

HPC adopted 19-Dec-23 - Assessment of the evidence presented for Tunbridge Wells Borough Council (TWBC) Submission Local Plan and Allocation Policy AL/HO3 “Land East of Horsmonden”

Introduction:

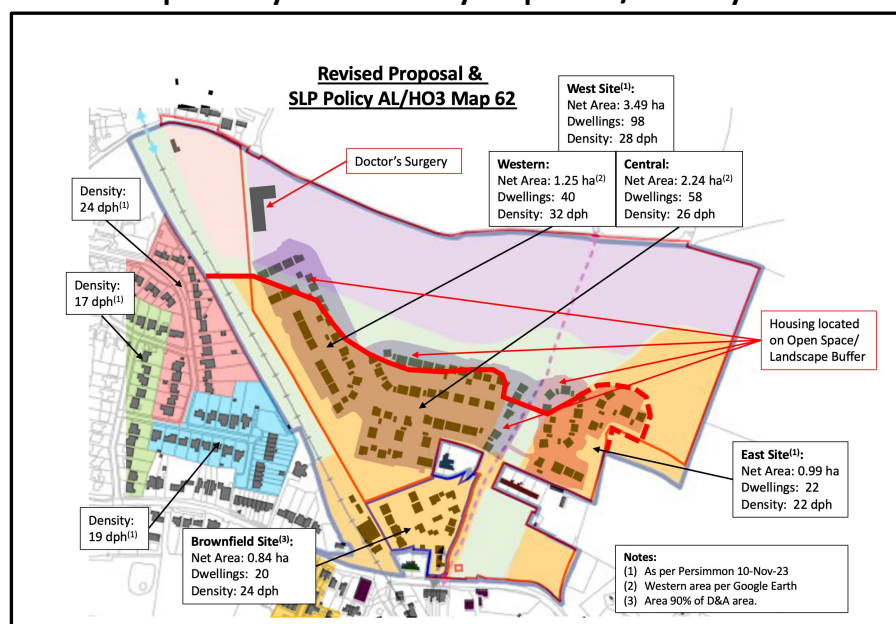
This paper was compiled by Horsmonden residents and members of Bassetts Farm Forum and presented to the Horsmonden Parish Council. It reviews the quality and consistency of the evidence used in determining the allocation of development on Land East of Horsmonden (TWBC new Local Plan Policy STR HO1 and AL/HO3). Published documents listed in **Appendix 1** of the main report have been considered. References to these documents in the main report are underlined. Key statements, other evidence and cross references within this report are highlighted in **bold**. Whilst the new TWBC Local Plan is not yet “made” its core policies and those for Horsmonden are substantially complete. There are some points that will be subject to public consultation, but this paper has considered the documents as they stood in mid-November 2023.

Summary and Conclusions:

1. Tunbridge Wells Borough Council’s (TWBC) new Local Plan allocates Land East of Horsmonden for the development of 140 dwellings +/- 25 under Policy AL/HO3. The AL/HO3 site is made up of 5 separate parcels of land. 4 of these were offered during the SHELAA Call for Sites in 2016 and one is a brownfield site consented for 20 dwellings (with conditions). (**Appendix 2 and report para 69**).
2. From the very beginning of the new Local Plan allocation process in 2016 it was realised by TWBC officers that the AL/HO3 site is a highly sensitive landscape. *TWBC told the Local Plan Inspector that: “... A particular concern identified when the site was suggested and at the first site visit by officers was the rising ground and the potential effect on views from the south and AONB. This is the principal reason that development on the high ground to the north was not proposed.”* (see report para. 42). In the September 2019 Local Plan Regulation 18 consultation Persimmon made representations including a Landscape Statement which stated: *“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”.* (see report para. 18)
3. After multiple Landscape and Visual Impact Assessments (LVIA), consultations, in depth reviews by TWBC specialist officers, and examination by a government Inspector, the AL/HO3 site has been established as two areas with different purposes. (**See Appendix 1 for an overview of the Local Plan documents reviewed**). The site is divided by a revised Limit of Built Development (LBD) boundary, which defines:
 - i) a southerly area designated for residential development and a doctor’s surgery, and
 - ii) a northerly area, together with an orchard to the south of New Bassetts Cottages (which are Non-Designated Heritage Assets), designated as green Open Space for community use. (**See para 68 Figure 3 Map 62 and Appendix 3**).This delineation is intended to ensure that development can be contained and any harm to landscape and views, both from within the site and from outside it looking in, including from the AONB, is reduced to an acceptable level. The considerations and evidence assimilated in arriving at the position of the LBD are strong for the western part of the site, which is visible from the AONB, and achieves a balance between the residential area and preserving the sensitive landscape. Questions are left open about the extent of development on the eastern part of the site.
4. The Horsmonden Neighbourhood Plan (HNP) was adopted and “made” in July 2023. The HNP specifies the Submission Local Plan’s Limit of Built Development (LBD) as its own definition of the limit for development proposals. (**HNP Policy 2.1. See report para. 38**).

