eco benefits / layouts generally and control	Environmental impact hasty influx of population, imbalance and divisions, impact on new village school
New Benenden(s) Lite (70-90 homes)	Social housing, diversity i.e. 1 & 2 bedrooms, GP surgery, dentist and young people, infrastructure, phased development and opportunities for business	Find suitable sites, quality of build, disrupt natural environment. More traffic congestion.
Spread it thin (<4 homes)	Redevelopment of redundant farm buildings	May get rather unreliable developers.
Homes for older people	Specific design for older people / with disabilities	Empty homes would be a waste for other age groups.
Local needs and key worker housing	Big employers might be able to provide land and strengthen relationships with employers	Housing at hospital remote from rest of village
Standard housing > 10 houses	If less than 20 houses could be built by local builder	Could change character of the village
Community Land Trust	Local benefactors / employers such as school, hospital or Harmsworth Trust. Very pro. Inspire new talent to get involved	Danger of trustees having vested interests, continuity, risk of conflict and division of where it is located.
Standard housing > 10 houses	Control it through CLT	Lose design etc. control
Local needs and key worker housing	Local people, nurses, teachers remain. Other people downsize. Families help each other.	Not integrating. People moving away. Loss of countryside.

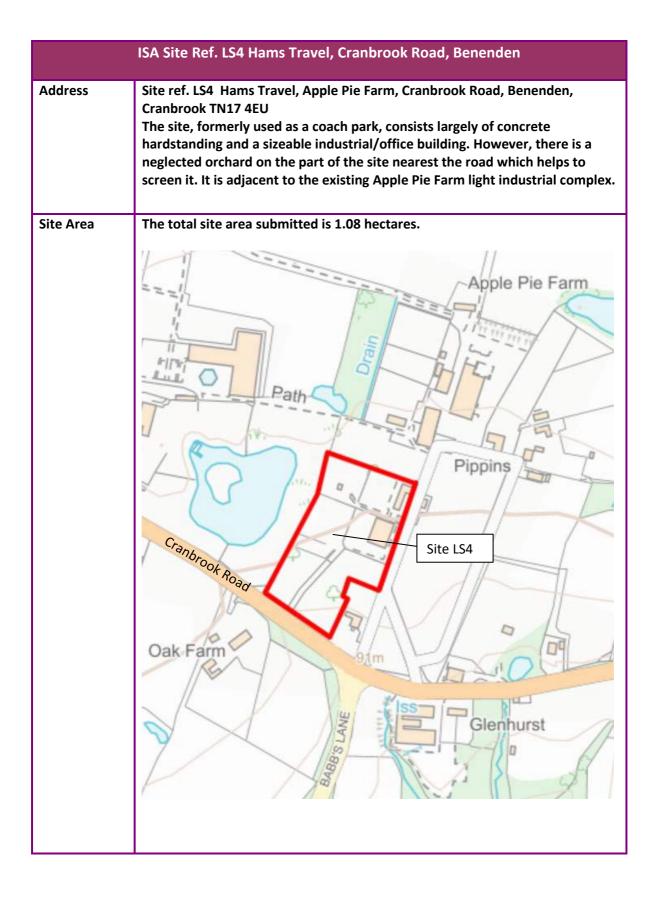
Conclusion and Recommendations

This was a well-attended workshop and residents appeared to enjoy and engage with the scenarios and topics. It was very ambitious in its scope and there are lessons to be learnt for the subsequent workshops.

Supporting Document HSA3 Individual Site Assessments

Submitted Sites — Benenden

Site
Hams Travel, Cranbrook Road, Benenden
Uphill, New Pond Road, Benenden
Pullington Farm, Benenden Road, Benenden
Land adjacent to Glebe Field, Rolvenden Road, Benenden
Land adjacent to Beacon Field, Rolvenden Road, Benenden
Land north of Site LS16, New Pond Road, Benenden
Walkhurst Road, Benenden (Under Construction as at 2020)
Broughton House, Rolvenden Road, Benenden
Greenacres, Land north of The Street, Benenden
Land west of Iden Green Road at Benenden crossroads
Land Adjacent to Feoffee Cottages, Walkhurst Road, Benenden
Land north of Benenden (Large site between New Pond Road and Walkhurst Road)



Description

The site submitted is an inverted L-shaped area of hardstanding together with a sizeable industrial building providing garage repairs and office space. The southern part of the site, nearest the road, comprises a neglected orchard which screens the site from the road. Access to the site would be from Cranbrook Road (existing access drive). This part of the road is outside the 30mph speed limit, is relatively straight, but with a blind summit to the west, and traffic travels fairly fast. Any planning application should include a Traffic Impact Study and will need to address reducing the traffic speed on the New Pond Road.

There is no separated pedestrian footway from the access road.

The site is adjacent to the existing light industrial units at Apple Pie Farm and near to the Cranden Diamond Products building on the other (south) side of the road.



View of the Hams Travel site from the entrance road (south): concrete hardstanding with bus parking on the left and industrial building on the right.

Amount of development

Not known. Given the site's history and location (see above) it is suggested that it would be more beneficial to the parish to retain the site for business/industrial use in order to provide sustainable employment in the parish.

Planning policy	The site is a brownfield site within the AONB and any development on the site would have to take into account the impact on the AONB. It is therefore suggested that the orchard area, though neglected, performs a valuable role in screening the site and should be retained in some form. Any development should conserve and enhance the landscape and scenic beauty, wildlife and cultural life of the AONB; major development would need to satisfy the requirements of NPPF para. 172.		
SHELAA / HELAA status	No information is available from TWBC on their assessed status of the site.		
Opportunities	A brownfield site. Industrial/business development on this site could offer the opportunity for a sensitively designed scheme that could provide much needed local employment and modern business premises. However, it is considered that too much, or development on too large a scale, on this site would be detrimental to the distinctive character and setting of the AONB landscape. Given the existing light industrial units of Apple Pie Farm and Cranden Diamond Products across the road it would seem an opportunity to create a business/light industrial hub which could be mutually beneficial for businesses as well as providing sustainable local employment.		
Constraints	The site is within the AONB with the highest protection in terms of conserving landscape and scenic beauty. Any scheme on the site would have to take this into account and also address questions of adverse environmental impact. Screening of the site should be preserved. Speed of traffic on Cranbrook Road making access potentially dangerous especially when exiting the site onto the main road the road, because of the nearby blind summit.		
Assessment	Site is suitable (Y/N) Yes for commercial/industrial purposes		
conclusions	Site is available	(Y/N) Yes	
	Site is achievable	(Y/N) Yes for commercial/industrial purposes	
Conclusions	The site is not currently considered suitable for housing development as it is relatively unsustainable, given the distance from Benenden village, the lack of any local amenities, the lack of pedestrian access to the village centre, the lack of a bus service. However, a well-designed business park or light industrial units of appropriate scale would provide local employment and business opportunities.		

	Site Ref. LS16 Uphill, New Pond Road, Benenden
Address	Site Ref. LS16 Uphill, New Pond Road, Benenden The site lies adjacent to New Pond Road and to the north of The Street in Benenden village centre. It is outside the Conservation Area but within the newly-defined Limits to Built Development (TWBC Draft Local Plan 2019).
Site Area	The total site area 0.78 hectare.
Description	The site submitted is the house and garden of a property in New Pond Road. It has direct access from New Pond Road, some 140m north of the cross roads. This part of the road is outside the 30mph speed limit, is straight, and traffic travels relatively quickly. Accidents at the Benenden crossroads, a further 200 metres along New Pond Road, indicate that traffic calming measures would be a necessary part of the development and therefore, any development proposal would be expected to include, within its Traffic Impact Study, proposals to seek to improve the safety of the junction. CFS3_16 CFS3_16 Submitted site outlined in red

Amount of development	The site comprises a residential plot inside the LBD; strictly speaking this is PDL. The site abuts submitted Site 158 (Greenacres) and sits between this and the Hortons Close 'exception site' development within the LBD boundary and close to the village centre.		
Density would need to take account of the existing site including Hortons Close, the nearby Conservation Area, densities of recent permissions in Benenden (Rydon Ho Homes in Walkhurst Road) and Cranbrook (Crane Vallet 12 – 17 dwellings per hectare. It is considered that this realistically developed at a similar density in order to mand distinctiveness of the village centre, which it abuts		Conservation Area, and housing enenden (Rydon Homes/Wedgewood horook (Crane Valley) which have yielded considered that this site should be density in order to maintain the character	
Planning policy	The site is within the AONB and consequently great weight should be accorded to conserving the landscape and scenic beauty; the presumption in favour of sustainable development does not apply.		
SHELAA / HELAA status	This site has been allocated in the TWBC Draft Local Plan 2019		
Opportunities	The site has the opportunity for a modest development. However, the impact of development on the site should be considered, so that it does not become 'out of scale' with the adjacent village centre and established low-density development pattern, north of the Street.		
Constraints	The key constraint for this site is its	location within the AONB.	
	The principal public views of the site are restricted from New Pond Road.		
	The site has substantial mature trees and hedging, notably to the West, North and East.		
	Traffic speed and hazardous crossroads – possible contribution to speed reduction mitigation measures and pedestrian facilities.		
	There is no pavement on New Pond Road. However, a rural footpath set back from the road along the wide verge and in a style in keeping with the existing village centre (BNDP Policy BD7) would link it up with Hortons Close and connect the development to the village centre via the pavement running along the Street.		
Assessment	Site is suitable	(Y/N) Yes, for a modest development	
conclusions	Site is available	(Y/N) Yes	
	Site is achievable	(Y/N) Yes	
Conclusions	The site sits adjacent to recent built development, close to village facilities and is within the redrawn LBD boundary proposed by the TWBC Draft Local Plan 2019. It is PDL comprising an existing dwelling with substantial garden. The sustainability credentials of this site are high and it is considered that it is potentially suitable for development respecting the constraints and requirements outlined above.		

Site Ref. LS18 Pullington Farm		
Address	Site Ref. LS18 Pullington Farm, Benenden Road, Benenden.	
Site Area	Not given by TWBC, but estimated at circa 0.75 ha.	
Description	A flat, roughly triangular site. This land is south of the B2086 Benenden Road and is currently rough, uncultivated ground with an aggregate track running through it. There are what appear to be a couple of partly ruined breeze-block barns/garages/stores on the site, although no indication that this is other than agricultural use. It is accessed directly from/onto the road and given the speed of cars at that point (60mph) access might be hazardous, particularly when turning right towards Rolvenden, as there is a blind bend to the left, when exiting the site. The site is located on the ridge with extensive views to the south. As a result any development would be visible from a considerable distance away. It is bordered to the west by a large pond surrounded by mature oak trees (not included in the site), the PRoW and by a private track to Iden Green. Along the road frontage there is a mature hedge.	





Amount of development

Not Known.

Planning policy

The site is outside the Limits to Built Development and the Conservation Area. The site is within the AONB and consequently great weight should be accorded to conserving the landscape and scenic beauty, the presumption in favour of sustainable development does not apply.

Development on this site would adversely affect the AONB given the high visibility

of the site on the ridge. Any development on the site could impact the setting of the Conservation Area as well as compromising the currently rural eastern approach to the village, and would be at variance with observations made in the Benenden and Iden Green Conservation Areas Appraisal report published by TWBC in April 2005. Any development on this site would, in effect, be ribbon development and better sites are available closer to village amenities.

SHLAA / HELAA status	Not allocated in the TWBC Draft Local Plan 2019.	
Opportunities	Little opportunity for development due to constraints, although there are some existing derelict agricultural buildings on the site.	
Constraints	AONB. On ridge — distant views. Distance from village amenities. No roadside footpath: the busy main road has very narrow verges on this hazardous section of the B2086.	
Assessment	Site is suitable (Y/N) No	
conclusions	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) No
Conclusions	This is a dominant site on a ridge within the AONB, and because of its landscape, scenic beauty and environmental impacts, together with the hazardous access, is not considered suitable for residential development. It is not considered appropriate for allocation in the BNDP.	

