

Stage 1

Issue 3 - Sustainability

10. Where individual sites are concerned, how did the Sustainability Appraisal determine what were reasonable alternatives?

Sustainability is the golden thread which must run through all NPPF plan-making, yet allocations in Benenden place most houses at an unsustainable site. Equally, Benenden Neighbourhood Plan (BNP) allocations, on which Local Plan allocations are based, published its allocated sites in February 2019, prior to the publication of the SA. The BNP (and by implication the Local Plan) fails to allocate sites considered sustainable by TWBC planning officers.

One of these sustainable sites (158 or Greenacres) appears to have been considered suitable for housing even by the BNP group itself up till 2018.

Evidence that reasonable alternatives in Benenden were considered suitable up till July 2019

- https://forms.tunbridgewells.gov.uk/_data/assets/pdf_file/0005/403187/CD_3.22b_SHELAA-Benenden-Site-Assessment-Sheets.pdf
Page 2 unallocated sites 158 and 222 are included in the map showing *Strategic Housing and Economic Land Availability Assessment. Regulation 18 Consultation. July 2019.*
- The Pre-Submission Local Plan (PSLP), in its section on Benenden, allocates Uphill as a site for development but inserts a Clause 8 requiring access through Uphill to the land behind (158) for development in the future. Yet, following 8 letters of complaint from Benenden residents in the centre of Benenden, this requirement is dropped from the next iteration of the Plan. If 158 is suitable for future development, why is it not allocated now? If an access road was required in the PSLP, why is it not required in the next iteration?
- In 2018 TWBC allocated 174 houses for site 158. This was announced at an April meeting of the Benenden Neighbourhood Steering Committee when the BNPs' lobbyist with TWBC (Tom Dawlings, Leader of the Council) said he would talk to the chief negotiator for site 158 in order to reduce the number of houses there and place more at the hospital. He said he would negotiate without disclosing the fact that TWBC was proposing 174 houses for his site. This was, in the view of a member of that committee (the organizer of the Friends of the East End - FEE - a group dedicated to ensuring that there is a balanced allocation of houses in Benenden), unfair to the landowner. The FEE organizer revealed the TWBC proposal to him, and to others, and was promptly fired from the BNP Steering Committee.
- Up till July 2019, TWBC maps of suitable sites in Benenden included sites 158 and 222. Both these sites had undergone previous sustainability assessments as they were both candidates in 2006 as potential sites for a new village primary school. (The issue went to a referendum in 2006 when the village chose site 158, but for unknown reasons, the school was built at another site.)
- The 2019 Local Plan lists reasonable alternative sites in Benenden Parish which includes 158, Land to the rear of Greenacres, The Street and adjacent to New Pond Road as suitable. But it is not allocated.

- Up till 2018, the chair of the BNP Steering Group expected some houses to be sited at 158 (also known as Greenaces). See an email from Paul Tollhurst, 21 April 2018, to the FEE organizer. *“For the Greenaces site adjacent to Benenden Village: Our objective is to have housing density in keeping with the village, reflecting what will be sustainable on a site which needs a buffer zone between it and the ancient woodland, and is on a significant slope.”* The implication appears to be that some housing is expected at 158, though fewer than the 174 suggested by TWBC planner.

Unsustainability of Benenden hospital sites

- *Table 33. SA scores of Potential Development in Benenden parish* shows the hospital sites (AL/BE3 & 4) score negative (red) for services, facilities and travel. *“Lack of services, facilities and travel options is a key issue for all development in this settlement and the sites in East End cause the score for Services and Facilities, Climate Change and Travel to be particularly negative overall. However, the education objective does not deteriorate when considering cumulative effects as the schools in Tenterden will be a viable option for residents in East End and thus are likely to take the pressure off Benenden Primary School.”* This last sentence is speculative. It is not evidence. The first sentence admits that the East End scores so badly on sustainability that it drags all Benenden sites down, if considered together. In spite of this, the East End is considered the right site for most housing.
- *Local Plan Appendix K Benenden Scores for Reasonable Sites in Benenden (part 1 of 2)* shows that site 158 & 222, once both considered for the site of the new primary school, are now labelled as lacking *“services and facilities including public transport at the settlement.”*
- Site LS 8 or AS_8 (Iden Green), also considered as a reasonable alternative, is not allocated. The scoring is questionable.

Summary

1. The SA does not appear to have determined the allocation of sites in the parish of Benenden.
2. Reasonable sites such as site 158, were expected to be development sites (even if only in the future) in the PSLP.
3. The hospital sites are acknowledged in the SA as being unsustainable.
4. Sites in the *centre of the village and in the centre of the village’s only hamlet* (Iden Green) are score poorly in the SA on services, facilities and travel.
5. Most houses are allocated to the hospital sites which score poorly for climate change, travel, equality, services and facilities.