5. Local Plan Policy AL/HO3 was refined throughout the Local Plan development. This policy stipulates a number of conditions which must be met by any development on the site. **(Appendix 6.)**
6. TWBC has stated to the Inspector that it is confident that impacts on the setting and amenity of Non-Designated Heritage Assets at Bassetts Villas and New Bassetts Cottages, both within, or directly adjacent to, the revised LBD, can be managed during detailed planning application discussions. **(See report para 44)**
7. Landscape sensitivity concerns about the extent of development remained even past the Examination stage for land to the East of the North-South public right of way (PROW) (WT340A), which can be seen from south side of the valley opposite the site **(See report para 36).**
8. The new Local Plan Policies STR 1, STR 8 and H2 recognise NPPF Section 7 requirements for good design, by emphasising the importance of “.. *having full regard to the context of the site, including its character, landscape setting, topography, surrounding built form, and access to infrastructure and services*”. **This is particularly relevant to the extent of any development on AL/HO3, its layout, housing design, housing density, and the inclusion of green space within the developed area as well as around it. (See report Para.35)** (see also 17, 18 and 19 below)
9. In January 2023 Persimmon submitted an application to build 163 dwellings on part of AL/HO3. This proposal extended over the new Local Plan LBD but did not provide any LVIA justification for this. Similarly, no justification was made for extensive development of the eastern part of the site **(report para. 48 onwards)**
10. A recent Revised Proposal presented by Persimmon for AL/HO3 **(Appendix 7)** acknowledges that development on the eastern part of the site needs to be restricted to avoid excessive harm to the landscape when viewed from the southern side of the valley. 140 dwellings are proposed including 20 consented dwellings on a brownfield site to the south **(see report Table 2 and para. 72).**
11. The Revised Proposal locates the doctor’s surgery on land designated as green open space for community use, and the residential area extends outside the LBD. Altogether the proposal takes 1.22 hectares of public Open Space for building development. Additionally, 5 houses are placed on land designated for Open Space within the LBD. **(Report para. 74 onwards). Figure 4 (report para. 76)** puts this in context by combining the Revised Proposal layout with the new Local Plan layout map for AL/HO3. **Figure 4 is reproduced below.**

Figure 4 Revised Proposal Layout and Policy Map 62 AL/HO3 Layout Combined



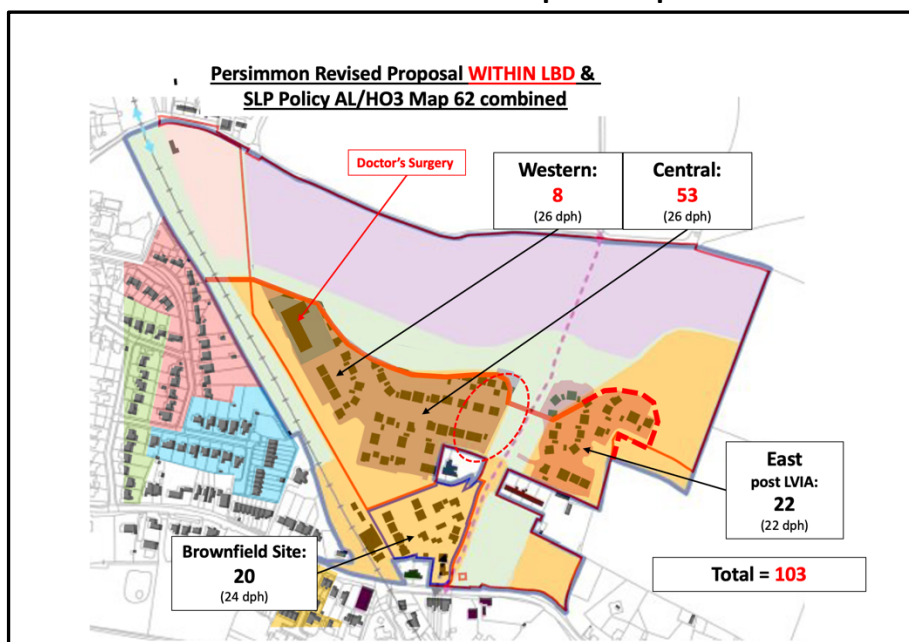
12. The density of the housing proposed on the most western residential area at 32 dph is very high when considered alongside near-by existing village buildings, the proximity of this site to the countryside, and its visibility from Goudhurst within the AONB. Such a high density does not suggest a sense of transition to the countryside, nor does it reflect the village to which it would belong, or the rest of the AL/HO3 site. Street lighting for this density and number of houses would be very visible from Goudhurst as well as from the surrounding public rights of way, and would ≈ substantially affect the area's current dark sky status.
13. Persimmon's proposals do not include all the allocated components of AL/HO3 (**See report para. 5**). By removing the areas not included in the Persimmon proposal together with the effect of the reduction to the eastern part of the site (as 9 above), and removing houses placed on designated Open Space within the LBD, which also makes some allowance for the setting and amenity of Bassetts Villas, a Non-Designated Heritage Asset within the site, these combine to reduce the new Local Plan target to 109 +/- 19 dwellings for the Persimmon sites. (**see report para. 80**)
14. A total of 108 dwellings would ensure Persimmon achieve compliance with the new Local Plan and HNP policies. With permission granted for 20 dwellings on the brownfield site, this leaves 88 for the Persimmon part of AL/HO3 (**see report para. 82**).
15. At this level, Horsmonden's contribution to Borough housing needs will be well within the new Local Plan allocated target housing range for the next 15 years after this range has been adjusted to take account for the parts of AL/HO3 not included in the Persimmon site, the reduction to the eastern development for LVIA reasons, and provision is made for the setting and amenity of Bassetts Villas. (**see Table 4 para 83 reproduced below**)