Sites Ref	s. LS19 and 20 adjacent Glebe Field and Beacon Field, Benenden	
Address	Site Refs. LS19 and LS20 adjacent Glebe Field and Beacon Field Two adjacent fields on the ridge south of Diocesan Land (the Glebe) leased to the Primary School by Canterbury Diocese for 100 years, and south of the site for the new Primary School.	
Site Area	Approx. 2.75 hectares for the two sites.	
Description	Two adjacent gently sloping fields, currently used for grazing, which command dramatic views south towards Rye. This land is south of the east- west axial ridge, on which Benenden is sited, south of the Glebe field, currently used as a playing field by the Primary School, and south of the Beacon Field where the new Primary School development is located. The new Primary School development is to the north of the ridge. The sites have been both cultivated and pastoral land recently. There is no apparent vehicular access to either of the sites in the submission and how the sites are to be accessed from Rolvenden Road is unclear.	
	The Cit Vinaugus Charity LS19 LS20 Program School	
Amount of development	Not known.	
Planning policy	This is a rural site outside the LBD. The site is within the AONB and consequently great weight should be accorded to conserving the landscape and scenic beauty; the presumption in favour of sustainable development does not apply. Views — the view south from the PRoW no. 325 which runs along the top of Site Ref. LS20 will be protected in the Benenden NDP. Any development of this (south) side of the ridge would have an adverse impact on the view north from Iden Green/Iden Green Road and, indeed, be visibly from a considerable distance away. Impact on the southern and eastern approaches to the village which would be at variance with observations made in the Benenden and Iden Green Conservation Areas Appraisal report published by TWBC in April 2005, Traffic concerns if road access was achieved onto Rolvenden Road in proximity to the access to the Primary School.	

SHLAA/HELAA status	Not allocated in the TWBC Draft Local Plan 2019.		
Opportunities	Close to the village centre facilities.	al a la constant de l	
Constraints	AONB — development appears likely to significantly harm scenic landscape quality because of the prominence in the landscape due to position on the south side of the ridge. Impact on the Conservation Area and setting of Listed Buildings. Not adjacent to the LBD. No apparent vehicular access to either site in the submission. Good quality, viable agricultural land. PROW no. 325 crosses site LS20. View from PROW LS20 will be protected in the BNDP. Visual impact on the southern/eastern approaches to the village. The promoted sites are very 'open' lack any clear boundaries to the southern		
	side and could be difficult to 'contain'		
Assessment	Site is suitable	(Y/N) No	
conclusions	Site is available	(Y/N) Yes	
	Site is achievable	(Y/N) No	
Conclusions	These sites if developed would be very prominent and therefore undesirable in an otherwise unspoilt scenic rural landscape. Although they are close to the village centre, development would adversely affect Benenden's historic core: the church, the churchyard (nominated Local Green Space in the BNDP) and the Glebe field, as well as taking up good quality agricultural land. The lack of vehicular access would make these sites unworkable and other village sites would have less impact and therefore be preferable. The sites could be difficult to contain, if developed. They are not considered to be appropriate for allocation in the BNDP.		

	ISA Site Ref. LS22 Land north of Site LS16, New Pond Road
Address	Site ref. LS22 New Pond Road, Benenden The site lies parallel to allocated site LS16 and is within walking distance of Benenden village centre.
Site Area	The total site area submitted is 0.72 hectares. TWBC Landscape & Biodiversity have suggested that part of the site, almost 1/3, adjacent to the Ancient Woodland bordering the gill, be excluded, providing a 25m buffer to protect the Ancient Woodland. The site is a greenfield within the High Weald AONB, outside the existing and TWBC Draft Local Plan 2019 Limits to Built Development.
	New Pond Brewer's Shaw 68m LS22 Beech Tree Cottage Hall The Green 8

Description

The site submitted is a rectangular meadow abutting New Pond Road, the site is given over to grassland, sloping at its northern end towards a gill. Access to the site would be from New Pond Road (existing gateway). This part of the road is outside the 30mph speed limit, is straight, and traffic travels relatively fast. Any planning application should include a Traffic Impact Study, and will need to address reducing the traffic speed together with a proposal for achieving safe pedestrian access to the site.

Pedestrian access from the southern edge of the site into the centre of the village could be achieved by linking up with the footpath planned to connect LS16 (Uphill) as shown on the site plan above.

Accidents at the Benenden crossroads, a further 300 metres along New Pond Road, indicate that traffic calming measures would be a necessary part of the development and therefore any development proposal would be expected to include, within its Traffic Impact Study, proposals to improve the safety of the junction.

The Conservation Area lies to the south of the site separated from it by allocated site LS16 and the development of Hortons Close. The Historic Park at Benenden School, the other side of New Pond Road, and the setting of a number of Listed Buildings are also relevant. The whole of the site lies outside the existing and planned Limits to Built Development, within the High Weald AONB and is bounded by Ancient Woodland on its northern side.



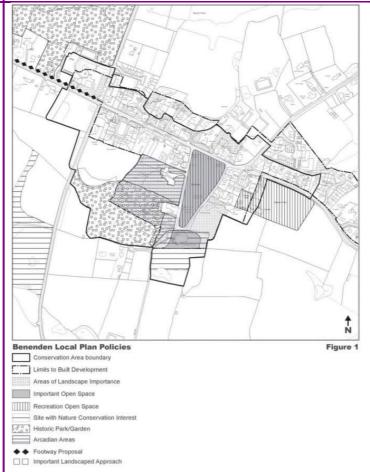
Existing access point from New Pond Road is within both the minimum 15m and TWBC suggested 25m buffer zone for the ancient woodland to the north of the site. Any new access point must be outside the buffer zone.

Amount of developmen

Not known. However, taking account of the buffer zone necessary for the Ancient Woodland, the slope and other important environmental features, the 'developable area' is estimated to be 63% of the total figure of 0.72 hectares. In addition any scheme should enhance and protect the setting of the AONB and the Conservation Area which is close to the southern boundary of the site. This may be in the form of a 'green' buffer zone with plantings of native trees and shrubs, which would offer some protection to neighbouring properties.

Taking into account the housing density of the adjacent Conservation Area and built development areas, and housing densities of recent permissions in Benenden (Uphill) it is considered that if this site were to be developed it should be at a maximum density of 22 dwellings per hectare to maintain the character and distinctiveness of the village.

Planning policy



The site is within the High Weald AONB with the highest protection in terms of conserving landscape and scenic beauty; major development should be refused except in exceptional circumstances. Any development should conserve and enhance the landscape and scenic beauty, wildlife and cultural life of the AONB; major development would need to satisfy the requirements of NPPF para. 172.

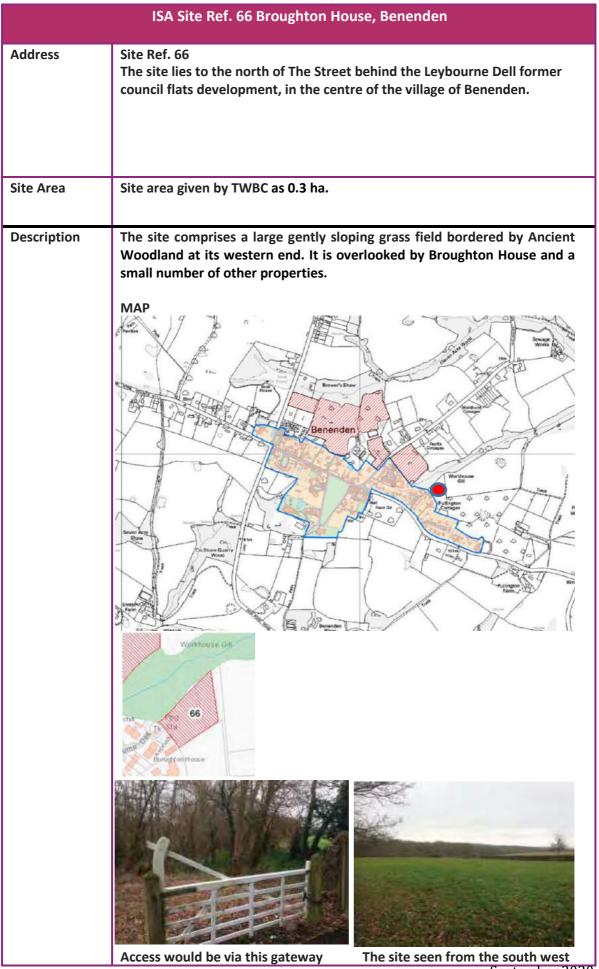
There is also a need to consider the setting of the Conservation Area, Historic Parkland and Listed Buildings.

Ancient Woodland will need a protective buffer of 25m.

Pedestrian access will need to be negotiated.

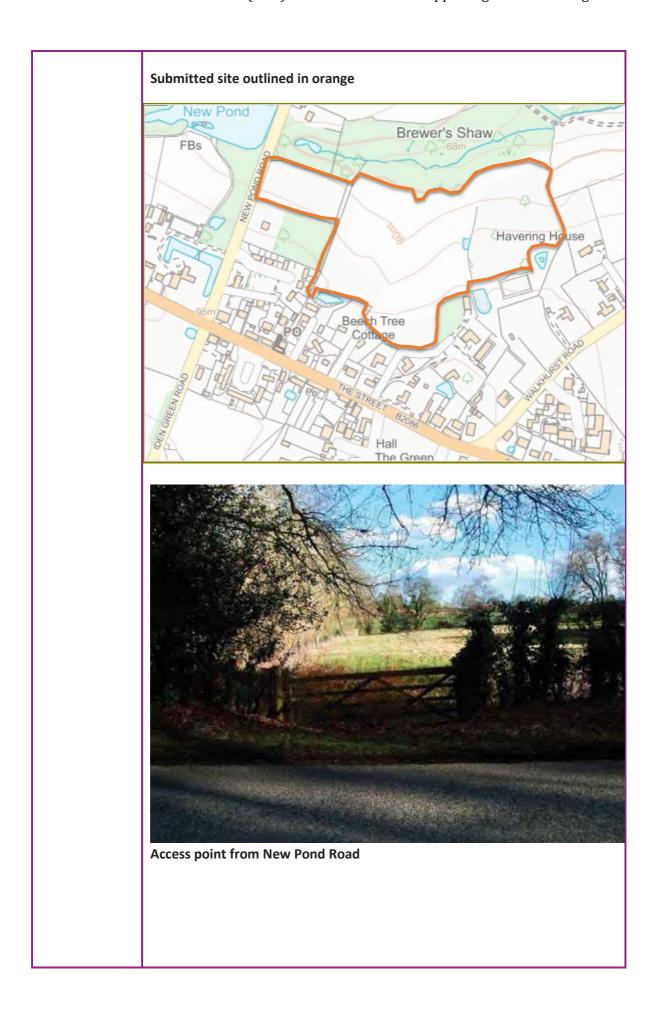
Access to the site is from a straight road with reasonable sight lines, however access points already exist for St Georges Place, Hortons Close and Uphill. A further access point close to these may prove problematic given the speed of traffic approaching Benenden from the north along New Pond Road.

SHELAA / HELAA status	No information is available from TWBC on their assessed status of the site.		
Opportunitie s	Close to village amenities. Development on this site could offer the opportunity for a sensitively designed scheme that could potentially be integrated into the existing village centre. However, it is considered that development on this site would be detrimental to the distinctive character and setting of the village and harmful to the AONB landscape.		
Constraints	The site is within the AONB with the highest protection in terms of conserving landscape and scenic beauty. Impact on the Conservation Area and setting of heritage assets. There is also a constraint imposed on the northern part of the site by its sloping nature down to the Ancient Woodland. Speed of traffic on New Pond Road making access dangerous and increased traffic contributing to the hazardous crossroads in Benenden. Outside the current and TWBC Draft Local Plan LBD.		
Assessment	Site is suitable	(Y/N) No	
conclusions	Site is available	(Y/N) Yes	
	Site is achievable	See above	
Conclusions	The sustainability credentials of this site are high but there are constraints. It is considered that though this is a sustainable site, the harmful impact on the AONB and the Conservation Area weigh against it particularly given the preference for brownfield sites which have already been allocated in the BNDP.		



Planning policy	The BNDP Housing Group met the owners of Broughton House, who own the site. They have lived there some 20 years. They have offered the site on the basis they would wish to see a few dwellings suitable for single people, or couples downsizing or as retirement homes. They thought bungalows might be suitable as with the ground sloping away they would retain their views to the north. They had in mind 4-5 well-designed properties with approx. ¼ acre gardens. This is a rural site outside the LBD.		
	The site is within the AONB and consequently great weight should be accorded to conserving the landscape and scenic beauty; the presumption in favour of sustainable development does not apply. Under TWBC planning policy the site would support a higher density of development.		
SHLAA / HELAA status	Not allocated in the TWBC Draft Local Plan (2019)		
Opportunities	The site presents an opportunity to provide a few well-designed, high spec dwellings within walking distance of the village centre in a secluded location which should not be too detrimental to the immediate landscape. Elderly residents make up 22% of the population of Benenden and opportunities to downsize in the village itself are limited. This development would meet a demonstrable housing need. There is an existing access via Leybourne Dell at the cul-de-sac end of which lies a farm gate giving access to the site. However, this is set within		
	the boundary of the Ancient Woodlan pedestrian access.	d so could only be considered for	
Constraints	AONB, however this modest site has strong boundaries on three sides and is well screened. Adjacent to the LBD. Adjacent to the Conservation Area. The Ancient Woodland bordering the western end of the site must be protected with a buffer zone of at least 15m. The existing access via Leybourne Dell is narrow in places (between Kennedy and Churchill Houses). An alternative access is available from Rolvenden Road via the existing driveway to Broughton House. Anything more than a small development would increase traffic flow in Leybourne Dell which would be undesirable given that it is a relatively quiet environment with pedestrians and children playing. Surface water and sewage drainage may prove a challenge as has been the case in the Walkhurst Road development.		
Assessment	Site is suitable	(Y/N) Yes for modest development.	
conclusions	Site is available	(Y/N) Yes	
	Site is achievable	(Y/N) Yes subject to safe vehicle access and suitable drainage.	
Conclusions	This is an achievable project which fits in well with the BNDPs stated aim to provide houses in the village for people who want to downsize. The site appears suitable for modest development, as outlined above, particularly for a few high-quality, low-rise dwellings with gardens. If these were indeed aimed at retirees this would be fulfilling a housing need expressed in the Benenden Housing Needs Survey 2015 and expressed again in the public consultations at the commencement of the Benenden NDP.		

