

For the attention of Jennifer Begeman, Case Officer

Planning Application No. 24/00078/HYBRID: Hybrid application: Full application for the erection of 120 No. dwellings (Use Class C3), including affordable housing, landscaping, public open space, allotments, ecological enhancements, SUDs and access. Outline application (with all matters reserved) for 0.25 hectares of land for a new Medical Centre (Use Class E(e)) with associated access, parking and landscaping. | Bassetts Farm Goudhurst Road Horsmonden Tonbridge Kent TN12 8AS

We write in connection with the above planning application. The Parish Council has examined the plans and knows the site well.

The land at Bassetts Farm is identified as a strategic allocation for development in the Tunbridge Wells Submission Local Plan pursuant to policy AL/HO3.

We have considered the application carefully and wish to raise an objection and recommendation for refusal to the application as presented.

We have a series of significant concerns about the proposal, for the reasons outlined in this submission. As context, we are disappointed to note that the Horsmonden Neighbourhood Plan does not appear to have been fully consulted by the site promoter when putting their proposal together. This is the most recently adopted document in the Development Plan relating to Horsmonden parish and has been prepared following in-depth engagement with the community. As such, it presents a thorough description of how the community wish Horsmonden to evolve and a clear set of policies to enable this. The National Planning Policy Framework specifically advises that:

“Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers” (para 132).

This site presents an opportunity for the promoters to work with the community in line with the policies of the Neighbourhood Plan, underpinned by detailed design guidance, to bring forward a scheme that complements and enhances the local area. As presented, we do not believe this has been achieved and would urge decision makes to require this to be remedied before granting permission.

Within our response, we have set out recommendations for how the negative impacts of the proposed development might be amended or mitigated.

Reference is made to the relevant paragraphs of the NPPF, the saved policies of the Tunbridge Wells Local Plan 2006, the policies of the adopted Tunbridge Wells Borough Council (TWBC) Core Strategy (2010) and the policies of the Horsmonden Neighbourhood Development Plan, which was made in July 2023. Reference is also made to the emerging Local Plan although this is currently at examination and therefore carries limited weight in planning decisions.

We request the opportunity to address the planning committee when the application is determined.

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1. Principle of sustainable development of the site and limits to built development (LBD) including landscape and visual impact

- NPPF paras: 8, 69,
- Saved policies of the Local Plan (2006): LBD1, EN25, H5, H8
- TWBC Core Strategy (2010): CP1, CP6, CP 14
- TWBC Submission Local Plan: PSTR/HO 1, AL/HO 3, STR 1, STR 8, STR 10, EN10, EN18, EN19
- Horsmonden Neighbourhood Plan (2023): 2.1

Summary:

- 1.1. **No built development should significantly exceed the Limits to Built Development (LBD) as adopted.** We strongly object to the scheme as proposed, which seeks to bring forward built development significantly beyond the adopted LBD. Adopted and proposed development plan policies clearly focus development to within the LBD. The LBD adopted in the HNP is strongly evidenced. The applicant has not accurately referenced the adopted LBD in their plans and the plans should be reconsidered accordingly.
- 1.2. Whilst some level of development around the adopted LBD boundary may be appropriate from a design perspective, to break the development line fronting open countryside, the proposal seeks to use the 65m AOD contour line effectively as the LBD. This would be detrimental to the landscape and existing village character. It would also have a detrimental visual impact on the site when viewed from the High Weald National Landscape.
- 1.3. We would recommend the scheme is reviewed to restrict residential development to within the adopted LBD. This may require a reduction in overall housing numbers as discussed in Section 3 of this response.

Background:

- 1.4. Core Policy 1 of the adopted [Core Strategy](#) states that *“sites adjacent to or outside the LBD of villages will not generally be allocated or released”*.
- 1.5. This aligns with the statement contained in the [Limits to Built Development Topic Paper for Pre-Submission Local Plan](#): *“Generally, and subject to compliance with other policies in this Plan, there will be a presumption that the principle of proposed development such as infilling, redevelopment, and/or changes of use will be acceptable inside the LBD, while land and buildings outside the LBD will be considered as countryside where there is much stricter control over development” (p.1).*
- 1.6. It also aligns with SLP Policy STR 1 (The Development Strategy) clause 2, *“The Local Plan...looks to focus new development within the Limits to Built Development of settlements, as defined on the Policies Map, where proposals accord with other relevant policies of this Plan”*.
- 1.7. It is further supported by Policy 2.1 of the made HNP, which focuses development within the LBD, as defined in Figure 5 of the HNP:

Policy 2.1: Walkable village

Development proposals for new housing that are situated within the limits to development shown on Figure 5 and which are located within safe, walkable distances of the village services and facilities, will be supported.

- 1.8. The applicant's Planning Statement at p.4 states that "whilst the site is located outside of the current Limits to Built Development (LBD) of Horsmonden, and policy LBD1 of the Tunbridge Wells Local Plan 2006 looks to restrict development outside the LBD, the site is situated immediately adjacent to the LBD boundary and included within the LBD for Horsmonden in the Submission Local Plan (October 2021) and Horsmonden Neighbourhood Plan (as Made on the 5 July 2023)".
- 1.9. This statement is not wholly accurate. The site is not wholly included within the adopted LBD for Horsmonden. Rather it extends significantly north of the adopted LBD, particularly on the western part of the site.
- 1.10. The adopted LBD is not indicative, as is often referenced by the applicant. It has in fact been established in the HNP, as shown on *Figure 1* (the dotted pink line). It duplicates the LBD as shown in the TWBC SLP, which was informed by a series of evidence reports (see para 1.10) and has been adopted via the HNP in advance of the adoption of the SLP.

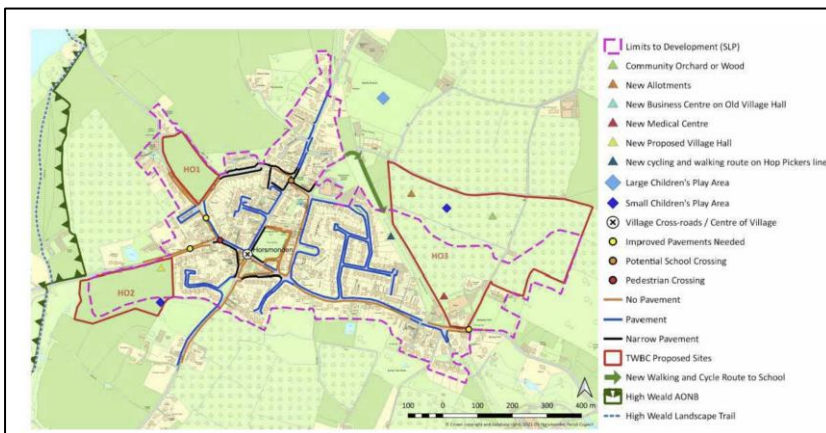


Figure 1: Map showing the adopted Limits to Built Development (source: HNP, 2023)

- 1.11. This adopted status is confirmed. The LBD was considered at the HNP examination where the extract (*Figure 2*) confirms that it has been defined by the HNP and hence forms part of the adopted development plan.

57. On that point I understand that the plan is proposing to use the limit to development around the village which is being promoted in the Submission version of the Local Plan, rather than the current boundary from the adopted 2006 Local Plan. However, that new plan has not itself been adopted as it is still at the examination stage. I will therefore be recommending that the neighbourhood plan should actually define the Limit to Development, shown in Figure 5, as its limit of development and if, as expected, the neighbourhood plan is made before the new local plan is adopted, it will become part of the development plan earlier.

Figure 2: Extract from the HNP Examiner's Report

1.12. The justification for the location of the adopted LBD is clear. It has been informed by the following evidence:

- [Limits to Built Development Topic Paper for Pre-Submission Local Plan \(2021\)](#) – the review of the existing LBD concludes, for proposed site AL/HO3 that: *“Incorporation of site allocation AL/HO 3 (land to the east of Horsmonden): the developable area of the allocation is to be incorporated, with the landscape buffers (where not enclosed by areas proposed for development), safeguarded land and land allocated for community use all excluded. This includes the extant outline planning application 15/505340/OUT for up to 30 dwellings at Bassetts Farm and the adjacent existing built development/cottages”*. The map contained in the document at page 47 clearly shows the ‘developable area’ of the site abutting the LBD.
- [Landscape Sensitivity Assessment of additional settlements in Tunbridge Wells \(2018\)](#) – Sub Area HO2 in the report largely relates to Policy AL/HO3. It is situated within the Horsmonden Fruit Belt. The study concludes that *“across most of the sub-area there is little scope for mitigation as any strategic development is considered likely to result in change that significantly detracts from valued landscape characteristics.”* Notably, this report refers to the Hop Picker's Line, the former railway line and wildlife corridor which bounds the proposed site on the western boundary. Paragraph 8 of the assessment states: *“Were development to take place to the east of the former railway line, it would be important to minimise any loss of integrity of the tree corridor that marks its route, which has value as an ecological and potentially a recreational resource, and which contributes to the wooded backdrop of the village in views from the north and west”*.
- [AONB Setting Analysis Report: supporting plans and photographs \(2020\)](#) – The northern areas of the proposed site allocation are considered to have medium sensitivity, meaning that development in this location without mitigation may harm the National Landscape (formally referred to as the AONB). The landscape buffer is shown on these maps (*Figure 3*).

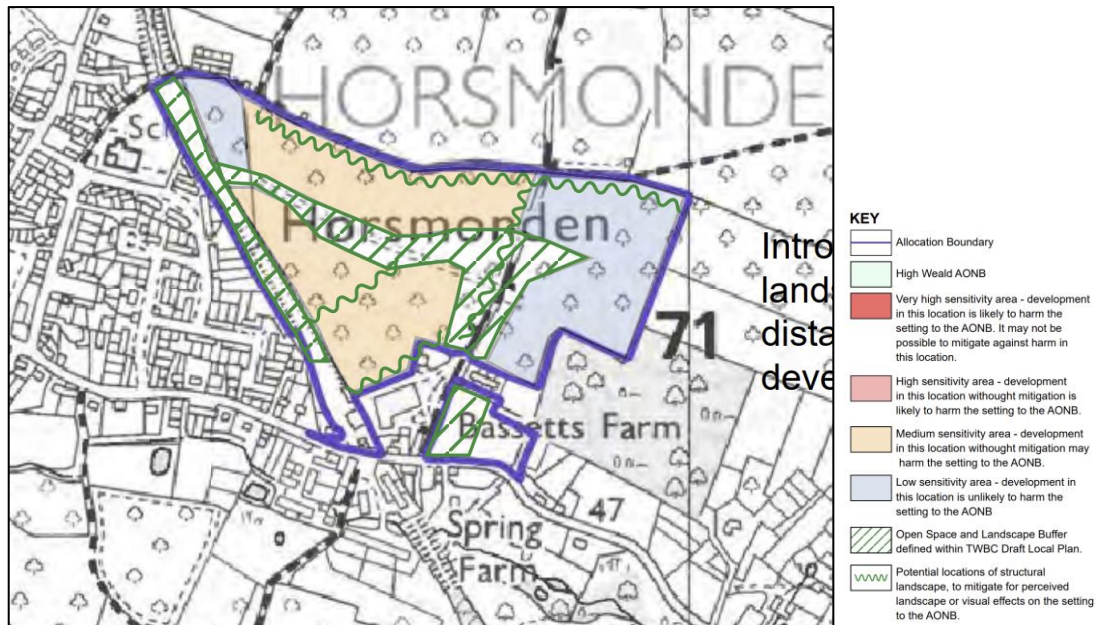


Figure 3: Extract from the National Landscape (AONB) (source: AONB Setting Analysis Report, 2020)

1.13. Whilst the SLP could still in theory amend the adopted LBD, this is considered unlikely. The SLP is currently at examination. [The Inspector’s Initial Findings Letter](#) (November 2022) raised several queries relating to the draft document. The minutes of the [Planning and Transportation Cabinet Advisory Board](#) (13 November 2023) records that a number of amendments to the strategy for the SLP are being consulted on from January 2024. None of these amendments relate to the sites proposed in Horsmonden, which means that it is unlikely that there will be significant amendments to the strategy for Horsmonden and its adopted LBD.