Table 4. Overall Horsmonden Housing delivery for new Local Plan:					
	SLP Low	SLP Mid	SLP High	Actual/Proposed	
Gibbet Lane (AL/HO1)	45	50	55	49	As built
Brenchley Road (AL/HO2)	80	90	100		50-70 per June 2022 statement to Inspector
	(10)	(20)	(30)		LP Dev Strategy Topic Paper different adjustment
	70	70	70	68	Outline Planning Granted 22/00296/OUT
					with conditions
Bassetts Farm (AL/HO3)	115	140	165		
	(8)	(10)	(12)		Adjust to remove Old Station Garage
	(13)	(16)	(19)		Adjust for Eastern LVIA reduction 38 to 22 =(-16)
	(4)	(5)	(6)		Adjust for setting/amenity of Bassetts Villas NDHA
Persimmon site delivery target	90	109	128	108	Modified Persimmon Plan
Old Station Garage (part of AL/HO3)	8	10	12	10	Add back for potential future infill.
Horsmonden Total Adjusted Target	213	239	265	235	
of which Affordable Housing	85	96	106	94	
LP allocation level without HO3 adjustment	230	260	290		{ Per Local Plan Development Strategy Topic Paper
of which Affordable Housing	92	104	116		{ - Addendum. Para 13.1 November 2023

16. The net housing density in the Persimmon Revised Proposal for the western most development area is very high as stated in 12 above and it does not dovetail comfortably with its rural surroundings nor the village (**see report para. 84 onwards**).
17. NPPF Section 7: Requiring Good Design, sets out that **good quality and inclusive design** is a key aspect of sustainable development which needs to “...**respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation**”. (**see report Para 86**)
18. New Local Plan Policies STR 1, STR 8 and H2 (**Report Para. 6, 27 & 87.**) all recognise that **it is critical to address the setting of the development**.
19. The AONB Setting Analysis for AL/HO3 refers to the High Weald Design Guide which emphasises that it is critical to “..**ensure that the housing developments are truly ‘of the place’, a genuine and integrated part of the existing settlement, rather than a generic ‘added on’ estate**”. (**See Para. 88 & 89**)

20. 16 to 19 above can be mitigated by reducing the housing density of the western most area of AL/HO3 whilst containing the development, including the doctor’s surgery, within the orange area prescribed by the new Local Plan in Map 62 (Figure 3 report para 68) as defined by the HNP. Reduction of the most western area to 26 dph would yield 103 dwellings on the Persimmon part of AL/HO3.(Report Para 90 and Figure 5 reproduced below). This would enable the inclusion of more green space within the developed area as well as around it.

Figure 5 – A Modified Persimmon Revised Proposal as per Table 5 & 5a:



21. Overall Horsmonden would contribute 230 dwellings through the allocation process compared to a revised allocation range of 213 to 265. See report Para 92 Table 6 reproduced below:

	SLP Low	SLP Mid	SLP High	Actual/Proposed	
Gibbet Lane (AL/HO1)	45	50	55	49	As built
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	(10)	(20)	(30)		LP Dev Strategy Topic Paper different adjustment
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Bassetts Farm (AL/HO3)	115	140	165		
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	(4)	(5)	(6)		Adjust for setting/amenity of Bassetts Villas NDHA
Persimmon site delivery target	90	109	128	103	Modified Persimmon Plan including western area reduced density
Old Station Garage (part of AL/HO3)	8	10	12	10	Add back for potential future infill.
Horsmonden Total Adjusted Target	213	239	265	230	
of which Affordable Housing	85	96	106	92	
LP allocation level without HO3 adjustment	230	260	290		{ Per Local Plan Development Strategy Topic Paper
of which Affordable Housing	92	104	116		{ - Addendum. Para 13.1 November 2023

22. The evidence used to develop the new Local Plan and the allocation of development on Land East of Horsmonden is strong and consistent. Representations that AL/HO3 allocated “up to 165 dwellings” for the Persimmon part of this allocation are inaccurate. The correct new Local Plan target figure for the Persimmon development land is 109 +/- 19 (see 13 above). When building limits, landscape & visual impact adjustments are made to Persimmon’s Revised Proposal this reduces to 103 dwellings.
23. For the reasons given in this report neither the original planning application made by Persimmon in January 2023 nor Persimmon’s October 2023 Revised Proposal (application pending), are in compliance with building limits defined in the emerging new Local Plan based on strong published landscape and visual impact evidence. This building limit is specifically defined in the made Horsmonden Neighbourhood Plan.