ISA Site Ref. 158 Greenacres/The Orchard Site		
Address	Site Ref. 158 The site lies parallel to the north side of The Street in Benenden village centre. The central/southern section of the site abuts the Limits to Built Development. The site stretches from New Pond Road round to Greenacres bungalow and the residential development situated north of the LBD.	
Site Area	The total site area originally submitted is 5.8 hectares. It has been suggested that part of the site, the pear orchard to the east, might be excluded from the site. In this instance the total site area would be approx. 4 hectares.	
Description	The site submitted is in two ownerships and comprises three distinct parcels. To the west, a rectangular meadow abutting New Pond Road, the central part given over to grassland, gently sloping at its southern end but steeply sloping towards a gill at the northern end, and the eastern part of the site which is currently a pear orchard. The only access to the site would appear to be from New Pond Road. This part of the road is outside the 30mph speed limit, is straight, and traffic travels relatively quickly. There is an assurance that pedestrian access from the southern edge of the site directly into the centre of the village can be achieved, However, should pedestrians have to depend on a walking route via New Pond Road to access the village centre, this would significantly reduce the sustainability credentials of the site. Accidents at the Benenden crossroads, a further 200 metres along New Pond Road, indicate that traffic calming measures would be a necessary part of the development and therefore, any development proposal would be expected to include, within its Traffic Impact Study, proposals to seek to improve the safety of the junction. The Conservation Area lies along the southern boundary of the site, separated from it by a narrow strip of more recent development. The Historic Park at Benenden School, the other side of New Pond Road, and the setting of a number of Listed Buildings, are also relevant. The whole of the site lies within the AONB and is bounded by Ancient Woodland on its northern side.	



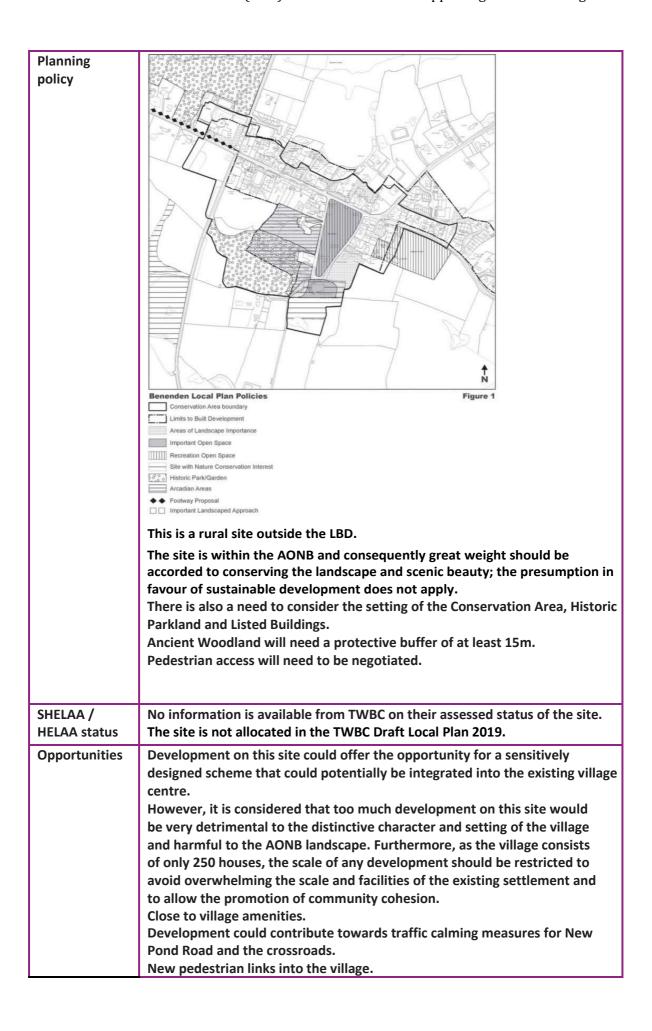


View looking north over the site to the ancient woodland

Amount of development

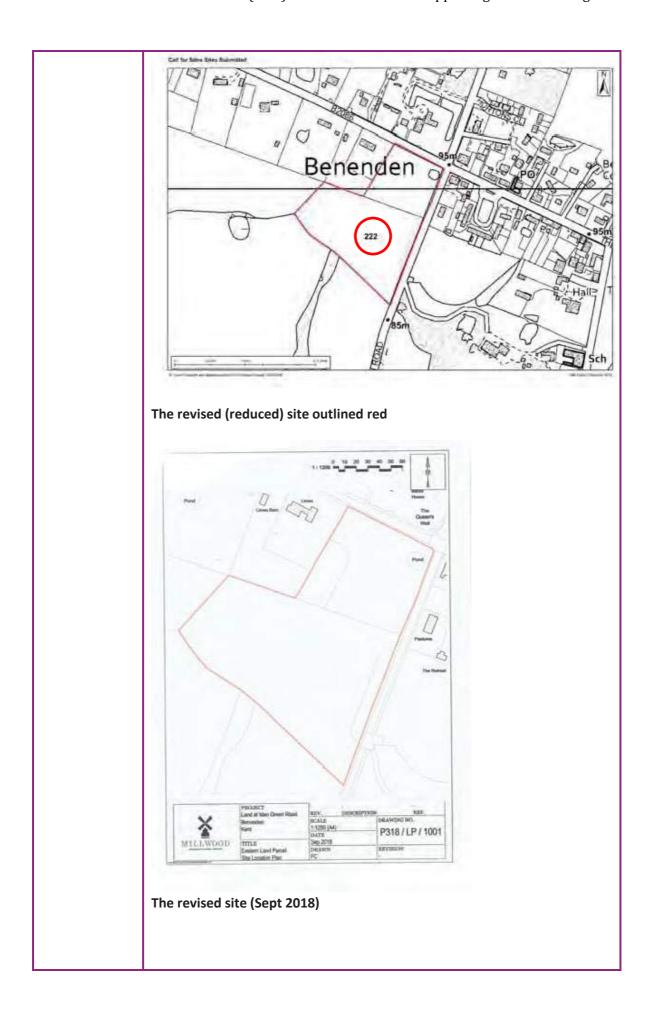
The combined site has a total area of approx. 4 hectares if the pear orchard is excluded (TWBC figure). However, taking account of the buffer zone necessary for the Ancient Woodland, the steep slope of parts of the site and other important environmental features the 'developable area' is estimated to be 68% of this figure, taking the Feoffee Cottages site as a benchmark. In addition, any scheme should enhance and protect the setting of the Conservation Area which is close to the southern boundary of the site. This may be in the form of a 'green' buffer zone with plantings of native trees and shrubs, which would offer some protection of the amenity of existing houses which border the site to the south. A further 0.3 hectares has been allowed to serve this purpose. Thus, the assessed site potential 'developable area' is 3.6 hectares.

Taking into account the housing density of the adjacent Conservation Area and and built development areas, and housing densities of recent permissions in Benenden (Rydon Homes/Wedgewood Homes) and Cranbrook (Crane Valley) which have yielded 12 – 17 dwellings per hectare, it is considered that if this site were to be developed it should be at an average density of 12.5 dwellings per hectare to maintain the character and distinctiveness of the village centre. Development density could be higher at the New Pond Road end of the site as this is shielded from the Conservation Area.



Constraints	AONB. Impact on the Conservation Area and the setting of heritage assets. There is also a constraint imposed on the northern part of the site by its steeply sloping nature, down to the Ancient Woodland. Speed of traffic on New Pond Road making access dangerous and increased traffic contributing to the hazardous crossroads in Benenden. Presence of main drain across part of the site.		
Assessment	Site is suitable	(Y/N) Yes, for a modest development	
conclusions	Site is available	(Y/N) Yes, but will require the agreement of the two separate owners. Vehicle access to the eastern part of the site can only be achieved via the western part of the site abutting New Pond Road though there is pedestrian access.	
	Site is achievable	(Y/N) Yes. See above and also the question mark over including the commercial pear orchard within the site.	
Conclusions	The sustainability credentials of this site are high, but there are constraints and deliverability may not be straightforward with two owners involved. It is considered, however, that though this is a sustainable site, the harmful impact on the AONB and the Conservation Area weigh against it particularly as there are a number of brownfield sites in the Call for Sites which could be utilised. 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, with containment to control any proposals for an easterly expansion at a future date. It is not considered to be appropriate for allocation in the BNDP.		

Site Ref. 222 Land west of Iden Green Road at Benenden Crossroads		
Address	Site Ref. 222 Iden Green Road/Cranbrook Road, Benenden. Field bordered with mature trees and hedging, west of Iden Green Road stretching from Iden Green Road itself and along behind the houses fronting Cranbrook Road, Benenden.	
Site Area	Original site submission 5.05 hectares. Site re-submitted September 2018 estimated to be approx. 3 hectares and now excludes the western part of the original site behind the houses along Cranbrook Road.	
Description	The current site is flat/gently sloping meadowland effectively enclosed by mature trees and a high mature hedge on the eastern side, along Iden Green Road. There is Ancient Woodland a short distance to the south of the site, along Iden Green Road. There are no properties on the Iden Green Road frontage, but there are two properties opposite, on the eastern side of Iden Green Road (one fronting The Street), and a drive access. The Limits to Built Development enclose these two properties. The north east corner of the site (approx. 0.5 hectares) is in the Conservation Area and a narrow strip extends down the road to include some mature trees. The north east corner contains a neglected pond (once part of the Manor) which will, together with its surroundings, be designated as a Local Green Space in the BNDP, and any development would be required to restore this historic pond and create a setting for it. The pond would need to be made accessible from the main part of the village. The original proposal for development from Millwood Homes comprised some 40 houses, located at the top (north) end of the site nearest the village. The Pre- application was turned down mainly on grounds of environmental impact. The revised scheme (September 2018) comprises some 29 houses located towards the bottom (south) end of the site, leaving the pond and surroundings as Local Green Space. Access to/from the site could be taken from Iden Green Road, which has good visibility at this point, but at a safe and satisfactory distance from the crossroads. The crossroads has very poor visibility in some directions and has been the cause of a number of accidents. Therefore, any development proposal would be expected to include, within its Traffic Impact Study, proposals to seek to improve the safety of the junction.	





The site looking west



The neglected pond

Amount of development

Original Millwood scheme approx. 40 houses. Revised Millwood scheme on reduced site for 29 houses.

The revised site comprises approx. 3 hectares, of which 1 hectare is excluded from development (pond and surroundings/green space), leaving 2 hectares for development, calculated at 68% developable area, allowing for minimum 15m buffers to protect Ancient Woodland and other green buffers, at an average density of 12.5 dwellings per hectare would give a figure of 17-18 dwellings.

In the context of the strategy for the parish to develop brownfield sites first, where possible, it is unlikely that this site will be allocated given its sensitive position marking the edge of the village, with sweeping views to the south from the Cranbrook Road, and therefore importance in the AONB (see Landscape and Environment Views). The BNDP would seek assurances that the now-excluded western part of the site would be excluded from any development in future and that the area surrounding the pond was similarly protected from future development.

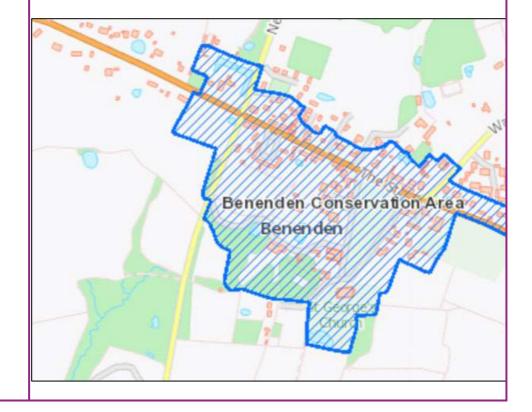
Planning policy

This is a rural site outside the LBD.