1.14. This is not to say that the LBD necessarily forms a strict line against which development must abut. As part of the examination of the SLP, [Matter 3 Issue 3](#) focused on the LBD aspect of the SLP. Question 4 discussed the appropriateness of the approach taken to define LBDs for site allocations. The record notes that *“it is considered that the approach to defining LBD boundaries, as set out in the [Limits to Built Development Topic Paper 2021](#)...will be effective”*. It also states:

“It is noted that the precise alignment of LBDs around development allocations may need to be refined as the Local Plan progresses and more detailed layout and design work is undertaken. If there is a need to further refine LBD boundaries around allocation sites as a result of more detailed work (e.g. through the planning application process), then this will be undertaken at the five year review of the Local Plan, in line with the NPPF.”

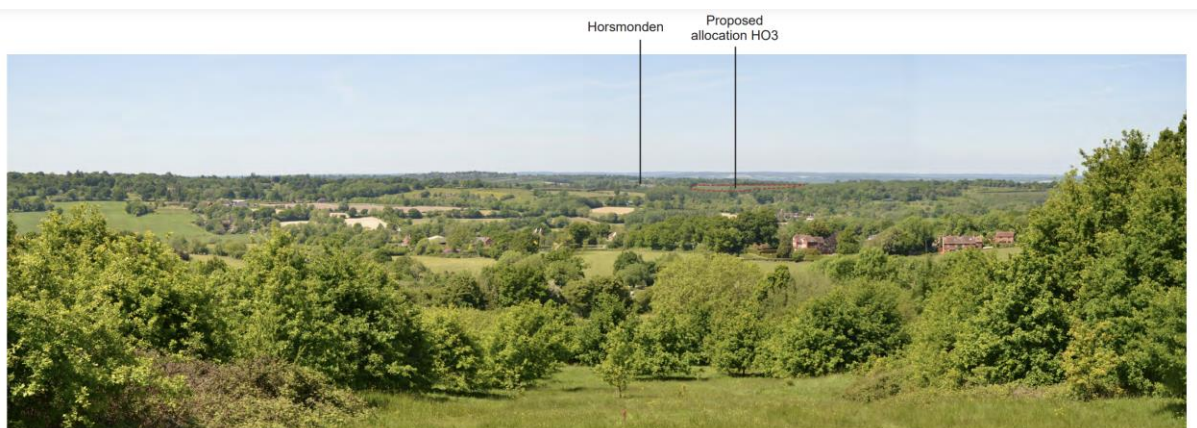
1.15. We acknowledge this more flexible approach as it allows for developments to be designed in a way that forms a more natural relationship between dwelling, street and open space, in line with local design guidance.

1.16. That said, it would appear that the applicant is seeking to effectively amend the LBD to extend the developable ‘residential use’ area of the site to align to the 65m AOD contour line, as set out in the Planning Statement:

6.2.26 In reviewing the extent of built development, the LVIA has tested the LBD as defined in the Submission Local Plan and made Horsmonden Neighbourhood Plan, and how these interrelate to the 65m AOD contour, given the manner in which the rest of the village appears to sit within this contour, and the lack of any defining features on site that help delineate the Limits of Built Development (LBD). Having done so it has become clear that whilst adopting the 65m AOD contour as a guide to the limits of built development would result in some parts of the development extending beyond the LBD as set out in the Submission Local Plan and 'Made' HNP, it would not, as set out in the LVIA, impact upon the setting of/ views from the AONB. Indeed, it makes for a more sympathetic and integrated development than that which would have arisen if the LBD proposed in the Submission Local Plan/ Made Horsmonden Neighbourhood Plan were adopted, as the development in effect sits within the envelop established by the current extent of built development in the village and thus looks and feels like a natural expansion of the village, set within the natural topography of the surrounding area and its associated landscape features.

1.17. We **strongly object** to development effectively seeking to utilise the 65m AOD as the LBD, in light of the impact that developing along this higher ground would have on the character of the landscape and existing village and the visual impacts as seen from the High Weald National Landscape. The adopted LBD, as described previously, has been identified following the development of a series of evidence documents, which demonstrate that the adopted LBD represents the most sensitive line at which development beyond it would have a detrimental landscape and visual impact.

1.18. Focusing on the visual impact, the development site is clearly visible from Goudhurst, which is located within the High Weald National Landscape, as demonstrated in the AONB Setting Analysis Report (*Figure 4*). Combined with the other evidence outlined in Para 1.10, *Figure 3* shows the most sensitive parts of the site, and the location of the landscape buffer, the southern boundary of which aligns with the adopted LBD.



Photograph H6 View north-west from a footpath on the northern edge of Goudhurst. There are distant views of site allocation HO3.

Figure 4: View of the proposed site from within the National Landscape at Goudhurst (source: AONB Setting Analysis Report)

1.19. That east-west landscape buffer links on the western side to the north-south buffer which follows the part of the former railway line (the Hop Pickers' Line). If the area used for built

form were to extend beyond the LBD at the northwestern part of the site, this ecology corridor linking the Hop Pickers' Line wooded area to the wider landscape buffer and the Community Use (open space) and the countryside beyond, would effectively be cut off.

- 1.20. The extent of built development within the site was considered at the Local Plan hearing (Matter 7, Issue 13). Para 56 of the [Hearing Statement](#) states that that the proposed area identified for residential use on the site reflects the constraints and opportunities for mitigation/ enhancement identified as well as design measures suggested by the AONB Setting Analysis Report to reduce the predicted effects on the setting of the National Landscape. This includes the promotion of a landscape-led approach to masterplanning that creates a structure to contain the allocation site area, which is consistent with the character of the adjacent High Weald National Landscape (reference: criterion (6) of Policy AL/HO3), and which should include testing of any impact of proposed development within site AL/HO3 from prominent viewpoint locations at Goudhurst located within the High Weald National Landscape.
- 1.21. Accordingly, the northern, higher parts of the site beyond the landscape buffer are to be used for open space community uses (for example, a community orchard, allotments) and not built form to reduce the impact of development upon the wider rural area, including views from the areas of higher land to the south of the site outside of the developed area of the village and including views from Goudhurst located within the High Weald National Landscape.
- 1.22. Notably, the [Landscape and Visual Impact Assessment Report](#) (December 2022) prepared by the applicant in their withdrawn application (23/00044/HYBRID) states at para 5.4.1 that *"the majority of the village sits at between 50m and 60m AOD"*.
- 1.23. Para 5.8.15 of that document states *"The proposed development respects the setting of the surrounding area and maximizes the value of existing vegetation. Due to the sensitively considered layout, with proposed development contained to the lower slopes, along with the introduction of large species tree lines breaking up built form and following contour lines, new development follows the existing village pattern of settlement across the hills at approx. 60m AOD, with the northern upper slopes retained as open space and still visible beyond in longer distance views from the edge of the AONB"* (underlining by author).
- 1.24. This is further emphasised in the applicant's [Landscape Statement](#) (Appendix 1), which was submitted as part of their comments on the Regulation 18 Local Plan:

6.4.2 Any proposed development should be informed by the characteristics and opportunities identified, taking into account the following recommendations:

- The location of proposed development areas should respond to the landscape features and characteristics that give the landscape its sense of place and local distinctiveness. For this reason, development should be kept below the 60m contour line in order to avoid breaking the ridgeline. A detailed topographical survey should be undertaken to inform the extent of the built development area and the ridge heights of proposed dwellings.

- 1.25. Intriguingly, the applicant's updated [Landscape and Visual Impact Assessment Report](#) (December 2023) submitted as part of the current application, has been amended with respect to its reference to the contour lines. It now states that *"the majority of the village sits at between 50m and 65m AOD" (5.4.1)*. In fact, whilst there is built form to the west of the village along these contours, the built form above 60m is neither visible from the application

site nor from Goudhurst. We therefore consider that using the AOB 65m line effectively as the LBD would be detrimental in terms of visual impact. This is in line with previous evidence prepared both for TWBC and by the applicant. We strongly object to the attestation that the revised LVIA assessment “is finer grain” than the wealth of evidence previously produced for the site. We consider that all the landscape and visual evidence gathered over the last 7 years must be considered equally and as such, the evidence in favour of the LBD defined and adopted by the HNP for the AL/HO3 site to the west of PROW 340A is strong and the LBD must not be significantly breached.

- 1.26. Whilst we appreciate that development may in practice extend in a marginal way around the adopted LBD - to enable a more gently designed boundary abutting open landscape - we do not consider the AOD 65m line to be an appropriate alternative boundary to the adopted LBD.

2. Location and delivery of the medical centre

- **NPPF paras: 75, 81, 100, 114, 116**
- **Saved policies of the Local Plan (2006): LBD1**
- **TWBC Core Strategy (2010): CP1**
- **TWBC Submission Local Plan: PSTR/HO 1, AL/HO3, STR 1, STR 4, STR 5**
- **Horsmonden Neighbourhood Plan (2023): 2.1, 4.1**

Summary:

- 2.1. **The location of the medical centre should be within the area zoned as ‘residential’:** We strongly object to the proposed location for the medical centre. The scheme should be amended to ensure that it is repositioned to accord with the policies of the HNP and the site allocation policy AL/HO3, i.e. that it is located within the part of the site zoned as Residential Use. This should be closely linked to the village centre.
- 2.2. **The medical centre must be delivered alongside the residential development:** We are concerned about the synchronicity between the residential areas being built out and the delivery of the associated medical centre. To ensure that the land for the medical centre is handed over to the NHS, and that the site does come forward within the proposed timeframe, we would consider that a suitable legal mechanism is put in place, for instance in the S106 agreement, to secure the delivery of land by Persimmon Homes on an accessible and serviced plot of land of 0.25ha. In combination with this, we consider that a planning condition should be applied stating that the medical centre development must begin within a timescale aligned to the delivery of the residential units, currently anticipated to be completed by 2028, to expedite the development without threatening its deliverability or viability. This approach is supported in the NPPF at para 81. In the event that this condition is not met, any further residential development on the site should be halted.
- 2.3. In the period before the safeguarded medical centre site is delivered, we consider that it would be sensible to apply a landscaping planning condition for this part of the site, setting out a suitable ‘meanwhile use’ for this land, such as a grassed and managed green space, so that it does not become an unkept untidy area in this development. The condition will need to set out the responsibilities and logistics relating to the management of this site.
- 2.4. In the event that the medical centre is not built out, the Parish Council would wish to be fully involved in discussions about the future use of that site and a condition applied to enable community use here related to health and wellbeing, as opposed to residential use.