Assessment of the evidence presented for Tunbridge Wells Borough Council (TWBC) Submission Local Plan and Allocation Policy AL/HO3 “Land East of Horsmonden”

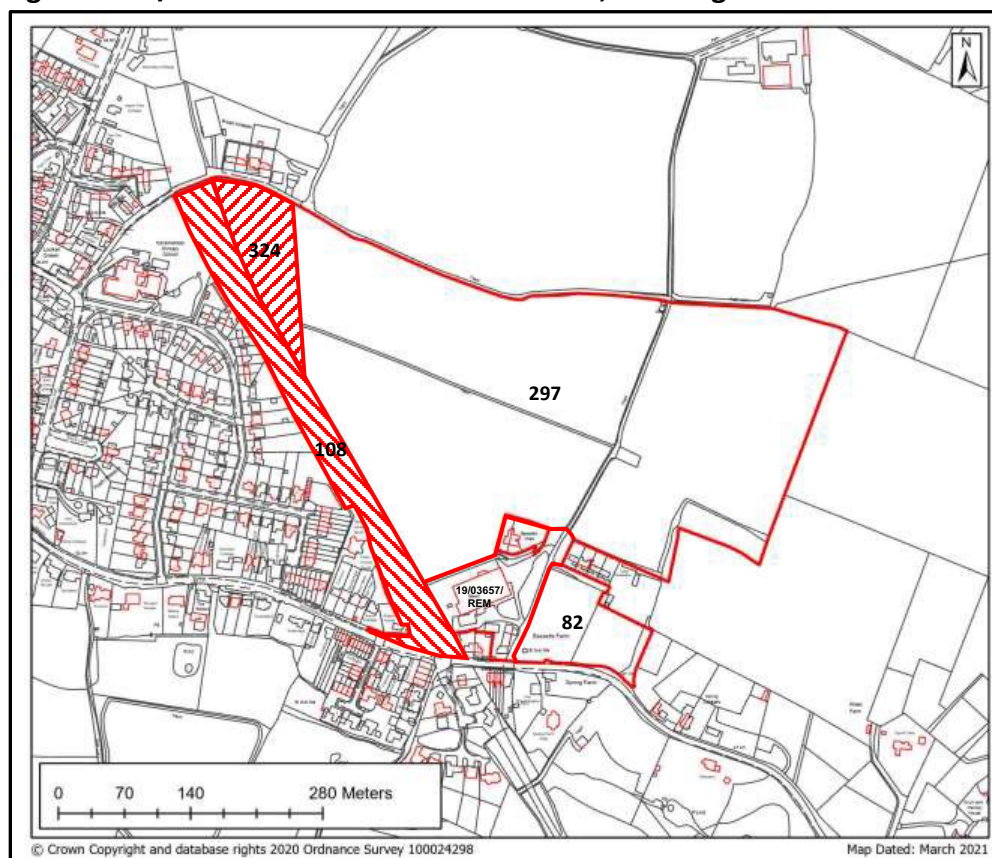
Main Report.

Development of the new TWBC Local Plan.

Strategic Housing and Economic Land Availability Assessment (SHELAA):

1. TWBC has been developing a new Local Plan since 2016 to update and replace its existing policies for residential and commercial planning.
2. The new Local Plan is intended to cover a planning period from 2020 to 2038 and a Submission Local Plan (SLP) was submitted to the Secretary of State for independent examination in November 2021. Issues regarding proposed major strategic developments have slowed the progress of the Local Plan.
3. One of the early activities in the development of the new Local Plan was to update projections of Borough housing supply for the plan period. This included a Strategic Housing and Economic Land Availability Assessment (SHELAA). As well as reviewing existing allocations, two 'Call for Sites' were undertaken, firstly from February to September 2016 and a further one between May and June 2017. (Reference: Para 6.2 Distribution of Development Topic Paper for Draft Local Plan – Regulation 18 Consultation September 2019)
4. As part of the SHELAA “Call for Sites” various sites to the East of Horsmonden were offered for planning consideration. These sites and their subsequent assessment for development suitability are shown in **Appendix 2** together with their combination as allocation AL/HO3 in the emerging Local Plan. AL/HO3 also includes a brownfield site to the south (15/505340/OUT & 19/03657/REM) which is consented, with conditions, for 20 dwellings. Figure 1 shows all these sites together.

Figure 1. AL/HO3 – Land East of Horsmonden, showing individual SHELAA sites.



5. Sites 108 and 324 are shown hatched in Figure 1 as they are not included in planning applications made in 2023 for the rest of AL/HO3 by the developer, Persimmon.
6. A revised SHELAA report was published in January 2021 following various consultations on the development of the Local Plan. Section 3 of the SHELAA Main Report describes the rigorous methodology used in assessing all sites. Para 3.38 (see below) describes how the “dwelling capacity” of each site is calculated starting with a standard yield of 30 dwellings per hectare, but then progressing to more refined density calculations “to inform the allocations policies” in the emerging Local Plan.