The site is within the AONB and consequently great weight should be accorded to conserving the landscape and scenic beauty; the presumption in favour of sustainable development does not apply.

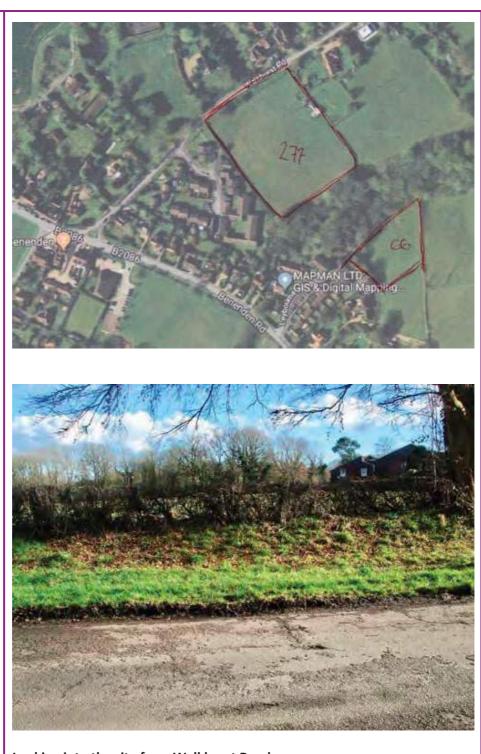
The site commands sweeping views from the northern/crossroads end of the site (Protected View in the BNDP) and consequently new development should be restricted.

Part of the site is also in the Conservation Area, as described above. There are many mature trees surrounding the site, in particular a group of pines and some on the frontage, which should be preserved. The pond and its surrounds is designated a Local Green Space in the Benenden NDP.



SHELAA / HELAA status	This site has not been allocated in the TWBC Draft Local Plan 2019.	
Opportunities	Near to village centre.	
Constraints	AONB. Greenfield site; good quality agricultural land, currently used to produce a hay crop. The contribution of the open field (and woodland to the SE) to the designation of the CA and Historic Parkland is notable. This extends along the entire site frontage, on to Iden Green Road, to contain the historic core of the village in the AONB setting. Significant groups of mature trees. Historic pond and associated archaeology. Proximity to Roman road and the modern High Weald Landscape Trail. Views from crossroads to be protected in the Benenden NDP. Area around the pond to be designated a Local Green Space in be NDP. Green space which marks the historic western 'border' of the village.	
Assessment conclusions	Site is suitable	(Y/N) Yes — However, the numerous environmental reasons why the site should not be developed mean that other, better screened, less strategic village sites should be preferred.
	Site is available	(Y/N) Yes — It is understood that Millwood Homes have an option on the site and wish to develop.
Conclusions	Site is achievable The revised site has the potential to accommodate approx. 17-18 dwellings at its southern/eastern end, with a potentially beneficial enhancement of the presently neglected pond and surroundings in the Conservation Area. National Planning Policy dictates that previously developed land should be developed before greenfield land. This together with numerous environmental reasons, and the fears of creeping suburbanisation if development were permitted on this (west) side of Iden Green Road, where currently there are no buildings, makes this a site unsuitable for development. Ribbon development linking the two distinct settlement of Iden Green and Benenden would be contrary to current policy.	
	It is not considered to be appropriate	te for allocation in the BNDP.

	ISA Site Ref. 277 Land adjacent to Feoffee Cottages
Address	Site Ref. 277 Walkhurst Road, Benenden TN17 4DR Land to the east of Walkhurst Road and adjacent to the Grade II Listed Feoffee Cottages. Bordered to the south by Rothermere Close.
Site Area	Total site area as submitted 1.46 hectares
Description	The site (outlined in red below) is currently grazing/meadowland which slopes steeply to its southern extremity. There is a small agricultural building on the northern boundary of the site. The site is just north of Rothermere Close/Harmsworth Court and the Conservation Area, and is contained between the houses in Rothermere Close and the Grade II listed Feoffee Cottages, the latter owned by the Benenden Almshouse Charities. Walkhurst Road, from which access would be obtained, is a narrow country lane with no footways and used as a 'cut through' between Benenden village centre and Goddards Green Road / East End. The south-eastern part of the site is bordered by Workhouse Gill which is Ancient Woodland and also contains a pond. The southern corner of the site provides rural views from Harmsworth Court to its west. It is intended by the Almshouse Charities to preserve these views as much as possible and consequently only the more northerly part of the site is proposed for development. Benenden Almshouse Charities (Registered Office: The Rectory, The Green Benenden TN17 4DL)



Looking into the site from Walkhurst Road



Looking north towards Feoffee Cottages

Amount of development

The developer is the Benenden Almshouse Charities which plans to construct 22-25 dwellings on the northern part of this 1.46 hectare site. The reason for using only the northern part of the site is explained above and is accepted. 12-14 of the dwellings would be built in accordance with the existing almshouse principle and a further 12-13 dwellings would be 'market housing' to support the almshouse delivery of 'affordable housing'. The lower part of the site would be left as grazing on the steep bank.

Whilst the prerogative of the site owners is to deliver whatever number of house they consider appropriate, nonetheless the TWBC Planning Department have suggested that there is the potential to include more housing on the southern part of the site, whilst still meeting conservation requirements, and they suggest that 30 dwellings would be possible. Clearly this debate will continue between the two parties, but it is useful to note that with a full 30 dwellings on the site the developable area has been accepted as only 68% when allowing for natural features, ancient woodland etc. This is likely to be typical of other sites in the Benenden area in this undulating and ancient landscape.

It is the aim of the BNDP to preserve the character of the ancient village of Benenden and as such would regard the figure of 30 dwellings per hectare (dph) as too high to be in keeping.

Planning policy

This is a rural site outside the LBD.

The site is within the AONB and consequently great weight should be accorded to co conserving the landscape and scenic beauty; the presumption in favour of sustainable development does not apply.

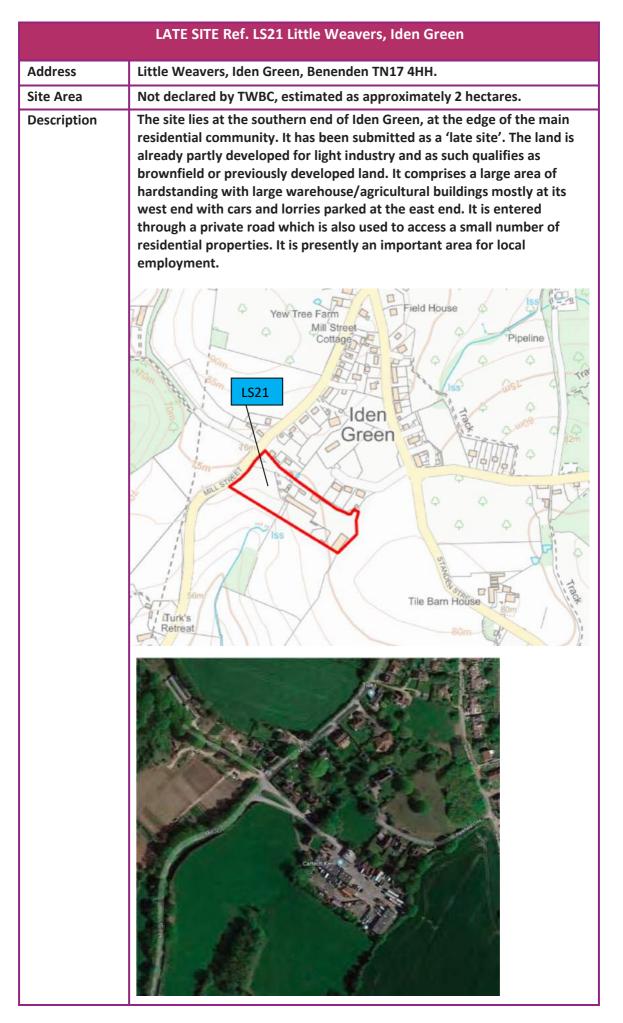
	The site is included in the newly re-drawn Limits to Built Development and close to the Conservation Area boundary. From all these points of view any development on this site should seek to enhance the local setting and achieve satisfactory containment within the Benenden built area. The Traffic Impact Study for the site development would need to consider safe pedestrian access to the site.	
SHELAA / HELAA status	Allocated site in TWBC Draft Local Plan 2019. TWBCs positive response in the Pre-application process has been to encourage the Benenden Almshouse Charity to develop 25 dwellings with a higher proportion of almshouse/low-cost housing, exempt from Right to Buy.	
Opportunities	There is an opportunity here to develop a group of houses along Walkhurst Road with a gradation from the low density Conservation Area to essentially scattered and rural development further along Walkhurst Road, but within easy access of the core village amenities and all services. Safe pedestrian access would, however, need to be provided and land could be provided by the Charity for this purpose.	
Constraints	The constraints to development on this site are the principle of developing in the AONB and the steeply sloping southern section. Relationship with the setting of a Listed Building (Feoffee Cottages) and the form and cluster of established and historic Heritage development	
Assessment	Site is suitable	(Y/N) Yes
conclusions	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) Yes
Conclusions	It is considered that this site has the potential to accommodate 25 dwellings. Within this total development there is the opportunity to provide 14 'affordable housing' dwellings in accordance with the parish's existing almshouse principle. The Benenden Almshouse Charities already owns 9 very small one-bedroom almshouse flats or terraced cottages on two parish sites and are in need of major refurbishment/modernisation. As almshouses are exempt from the Right to Buy legislation and are occupied only by those with a parish connection under licences to occupy, the development provides an enduring stock of low cost housing for licencees. Further, the charity does not have a lower age limit restriction. Given this site's proximity to a Grade II Listed Building, position in the AONB and proximity to the Conservation Area, the BNDP Housing Group is backing this scheme only on the basis that it will provide affordable housing for local families in perpetuity.	

Submitted Sites — Iden Green

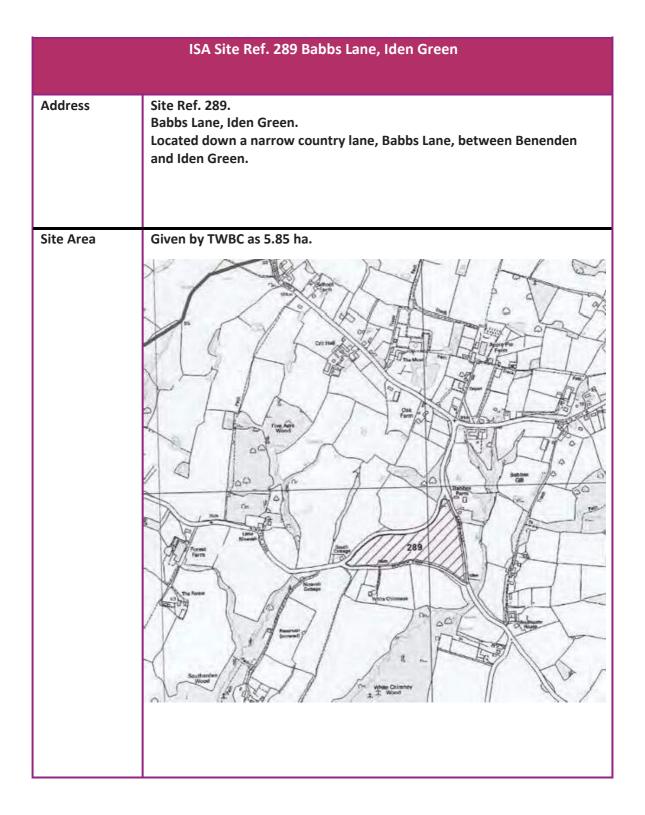
Site Ket.	Site
LS8	Chapel Lane, Iden Green
LS21	Little Weavers, Mill Street, Iden Green
289	Babbs Lane, Iden Green
295	Wandle Mill, Mill Street, Iden Green
397	Pheasant Lodge, Standen Street, Iden Green
437	Land west of Iden Green crossroads (Coldharbour Road)
437	Land east of Iden Green crossroads (Iden Green Road/Standen Street), Iden Green
437	Land south of Iden Green crossroads (Standen Street), Iden Green

	Site Ref. LS8 South of Chapel Lane, Iden
	Green
Address	Site Ref. LS8 Iden Green Road/Chapel Lane, Iden Green The site lies to the south of Chapel Lane and is adjacent to the village green and recreation area in Iden Green. It is within the Conservation Area and outside the old Limits to Built Development.
Site Area	The total site area is approx. 0.8 hectare.
Description	The site submitted is a greenfield site, a small area of grazing land accessed by a farm gate from Iden Green Road, about 120 metres from the Iden Green crossroads. It is behind the Congregational church on Iden Green Road, also known as Mr Noah's Nursery School, and behind cottages built along Iden Green Road. The site has been used for haymaking and has a small pond on the recreation area side, important for wildlife. The whole of the site lies within the AONB.
	Submitted site outlined in red, current boundaries 2018
	1991 boundaries

Amount of	Not known.	
development	A previous proposed development (1991) on this site was refused as being detrimental to the Conservation Area and on highway and infrastructure grounds.	
Planning policy	This is a rural site outside the LBD. The site is within the AONB and consequently great weight should be accorded to conserving the landscape and scenic beauty; the presumption in favour of sustainable development does not apply.	
SHELAA / HELAA status	The site has not been allocated in the TV	WBC Draft Local Plan 2019
Opportunities	The site is within the Iden Green community with potential access directly onto Iden Green Road. Only a small, sensitively designed development might be considered for this site, though it could be more appropriate to allocate more land behind the Congregational Church for use by Mr Noah's Nursery School toprovide an outdoor play area for the children.	
Constraints	Location within the AONB, and within the Conservation Area. Increased traffic through the hazardous Iden Green crossroads. Traffic emerging from Oakfield Cottages, opposite the current access, potential traffic hazard. Nursery School traffic/parking on Iden Green Road. The site is at a higher level than the cottages and land along Chapel Lane. Agricultural land containing a pond for wildlife.	
Assessment	Site is suitable	(Y/N) No
conclusions	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) No
Conclusions	The site is unsuitable for building development due to its location in the AONB; adverse impact on the setting of the Conservation Area and the rural landscape character. Although it is within the settlement of Iden Green, there are few facilities/amenities which reduce its sustainability. It is not considered to be appropriate for allocation in the BNDP.	