Background

Location of the medical centre:

- 2.5. The need for a new surgery/medical centre was identified in the [TWBC Infrastructure Delivery Plan](#) (IDP) that supports policies in the SLP.
- 2.6. Accordingly, a requirement of SLP Policy AL/HO3 is that provision is made for the delivery of a medical centre. Criterion 4 of Policy AL/HO3 requires the doctor’s surgery to be strongly linked to the residential development (*“Residential development shall be located on the areas identified for residential and doctors surgery use on the site layout plan, with the exact location*

of the surgery to be determined having regard to accessibility to the main village and services, and landscape impact”). This means that it should be located within the area defined for residential development.

- 2.7. The provision of a health centre is supported by Policy 4.1 of the HNP. The importance of the location of this facility is further considered in the HNP, with an indicative location shown within the area assigned to residential within the site (*Figure 1*). This was informed following discussions with TWBC planning officers and the applicant, with consultants from AECOM commissioned to prepare Design Guidance as part of the HNP. AECOM’s work states that the *“medical facilities should be located in the southern part of that site as close as possible to the Goudhurst Road to facilitate easier access for existing residents with sufficient parking for people with limited mobility or driving from outlying areas such as neighbouring villages and staff”*. This is underpinned in HNP Policy 4.1 (New Medical Facilities). It also aligns with HNP Policy 2.1, which supports development that is within a walkable distance of the village.
- 2.8. We understand that the applicant proposes that land is set aside to accommodate the medical centre comprising a 710sqm building and associated parking of 16 spaces, including an ambulance bay.
- 2.9. The applicant’s planning statement states that *“whilst locating the proposed medical center centrally within the site was explored, this was felt to make it more remote from the village center and a location in the NW corner near to the primary school was deemed a more suitable location to create what in effect could become a community hub”*.
- 2.10. We **strongly object** to this proposed location of the medical centre. It does not accord with criterion 4 of SLP policy AL/HO3. This criterion requires the medical centre to be located within the orange ‘Residential Use’ area on the site allocation map and not the purple ‘Community Use’ area, which is specifically buffered to the development by open space.
- 2.11. The applicant seeks to position the medical centre adjacent to the ‘safeguarded land’ for future school expansion, describing this area as a ‘community hub’. The use of the phrase ‘community hub’ is considered to be misleading, as any built development (which would include the medical centre) within the purple ‘Community Use’ area (and incidentally within the green ‘Open Space and Landscape Buffer’) is not supported due to the landscape and visual impact in this higher part of the site.
- 2.12. Furthermore, built development in this location would reduce the overall footprint of open space and community provision provided for in the SLP.
- 2.13. In addition, as part of the discussions to inform the draft of Policy AL/HO3, a location close to an entrance into the site was considered most appropriate to reduce the amount of medical centre related traffic movements *through* the site. It is anticipated that the majority of people visiting the surgery are likely to arrive by car given that the practice will serve a wider rural area beyond the immediate village (confirmed by the Clinical Commissioning Group (CCG)) and in the context of a limited bus service. Further details are provided in the [Hearing Statement](#) (Matter 7, Issue 13), para 79 onwards.
- 2.14. Emergency access to the north-west of the site, where the centre is currently proposed, is very narrow, following a footpath and currently providing simple access to a handful of existing

cottages/houses. Accordingly, it will be necessary to ensure that this access will be adequate to serve emergency vehicles. This is discussed further in section 8 of this response.

- 2.15. A further consideration is the nature of the school expansion in relation to the proposed siting of the medical centre. Land (outside the applicant’s area) is safeguarded for such an expansion. While the nature of this is not clarified, it would be fair to assume that it will feature some level of natural play intended to be linked to the broader community uses and open space to the east. The location of the medical centre as proposed would block this access and uses.
- 2.16. The proposed area of residential and other built development (which would include the medical centre) within the site has been established following consideration of site constraints, including those contained on the Council’s GIS layers, as well as consideration of relevant evidence base documents, informed by officer site visits and discussions with the Council’s specialist Landscape and Biodiversity Officer and Conservation and Urban Design Officer. Further details about how landscape considerations informed the indicative site layout are set out in the [Hearing Statement](#), para 49 onwards, and heritage considerations from para 58 onwards.
- 2.17. The location of the health centre was discussed at the [Local Plan Examination hearing session for Horsmonden](#) (that can be accessed from 2hrs:35mins) on 5 July 2022. Officers confirmed that its precise location was not finalised and that this would be done through the masterplanning of the site as part of the planning application process. The Inspector agreed with this approach, however, he advised that Policy AL/HO3 should be modified to state that the medical centre will be delivered within the orange Residential Use area, as shown on the site allocation map (*Figure 5*) and not within the purple Community Use area.

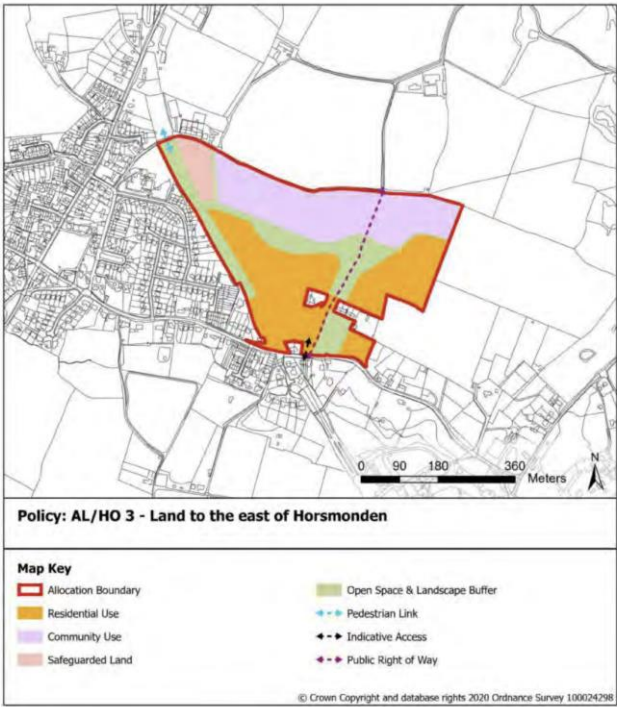


Figure 5: Site allocation map for AL/HO3 (SLP)

Delivery of the medical centre:

- 2.18. Criterion 14 of SLP Policy AL/HO 3 currently requires that “A suitable legal mechanism shall be put in place to ensure that the provision of the new health centre/doctors surgery is tied to the delivery of the housing, at a suitable stage of the development, to be agreed at the planning application stage”. This criterion is subject to amendment following the [Local Plan Examination hearing session for Horsmonden](#), where the Inspector recommended taking a more flexible approach within the policy itself.
- 2.19. It is noted the infrastructure provision within the Planning Statement details a minimum of 0.25ha of serviced land is set aside to accommodate a medical centre.
- 2.20. We understand that the land for the new medical centre is to be provided by Persimmon Homes for the NHS to develop. However it is not to be built out by Persimmon Homes themselves. This is established in the ‘outline part’ of this Hybrid application, with full details to be provided later in a separate application by the NHS.
- 2.21. We are concerned about whether, how and when the site will come forward. The proposal sets out that if the land is not called upon within 5 years, a contribution will be released for use in a medical facility within 5km of the site. We understand that the latest Housing Trajectory (December 2023) identifies the following for site AL/HO3: Delivery of 50 units in 2026/27 and 70 units in 2027/28; 20 units, subject to separate planning permission, phased for 2026/27.
- 2.22. The NHS Kent and Medway state the following in their formal response to the application (posted on the Planning Portal, 8 Feb 2024):
- *“It has always been highlighted and documented that more detailed discussions and assessment would be required for this area to define any future requirements. **It is noted that whilst this application has been submitted most of the housing growth proposed in the area is expected in the latter part of the plan period, based on the council’s housing trajectory**”*
 - *“...There is currently limited capacity within existing general practice premises to accommodate growth in this area and the need from this development, along with other new developments, **will therefore need to be met through the creation of additional capacity in general practice premises**”*
 - *“**At this early stage the more detailed assessment has not yet been undertaken** and therefore the position, as documented in the IDP, remains that land should be **safeguarded during the plan-period (to 2038)**. Should the land not be required an appropriate financial contribution towards general practice infrastructure would be required to mitigate the impact of this development”.*
 - *“It is noted the infrastructure provision within the planning statement details a minimum of 0.25ha of serviced land is set aside to accommodate a medical centre and that if the land is not called upon within 5 years a contribution will be released for use in a medical facility within 5km of the site. **The ICB will like to request an extended period of safeguarding the land for up to 7 years in line with the council’s housing trajectory.**”*

- 2.23. The statements highlighted in bold above are no longer correct. The most recent SLP Consultation Trajectory - "[*Updated Local Plan Housing Trajectory Dec 2023*](#)" - has moved the delivery of both AL/HO2 and AL/HO3 to 2026 to 2028 (and in fact the applicant's Energy Statement states that the early phases of the development will be prior to the Future Homes Standard being brought in, in 2025) - so delivery is no longer "*in the latter part of the plan period*". Hence the IDP relied upon by the NHS is out-of-date and therefore so is the NHS's expected timing to complete its "*more detailed assessment*".
- 2.24. The Parish Council is therefore concerned about the lack of synchronisation concerning the medical centre delivery (and indeed other parts of the IDP such as addressing the school expansion) with the site plans as submitted. Thus for any development on Bassetts Farm, timing needs to be tied to delivery of the medical facilities as per AL/HO3 Condition 14.
- 2.25. Furthermore, we would agree that a suitable legal mechanism is put in place, for instance in the S106 agreement, to secure the delivery of land by Persimmon Homes on an accessible and serviced plot of land of 0.25ha. In combination with this, we consider that a planning condition should be applied stating that the medical centre development must begin within a timescale in alignment with the delivery of the residential part of the site, to expedite the development without threatening its deliverability or viability. This approach is supported in the NPPF at para 81. In the event that this condition is not met, any further residential development on the site should be halted.
- 2.26. In the period before the safeguarded medical centre site is delivered, we consider that it would be sensible to apply a landscaping planning condition for this part of the site, setting out a suitable 'meanwhile use' for this land, such as a grassed and managed green space, so that it does not become an unkept untidy area in this development. The condition will need to set out the responsibilities and logistics relating to the management of this site.
- 2.27. Should the medical centre not be built out, the Parish Council would wish this site to be retained as a non-residential use (relating to community or health provision), which would align with the site allocation policy, in line with Clause 4 (d) of SLP Policy PSTR/HO 1.