11. Are the scores and conclusions reached in the Sustainability Appraisal reasonable, sufficiently accurate and robust to inform the submission version of the Local Plan?

Inaccuracy is evident in Benenden in the *SA of potential development sites*.

- In *Table 33. SA scores for allocation sites*, Hospital sites (AL/BE2 and 4) are on either side of rural lane, Goddards Green Road. They are almost identical. Both are made up of old sanatorium buildings with Local Wildlife Sites

surrounding those buildings, yet they are scored differently on **climate change, equality, travel, land use and landscape** (heritage scores differently because of the 1906 sanatorium building in BE3). These differences are difficult to credit, especially those relating to climate change, equality and travel. New development sites on either side of the road will have identical negative effect on climate change and identical negative effect in terms of failing to promote equality. The disabled and those requiring affordable housing on either side of Goddards Green Road face the same problem of no link to the 3- miles distant village - no footpath or bike link. There are no amenities at the hospital which has stated it will not open its buildings for public use, nor set up a shop. Further, there is no daily bus service at the hospital. In recognition of this, the LP suggest 40% affordable housing on one of the two small sites in the village (Uphill) and countenances the use of the village almshouses at the other village site (Feoffee) to offset affordability requirements at the hospital. As for travel, both hospital sites are identically distant from all facilities and services.

- Scores for unused but reasonable sites in the parish also suggest inaccuracy.
 1. LS 8 or AS_8, in the centre of the hamlet of Iden Green (with pub, restaurant, paved foot path to village, children’s play-ground, public tennis courts, community hall, nursery school, church and all only one mile from the village) is described as a “remote location” lacking services and facilities. (see SA of the Potential Development Sites Appendix K)
 2. Sites 222 (at the village cross roads a few yards from the village shop and daily bus services) and Site 158 (in the village heart and a few yards from the village shop daily bus services) are both described as lacking “services and facilities including public transport at the settlement.” (see SA of the Potential Development Sites Appendix K)
 3. See https://tunbridgewells.gov.uk/_data/assets/pdf_file/0005/343868/IssuesandOptions-PostConsultationFinal-minorupdates.pdf for sustainability objectives. Objective No. 2 is Biodiversity - to protect and enhance biodiversity and the natural environment. No. 4 is Climate Change - to reduce carbon footprints and adapt to predicted changes. No. 8 is Equality - to increase social mobility and inclusion. No. 17 is Travel - to reduce the need to travel in private vehicles. All these objectives are ignored in the allocation of development sites at the hospital.

(i) Biodiversity and Climate Change

Hospital development sites include wildlife sites listed by Natural England as high priority grassland habitat. Species rich grassland acts as a carbon sink comparable to the effect of rain forests. The plan proposes to ‘protect’ these sites but Benenden hospital (with whom planners have held frequent discussions) uses the same word ‘protect’, by which it means, according to its comments on the Local Plan and its letter to the BNP Plan examiner, digging up such sites, building on the spaces where they once existed, driving heavy vehicles over such sites during demolition and construction and moving earth removed from such sites to an unspecified location. And all this, although there is no botanical evidence to suggest the re-location of wildlife sites is possible. In fact, the contrary is suggested. High Priority grassland sites are rare because it is rare to find land

which has not been ploughed or disturbed for a long period of time. The rare species found at this site, such as rare waxcaps, thrive only on land which has not been disturbed.

(ii) **Equality and Travel**

The disabled and those requiring affordable housing on either side of Goddards Green Road face the problem of no footpath of bike link to the 3- miles distant village and no daily bus service. There are no amenities at the hospital which has stated it will not open its buildings for public use, nor set up a shop. Possibly in recognition of this, the LP suggest 40% affordable housing on one of the two small sites in the village (Uphill), and countenances the use of the village almshouses at the other village site (Feoffee) to offset affordability requirements at the hospital. As for travel, both sites are identically distant from all facilities and services.

Documents:

1. SA of the Potential Development Sites, Benenden, Table 32, List of reasonable alternative sites in Benenden Parish
2. Figure 14, Map of reasonable alternative sites within Benenden Parish
3. Table 33 SA scores for allocated sites (including hospital sites AL/BE3 and 4)
4. Appendix K Benenden. Scores for Reasonable Sites in Benenden (part 1)
5. Ditto, part 2.

On line, you can find the scores for Benenden at

https://tunbridgewells.gov.uk/_data/assets/pdf_file/0004/387796/Sustainability-Appraisal-for-PSLP_compressed.pdf