Amount of development	A large part of the submitted site has already been developed for light industrial/business use.	
Planning policy	This is a rural site outside the LBD. The site is within the AONB and consequently great weight should be accorded to conserving the landscape and scenic beauty; the presumption in favour of sustainable development does not apply. There is, however, a preference for redevelopment of a PDL over a greenfield site.	
SHLAA / HELAA status	Not allocated in the TWBC Draft Local Plan 2019.	
Opportunities	As the site is already developed, the impact on the community would be less than other sites being considered. Strong consideration should be given to whether the site should be targeted in the NDP to provide further employment opportunities. The NDP Business Group have suggested this site be considered for more light industry / work from home units.	
Constraints	There are very few sites within the community that offer localised employment. Housing development on this site would have a detrimental impact on a number of jobs. The site appears to be fully occupied by trading businesses. AONB. Views — the view from the access to Turks Yard will be protected in the Benenden NDP and thus the suggested access to the site should be restricted to the current access road and not expanded southwards as in the site submission. Access to Mill Street is hazardous because of the lack of clear sightlines and the speed of oncoming traffic.	
Assessment conclusions	Site is suitable	(Y/N) Yes
	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) Yes
Conclusions	The impact of developing this area for residential use could be seen as less than other greenfield sites due to the level of existing development, but there is a much larger issue with changing the use of this land. This site offers well established employment opportunities for a number of people within the local area and if it were to be used for housing this would reduce job opportunities in the area. There are no known alternative employment sites to relocate businesses to in the parish. It is considered that the best use of this brownfield site would be to further improve the zone with new office and light industrial buildings for increased employment and business opportunities. It is not considered appropriate for allocation in the BNDP.	





View looking north east across the site towards Parsonage Wood

Description

A slightly sloping, open and roughly triangular site. This land is west of Babbs Lane and bordered on the other two sides by the two branches of Nineveh Lane. It is currently well-maintained grazing land.

Development is currently proposed only in the north-eastern part of the site, but there are no natural boundaries to prevent development spreading to the rest of the site.

It is accessed from/onto the more northerly branch of Nineveh Lane which is a small, mostly single track, country lane currently used by the few drivers going to Great Nineveh and ill-suited to greater volumes of traffic. There is also a gateway giving onto the field from the southerly 'arm' of Nineveh Lane.

The southern branch of Nineveh Lane comprises part of Cycle Route 18.



The southern branch of Nineveh Lane

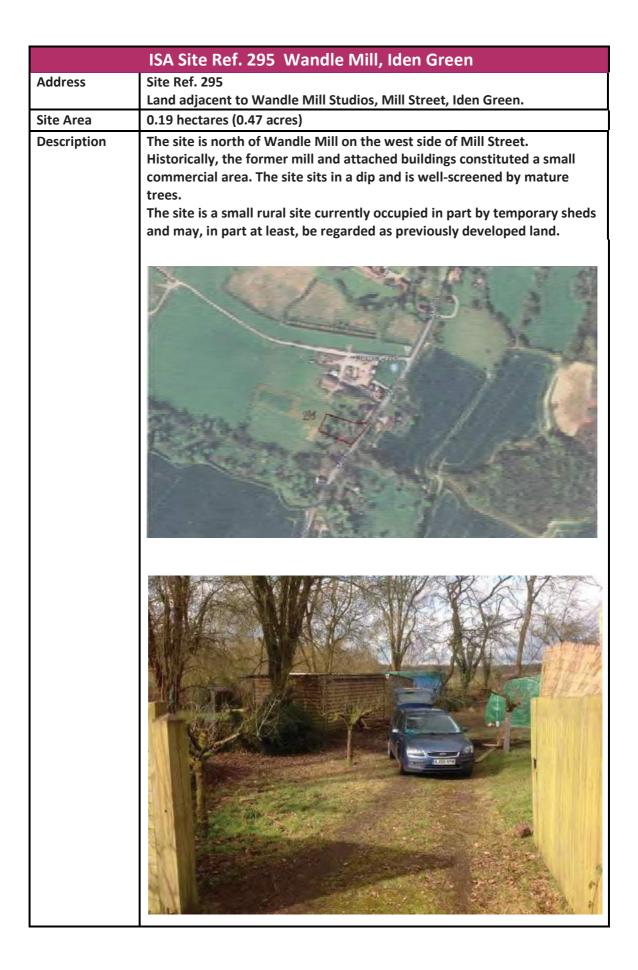
The site is bordered on the south side of Nineveh Lane by Ancient Woodland and crossed from north to south by a Public Right of Way (PRoW) (WC317). There are also seven Listed Buildings to the south and east of the site whose setting would be impacted by development on the site. The site is overlooked by the parish's only SSSI, Parsonage Wood, on the hill to the east of Babbs Lane, from where any development would be plainly visible in an otherwise largely undeveloped landscape. The site is beneath and sloping away from the ridge on which Parsonage Wood sits. Views to the west from Parsonage Wood, which is also a popular local amenity as it contains two PRoWs (WC311 and WC312), would be impacted by development on this site.





View looking north east taken from Nineveh Lane

		
Amount of development	There have been a number of schemes proposed for the site including one for 18- 30 eco-homes, a similar but reduced scheme, and more recently a proposal for 12 self-build houses for the use of agricultural and rural crafts-people. This would then be increased to 24 houses, all of them at the north-eastern end of the site, as and when the initial units were built and occupied. There was no guarantee that the scheme would not be expanded further to occupy part or all of the rest of the site. They would have access to land for gardens/vegetable growing and possible small-holdings. It would be ecologically self-supporting with reed-bed drainage and grass roofs. Any development on this site would drastically impact its rural character.	
Planning	This is a rural site outs	side the LBD.
policy	The site is within the AONB and consequently great weight should be accorded to conserving the landscape and scenic beauty; the presumption in favour of sustainable development does not apply. Development on this site would adversely affect the character and appearance of the AONB given the high visibility of the site from publicly accessible vantage points on the Parsonage Wood ridge. It is not a sustainable location which is a considerable distance from any	
CIII A A /	amenities (Benenden village).	
SHLAA / HELAA status	Not allocated in the TWBC Draft Local Plan 2019.	
Opportunities	The site promoters have pointed to opportunities in the form of innovative design and self-build, but there are many constraints, not least of which is its sensitive location in the heart of the AONB.	
Constraints	AONB. PROW across site. Poor road access. Impact on Cycle Route 18. Outside the LBD. Adjacent to SSSI and Listed Buildings (including one Grade II*). Viable agricultural land. Lack of facilities/utilities.	
Assessment	Site is suitable	(Y/N) No
conclusions	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) No
Conclusions	Although the proposals for self-build and rural craft live/work units may be attractive, this remote rural site, so close to an SSSI, could lead to an extensive spread of severe impacts in a highly visible part of the AONB landscape. Site access is poor and could impact on a preferred cycle route. This is coupled with the lack of access to any amenities and doubtful deliverability. The site was identified as one of the least suitable for development and it is not considered to be appropriate for allocation in the BNDP.	

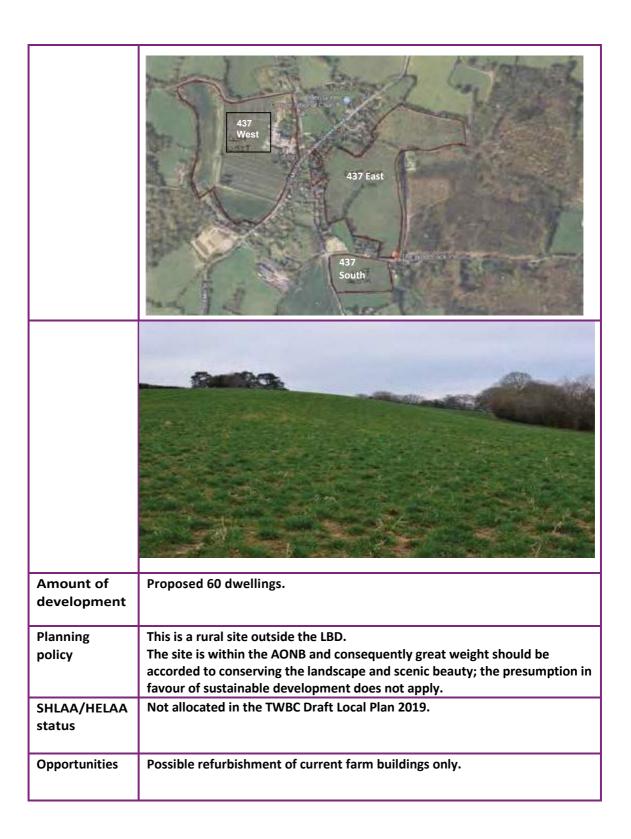


Amount of	The comment was done shade and no	luture of one act book from the read with
Amount of development	The current wooden sheds and polytunnel are set back from the road with a parking area in front of them on the east (road) side of the site. The landowner is suggesting building on a similar footprint. At a meeting with the landowner it was suggested he is considering 4-5 properties built as a terrace. The landowner is also sympathetically inclined to the idea of building the houses as work/live units with studios or workshops behind the houses. He anticipates selling one of the houses and the rest would be low-cost rental. This is in keeping with current practice in his adjacent properties.	
Planning Policy	This is a rural site outside the LBD The site is within the AONB and co	onsequently great weight should be
		cape and scenic beauty; the presumption
	in favour of sustainable developm	
		ustrial development round the Grade II
	Listed Wandle Mill; outside the de	esignated LBD. Itential impact on the setting of the
	nearby Listed Buildings and collect	•
SHLAA/ HELAA	Site not allocated in the TWBC Dra	aft Local Plan 2019.
status		
Opportunities	Good small site for residential/ homeworking/small business use.	
	Access onto Mill Street is good, though traffic is travelling quickly at this	
	point. Subject to detailed assessment, at least partly previously developed land.	
	Work/live units could contribute to local business economy.	
Constraints	AONB. Relationship with the setting of the Listed Buildings (Wandle Mill and	
	Watermill House) and form and cluster of established and historic Heritage buildings. Would not be appropriate for anything other than a very small scale development.	
	Speed of traffic on Mill Street.	
	Distance from local amenities.	
Assessment	Site is suitable	(Y/N) Yes
conclusions	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) Yes
Conclusions	Pomoto from villago contro and in	the AONR A small site with good year
Conclusions	access being suitable, available ar	the AONB. A small site with good road
	_	nce from local amenities, may be more
	suitable for work/live units or bus	· · · · · · · · · · · · · · · · · · ·
	The site doesn't score highly but o	- ,
	potential site because of the intention of the landowner to provide work/live units and therefore to increase employment in the parish. Should the nearby Turks Yard/Little Weavers site (LS21) become a more significant light industrial /office/ business space then it would be	
	interesting to suggest creating a business 'hub' in this part of Iden Green.	