Extract from the SHELAA Main Report:

- 3.38 The size of the developable area has then been used to calculate and approximate the amount of development that may be suitable for a site to deliver. This estimate is not a target to be achieved, rather it is a high-level yield, an aid to help understand the amount of land potentially available to meet the growth needs of the borough. **The calculation is based on the developable site area only and, for a potential housing site, a standard yield of 30 dwellings per hectare applied to calculate a dwelling capacity for each site.** If there is any departure from this approach, this is set out on the individual assessment sheet. It is recognised that for some sites, when considered in more detail, a higher or lower density may be appropriate to reflect the context of the site. **The NPPF requires that LPAs set out their own approach to housing density to reflect local circumstances whilst also seeking to achieve more efficient use of land. A more refined density calculation has been used at a later stage in plan making to inform site allocation policies. This will take full account of the context of each site and its opportunities and constraints, such as location, surrounding character and environment.**
- 3.39 The new Local Plan will need to allocate sites for other uses, including employment land, in addition to residential use. A number of sites have been submitted for non-residential uses; also a number of sites are considered to be more suitable for a non-residential use due to, for example, its location, the adjoining uses, etc. Where this is the case, a residential capacity has not been attributed to the site but an assessment of the likely capacity to deliver an employment use has been made. Where a site is considered to provide potential for a mix of uses an estimated yield of 15 dwellings per hectare has been used, though this has been an initial assessment only and has been subject to further scrutiny.
- 3.40 **For some sites, the site assessments identified that only part of the site would be suitable for development and in these instances the estimated development yield was based on the smaller area.**
- 3.41 The site assessment work has also included the following considerations:
- for sites that may individually or in conjunction with adjacent sites, constitute a reasonable option for a strategic urban expansion or new settlement, site assessment sheets are produced for each submitted site, if necessary with a further sheet for each combination of sites that together may form a reasonable new/expanded settlement option. These site combinations mirror the consideration of options in the Sustainability Appraisal;
 - for those sites located/partially located within the High Weald AONB, the AONB Management Plan has been referred to ascertain for each site which specific AONB components are included ([view the High Weald AONB Management Plan](#)). Sites have been screened against these component parts, which are listed on the SHELAA assessment sheets;

- comments from specialist officers (landscape, heritage and conservation, biodiversity, highways, trees) have been taken note of;
- **other relevant evidence base/supporting documents have been taken into consideration when assessing sites, though not specifically recorded on the SHELAA assessment sheets. In particular these include Landscape Sensitivity Studies, Green Belt Studies and the Distribution of Development Topic Paper which sets out the exceptional circumstances for Green Belt release, and additional landscape work relating to major development in the AONB and ecological Grasslands survey work;**
- in respect of the AONB, the SHELAA assessment sheets record where a site is located in the AONB. **For sites located outside of this designated area, reference to the AONB is recorded on the assessment sheets where the setting of the AONB has been a contributing factor to the site assessment outcome;**
- any relevant planning history, with extant consents as of 1st April 2020 being recorded on the SHELAA assessment sheet;
- **consideration has also been given to any representations made to the Regulation 18 Draft Local Plan public consultation, including those submitted in relation to the SHELAA supporting the Draft Local Plan.**

Tunbridge Wells Borough Council

Strategic Housing and Economic Land Availability Assessment for the Pre- Submission Local Plan Date of publication – January 2021

7. As stated in the SHELAA Main Report para 3.41 above, site assessment work included particular reference to Landscape Sensitivity Studies and the setting relative to the AONB as well as any representations made to the Regulation 18 Draft Local Plan public consultation.

Landscape Sensitivity Assessment of additional settlements:

8. A report "Landscape Sensitivity Assessment of additional settlements in Tunbridge Wells. Paddock Wood, Horsmonden, Hawkhurst, Cranbrook. Report for Tunbridge Wells Borough Council. Prepared by LUC" was published in July 2018 and was thus available as part of the detailed site assessments of the AL/HO3 allocation.
9. This report (page 73) made the following Sensitivity Conclusions for the area covered by AL/HO3 "*The former railway line, with associated tree cover and banks, serves to strengthen the rural character of the sub-area [AL/HO3], by creating a clear distinction between the village and the countryside, and is a valued landscape element in its own right. Orchard land use contributes to local character, **so sensitivity to built development across most of the sub-area [AL/HO3] is 'high'.***" With 'high' being the highest sensitivity assessment.

Limits to Built Development Topic Paper:

10. “Limits to Built Development Topic Paper for Draft Local Plan – Regulation 18 Consultation” was published in August 2019. Para 1.3 of this paper states *“The definition of LBDs is an established policy tool to provide both certainty and clarity to residents, landowners, developers, and other interested parties on where new development would generally be acceptable in principle. By drawing LBDs around settlements (including land to meet growth needs), LBDs help focus growth to sustainable locations/settlements, while protecting the surrounding, more rural areas from inappropriate and intrusive development”*.
11. The Limits to Built Development Topic Paper for Draft Local Plan took account of the SHELAA assessment work, and the Landscape Sensitivity Assessment referred above. An LBD was proposed for the AL/HO3 which stopped at the North/South public right of way (PROW) (WT340A) as shown in Figure 11 of the paper for Horsmonden (**Appendix 3**)
12. The Limits to Built Development Topic Paper proposed the following definition which was included in the Draft Local Plan:

Policy STR 10

Limits to Built Development Boundaries

The proposed Limits to Built Development for all settlements are shown on the draft Policies Map.