3. Number of dwellings proposed on the site and associated density and housing mix

- NPPF paras: 61, 64, 128-130
- Saved policies of the Local Plan (2006): LBD1, H5, H8
- TWBC Core Strategy (2010): CP6
- TWBC Submission Local Plan: PSTR/HO 1, AL/HO3, H1, H2, H3
- Horsmonden Neighbourhood Plan (2023): 5.1, 6.1

Summary

- 3.1. **We object to the quantum of development proposed within the application.** The Residential Use footprint of the site is not accurately reflected within the proposal and does not accord with adopted policy.
- 3.2. **The overall number of homes should be reduced and the density of the site optimised,** which could also assist in delivering more effectively the identified housing mix as required by the HNP (focusing on smaller 1-, 2-, and 3-bedroom homes).
- 3.3. This would require a reconfiguration of western area as currently shown, making provision for the medical centre within the Residential Use area and to allow for a non-developed edge from the top of Orchard Crescent/School across the site.

Background

- 3.4. SLP Policy AL/HO3 supports development of approximately 115-165 dwellings on the allocated site as a whole. The footprint of the site allocated in the SLP, however, differs from the footprint of the site proposed by Persimmon Homes (*Figure 6*). This is because Persimmon Homes do not have control over the whole site.



Figure 6: SLP proposed site allocation compared to PH proposed site

- 3.5. The site relating to this application excludes:
 - The area safeguarded for the future expansion of the primary school
 - The path of the former railway line (the Hop Pickers' Line) (identified as parcel 108 in the SHELAA), which is allocated in the SLP as open space / landscape buffer alongside an element of residential development.
 - The area to the south west of the site (Old Station Garage) (allocated as residential).
- 3.6. The area designated as 'Residential Use' to the south east (parcel 82 in the SHELAA), east of the public right of way, does form part of the proposal. The western half of this parcel is

designated as local green space under SLP policy EN 15, the south eastern half as a large attenuation basin serving the development.

- 3.7. In light of the smaller footprint of the site proposed when compared to the actual site allocation in the SLP, it is logical that the proposed number of dwellings (115-165) as set out in Policy AL/HO3 would not be wholly deliverable from the Permission Homes application alone.
- 3.8. Moving the medical centre from the purple 'Community Use' area and into the orange 'Residential Use' area, as per the requirements of the site allocation policy and the advice of the Local Plan Inspector, would further reduce the footprint of the application site suitable for built development.
- 3.9. Within this context, the Parish Council has sought to calculate the quantum of development that might be achievable on the site footprint within the zone allocated for residential use. This has borne in mind the fact that:
 - HNP Policy 5.1 (Design of Development) requires proposals to apply the Horsmonden Character Analysis and Design Guidelines including respecting *"the scale, external appearance, height, form, layout/orientation and density of its parish context"*; and
 - SLP Policy AL/HO3 clause 8 requires *"built development on the eastern area of the site to be at a lower density and informed by a landscape and visual impact assessment"* (proposed to be amended to 'appropriate density' following the Local Plan hearings).
- 3.10. The existing densities of the various residential areas of the village are shown in *Figure 7* alongside the densities proposed on the western and eastern part of the site by the applicant.



Figure 7: Existing village densities (source: Design and Access Statement, p.20) with indicated densities for the development applied (author's own)

	Back Lane 25 dwellings @38dph
	Oast View 24 dwellings @19dph
	Orchard Crescent 46 dwellings @24dph
	Orchard Way 35 dwellings @17dph
	Orchard Close 13 dwellings @21dph
	Morley Drive 36 dwellings @40dph
	Hops Drive 49 dwellings @32dph
	Brenchley Road 63 dwellings @25dph
	Tanyard's Field 98 dwellings @circa 28dph
	Vidlers Field 22 dwellings @circa 22dph

- 3.11. Aside from the area near to Goudhurst Road, for which 20 homes are already approved, the proposal divides the remainder of their site into two residential parcels:
- 3.12. Tanyard's Field to the west is itself divided into two sections. The western section is proposed for 40 dwellings at a density of circa 32 dwelling per hectare (dph), and the eastern section is proposed for 58 dwellings at a density of circa 26 dph. Together these 98 dwellings average circa 28 dph.
- 3.13. For information, the 20 dwellings consented on the site frontage amount to circa 21.5dph.
- 3.14. Were the medical centre to be relocated to within Tanyard's Field, as required by the SLP and the HNP, and were the residential allocation restricted to largely within the LBD, as required by the adopted Core Strategy, the HNP and the SLP, the quantum of residential development would need to accordingly reduce in Tanyard's Field.
- 3.15. Applying a density of 26dph to the entire western part of the site would be more in-keeping with the surrounding residential densities, noting that the nearest housing areas are of a density of 24dph and 15dph respectively. This would align with the Horsmonden Design Guidelines and Policy 5.1 (Design of development) of the HNP. A suitable number of dwellings to accommodate within Tanyard's Field at such a density would be approximately 61 dwellings.
- 3.16. Vidlers Field: The eastern part of the site is proposed for 22 dwellings at a lower density of 22dph (para 6.3.13 of the Planning Statement). This aligns with SLP Policy AL/HO3 clause 8 and would be considered to be in-keeping with the prevailing local character of the village. It is noted however, that three dwellings in this area are shown outside the adopted LBD, therefore would need to be reconsidered.
- 3.17. Thus, within these parameters, a more achievable number of homes that could be considered would be approximately 103 dwellings (or 100 if the three dwellings proposed in Vidlers Field outside the LBD were removed), formed of approximately 61 homes on Tanyard's Field, 22 (or 19) on Vidlers Field, and 20 already with permission.
- 3.18. This would continue to fulfil the requirements of SLP Policy AL/HO3, particularly when added to any residential development coming forward in the south-western (the Old Garage) part of the site (which is outside the Persimmon Homes scope).
- 3.19. An option could be to optimise the density across the site by amending the housing mix across the site, notably in relation to size of homes (number of bedrooms). The Planning Statement

proposes that 66.6% of market homes on the site will be 4- and 5-bedroom homes (59.7% and 6.9% respectively) (Figure 8). No 1-bedroom homes are provided across the site.

	Market	%	Affordable	%	Total	%
2B	4	5.6%	29 ⁶	60.4%	33	27.5
3B	20	27.7%	17	35.4%	37	31
4B	43	59.7%	2	4.2%	45	37.5
5B	5	6.9%	0	0	5	4
Total	72	60%	48	40%	120	100%

Figure 8: Proposed housing mix (Planning Statement)

3.20. The applicant suggests that this is in line with adopted Core Strategy policy, however, this is not based on the most up-to-date housing needs assessments (as per the HNP). As a result, it is also contrary to the findings of the HNP, which clearly states the need for smaller, lower budget family homes in the parish:

“There is a significantly larger proportion of detached houses or bungalows in the parish (43.6%) compared with the borough (26.7%) and county (25.1%) and a slightly greater proportion of semi-detached houses or bungalows (34.2%) compared to the borough (29.4%) and county (30.5%). This means that there are fewer smaller properties such as terraced houses (12.7%) compared to the borough (17.9%) and county (24.8%), and even fewer flats proportionately (8.5%) compared to the borough (25.7%) and county (18.7%). This may also be linked to the low proportion of younger adults living in the parish and so the HNP makes provision for more smaller homes, in particular terraces and flats in the proposed new development”.

3.21. Policy 6.1 of the HNP specifically requires an appropriate proportion of smaller homes (1-, 2- and 3-bedrooms) to be delivered. There are no 1-bedroom homes proposed in the scheme and there is a question as to how the number of 4- and 5-bedroom homes as proposed will effectively address evidenced local housing need.

3.22. Reducing the size of homes (in terms of numbers of bedrooms) could potentially enable a greater number of dwellings to be delivered within the actual residential part of the site as shown in the site allocation policy. This would need to be carefully designed, however, so as not to negatively impact local character. Density concerns could be potentially alleviated through the sympathetic design of accommodation in accordance with the Horsmonden Design Guidelines and the High Weald Housing Design Guidelines (see Section 5).

4. Provision of affordable housing

- NPPF paras: 60, 64, 66, 128
- Saved policies of the Local Plan (2006): LBD1, H5, H8
- TWBC Core Strategy (2010): CP6, CP14
- TWBC Submission Local Plan: PSTR/HO 1, AL/HO3, H1, H3
- Horsmonden Neighbourhood Plan (2023): 6.1

Summary

- 4.1. **The tenure mix as presented does not align with the evidence prepared for the HNP:** Whilst we welcome the overall percentage of homes to be delivered as affordable homes, we are concerned about the tenure mix of these homes. There appears to be no allowance for First Homes, which would potentially enable greater discounts to buyers, in particular those with a local connection to the parish or key workers. Additionally, bungalows (including market) have been identified as local need in the HNP for those wishing to downsize. Only four bungalows are provided and all as affordable products.
- 4.2. **Affordable homes are not tenure blind, nor are they adequately distributed across the site:** We also object to the distribution of and design of the affordable homes element. These are considered to be neither 'tenure blind' nor evenly distributed across the development. This is contrary to design guidance and is picked up further in Section 5 of this response.

Background

- 4.3. The application proposes that 40% of the dwellings will be delivered as affordable homes. This equates to 48 homes at the proposed quantum of development. This is in excess of the requirement of 35% in Core Policy 6 of the adopted Core Strategy 2010 and in line with the minimum recommendation in SLP Policy H3. It also accords with Policy 6.1 of the HNP. As such, this is welcomed by the Parish Council.
- 4.4. The proposal states that the affordable homes will be designed to be tenure blind and evenly distributed across the development. We strongly object that this is the case. The affordable homes are clearly distinguishable on the site plan and in terms of elevation. The affordable homes have predominantly frontage parking units (only six of the units are on-plot, presumably the Shared Ownership provision), compared to private dwellings providing predominantly on-plot parking.
- 4.5. The presence of long runs of semi-detached and terraced affordable homes with frontage parking results in some street frontages being very dominated by parked cars with monotonous frontage behind. For instance, standing between proposed Plot 2 and Plot 66 and looking down the main spine road, would result in a view of up to potentially 40 parked cars.
- 4.6. Whilst we accept that the affordable housing mix tends to smaller, more compact properties (e.g. semi-detached and terraced) and the management of such properties encourages a level of clustering, every affordable property has more or less the same elevational treatment with no variation and the same configuration of parking. We consider that this negatively impacts the streetscape and social integration and does not conform to the requirements for mixed and sustainable communities. It does not accord with SLP Policy H3, which states that *"Affordable housing must be well integrated into the development: integration, together with the application of high quality design, use of good quality materials, and landscaping, should*

mean that the affordable housing is not visually distinguishable from the market housing (see Policy EN 1: Sustainable Design)”. Further information on design and character is presented in Section 5 of this response.