Site F	Ref. 397 Pheasant Lodge, Standen Street, Iden Green	
Address	Site Ref. 397 Pheasant Lodge, Standen Street, Iden Green This flat, roughly square site is currently garden with a bungalow occupying the centre of the site.	
Ste Area	1.62 hectares (4.0 acres)	
Description	The site is reached via Standen Street, a narrow, winding, rural lane which is bordered by orchards and a scattering of houses, several of them current or former farmhouses, or their buildings, and two of which are Grade II Listed. Remote from Iden Green and Benenden. The site is a level, mostly grassed site, currently occupied by one bungalow.	
	Standen Barn Cottage 397 Standen Street Springhill Farm Lower Standen Farm	

Amount of development	Outside the built-up area the residential curtilage is technically classed as 'previously developed land', and the plot is physically capable of accommodating a considerable number of dwellings. However, the very rural nature of the location of this site, together with its poor access via a narrow lane and dangerous crossroads at Iden Green, renders it unsuitable for development.	
Planning Policy	This is a rural site outside the LBD. The site is within the AONB and consequently great weight should be accorded to conserving the landscape and scenic beauty; the presumption in favour of sustainable development does not apply.	
SHELAA/HELAA status	Not allocated in the TWBC Draft Local Plan 2019	
Opportunities	Small scale development of a higher value house in keeping with its rural setting.	
Constraints	AONB. Narrow lane and very dangerous crossroads at Iden Green giving access to Standen Street. Unsustainable because of distance from amenities, poor utilities (broadband/mobile coverage). Large scale development of this site would not be appropriate in this rural location. Adjacent to two Grade II and one Grade II* Listed Buildings.	
Assessment conclusions	Site is suitable	(Y/N) Yes, only for a single replacement dwelling
	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) Yes
Conclusions	An attractive, level site but suitable and viable for very limited development only. Its very rural location in the heart of the AONB, the poor access and potential contribution of more traffic to the hazardous Iden Green crossroads mitigate against development on this site. Impact on the setting of the historic farmstead Listed Buildings and the characteristics of the AONB will be constraining factors. It is not considered to be appropriate for allocation in the BNDP.	

	ISA Site Ref. 437 Land West of Iden Green Crossroads	
Address	Adjacent Iden Green — part of 3 submitted sites: 437 West (Coldharbour Road) 437 East (Iden Green Road/Standen Street) 437 South (Standen Street)	
Site Area	Total area of the three sites 61.43 acres (24.87 hectares) Area of 437 West approx. 12 hectares.	
Description	437 West lies to the north west of Iden Green crossroads & Iden Green settlement which it abuts on the site's eastern edge. Land submitted by landowner as part of the TWBC 'Call for Sites'. The site includes the farm buildings of Yew Tree Farm and appears to contain seven cottages on Coldharbour Road. Access to the site is from Coldharbour Road or Mill Street. The site comprises orchard land and grass fields and is bounded by a stream on its western edge. The site is very undulating. Mainly agricultural land.	
	umtree Wood Site 437 West Iden Green	



Constraints	AONB.	
	The northern part of the site is very steep and unsuitable for building.	
	As the highest point in the area, the site includes the Jubilee plantat commands views of more than 180 degrees looking from the north views to the south.	
	Any development on this site would b	e highly visible from many directions.
	Access difficult except via current farm entrance, currently still necessar navigate around the hazardous Iden Green Crossroads with poor sight	
	and with Coldharbour Road being sing in traffic.	gle track and not suited to an increase
	Site bordered by Ancient Woodland and an ancient drovers' road (now a footpath from Sarnden to Marshalls Farm shop).	
	The Southern part of the site is more	e level fronting Mill Street but access
	· ·	poor sight lines including a bend and
	brow of a hill.	
Assessment	Site is suitable	(Y/N) No
conclusions	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) No
Conclusions	A large site unsuitable for building development due to location within the	
	AONB; adverse impact on the setting of the Conservation Area; protected	
	trees and species; and the character of a rural lane; the steep landscape	
	except for the area occupied by the existing farm buildings at Yew Tree Farm. Although it is adjacent to the settlement of Iden Green, there are few	
	facilities/amenities which reduce its sustainability. There are significant	
	problems of access and the Iden Green crossroads which would also mitigate	
	against it being suitable for housing development.	
	It is not considered to be appropriate	for allocation in the BNDP.

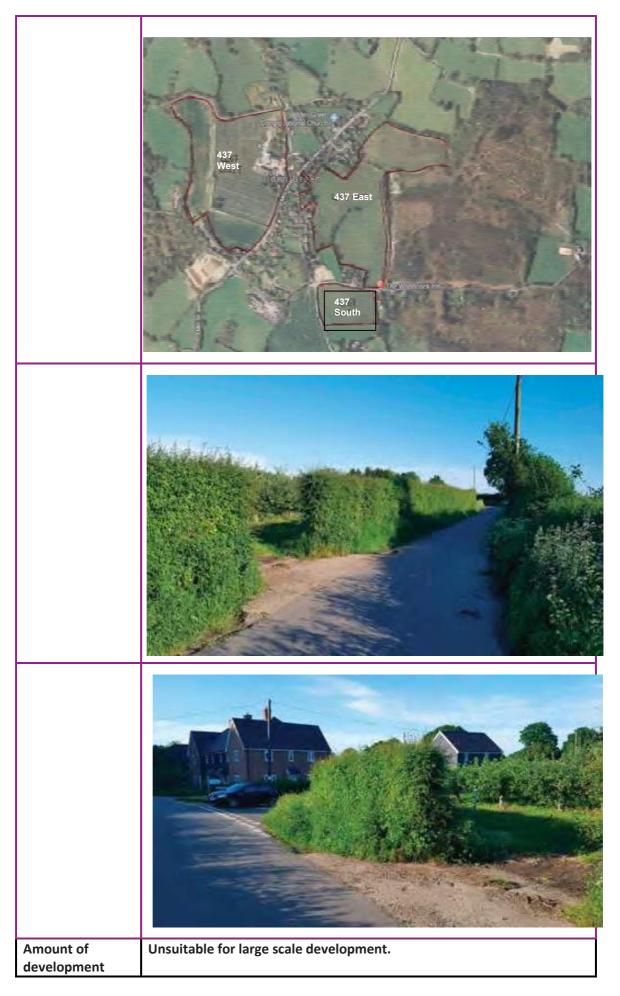
	Site Ref. 437 Land East of Iden Green Crossroads	
Address	Adjacent Iden Green — part of 3 submitted sites: 437 East (Iden Green Road/Standen Street) 437 South (Standen Street) 437 West (Coldharbour Road)	
Site Area	Total area of three sites 61.43 acres (24.87 hectares). Area of 437 East estimated as approx. 10 hectares.	
Description	437 East lies to the east of the Iden Green crossroads & south and east of the Iden Green settlement. A rural site bordering the Iden Green Conservation Area, set back from Standen Street and Mill Street. The land is currently farmed as apple orchards, with access by way of a narrow farm track leading off Iden Green Road very close to the crossroads. While the land abutting Iden Green is relatively flat it then falls steeply away into a valley before rising sharply again to the south where it borders Woodcock Lane. Bordered to the east by Ancient Woodland. The main sewage treatment plant serving the settlement adjoins the	
	Rec reation Sewage Works Site 437 East Pipeline Track Moor V Woodcock La	



Amount of development	Not known
Planning policy	This is a rural site outside the LBD. The site is within the AONB and consequently great weight should be accorded to conserving the landscape and scenic beauty; the presumption in favour of sustainable development does not apply. Proximity to the Conservation Area.
SHLAA / HELAA status	Not allocated in the TWBC Draft Local Plan 2019.
Opportunities	Adjacent to the settlement of Iden Green.

Constraints	AONB.	
	Bordered by Ancient Woodland.	
	Outside the LBD.	
	Proximity to/impact on the Conserva	ation Area.
	Good quality viable agricultural land	
	Part of the site is steeply sloping.	
	Access in close proximity to the haza	rdous Iden Green crossroads. Any
	alternative access from Standen Stre	et would contribute increased traffic
	at the crossroads.	
	It adjoins the sewage works which ca	
	regarded as unacceptable when set a	9
	main sewer currently installed above	e ground leading to the sewage
	plant bisects the site East/West. The	service road to the adjoining
	sewage treatment plant lies against the eastern boundary but is outside	
	the present curtilage of the site.	
	The northern part of the site has pub	olic footpaths/rights of way no. 333
	and 335 which transverse it.	
	Distance from amenities/public transport (in Benenden) reduce the	
	sustainability of the site.	
Assessment	Site is suitable	(Y/N) No
conclusions	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) No
Conclusions	A large site, unsuitable for building d	evelopment due to its location
	within the AONB; adverse impact on the setting of the Conservation	
	Area, protected trees and species; and the character of a rural lane; the undulating topography, steep gulley and poor access. Although it is adjacent to the settlement of Iden Green, there are few facilities/amenities which reduce its sustainability. The significant problems of access and the Iden Green crossroads would mitigate against it being suitable for housing development.	
It is not considered to be appropriate for allocation in the BNDP.		e for allocation in the BNDP.

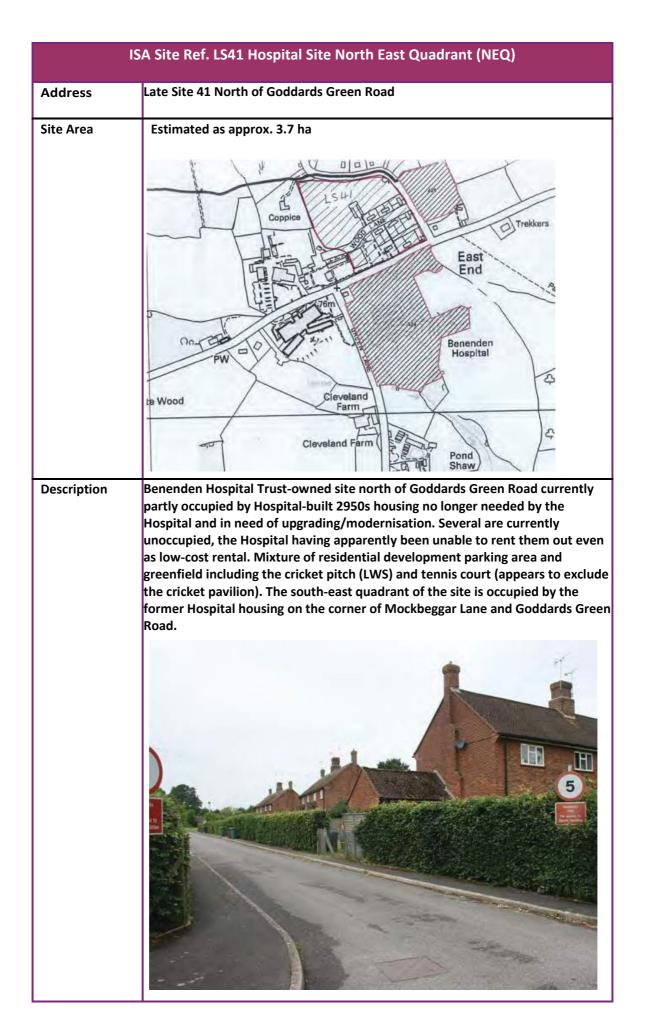
	ISA Site Ref. 437 South of Iden Green Crossroads	
Address	Adjacent Iden Green — part of 3 submitted sites: 437 South (Standen Street) 437 West (Coldharbour Road) 437 East (Iden Green Road/Standen Street)	
Site Area	Total area of three sites 61.43 acres (24.87 hectares). Area of 437 South approx. 2.45ha.	
Description	437 South is the smallest part of the much larger 437 East and West parcels of land which were submitted under the Call for Sites. For the purpose of this assessment, it is dealt with separately. The site's western and northern boundaries front Standen Street and Woodcock Lane, both of which are narrow country lanes. It lies on the south east edge of Iden Green. The site is flat and is in a rural location on the edge of the existing settlement. It is presently being farmed as an orchard.	



Planning policy	This is a rural site outside the LBD. The site is within the AONB and consequently great weight should be accorded to conserving the landscape and scenic beauty; the presumption in favour of sustainable development does	
SHLAA / HELAA status	Not allocated in the TWBC Draft Local Plan 2019.	
Opportunities	A small plot with good topography, and limited impact on neighbours.	
Constraints	AONB. Standen Street leads to the busy Iden Green Road / Mill Street crossroads which has a poor line of sight to the south. Standen Street and its crossroads is unable to sustain additional traffic. The rural location provides no safe pedestrian access / no public transport.	
Assessment	Site is suitable	(Y/N) No
conclusions	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) No
Conclusions	The site's rural location within the AONB, the character of the rural lane and poor access, together with few facilities/amenities in the settlement of Iden Green, reduces its sustainability. There are significant problems of access to/from the site and the Iden Green crossroads, which mitigates against it being suitable for housing development. It is not considered to be appropriate for allocation in the BNDP.	