New development shall be focused within the Limits to Built Development, where proposals accord with other relevant policies of this Plan.

Outside the Limits to Built Development, development will normally be limited to that which accords with specific policies of this Plan and/or that for which a rural location is demonstrated to be necessary.

Draft Local Plan:

13. The Draft Local Plan was published for consultation in September 2019. Page 312, Para 5.123 addresses the eastern part of AL/HO3: *“The eastern part, to be developed at a lower density than the rest of the site (as informed by a landscape assessment), is not included in the new LBD for Horsmonden”* and Point 7 of Policy AL/HO3 states *“Built development on the eastern area of the site to be a lower density informed by a landscape assessment (see Policies EN 1: Design and other development management criteria and Policy EN 20: Rural Landscape)”*. These statements make it clear that the eastern part required further consideration as to its suitability for development.
14. **Appendix 3** shows a copy of a detailed map of Horsmonden accompanying the Draft Local Plan (Map 25). The development site areas for residential and land for a health centre (Ref. Policy AL/HO3 point 10) are clearly demarked in pink.

Representations to the draft Local Plan (Regulation 18):

15. In November 2019 Persimmon submitted Representations to the draft Local Plan (Regulation 18) and this includes a Landscape Statement completed by James Blake in October 2019.
16. This Landscape Statement references the NPPF at para 2.1.3: *“NPPF Section 7: Requiring Good Design, sets out that good quality and inclusive design is a key aspect of sustainable development. As such all new developments should ‘function well and add to the overall quality of the area..;’ ‘establish a strong sense of place...;’ ‘optimise the potential of the site to accommodate development, creating and sustaining an appropriate mix of uses (including green and other public space);’ ‘respond*

to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;’ and ‘be visually attractive as a result of good architecture and landscaping’. These principles are supported by NNPG 26: Design.”

17. This emphasises that a balance is essential between accommodating new development and responding to local character and reflecting local surroundings in order to achieve a sustainable development.
18. In assessing the AL/HO3 Landscape character The James Blake Landscape Statement notes: “.. that **landscape is a continuum and character does not generally change abruptly on the ground**. More commonly, the character of the landscape will change gradually and therefore the boundaries between both Landscape Character Types (LCTs) and Landscape Character Areas (LCAs) should be considered to reflect zones of transition” (Para 3.1.3). It references Tunbridge Wells Borough Landscape Character Assessment, which characterises AL/HO3 and its immediate area as part of the Horsmonden Fruit Belt Landscape Character Area (LCA 2). It then goes on to say that “**Although not within the High Weald Area of Outstanding Natural Beauty, for many people travelling through the area it is perceived as such**. As highlighted within the Landscape Character Assessment, ‘there are strong associations between this area [AL/HO3] and the AONB and the area enhances the character of the AONB landscape’”. (Para 3.1.11 & 3.1.14)

The James Blake Landscape Statement describes Horsmonden’s settlement character: “3.3.1 Although a sizeable village, Horsmonden’s situation away from the highest ground means it is not especially visually prominent in the wider landscape. **The majority of the village sits at between 50m and 60m AOD, just below the plateau top on the edge of a narrow valley running down to the River Teise in the east.**”; and under 6.4 Suitability of the Site for Development it states: “**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.**”.

AONB Setting Analysis:

19. An AONB Setting Analysis Report was produced by Hankinson Duckett Associates for TWBC in November 2020. This report is only concerned with the impact on the AONB.
20. It refers to National Planning Practice Guidance (NPPG):
“2.3.1 NPPG Paragraph 039 (reference ID 8-039-20190721) considers ‘How should development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty be dealt with?’. The guidance states that:
‘Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. **This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.**’”
21. For AL/HO3 the AONB Setting Analysis concludes:
4.3.17 “.....The prescriptions for the proposed Open Space and Landscape Buffer within the draft local plan policy AL/HO3, **would reduce the extent to which the development would be appear to expand beyond the existing settlement edge.**”
4.3.19 “Design measures that would reduce the predicted effects on the setting to the AONB include:

Site HO3 – in addition to conforming to the Green Infrastructure provision set out within the draft policy, test the visibility of proposed development within site HO3 from prominent viewpoint locations at Goudhurst (e.g. photograph H6), using wireframes or photomontages in order to fully assess the potential effects on the setting to the AONB.

- Promote a landscape led approach to masterplanning **that creates a structure to contain the allocation sites which is consistent with the character of the adjacent High Weald. Any masterplan should adhere to relevant guidance including the National Design Guide and should take inspiration from the High Weald Design Guide and Management Plan.**

- Give careful consideration to the setting of listed buildings, which lie adjacent to the AONB and are protected in their own right”.