- 4.7. To inform the HNP, a local housing needs assessment was carried out by the Rural Housing Enabler in March 2020. 1,075 surveys were distributed with 307 surveys being returned, representing a 29% response rate. The survey identified a need for 18 affordable homes, made up of 7 single people, 4 couples and 7 families, as well as a number of homes for older people. This would potentially not be delivered via the site as proposed, notably the family-sized affordable homes.
- 4.8. In terms of tenure, the study also identified an interest in shared ownership as well as discounted market sale, although only a shared ownership option was found to be affordable to the households in question. This study was undertaken in advance of the introduction of First Homes.
- 4.9. Whilst the affordable homes tenure split is still to be agreed, the layout caters for 60% affordable rent: 40% shared ownership. The TWBC [Review of affordable housing needs in the context of ‘First Homes’](#) notes that consideration should be given to the pricing of products such as discounted market sale (including First Homes) to ensure they are affordable in a local context.
- 4.10. Within the development, there is no provision for First Homes and this should be addressed, as it could assist local people in accessing housing in light of the greater discounts that are possible. Government guidance suggests that the first 25% of all affordable housing quotas should be delivered as First Homes.
- 4.11. In terms of integrating such affordable homes, it is our understanding that shared ownership properties are often seen as easier to integrate with private, but First Homes can also provide a good solution, encouraging greater variety in type and size. Some developers are providing 1-bed houses as First Homes, which creates variety in streetscene. Bearing this in mind, and in the context of potentially exploring routes to optimise density (as required by the NPPF), we would encourage the provision of at least some 1-bedroom houses/maisonettes as First Homes to reduce the ‘footprint’ of affordable land-take whilst still broadly preserving private mix.
- 4.12. There is also provision for only four bungalows, despite this being considered a particular need in the HNP (Para 1.76 and Policy 6.3) to enable downsizing. All of these are provided as affordable homes. In addition to these, provision of market bungalows needs to be included, a need evidenced in the HNP for those wishing to downsize locally (but who do not require or qualify for affordable housing).

5. Design and Character

- NPPF paras: 96, 97, 111, 114, 116, 123, 128, 129, 130-137, 139, 159, 160, 162, 182
- Saved policies of the Local Plan (2006): LBD1, TP5, TP9
- TWBC Core Strategy (2010): CP1, CP3, CP5
- TWBC Submission Local Plan: PSTR/HO 1, AL/HO3, STR 1, STR 2, STR 6, STR 7, EN1, EN2, EN3, H1, H2, H3, TP3
- Horsmonden Neighbourhood Plan (2023): 2.1, 2.2, 2.6, 2.7, 5.1, 6.1, 6.3, 7.2, 7.4
- Horsmonden Design Guidelines
- High Weald Housing Design Guide

Summary:

- 5.1. **The application fails to adequately adhere to the Horsmonden Design Guide, as required in HNP Policy 5.1.** We strongly object to the proposal on the basis that it is not well designed and fails to adequately reflect local design policies as required by national policy. The community has an adopted neighbourhood plan, which clearly sets out design expectations by way of the Horsmonden Design Guide. In addition, the setting of the development means that the High Weald Housing Design Guide should be carefully consulted and reflected. We do not consider that adequate regard has been given to either document. This would need to be addressed through a redesign of the scheme, taking into account our previous comments relating to the residential footprint available within the adopted LBD, which also needs to incorporate the medical centre. We are disappointed that comments made at the public consultations do not appear to have been reflected in the overall site design.
- 5.2. **The open space/ landscape buffer to the west of the footpath directly north of the Bassetts Villas (non-designated heritage asset) has not been included in the proposal.**

Background:

- 5.3. The Planning Statement sets out that the appearance of the proposed dwellings is informed by the traditional vernacular of Horsmonden, incorporating the design guidance of the Horsmonden Neighbourhood Plan, to ensure that the development will be in keeping with local character. This has led to the introduction of two character areas – Tanyard’s Field and Vidler’s Field.
- 5.4. Tanyard’s Field is situated in the western portion of the site. The proposal states that it will, given its proximity to the former railway line and terraced cottages on Goudhurst Road, encompass slightly higher density housing. This will include a mix of terraced and semi-detached properties, with brick and clay hanging tiles and the occasional white weatherboarded focal properties with frontage, as well as either courtyard or on street parking.
- 5.5. Vidler’s Field is situated on the eastern portion of the site. The proposal states that it will reflect the lower density properties and characteristics found around The Green in Horsmonden. This will include detached and semi-detached properties encompassing brick and clay hanging tiles and the occasional white weatherboarded focal properties, with distinctive white picket fencing and frontage, as well as side parking.
- 5.6. We have the following comments:

- 5.7. The Heritage Statement paints a picture of the rural heritage of the parish, which has evolved over centuries around farming, notably hops, with the presence of typical Kentish Farmsteads. Typical characteristics of some of the older dwellings in the area include features such as hipped / half-hipped plain tiles on oldest, gables from 19th century, a predominance of buildings with tile hangings and some weatherboarding, and gable end chimneys.
- 5.8. National policy, at para 132, states that “neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers”. In Horsmonden, this is achieved by way of the HNP policies relating to design and character, which are underpinned by the Horsmonden Design Guidelines.
- 5.9. Policy 7.2 of the HNP seeks to protect important local views, stating: “Development must not cause any loss or diminution of historical or significant view into and out of settlements.” Aside from views onto the site from the High Weald National Landscape, for instance from Goudhurst, three significant views have been identified that need careful consideration within the design of the application (Figure 9). Views 6, 7 and 13 in particular include Bassetts Villas (non-designated assets) within their scope. The design of the scheme needs to be amended to take account of this.

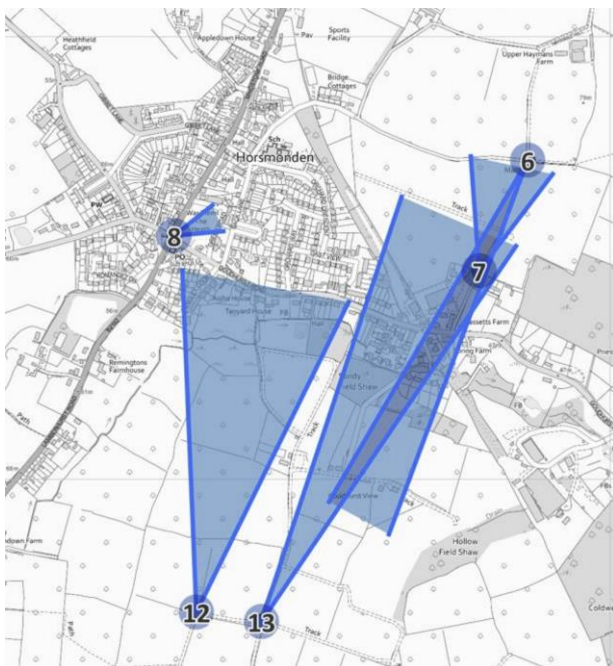


Figure 9: Significant views identified in the HNP (Views 6, 7 and 13)

- 5.10. From a heritage perspective, the proposal seeks to site eight dwellings to the west of the footpath located to the east of Bassetts Villas, which are non-designated heritage assets. This is not in accordance with the site allocation policy in the SLP, which requires a landscape buffer in this location, to the west of the footpath. This is shown on Figure 10. The plans should be amended to incorporate this buffer, which would assist in preserving the setting of those heritage assets.

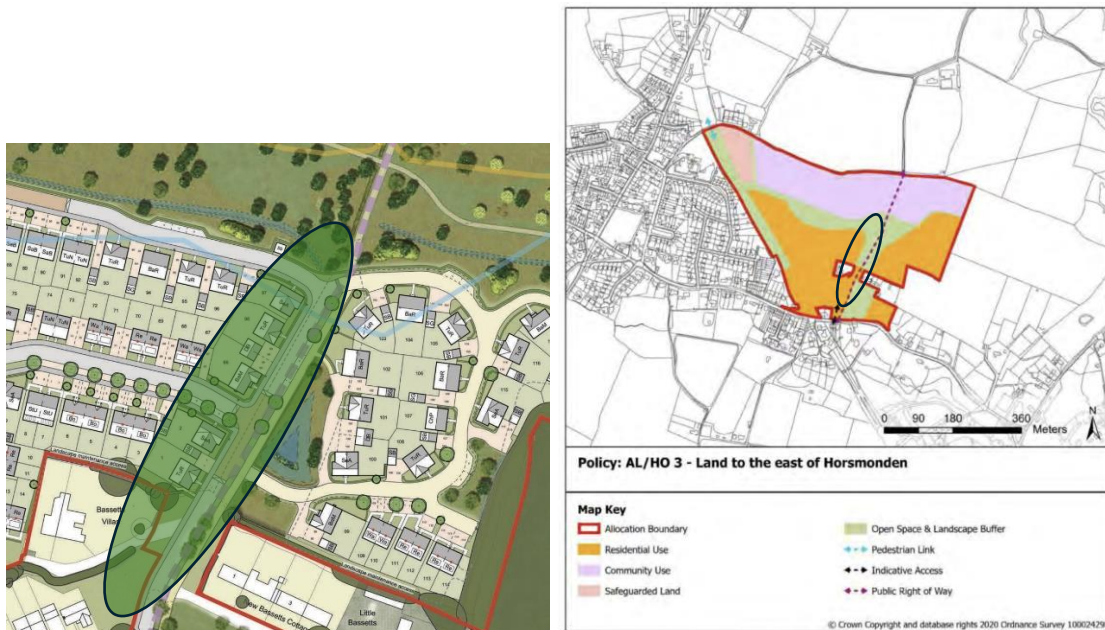


Figure 10: Image showing area (within the oval area) where landscape buffer should be placed (left), as per SLP site allocation policy (right)

5.11. In terms of conformity with the Horsmonden Design Guidelines, we have the following comments:

- Para 3.2.4 states that *“the use of a repeating dwelling type along the entirety of a street should be avoided”* and that *“boundaries, such as walls or hedgerows whichever is appropriate to the street, should enclose and define each street along the back edge of the pavement”*. This is not achieved, notably where long runs of identical affordable properties are set behind frontage parking and no street enclosure is possible.
- Para 3.2.6 states that *“monotonous building elevations should be avoided, therefore subtle changes in roofline should be ensured”*. Again, the affordable homes layouts do not achieve this as presented.
- Para 3.2.7 suggests that sash windows and bay windows are typical of the local vernacular. These are not shown anywhere in the application. The four or five different window types shown across entire application would be improved with greater variety (which could be as straightforward as different glazing bar configurations).
- Para 3.2.8 states that *“when placing parking at the front, the area should be designed to minimise visual impact ... keep a sense of enclosure and break the potential of a continuous area of car parking in front of dwellings by means of walls, hedging, planting and use of differentiated quality paving materials”*. Whilst we acknowledge that surface finishes are varied in places, we consider that more could be done to break up parking and create better street-edge enclosure thus reducing the urbanising overall effect.
- Para 3.2.11 reinforces that buildings should be individual and demonstrate variety, linked by character as opposed to typology. We consider this to mean unified as opposed to uniform and the application should better reflect this.