Submitted Sites — East End

Site Ref.	Site
LS40 a) & b)	Land adjoining Hospital site Ref. 424, Goddards Green Road, East End
LS41	Benenden Hospital Land north of Goddards Green Road (NEQ), East End
424	Benenden Hospital (redundant buildings) Land south of Goddards Green Road (SEQ), East End
425	Land east of Mockbeggar Lane, East End



Amount of development	Potential to redevelop to an appropriate scale and density for the area given that East End is a small, low-density community.	
Planning Policy	Outside the AONB. While garden land should not be strictly regarded as 'previously developed land' being housing and surrounding curtilage, this is largely a development of 'brownfield land', and is preferred planning policy.	
SHLAA/ HELAA status	Allocated site in TWBC Draft Local Plan 2019.	
Opportunities	Access via Wood Lane from Mockbeggar Lane and from Goddards Green Road. Some utilities already in place. The site is owned by the Hospital and is available. The site includes low-density 1950s housing on part of the site, in need of modernisation/regeneration. Opportunity to secure the cricket pitch (LWS — so needs protecting, not using for dog-walking, etc.), tennis courts and other facilities for the benefit of the local community and hospital community in perpetuity.	
Constraints	Local Wildlife Site (the cricket pitch) forms part of the site, and Ancient Woodland borders the site. Goddards Green Road is narrow in places and unsuitable for high volumes/'rush hour' traffic. Poor mobile/broadband coverage. Poor public transport at present (twice weekly bus to local markets). Few employment opportunities outside the hospital. Few facilities/amenities.	
Assessment conclusions	Site is suitable	(Y/N) Yes
	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) Yes
Conclusions	The majority of this site is brownfield — 1950s housing, car park, tennis courts — but with some important wildlife elements (LWS/nearby Ancient Woodland). If the development were to reflect the significance of the LWS and the existing community then a sensitively designed scheme, at the appropriate density, might be acceptable. Should development on the site go ahead, it is considered that East End should be developed as a more self-sufficient local community. A small shop, café or community space should be sought as a planning gain. The public bus service should be improved also as a planning gain in addition greater connectivity with the other communities within the parish via a public footpath/cycle track linking the development with amenities in Benenden. The tennis courts should be retained for community use and the protection of the cricket pitch LWS beneficial for environmental reasons.	

ISA	Site Ref. 424 Hospital Site South East Quadrant (SEQ)		
Address	Site Ref. 424 South of Goddards Green Road/east of Green Lane Originally part of Benenden Hospital but now redundant as has been replaced by recently-opened, modern building (west of this site). Also see LS40a) & b), LS41 and 425 submitted by the Hospital and the subject of separate assessments.		
Site Area	4.2ha + possible addition of LS40		
	Coppice Coppice East End Renenden Hospital Cleveland Farm Pond Shaw Benenden Hospital France Farm Pond Shaw Benenden Hospital France Farm Pond Shaw Benenden Hospital France Farm France Farm Pond Shaw Benenden Hospital France Farm Fran		
Description	Brownfield site occupied by redundant hospital buildings and Peek Lodge, the hospital's ex-hotel. Currently being used as a police-dog training site. A sloping site with buildings occupying the top 2/3 of the area. The bottom 1/3 is an important wildlife site (LWS) of particular interest and has a Kent Wildlife warden to oversee it. The site commands views from the south and east and any development would be visible from a distance. Campus lighting is clearly visible at night on the ridgeline.		



Peek Lodge (ex-hospital patient/relatives hotel)



Amount of development

There is a significant built footpath on this brownfield site, much of it quite densely built on, with a hotchpotch of buildings built over the twentieth century. Reference the existing planning permission, nature, quantity etc.

Planning permission for 24 houses, 35% affordable, granted as part of the original Hospital development.

Given the increase in the size of the site (Peek Lodge now included), this would seem to be an appropriate site for a reasonable increase in the 24 houses already planned for the site, applying a density deemed appropriate for this part of the parish, and taking into consideration the scattered nature of the existing settlement.

Planning policy	Brownfield site. Outside but adjoining the AONB; any development must not significantly harm/impact the setting of the AONB. LWS (Lower part of the site — not intended as building land but will need protection — also around Peek Lodge).	
SHLAA/ HELAA status	Allocated site in the TWBC Draft Local Plan 2019.	
Opportunities	Existing development on the site might mean some utilities would already be in place.	
Constraints	Goddards Green Road is narrow in places and unsuitable for high volumes/ rush hour traffic. Poor mobile phone/broadband coverage. Poor public transport (bus twice a week). Few employment opportunities except at Hospital. Few facilities. Not appropriate location for much low-rental housing as too removed from services/amenities in the village centre. Instead, developer should make s106 contribution to greater quantity of affordable housing in Benenden village.	
Assessment	Site is suitable	(Y/N) Yes
conclusion	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) Yes
Conclusion	This is a brownfield site with planning permission, NPPF principles and although East End may not score highly in terms of utilities, it would seem to be an appropriate site to locate a number of houses applying the density deemed appropriate for this part of the parish. Part of the site is an important LWS but though the Hospital is not planning to build on that part of the site it will need robust protection in the form of a buffer/screening which may reduce the overall size of the site.	



A relatively flat, squarish field currently used for grazing. The field is Description bordered by hedging and on the north and east boundaries by large, mature oak trees and to the east gives on to further grass fields. The southern boundary is defined by a property and its garden and on the west by Mockbeggar Lane. Access to the site would be from Mockbeggar Lane. It marks the eastern edge of the settlement of East End. Amount of Given the development planned or anticipated for the two adjoining development hospital sites, any development on this greenfield site would be seen as overwhelming the existing settlement, extending it eastwards when it would be preferable to consolidate development on the previously developed Hospital land. East End in any case has very few facilities, low employment prospects and poor transport links. This site would be better retained as a natural 'border' to East End. **Planning** Outside the AONB. policy Not allocated in the TWBC Draft Local Plan 2019 SHLAA / **HELAA** status **Opportunities** Adjacent to Benenden Hospital campus, however substantial PDL sites exist that are closer to the area of urbanisation. Constraints Greenfield site. No facilities in East End (no shop/school). Poor public transport (bus twice weekly). Mockbeggar Lane is a narrow country lane. Few employment opportunities except at the Hospital.

Assessment	Site is suitable	(Y/N) No
conclusions	Site is available	(Y/N) Yes
	Site is achievable	(Y/N) No
Conclusions	Taken in locational context of East En available sites. The site is outside the impact on the setting of the AONB. To country lane. However, there is subston two other PDL sites at East End (42 preferable in terms of NPPF principle site and b) would be a further incursithan a consolidation within established is not considered appropriate for all	AONB but any development would he site has poor access off a narrow tantial net housing growth potential 24 SEQ and LS41 NEQ). Both are sover this site: a) this is a greenfield on into the open countryside rather ed limits.

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Supporting Document HSA4	
High Weald AONB Advice on Benenden Neigl	nbourhood Plan Sites

www.highweald.org



High Weald AONB Advice on Benenden Neighbourhood Plan Sites

Produced by: High Weald AONB Unit

December 2018



An Outstanding Medieval Landscape

The High Weald AONB

The High Weald Area of Outstanding Natural Beauty is one of the best surviving medieval landscapes in northern Europe. The components of the High Weald's natural beauty that make it recognisably distinct are:

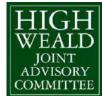
- Geology, landform, water systems and climate: deeply incised, ridged and faulted landform of clays and sandstone from which spring numerous gill streams.
- Settlement: dispersed historic settlements of farmsteads and hamlets and late medieval villages.
- Routeways: ancient routeways often narrow, deeply sunken, and edged with trees, hedges, wildflower-rich verges and boundary banks.
- Woodland: a great extent of ancient woods, gills, and shaws in small holdings
- Field and heath: small, irregularly shaped and productive fields often bounded by, and forming a mosaic with, hedgerows and small woodlands

The High Weald AONB Joint Advisory Committee (JAC) is a partnership established in 1991 of 15 local authorities, Defra, Natural England and organisations representing farming, woodland, access and community interests. The JAC is responsible for publishing and monitoring the statutory AONB Management Plan.

The JAC is supported by a small, dedicated staff team, the High Weald AONB Unit, which develops understanding of the High Weald's key components - their history, development, distribution, special qualities, deterioration, damage and loss - to provide an evidence base for the AONB Management Plan and related policy and guidance.

This guidance is based on that understanding and aims to help everybody conserve and enhance one of England's finest landscapes.





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The views expressed in this report are those of the author(s) and do not necessarily reflect those of the High Weald Partnership

Introduction



The High Weald AONB Unit Advice

The advice from the High Weald AONB Unit takes the form of an assessment of each site against the five landscape components identified on the High Weald AONB Management Plan. These are:

- Geology, landform, water systems and climate (topography and watercourses)
- Settlement (historic settlement pattern and scale of development relative to settlement)
- Routeways (impact on adjacent historic routeways, ecology and archaeology)
- Woodland (on site and adjacent woodland and ancient woodland including downstream)
- Field and heath (field systems and meadows / heathland data

Maps showing these features, together with the metadata explaining the origin of the data, can be viewed on the High Weald AONB website under Parish Information.

The sites are also assessed against the Management Plan's objectives for Public Understanding and Enjoyment, including views (where known), enjoyment of public rights of way and public open space.

An overall conclusion is provided as follows:

- High impact on the AONB
- Moderate impact on the AONB or
- Low impact on the AONB

Background

Benenden & Iden Green Parish Council decided to create a Neighbourhood Development Plan in spring 2017. As part of the evidence gathering stage of this plan it is assessing potential sites for development. The High Weald AONB Unit was asked to input to this process and identify the impact of sites on the Area of Outstanding Natural Beauty.

This is a desktop assessment based on the AONB Unit's datasets and will need to be supplemented by evidence on visual impact. It should also be noted that there will be other planning considerations which may affect the overall rating for sites. In accordance with standard SHELAA methodology, the sites are assessed individually; however cumulative impact will need to be considered prior to any decisions on site allocations.

Finally, the site assessments in this report reflect the professional views of the AONB Unit's Planning Advisor on the potential impacts on the High Weald landscape. They are not necessarily the views of the High Weald AONB Joint Advisory Committee.



Site 66	Broughton House, Benenden
Geology, landform, water	Gill to the north-west, site would drain towards this gill and care would need to be taken to ensure that this sensitive
systems and climate	habitat was not affected by the development. See 'An overview of the character and ecological significance of gill
Topography and watercourses	woodland in the High Weald AONB'.
Settlement	Close to main village of Benenden, modest scale of development proposed. Any development would need to have
Historic settlement pattern and	regard to objectives S1-S3 of the High Weald AONB Management Plan.
scale of development relative to	
settlement	
Routeways	No historic routeways affected.
Impact on adjacent historic	
routeways, ecology and	
archaeology	
Woodland	Ancient woodland to the north-west which could potentially be affected by the development.
On site and adjacent woodland	
and ancient woodland including	
downstream	
Field and heath	Not a medieval field system due to nineteenth century field divisions.
Field systems and meadows /	
heathland data	
Public Understanding and	Site not visually prominent from public viewpoints.
Enjoyment	
Views, PROWs, public open space	
Conclusion	Moderate impact on AONB due to proximity of gill and ancient woodland.

Site 158	Greenacres, New Pond Road, Benenden
Geology, landform, water	Gill to the north of the site, and any development would drain towards it. Care would need to be taken to ensure that
systems and climate	this sensitive habitat was not affected by the development. Pond in centre of the site. See 'An overview of the character
Topography and watercourses	and ecological significance of gill woodland in the High Weald AONB'.
Settlement	Reasonably well-related to main village of Benenden but very large site which could result in development
Historic settlement pattern and	disproportionate in scale to the settlement. Any development would need to have regard to objectives S1-S3 of the
scale of development relative to settlement	High Weald AONB Management Plan.
Routeways	No historic routeways affected by the site.
Impact on adjacent historic	
routeways, ecology and	
archaeology	
Woodland	Ancient woodland to the north of the site and regard should be had to objectives W1-W4 of the High Weald AONB
On site and adjacent woodland	Management Plan.
and ancient woodland including	
downstream	
Field and heath	Most of the site is part of a medieval field system. The western field adjacent to New Pond Road is not medieval due to
Field systems and meadows /	nineteenth century field divisions. Medieval field systems are an important characteristic of the AONB and their loss
heathland data	should be avoided (see objectives FH2-4 of the High Weald AONB Management Plan and 'Field systems in the High
	Weald').
Public Understanding and	Site not visually prominent from public viewpoints.
Enjoyment	
Views, PROWs, public open space	
Conclusion	High impact on AONB due to loss of medieval fields and proximity of gill and ancient woodland. Would reduce to
	moderate impact if development restricted to western field adjacent to New Pond Road.