22. The Analysis focused on the visibility of AL/HO3 from the AONB East (Goudhurst) and designates the western part of AL/HO3 there is “**Medium sensitivity area – development in this location without mitigation may harm the setting to the AONB**”, on the Horsmonden Site Sensitivity Map. (See **Appendix 4**)
23. No assessment was made of the landscape and visual impact of any development at AL/HO3 from the south as it was considered that the site would be hidden from views within the AONB by trees and hedge rows. (Photo H4). **In fact, the site is visible from the edge of the AONB further to the east through the light hedges.** In any case the view from the south side of the valley is protected as View 13 in the Horsmonden Neighbourhood Plan. **So the designation of the eastern part of AL/HO3 in the AONB Setting Analysis Site Sensitivity Map (Appendix 4) is incorrect.**
24. **See Appendix 5** for photographs showing that **AL/HO3 is prominent within the landscape views from North Road, Goudhurst within the AONB. Any external lighting on a new development on AL/HO3 will harm the existing dark night skyline, and any development outside the Submission Local Plan LBD will be more visible from the AONB and is likely to harm the setting of the AONB.**
25. **Appendix 5** also provides photographs of AL/HO3 from the south side of the valley (HNP View 13) and also within the site (HNP Views 6 and 7) **see para 38 below.**

Consideration of responses to the Draft Local Plan consultation:

26. Following the Regulation 18 consultations, TWBC published a report: Consideration of responses to the Draft Local Plan consultation in September – November 2019, in March 2021.
27. This document includes TWBC responses to comments regarding Draft Policy H4: Housing Density (Now Policy H2 in the Submission Local Plan). TWBC acknowledged (page 166) that: “...it is recognised **that when some sites are considered in more detail a higher density may not always be appropriate.** The policy takes a flexible approach to density, **allowing the context of the site and the characteristics of the surrounding area to be taken into account on a case-by-case basis.** Given this it is not appropriate to set a numeric density standard. This is reflective of the method used to assess the yield of site allocation policies in the Local Plan and the consideration of planning applications.It is noted that the wording requiring ‘appropriately high densities’ on sites may not have been clear. **The purpose of the policy is not to encourage high densities on sites where this would be inappropriate, but to encourage the most efficient use of land while taking into consideration the character and context of individual sites.**”

28. Consideration of responses to the Draft Local Plan consultation in September – November 2019 (March 2021) also considers **representations regarding Horsmonden**. The number of dwellings for AL/HO3 was increased by 15 due to the inclusion of the consented brownfield site to the south of the area. The need for new school and medical facilities was also confirmed. The LBD was also adjusted to include all developable sites and those with extant permission.
29. A revised **Pre-Submission Local Plan** was published in March 2021 for further public consultation (Regulation 19). **Appendix 3** shows the revised Submission Local Plan Horsmonden Policy Map (Map 26).
30. Persimmon made representations during the Regulation 19 consultations (June 2021) requesting:
 - a) Map 62 showing AL/HO3 should be marked as indicative only. This is not shown in the Submission Local Plan.
 - b) Removal of the requirement for the eastern area of the site be at a lower density. This was removed following discussion with the Local Plan Inspector on the basis that it would be covered by requirements to use LVIAs.
 - c) Confirmation that vehicular access for the development will be via Goudhurst Road. This was not taken up by TWBC in the Submission Plan document.
 - d) Confirmation that the development is only expected to provide a health centre site and not deliver a health centre facility, nor tie its provision to the delivery of the housing. This was not changed in the Submission Local Plan document.

Submission Local Plan:

31. Following Regulation 19 public consultation, the Submission Local Plan (SLP) was submitted to the Secretary of State for independent examination in November 2021.
32. Submission Local Plan Policy STR 1 – The Development Strategy - contains the **principles of Limits of Built Development** as follows:
 - “2. 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;*
 - 3. Provides for the growth of settlements, having regard to their role and function, constraints, and opportunities....*
 - 8. Limits development within the High Weald Area of Outstanding Natural Beauty to that which can be accommodated whilst still conserving its key characteristics, this being mostly small-scale, only promoting larger proposals where exceptional circumstances are demonstrated;*
 - 9. **Normally limits development in the countryside (being defined as that outside the Limits to Built Development)** to that which accords with specific policies of this Plan and/or that for which a rural location is fully demonstrated to be necessary.”*
33. In 2022 TWBC stated to the Inspector “(Matter 3 Question 3 Issue 1) that it considered the LBDs “to be highly accurate” and that **the purpose of the LBD designation/policy approach is to “provide both certainty and clarity to residents, landowners, developers, and other interested parties on where new development would generally be acceptable in principle”** and that “*The justification for setting boundaries and limiting the LBD within such site allocations is that **not only will this assist in containing built development and providing clear limits on where development is considered to be appropriate (within the LBD) and inappropriate (outside the LBD) but will also allow space for appropriate landscaping (and in some cases the retention and protection of existing trees) where built form meets the wider countryside. This will protect the wider visual impact of new development on the surrounding rural landscape**”.*