- Para 3.2.12 considers sustainability and eco-design. It states that *“the aim of these interventions is to reduce overall domestic energy use”* and such features *“should be designed to reduce their visual impact”*. We would strongly encourage the use of alternative, less visually impacting measures to reduce energy use, for instance fabric-first improvements and ground and air source heat pumps, even in preference to solar panels, which can be unsightly unless integrated into the application at the outset. Where solar panels are used, these should be required on all properties, including affordable homes.
- 5.12. The location of the site is within the setting of and clearly visible from the High Weald National Landscape. Design guidance relating to the High Weald is therefore relevant. In terms of conformity with the High Weald Housing Design Guide (HWHDG), we do not consider that the design as currently envisaged meets requirements, for instance:
- Page 18 of the HWHDG states that *“modern or generic approaches to highways design are especially harmful to the High Weald’s character and identity, and care should be taken to design new streets in housing schemes so they reinforce the identity of the area, and appear as rural streets and lanes, not urban or suburban housing estate roads”*. Housing development that is *“dominated by excessive and unnecessary pavements and hard-surfacing – not appropriate”*. The predominance of cars in some parts of the site would be contrary to this principle.
 - Pages 19-22 emphasise the importance of street hierarchy, of which we consider the site to show little regard. Street enclosure is fairly poor in all areas, by either soft landscape or dwelling frontage, and overly dominated by urbanising features, for instance wide constant width carriageways and attached footways with no interim verges to the carriageway or margin to dwellings (public realm or private front garden). Furthermore, the provision of parking forward of the building line arranged perpendicular to street creates a rhythm of cars rather than traditional rural features (front boundaries, gates, gardens, dwelling projections).
 - Page 30 seeks to ensure *“integrating parking into design”*. We consider that on-street parking should be provided parallel to carriageway, and on-plot parking between dwellings, ideally as 1 x car width (not 2 x car width, or 4 x car width as in some instances on the site). The layout as currently imagined is overly car dominant and detracts from the rural village character. It also reduces the natural landscaping in preference to hard-standing driveways.
 - Page 31 specifically states that frontage parking should be avoided due to the harm caused to street enclosure. This is reinforced by the HDP and Design Guidance yet does not appear to have been followed in the design as shown.
- 5.13. Elevations: The Planning Statement suggests that the residential areas will generally comprise 2-storey dwellings, with a small number of 2.5 storeys dwellings located at focal points within the development. The cross-section imagery provided suggests that the ridge line of the proposed dwellings will fall below the brow of the hill to the north (along PRoW WT341), in order to limit the visual impact of the development on the wider landscape and views of and from the National Landscape would be retained and celebrated. We wish to object to this statement; as previously set out in our response, the applicant has taken the 65m ridgeline to be the prevailing height of the existing village. This is not considered to be correct and is contrary to a range of local evidence (para 1.10) and previous information provided by the applicant, including at the Regulation 19 Local Plan Hearing. Certainly, the proposed location for the medical centre – which we dispute – sits well above the adopted LBD, which is the boundary line that should be used to direct development (as well as within the area zoned for

community use). It is concerning that few of the applicant's maps make reference to the adopted LBD. Where reference is made, it is to an 'indicative' line yet to be adopted, which is incorrect.

- 5.14. There is overall, a very limited selection of street elevations shown in the documentation – just four different areas of the site, with all looking to be the same elevation. The images do not show any of the affordable housing runs at all, which we consider to be the worst performing against the adopted design guidance.
- 5.15. Within the overall design, as shown in the Storey Height Plan, there is one singular 2.5 storey height house. This is suggested as a focal point but appears to be included purely to add to bedroom numbers and should be omitted as it serves no other purpose. It is completely out of character when compared to the rest of the development.
- 5.16. There is a total of four bungalows in the whole proposal and they are in the form of two semi-detached units. Whilst we are content that the bungalows are appropriately positioned in front of Bassetts Villas to minimise the impact and to work with the topography, the lack of provision of 1-story homes sits against the needs of the village, as evidenced in the HNP. Para 1.76 of the HNP, for instance sets out that *“future development in the parish would need to include more smaller homes including semi-detached and terraced homes, bungalows and apartments rather than larger detached homes as set out in Policy 6.1.”* If more 1-storey dwellings were to be incorporated, which we would strongly encourage, these should be positioned along the northern boundary to have a lesser impact on wider open landscape.
- 5.17. Finally, the Design and Access Statement states the semi-detached buildings as 'wide' in plan rather than 'narrow' in plan. This is not replicated on the site plan, which shows all units being narrow in plan and thus increases building form and heights, resulting in an overall urbanising and 'uniform' nature.
- 5.18. Affordable housing design: The Design and Access Statement states that the 48 affordable homes are to be pepper potted around the site, with a mix of parking treatments, to ensure that the layout is tenure blind. As expressed previously in our response, we strongly disagree that this is the case. Our view is that the design of the affordable homes is extremely limited in terms of their palette of details and materials – largely confined to red brick, clay rooves, open eaves, arches, stone cills, string courses and projecting plinth courses – all the affordable houses look largely the same, only varying sometimes in plot width. As noted previously, this does not support the need for them to be tenure blind. We do not believe there are sufficient affordable properties, for instance, that feature weather boarding, which is a notable character feature in the village as a whole. It is currently used on one type of detached property. Applying features like this to the affordable homes would help to improve tenure blindness.
- 5.19. Whilst it is appreciated that the management of affordable homes can influence the need to cluster them, we consider that much more could be done to integrate the affordable homes into the proposed streetscapes, for instance by varying the materials used, the eaves heights and the parking configuration to bring these dwellings closer to street edge and break up the linear frontage.
- 5.20. Private dwelling design: There is somewhat more variety in the design of the private dwellings, however ultimately the same details are copied and pasted around the site, for instance the

same roof pitches and same patterns of fenestration. No bay windows appear to be introduced, again a typical design feature characteristic in Horsmonden. Whilst the affordable homes are all of brick, only six of the private units are, demonstrating the lack of integration across all housing tenures.

- 5.21. Materials and features: The Heritage Statement Report acknowledges the importance of the rich agricultural heritage to the site and wider context. This should be reflected in the materials and features used across the site within the built and natural environment.
- 5.22. The use of tile hanging and weatherboarding does reflect the local context and there is a fairly good use of picket fence/non-standard front boundaries, but additional 3D visualisations are required to assess the overall quality and composition, particularly the longer terrace/frontage parking areas. Whilst the corners around the higher-value plots are illustrated well, it is unclear as to the materials, design and layout of the main movement corridors. This is particularly concerning in respect of the parking arrangements for the affordable homes, which appear to contribute to a very car-dominated streetscape.
- 5.23. There is little imagination on the eastern parcel where every single unit is treated in brick and tile hanging. As above, all the affordable housing is not tenure blind as they all comprise brick with clay roofs. There should be a mixture of tile hanging or boarding introduced to tackle this.
- 5.24. Street Scenes: Four street scenes have been shown, which are not considered to be representative of the site when viewed as a whole. The text describes different areas of density, but there are no images to show the dense housing along the spine road and towards the west of the site. We also note that the car ports are shown as being the same size as the garages – we are unclear as to whether this would be acceptable in planning terms, where adopted parking guidance suggests that garages used as parking spaces must be at least 5.5m x 2.6m. This point is expanded in para 5.31.
- 5.25. Boundary treatments: All public realm rear garden boundaries are shown as timber fencing. The Horsmonden Design Guidance recommends not using “panel fencing”, rather it suggests that soft landscaping and planting with brick walls would be appropriate. This should be amended.
- 5.26. The site boundary itself is shown as comprising a 1.2m post-and-wire fence with a hedge, which is not considered a locally acceptable, fully natural edging to broader the open space.
- 5.27. Greenery within the streetscape: Whilst the use of street trees is much welcomed, the amount of streetscape greening generally is considered to be at a bare minimum. It is also unclear whether the tree positions shown in the diagrams are actually deliverable outside of highways visibility splays and lighting column positions. The loss of street trees to later technical constraints is a major concern.
- 5.28. Chimneys: The design incorporates a large number of chimneys, but few are working, hence this is included purely for aesthetic purposes. Where these are included, they should be of brick-slips to match facing materials, not moulded glass reinforced plastic.

- 5.29. Car-dominance: We consider that the site has been very clearly designed around highway movement as opposed to considering (and ideally prioritising) the pedestrian and other users. This is contrary to Policy 2.2 of the HNP, which seeks to ensure that development is “*designed to minimise traffic speeds within new residential development*”.
- 5.30. More could be done to break up the road edge to improve traffic calming and respect natural edges, for instance the use of pinch points, localised narrowing, green build-outs, better integrated parallel parking, etc.
- 5.31. The wider connectivity plan is loosely replicated in the final site plan but seems to lose the importance of green avenues breaking up different residential parcels and these have instead been filled with more houses.
- 5.32. Parking provision: The proposed development seeks to align to TWBC parking requirements as set out in Policy TP3 of the SLP. This aligns with Policy 2.7 (New Parking) of the HNP (*Figure 11*).

Parking standard definition (average)	Minimum
1 Bed Flat	1
1 Bed House	1
2 Bed Flat	1.5
2 Bed House	1.5
3 Bed Flat	2
3 Bed House	2
4+ Bed Flat	2
4+ Bed House	2.5
Additional Visitor Parking	0.2 per unit

Figure 11: Parking provision requirements as per HNP

- 5.33. In fact, the application goes above the minimum requirements, proposing that each dwelling will be provided with two parking spaces and secure cycle storage provision for at least two bikes, whilst visitor parking will be distributed across the site to ensure an even spread of provision. This represents an over-delivery against the minimum parking numbers, which could result in a proliferation of parking spaces in the streetscape (i.e. 2 spaces with 1 carport for a 3-bed is 150% of minimum). Whilst adopted policy does not specifically reference allocated or unallocated (or ‘independently accessible’ as some policies require), any additional parking provided over the minimum requirement might be better as unallocated off-plot, parallel on-street bays (incorporating localised narrowing, raised tables, green build-outs, etc.) to minimise harm to streetscape.
- 5.34. It is noted that the car ports to be provided are shown as the same size as the garages. As stated previously, parking provision in Tunbridge Wells does not accept garages as parking spaces unless they are 3.6m x 7.0m. To comply with these standards, the applicant appears to have discounted the car ports/garages and given additional spaces. Taking plot 106 as an example, this should have 2.5 spaces as per the parking requirements, but in fact has four including the garage. This serves to make the site look significantly more urbanised and increases the hardstanding/paved areas to enable a car port to be shown.

- 5.35. The visitor/unallocated parking spaces have been identified as spaces for particular plots, which is contrary to the purpose of unallocated spaces, which should be available to anyone so that people do not have to park on the roads. One could argue that if that unit uses the unallocated space as highlighted on the 'unallocated parking plan' then you will still get people parking on the road, adding to the urbanised nature of the development. The location of the visitor/unallocated spaces is also considered to be very impractical. Not only are they extremely visible from the open space to the north of the site when looking back at the development, but the spaces are also a significant distance from the intended houses. An example is plots 21-25, which share a space that is approximately 100m away from plot 21.
- 5.36. Overall, we consider that the applicant has not embedded the principles of the local design guidance within the scheme and this needs to be redressed.

6. Provision of green space and associated landscape management and maintenance

- NPPF paras: 96, 100, 102, 131-137, 139
- Saved policies of the Local Plan (2006):
- TWBC Core Strategy (2010): CP4
- TWBC Submission Local Plan: PSTR/HO 1, AL/HO3, STR 2, STR 5, STR 8, EN1, H1, H2, H3, TP3, OSSR2
- Horsmonden Neighbourhood Plan (2023): 2.2, 4.2, 6.3, 7.5
- Horsmonden Design Guidelines
- High Weald Housing Design Guide

Summary

- 6.1. **Management of open space:** The Parish Council would welcome discussions to clarifying how the public open spaces will be managed through terms in an s106 agreement and a Landscape and Ecology Management Plan.
- 6.2. Landscape maintenance access areas should be closed off from access as these will be without natural surveillance and could be a problem for loitering/rubbish.
- 6.3. Ultimately the Parish Council would wish to ensure that open spaces are fully recognised as Local Green Space under SLP policy EN 15. This would be achieved as part of the review of the HNP or as part of the early review of the Local Plan.