Site 222	Green Meadow, Land west of Iden Green Road / Cranbrook Road, Benenden
Geology, landform, water	Relatively flat site with pond in north-east corner.
systems and climate	
Topography and watercourses	
Settlement	Site close to village centre but proposal to designate north-east corner as LGS would divorce development from existing
Historic settlement pattern and	built development. Any development would need to have regard to objectives S1-S3 of the High Weald AONB
scale of development relative to	Management Plan.
settlement	
Routeways	Iden Green Road and The Street are historic routeways and regard should be had to objectives R1 and R2 of the High
Impact on adjacent historic	Weald AONB Management Plan.
routeways, ecology and	
archaeology	
Woodland	Benenden Wood to the south is ancient woodland and a Local Wildlife Site. The LWS extends to the southern boundary
On site and adjacent woodland	of the site. Regard should be had to objectives W1-W4 of the High Weald AONB Management Plan.
and ancient woodland including	
downstream	
Field and heath	The southern two fields are part of a medieval field system. Medieval field systems are an important characteristic of
Field systems and meadows /	the AONB and their loss should be avoided (see objectives FH2-4 of the High Weald AONB Management Plan and 'Field
heathland data	systems in the High Weald').
Public Understanding and	Prominent site from Iden Green Road and The Street.
Enjoyment	
Views, PROWs, public open space	
Conclusion	High impact on AONB due to loss of medieval fields, potential impact on Local Wildlife Site and visual prominence.

Site 277	Land adjacent to Feoffee Cottages, Walkhurst Road, Benenden
Geology, landform, water	Site slopes to the south towards a gill and pond which any development would drain towards. Care would need to be
systems and climate	taken to ensure that this sensitive habitat was not affected by the development. See 'An overview of the character and
Topography and watercourses	ecological significance of gill woodland in the High Weald AONB'.
Settlement	Well related to the village of Benenden. Any development would need to have regard to objectives S1-S3 of the High
Historic settlement pattern and	Weald AONB Management Plan.
scale of development relative to	
settlement	
Routeways	Walkhurst Road is a historic routeway and currently a narrow lane. Any road 'improvements' to facilitate access /
Impact on adjacent historic	footways is likely to impact on this historic character and regard should be had to objectives R1 and R2 of the High
routeways, ecology and	Weald AONB Management Plan.
archaeology	
Woodland	Ancient woodland to the south of the site and regard should be had to objectives W1-W4 of the High Weald AONB
On site and adjacent woodland	Management Plan.
and ancient woodland including	
downstream	
Field and heath	Part of an early post-medieval field system. Medieval field systems are an important characteristic of the AONB and
Field systems and meadows /	their loss should be avoided (see objectives FH2-4 of the High Weald AONB Management Plan and 'Field systems in the
heathland data	High Weald').
Public Understanding and	Site is visible from Walkhurst Road.
Enjoyment	
Views, PROWs, public open space	
Conclusion	Moderate impact on AONB due to proximity of gill and ancient woodland and potential impact on historic routeway.

Site 289	Babbs Lane, Iden Green
Geology, landform, water	Relatively flat site with a small pond at southern end and a gill to the east and south (beyond the lane). Care would
systems and climate	need to be taken to ensure that this sensitive habitat was not affected by the development. See 'An overview of the
Topography and watercourses	character and ecological significance of gill woodland in the High Weald AONB'.
Settlement	Remote from any settlement in area of very dispersed development. Development would be contrary to objective S2 of
Historic settlement pattern and	the High Weald AONB Management Plan.
scale of development relative to	
settlement	
Routeways	Babbs Lane and Ninevah Lane are historic routeways which would be adversely affected by any highway
Impact on adjacent historic	'improvements' to facilitate access. There is a historic PROW crossing the site. Regard should be had to objectives R1
routeways, ecology and	and R2 of the High Weald AONB Management Plan.
archaeology	
Woodland	Ancient woodland to the north and south-east of the site (beyond the lanes) and regard should be had to objectives
On site and adjacent woodland	W1-W4 of the High Weald AONB Management Plan.
and ancient woodland including	
downstream	
Field and heath	Not part of a medieval field system due to nineteenth century field amalgamation.
Field systems and meadows /	
heathland data	
Public Understanding and	Very visible from PROW. Impact of development on setting of the PROW.
Enjoyment	
Views, PROWs, public open space	
Conclusion	High impact on AONB due to remote location and impact on gill and rural character of the area.

Site 295	Land adjacent Wandle Mill Studios, Mill Street, Iden Green
Geology, landform, water	Small site to north of gill and adjacent to old mill. Care would need to be taken to ensure that this sensitive habitat was
systems and climate	not affected by the development. See 'An overview of the character and ecological significance of gill woodland in the
Topography and watercourses	High Weald AONB'.
Settlement Historic settlement pattern and scale of development relative to settlement	In area of dispersed development remote from main settlement. Brownfield site but with a number of trees on it. Any development should be along the road not 'in depth' to respect existing settlement pattern and retain trees to west and have regard to objectives S1-S3 of the High Weald AONB Management Plan.
Routeways Impact on adjacent historic routeways, ecology and archaeology	Mill Street is a historic routeway and regard should be had to objectives R1 and R2 of the High Weald AONB Management Plan
Woodland On site and adjacent woodland and ancient woodland including downstream	No ancient woodland on or near the site but a number of trees on the site.
Field and heath Field systems and meadows / heathland data	Not part of a medieval field system.
Public Understanding and	Will be visible from Mill Street if trees are removed.
Enjoyment	
Views, PROWs, public open space	
Conclusion	Moderate impact on AONB due to remote location and impact on the gill.

Site 397	Pheasant Lodge, Standen Street, Iden Green
Geology, landform, water	Flat site with no watercourses mapped.
systems and climate	
Topography and watercourses	
Settlement Historic settlement pattern and	In area of dispersed development remote from main settlement. Brownfield site if use as part of residential curtilage is lawful, but historically a field. Any development would need to have regard to objectives S1-S3 of the High Weald AONB
scale of development relative to settlement	Management Plan.
Routeways Impact on adjacent historic routeways, ecology and archaeology	Standen Street is a historic routeway and regard should be had to objectives R1 and R2 of the High Weald AONB Management Plan.
Woodland On site and adjacent woodland and ancient woodland including downstream	No woodland on or adjacent to the site.
Field and heath Field systems and meadows / heathland data	Not part of a medieval field system.
Public Understanding and	Very visible from Standen Street.
Enjoyment Views, PROWs, public open space	
Conclusion	Moderate impact on AONB due to remote location.

Site LS8	Iden Green Road / Chapel Lane, Iden Green
Geology, landform, water	Relatively flat site with no watercourses mapped.
systems and climate	
Topography and watercourses	
Settlement	Fields / green within small settlement of Iden Green. Important character component of settlement pattern where
Historic settlement pattern and	buildings are generally arranged along the intersecting roads. Any development on this site will remove open area and
scale of development relative to	will be 'in depth' development out of character with the settlement pattern contrary to objectives S1-S3 of the High
settlement	Weald AONB Management Plan.
Routeways	Iden Green Road and Chapel Lane are historic routeways and regard should be had to objectives R1 and R2 of the High
Impact on adjacent historic	Weald AONB Management Plan.
routeways, ecology and	
archaeology	
Woodland	No woodland on or adjacent to the site.
On site and adjacent woodland	
and ancient woodland including	
downstream	
Field and heath	Not part of a medieval field system due to nineteenth century field amalgamation.
Field systems and meadows /	
heathland data	
Public Understanding and	Visible from adjacent roads / PROW.
Enjoyment	
Views, PROWs, public open space	
Conclusion	High impact on AONB due to impact on historic settlement pattern.

Site LS16	Uphill, New Pond Road, Benenden
Geology, landform, water	Relatively flat site with no watercourses mapped.
systems and climate	
Topography and watercourses	
Settlement	Adjacent to village centre and modern cul-de-sac development at Hortons Close. Site appears to be used as residential
Historic settlement pattern and	curtilage but eastern part was historically paddock. Any development would need to have regard to objectives S1-S3 of
scale of development relative to	the High Weald AONB Management Plan.
settlement	
Routeways	No historic routeways on or near the site.
Impact on adjacent historic	
routeways, ecology and	
archaeology	
Woodland	No ancient woodland on or near the site but there are a number of mature trees on the site.
On site and adjacent woodland	
and ancient woodland including	
downstream	
Field and heath	Not part of a medieval field system due to nineteenth century field division and later development as residential
Field systems and meadows /	curtilage.
heathland data	
Public Understanding and	Views from New Pond Lane currently screened by trees.
Enjoyment	
Views, PROWs, public open space	
Conclusion	Moderate impact on AONB due to loss of open undeveloped land.

LS18	Pullington Farm, Benenden Road, Benenden
Geology, landform, water	Ridgetop site with extensive views to the south and adjacent pond to the west.
systems and climate	
Topography and watercourses	
Settlement Historic settlement pattern and scale of development relative to settlement	Medieval farmstead close to but outside the village of Benenden. Farmhouse to the east is Grade II listed but little else remains of the original farm buildings. Whilst site has some hardstanding and building remains on it agricultural development is excluded from the NPPF definition of previously developed land. Development of this site would be contrary to the historic settlement pattern (objective S2 of the High Weald AONB Management Plan).
Routeways Impact on adjacent historic routeways, ecology and archaeology	Benenden Road is a historic routeway and regard should be had to objectives R1 and R2 of the High Weald AONB Management Plan.
Woodland On site and adjacent woodland and ancient woodland including downstream	No woodland on or adjacent to the site.
Field and heath Field systems and meadows / heathland data	Not part of medieval field system due to nineteenth century field divisions.
Public Understanding and Enjoyment Views, PROWs, public open space	Site very visible from the PROW and Benenden Road. Development likely to impact on setting of the PROW.
Conclusion	High impact on AONB due to detachment from village, impact on medieval farmstead and loss of public enjoyment of rural setting of PROW.

Site 21	Little Weavers, Iden Green
Geology, landform, water	Ridgetop site with extensive views to the south. Spring immediately to the south and small pond to the north.
systems and climate	
Topography and watercourses	
Settlement	On edge of Iden Green, part of site currently occupied by a business park with the western part open field with the
Historic settlement pattern and	access on the northern edge. Any development would need to have regard to objectives S1-S3 of the High Weald AONB
scale of development relative to settlement	Management Plan.
Routeways	Mill Street is a historic routeway and there is a historic PROW running through the site. Regard should be had to
Impact on adjacent historic	objectives R1 and R2 of the High Weald AONB Management Plan.
routeways, ecology and	
archaeology	
Woodland	There is no woodland on or near the site.
On site and adjacent woodland	
and ancient woodland including	
downstream	
Field and heath	The field at the western end is part of an early post-medieval field system. Medieval field systems are an important
Field systems and meadows /	characteristic of the AONB and their loss should be avoided (see objectives FH2-4 of the High Weald AONB
heathland data	Management Plan and 'Field systems in the High Weald').
Public Understanding and	The site is visible from Mill Street and the PROW and development of the western field would impact on the public
Enjoyment	enjoyment of the rural landscape.
Views, PROWs, public open space	
Conclusion	Moderate impact on the AONB due to the inclusion of part of the field at the western end.

Supporting Document HSA5

List of Submitted Sites in the Call for Sites

Following the 2016 Call for Sites, landowners and their agents in Benenden put forward the following sites for consideration:

Site Ref. Benenden	Site		
LS4	Hams Travel, Cranbrook Road, Benenden		
LS16	Uphill, New Pond Road, Benenden		
LS18	Pullington Farm, Benenden Road, Benenden		
LS19	Land adjacent to Glebe Field, Rolvenden Road, Benenden		
LS20	Land adjacent to Beacon Field, Rolvenden Road, Benenden		
LS22	Land north of Site LS16, New Pond Road, Benenden		
35	Walkhurst Road, Benenden (Under Construction as at 2020)		
66	Broughton House, Rolvenden Road, Benenden		
158	Greenacres, Land north of The Street, Benenden		
222	Land west of Iden Green Road at Benenden crossroads		
277	Land Adjacent to Feoffee Cottages, Walkhurst Road, Benenden		
436	Land north of Benenden (Large site between New Pond Road and Walkhurst Road)		
Iden Green			
LS8	Chapel Lane, Iden Green		
LS21	Little Weavers, Mill Street, Iden Green		
289	Babbs Lane, Iden Green		
295	Wandle Mill, Mill Street, Iden Green		
397	Pheasant Lodge, Standen Street, Iden Green		
437	Land west of Iden Green crossroads (Coldharbour Road)		
437	Land east of Iden Green crossroads (Iden Green Road/Standen Street), Iden Green		
437	Land south of Iden Green crossroads (Standen Street), Iden Green		
East End			
LS40 a) & b)	Land adjoining Hospital site Ref. 424, Goddards Green Road, East End		
LS41	Benenden Hospital Land north of Goddards Green Road (NEQ), East End		
424	Benenden Hospital (redundant buildings) Land south of Goddards Green Road (SEQ), East End		
425	Land east of Mockbeggar Lane, East End	September 2020	