Background

- 6.4. The northern, higher parts of the site to be used for community uses and not built form, would reduce the impact of development upon the wider rural area, including views from the areas of higher land to the south of the site outside of the developed area of the village, including views from Goudhurst.
- 6.5. Policy AL/HO3 refers to *“a community orchard and open space”* and Criterion 13 of the policy requires the development to *“provide on-site amenity/natural green space and children’s and youth play space, and a community orchard that will be managed and maintained for this use”*. It is understood that following the Stage 1 hearings, the Inspector has recommended that the policy should be less prescriptive, to allow for a wider range of uses consistent with community and open space provision can be brought forward.
- 6.6. Policy 4.2 of the HNP sets out that land should be set aside for allotments within the Bassetts Farm/ Land east of Horsmonden Development (AL/HO3) and made available to the new and existing residents. The allotments should have sufficient parking provision for allotment holders and mains water. This will address the absence of allotment space in the parish.
- 6.7. HNP Policy 4.3 supports the provision of on-site children’s play facilities for sites of 50+ homes and a contribution to fund additional recreational activities at the Recreation Ground.
- 6.8. The open space provision is proposed for the following uses: community orchard to the northeast, a large wildflower meadow within the northern part of the site which will encompass the proposed play areas, allotments to the north west, the retained orchard to the south (adjacent to Goudhurst Road) and tree belts and pockets of amenity space within the residential area.

- 6.9. As previously stated, the Parish Council **strongly objects** to space allocated in Policy AL/HO3 as for 'community use' being taken over to built development. The overall quantum of open space development will therefore need to increase in the proposal.
- 6.10. Clarity will need to be sought as to how the proposed open space provided at the site will be maintained, who will be responsible for this and how it will be managed in the future. At a meeting on the 19 December 2023, the Parish Council discussed options including: TWBC adopting and managing these unusually large areas of public open space; or the developer setting up a maintenance company with the cost of the maintenance being borne by the new houses; or the Parish Council taking over responsibility.
- 6.11. TWBC officers advise that green spaces are typically secured under a Landscape and Ecological Management Plan that is for the lifetime of the development. It sets out prescriptions and objectives for ongoing management including community engagement. Implementation is by the developer and future management by a management company funded by a management fee from the new residents. This can be covered by condition and/or legal agreement (s106). The Council generally seek to have residents on the board of the management company and will require or have the right to require a monitoring report submitted for approval. Any changes to the management plan have to be approved by the Council.
- 6.12. Further discussions about this would be helpful, including related to the legal conditions in any associated s106 funding, which would be put in place to protect the open spaces. This includes consideration of the landscape maintenance access areas, which are currently excluded from the maintenance plan. Horsmonden Parish Council would wish to be fully involved in these discussions as a key stakeholder.

7. Biodiversity net gain

- NPPF paras: 124, 180, 181, 182, 186
- Saved policies of the Local Plan (2006): EN13
- TWBC Core Strategy (2010): CP4
- TWBC Submission Local Plan: PSTR/HO 1, AL/HO3, STR 2, STR 5, STR 8, EN9, EN10, EN12, EN18, EN19
- Horsmonden Neighbourhood Plan (2023): 7.3, 7.4

Summary

- 7.1. A S106 agreement relating to biodiversity net gain provision over a 30-year period is required. The Parish Council would support a further uplift in BNG in line with the Kent Partnership Trust findings where this is viable. This may be achievable in light of the need to restrict built form to the areas zoned for 'residential use' on the site as discussed previously.

Background

- 7.2. The need to demonstrate a minimum 10% biodiversity net gain (BNG) became mandatory on February 12 2024. As such, BNG must be secured by s106 for a period of 30 years.
- 7.3. The applicant proposes a 16.49% gain on habitat units.
- 7.4. Whilst this meets the legislative requirements, we note that the Kent Nature Partnership (the KNP) is promoting the adoption of a 20% biodiversity net gain requirement across the county, and the Parish Council would support this. The KNP has undertaken a strategic level viability assessment for 15% and 20% requirements. The assessment has found that a shift from 10% to 15% or 20% biodiversity net gain will not materially affect viability in the majority of instances when delivered onsite or offsite. Further detail can be found in its report, [Viability Assessment of Biodiversity Net Gain in Kent – June 2022](#).

8. Traffic and movement issues

- **NPPF paras: 96, 97, 104, 108, 109, 111, 114, 115, 116, 117**
- **Saved policies of the Local Plan (2006): TP1, TP4, TP5, TP9**
- **TWBC Core Strategy (2010): CP3**
- **TWBC Submission Local Plan: PSTR/HO 1, AL/HO3, STR 2, STR 5, STR 6, TP1, TP3**
- **Horsmonden Neighbourhood Plan (2023): 2.1, 2.2, 2.3, 2.4, 2.6, 2.7, 2.8**

Summary

- 8.1. **Traffic impact and safety:** The Parish Council has significant concerns about the quantum of traffic that will stem from the development. The access road to the site (Goudhurst Road) is already experiencing significant traffic issues relating to quantity and speed. There is a concern that the additional traffic from the development will lead to safety issues.
- 8.2. **Improvements to the village centre crossroads and public rights of way:** It is proposed that the applicant will provide a proportionate financial contribution towards the delivery of the identified off-site highway works or undertake the works in agreement with KCC H&T via a Section 278 Agreement; the details of which will be agreed with the Local Planning and Highway Authorities prior to the determination of this planning application. The Parish Council would wish to be fully involved in these discussions, as per HNP policy 2.3.
- 8.3. **Emergency access provision:** There is a query over the suitability and ownership of this land that needs to be fully resolved prior to permission being granted.

Background

Number of vehicles – congestion and safety concerns

- 8.4. The application to develop Bassetts Farm is estimated by Persimmon Homes to:
- increase daily traffic by 1,325 between 7am and 7pm by circa 1,610 per weekday (40%).
 - increase peak traffic by about 70%.
- 8.5. Access to the site is derived from a simple priority junction with Goudhurst Road, which currently takes the form of a farm track. Goudhurst Road at the site access has a carriageway width of approximately 5.5m and is subject to a 30mph speed limit. The upgrading of this junction has already been approved (15/505340/OUT) and subsequently amended (21/02027/FULL).
- 8.6. The Parish Council commissioned an automatic traffic count most recently in July 2023, with the [report](#) bringing together data from previous counts over a two year period. These counts took place on the Goudhurst Road at the Bassetts Farm Entrance. The key conclusions set out that over the ten year period to 2023:
- car and Motorbike traffic at the village entrance/exit on Goudhurst Road has increased by 590 vehicles per weekday (20%) to 3,559 per day.
 - van and HGV traffic has remained about constant at 433 per day.

- morning and evening traffic now peaks at 65 to 75 vehicles every 15 minutes for more than an hour.
- queuing of 3 to 10 vehicles occurred 13 times within a 2-week period in July 2023.
- traffic speeds have not changed significantly with the 30-mph speed limit being exceeded by 75% of vehicles overall. This is made up of:
 - over 1,450 Eastbound vehicles per day (81%) exiting the village.
 - nearly 1,240 Westbound vehicles per day (69%) entering the village.
- 55 vehicles per day exceed 45-mph along this stretch of road.

8.7. An update to the traffic survey was prepared in February 2024 by the Bassetts Farm Forum. This has been separately uploaded to the Planning Portal (see Bassetts Farm Forum - Traffic Report, February 12 2024) and concludes the following:

- The conclusions drawn from the Horsmonden Parish Council July 2023 ATC Traffic Survey have not changed, and the concerns (described below) of the harmful impact that the application will have on village traffic and road remain.
- Over 2,690 vehicles per day exceed the 30-mph speed limit passing the site entrance, and 310 vehicles per day exceed the 40-mph. The junction is not designed for speeds of 40 mph or more.
- Peak traffic will increase by 50% at the site junction and 35% at the village cross roads, greatly increasing the risk of a serious accident.
- The ATC data set used for the Transport Assessment is unreliable. Using a single day as a basis to model this critical junction is unsafe.
- According to the Design Manual for Roads and Bridges the junction is unsafe unless an 85th percentile speed of 30 mph is constantly maintained.
- The application is proposing to add over 1,000% additional vehicle trips (pro-rata plus medical centre) to the already questionable junction. This represents a completely different set of design criteria for this junction compared to the 20-house development for which permission has been granted. If granted for access to an additional 120 houses, this junction would carry an extremely high risk to vehicular and people's safety, unless traffic speeds can be permanently reduced.
- The expected traffic activity for the application site is potentially underestimated by ignoring car trips required to the railway station. Inaccuracies in modelling may also contribute to The Application conclusion that there will be no queuing at the junction. Queuing was observed during the July 2023 ATC survey and has been since then.
- The application states that Goudhurst Road is 5.5m wide at the site junction and therefore even one parked vehicle on Goudhurst Road anywhere near the junction will have a significant impact on traffic queuing, the junction capacity, and an increased risk from shortened safe Stopping Sight Distances.

- Eight dedicated parking spaces for properties 2 to 5 Station Cottages plus at least two visitor spaces serving Station Cottages, Old Bassetts Cottages, and other site visitors are essential on road safety grounds.
- 8.8. We are concerned that this constitutes a significant increase in traffic in an area that is already experiencing both significant traffic volume and traffic speeds, very often in excess of speed limits. The crossroad at the Heath Stores, further west in the village, for instance, is already extremely congested and difficult to navigate for all road users as a result. We are concerned about the impact of the significant increase in vehicles that will be using this stretch.
- 8.9. The NPPF at para 108 states that transport issues should be considered from the earliest stages of plan-making and development proposals. We do not consider that the applicant's Travel Plan adequately addresses the quantity of vehicles estimated to be at the site. Measures include promoting lift sharing and electric vehicles (the latter will not reduce the quantity of vehicles). As noted previously, the unusual arrangement of car parking on the development means that in some cases, there is a significant uplift in provision when compared to the adopted parking requirements. This should be reviewed. Greater emphasis should be placed on the promotion of walking and cycling – although it is noted that for cycling, no direct provision of cycle lanes to connect or improve the wider route network is proposed.
- 8.10. Several of the assumptions in the Transport Assessment and Travel Plan are questionable. The Parish Council does not consider that trip generation "calculated based on survey sites outside of London, in England, Scotland and Wales, in 'Suburban Area' locations, omitting surveys within a population area greater than 250,000" is appropriate for this rural village which according to the 2011 census had a total population of less than 2,500. Nor is the assumed modal share of 14% travelling by train appropriate, since any rail travel will require travel by car because there are neither any buses nor any off-road or segregated cycle routes to Paddock Wood or Marden stations, both of which are nearly 6km away along winding, unlit, lanes where in many cases the speed limit is 60mph and the volume of traffic is high.

Improvements to the Village Centre Cross Roads and footpath access

- 8.11. Para 3.3.5 of the applicant's Transport Assessment makes reference to the HNP, which supports enhancements to the footway network within the village. A Stage 1 design of an improvement scheme to address known issues at the B2162 Maidstone Road / Goudhurst Road / Lamberhurst Road / Brenchley Road crossroads junction is provided. This includes:
- narrowing Brenchley Road to 6.5m to improve visibility at the stop line on Lamberhurst Road;
 - realigning the stop line and reducing the carriageway width on Lamberhurst Road to 4.8m to provide a 2.0m width footway;
 - extending the double-yellow line parking restrictions on Lamberhurst Road and Brenchley Road; and
 - widening the footways on both sides of Goudhurst Road to 2.0m

- 8.12. Uncontrolled pedestrian crossing equipped with dropped kerbs and tactile paving are also proposed on Lamberhurst Road, Maidstone Road and Goudhurst Road.
- 8.13. It is proposed that the applicant will provide a proportionate financial contribution towards the delivery of this off-site highway works or undertake the works in agreement with KCC Highways and Transport via a Section 278 Agreement, the details of which would be agreed with the Local Planning and Highway Authorities prior to the determination of this planning application.
- 8.14. The Parish Council would wish to be fully involved in discussions relating to such improvements and the associated mechanisms, as set out in the HNP:

Policy 2.3: Enhancing Public Rights of Way

Where new residential development is proposed that includes, or is adjacent to, an existing PRoW, PRoWs should be enhanced where appropriate to improve connectivity within the site and links with other PRoWs and pavements suitable for active travel modes, including through the making of financial contributions.

Project 2.1: Enhancing cycling, riding and walking routes within the parish and to neighbouring settlements

The PC will work with KCC, neighbouring parishes and developers to identify and put in place enhancements to the existing PRoW network to increase provision for cycling, riding and walking (active travel) within the parish and connectivity with neighbouring settlements where possible.

Public rights of way and connectivity

- 8.15. The site is bisected by PRoW (Restricted Byway) WT 340A, which runs north east through the site from Goudhurst Road in the south to PRoW (Footpath) WT 341, on the northern boundary; and slopes down from north to south from 70 to 50m AOD.
- 8.16. The Parish Council welcomes the upgrading of this path to a restricted byway, which would encourage a greater range of uses.
- 8.17. A new 1.2m wide footway has been approved along the northern side of Goudhurst Road to connect the development to the village centre. Whilst this accords with the principle behind HNP Policy 2.1 (Walkable village), the Parish Council remains concerned about whether the proposed new pavement will be of inadequate width and suitably lit to enable safe access from the development to the village centre. The footpath was originally designed and approved in the context of supporting 20 new dwellings; it is not clear what evidence exists to demonstrate that it is suitable, as it stands, for 120 additional dwellings.
- 8.18. Further evidence and supporting measures are required to address this. For instance, given the length of this footway and the fact that a person entering one end of it, for example on a mobility scooter, cannot see whether there is someone with a buggy or a mobility scooter is entering at the other end, this footway needs to be upgraded to take account of the much greater footfall created by the application. Such an upgrade could be a midway widening of the footway into the bank (with a retaining wall) to allow mobility scooter to pass. Condition 2 of SLP Policy AL/HO3 requires such an improvement: *“Provision of pedestrian links into the village centre including improvement of the footway located on the north side of Goudhurst*

Road". Taking account of the easy accessibility of this footway for mobility scooters is supported by NPPF para 116 b). The application has ignored this SLP Condition.

- 8.19. Within the site, we understand that 2.0m wide footways are proposed alongside the primary spine road and the secondary spur roads, beyond which 6.0m width shared surfaces will commence. As noted in Section 5 of this response, we raise significant concerns about the urbanising of the site, exacerbated by a highways-led approach and dominated in many areas by significant areas of parking.
- 8.20. The proposal suggests that Restricted Byway WT340A will take a segregated route to the east of the main spine road, with a loose bound surface provided for use by walkers, cyclists and equestrians. It is further proposed that Footpaths WT341 and WT338 will be upgraded to Bridleways to allow cycle access to the site via the emergency access from Back Lane. The surface of the section of Footpath WT338 between Back Lane and the emergency access will be improved and laid with tarmac (or appropriate materials to be agreed with KCC Public Rights of Way).
- 8.21. We understand that the SLP Policy TP5 (Safeguarding Railway Land) states for the former Paddock Wood to Hawkhurst (Hop Pickers) line (HPL) *"The Local Planning Authority will also safeguard the Paddock Wood to Hawkhurst former railway line, as defined on the Policies Map, by refusing proposals that would compromise its use as a green infrastructure corridor. Proposals for development located adjacent to the safeguarded line may be required to contribute toward enhancing the route and/or provide new connections or access points"*.

Emergency Access

- 8.22. The emergency access is proposed to the north west to provide a separate means of access via Back Lane into the development should access be restricted for any reason from Goudhurst Road. This access would be controlled so that it cannot be used by any other form of motorised vehicle.
- 8.23. We have concerns about the adequacy of this access. The footpath area of Back Lane is a single track, unadopted lane, with responsibility falling to the frontagers to maintain the lane's surface. In light of the nearby education provision, it is unclear what plans/barriers would be implemented to prevent other, non-emergency, vehicles, including motorbikes, from travelling from the development down Back Lane, instead of exiting the development from Goudhurst Road.
- 8.24. We understand that the Kent Fire and Rescue Service has also raised concerns about the proposed emergency access road in respect of whether it can accommodate emergency vehicles. The road has previously been labelled on the landscape strategy plan as pedestrian/equestrian/cycle access point only.
- 8.25. It has come to our attention that there is some uncertainty about the ownership of Back Lane from the Primary School to the proposed pedestrian and emergency access to the site at the top northwestern corner. This will need to be ascertained prior to any granting of planning permission to ensure the deliverability of this access point is achievable.

9. Local amenity

- NPPF paras: 135, 136, 191
- Saved policies of the Local Plan (2006): EN8
- TWBC Core Strategy (2010): Core Policy 5
- TWBC Submission Local Plan: PSTR/HO 1, AL/HO3, STR 2, EN21, EN27
- Horsmonden Neighbourhood Plan (2023): 7.7

Summary

9.1. We would support the following conditions to mitigate potential impacts:

- a condition requiring the impact of local noise sources to be assessed.
- an air quality mitigation compliance condition to ensure that the mitigation measures are incorporated into the development.
- a condition to ensure that the lighting scheme as proposed is delivered to minimise the ecological impact of the lighting and minimise glare and impact on the night sky, informed by the Institute of Lighting Professionals (ILP) [Guidance Note GN01: The Reduction of Obtrusive Light](#).
- a condition requiring the developer to submit a code of construction practice to mitigate as far as possible against negative impacts.

Background

9.2. National policy requires that development creates places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. We have the following comments in relation to the proposal:

9.3. Construction Phase: The latest Housing Trajectory prepared by TWBC (December 2023) identifies the following delivery schedules for the sites across Horsmonden:

- (HO1: Development complete as at 1 April 2023)
- HO2: Delivery of 44 units in 2026/27 and 24 units in 2027/28;
- HO3: Delivery of 50 units in 2026/27 and 70 units in 2027/28; 20 units, subject to separate planning permission, phased for 2026/27.

9.4. It is clear that collectively, there will be a significant amount of construction taking place over a prolonged period, which will inevitably impact the existing residents. We therefore request a condition requiring the developer to submit a code of construction practice to mitigate as far as possible against negative impacts.

9.5. Noise: We understand that the proposal indicates the presence of some potential noise sources including a depot and an electrical substation, close to the development site. We would therefore request a condition requiring the impact of local noise sources to be assessed.

9.6. Air Quality: The development site is not in or near an Air Quality Management Area. An air Quality Mitigation Statement has been submitted with the application. Based on the damage cost calculation we believe that the mitigation statement is adequate and would therefore request the attachment.

- 9.7. Lighting: Policy 7.7 of the HNP recognises the dark skies enjoyed by the parish. These are not only valued by local residents but also support a range of nocturnal flora and fauna. As such light pollution should be reduced. Lighting proposals that illuminate external areas around buildings must be designed to minimise both the ecological impact of the lighting and minimise glare and impact on the night sky. This is relevant across the site including the medical centre. As previously noted, the site is visible from Goudhurst within the High Weald National Landscape. This will potentially have a greater impact at night.
- 9.8. Restricting the built development to within the LBD and within the orange 'residential use' zones, will help to alleviate the impact of light pollution. This includes moving the position of the medical centre to within this zone as previously discussed.
- 9.9. Details of a lighting scheme have been submitted by the applicant and these details should be required by condition.

10. Associated infrastructure

- **NPPF: 34, 55, 56, 100**
- **Saved policies of the Local Plan (2006):**
- **TWBC Core Strategy (2010): CP1**
- **TWBC Submission Local Plan: PSTR/HO 1, AL/HO3, STR 4, STR 5**
- **Horsmonden Neighbourhood Plan (2023): 4.1, 4.3**

Summary

- 10.1. **Developer contributions:** Aside from those noted within this response, the Parish Council has prepared a detail of s106 priorities and would be keen to discuss these with TWBC and the site promoter (see attached).
- 10.2. We understand that the safeguarded land related to the expansion of the primary school will be used for that use, or uses associated with the school, and not for residential uses.
- 10.3. The phasing of the medical centre and expanded school site must be aligned to the housing delivery.

Background

- 10.4. Planning obligations are legal obligations entered into to mitigate the impacts of a development proposal. A list of priorities has been agreed by the Parish Council in respect of the developments taking place across the parish.

School expansion:

- 10.5. In relation to the land safeguarded for future expansion of the school site, we appreciate that this is outside the scope of the applicant. Nevertheless, the quantum of development anticipated on this site, should it be granted, and in combination with the other housing allocations proposed in the SLP, it will be important to ensure that the safeguarded site is ultimately built out to address educational needs.
- 10.6. TWBC Officers have confirmed the following: “The [Hearing Statement](#) (para 69 onwards) provides a detailed justification for the proposed safeguarded land for future expansion of the Primary School. The safeguarded area is located in very close proximity to the Primary School, and it would be possible to provide direct pedestrian links between each site area that would not require the crossing of any road.
- 10.7. The [Infrastructure Delivery Plan](#) (page 48) under the heading ‘Additional future requirements needed to deliver growth proposed in the Local Plan Primary Schools’, identifies a requirement for the expansion of Horsmonden Primary School by up to one Form of Entry (FE) to provide for the Brenchley/Horsmonden/Lamberhurst planning area, and this has been agreed by KCC Education.
- 10.8. The site allocation Policy AL/HO3 includes the safeguarding of an area of land (the location of this land indicated on Map 62 Site Layout Plan) for the future expansion of Horsmonden Primary School. Criterion (12) of Policy AL/HO3 requires: “*Land to the north of the site for*

future school expansion, as shown on the site layout plan, to be safeguarded, with details provided as to how this land would be managed in any intervening period of time between development of other parts of the site and before being required for school expansion”.

- 10.9. Proposals for permanent development within this area of safeguarded land not connected with the expansion of Horsmonden Primary School would not be supported by the Borough Council, to ensure the land is available for its allocated use when required. It may be in the short-term that some temporary uses ancillary to the adjacent school will be proposed by KCC Education, for example additional play space for the school, Forest School type development. In the longer term as set out above, KCC Education have identified a requirement to expand the school to deliver additional spaces – the required built development may be located within the existing school area, that would then require additional play areas/open space to be delivered within the safeguarded area. Alternatively, the safeguarded area could accommodate built development associated with the school.”