34. Submission Local Plan Policy STR 8 – Conserving and Enhancing the Natural, Built, and Historic Environment states:
*“Development is expected to make a positive contribution to the natural, built, and historic environment of the borough.
This includes landscape assets, biodiversity, geodiversity, priority habitats and species, statutory and locally designated sites and areas, and archaeological assets.
This will be achieved by the following approach:*
1. *Development should contribute to, and enhance, the urban and rural landscapes of the borough, with particular regard to the designated High Weald Area of Outstanding Natural Beauty;*
 2. *The landscape character of the borough will be protected through retention and enhancement of the key characteristics or valued landscape features and qualities, as well as through the restoration of landscape character, in accordance with the objectives of the Borough Landscape Character Assessment SPD;*
 3. *Development proposals must be informed by a clear understanding of the landscape context (on- and off-site) and demonstrate how it has incorporated and enhanced site characteristics and landscape features, avoiding and minimising harm wherever possible. Landscape mitigation, where required, should be identified at the outset of the scheme design process to ensure that proposals are truly landscape-led and should be used to reinforce and restore landscape character. All new landscaping should make a positive contribution to landscape character;*
 4. *Within the area designated as the High Weald Area of Outstanding Natural Beauty, and its setting, development will be managed in a way that seeks to conserve and enhance the natural beauty of the area, commensurate with the "great weight" afforded to Areas of Outstanding Natural Beauty within the NPPF.....”*
35. Submission Local Plan Policy H 2 – Housing Density states:
“Development should make efficient use of land, having full regard to the context of the site, including its character, landscape setting, topography, surrounding built form, and access to infrastructure and services.”
36. The introduction to Policy AL/HO3 at Paragraph 5.609 states: *“Types and layout of development could address issues of landscape sensitivity, with the eastern part of the site to be developed at a lower density than the rest of the site (as informed by a landscape assessment). 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 distant views from Goudhurst”*.
37. The table in **Appendix 6** shows Submission Local Plan Policy AL/HO3 and compares this with earlier drafts as well as changes made following discussion with the Local Plan Inspector.

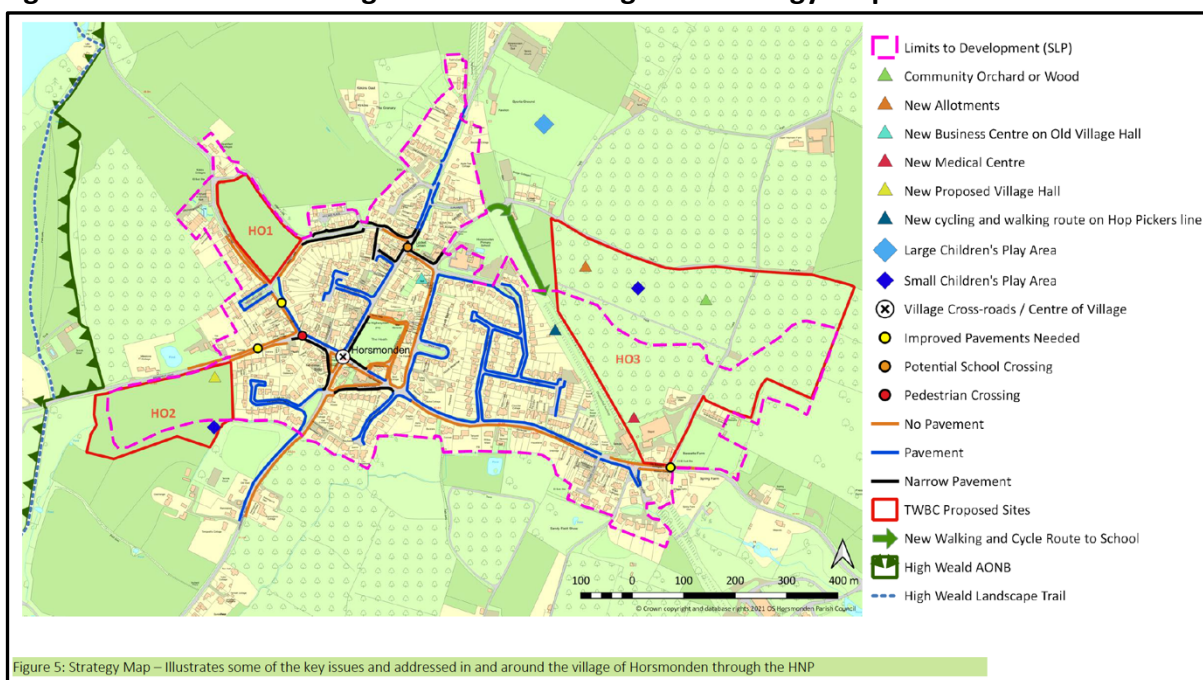
Horsmonden Neighbourhood Plan:

38. The Horsmonden Neighbourhood Plan (HNP) was voted for in June 2023 and was “made” by TWBC in July 2023 and thus holds equal weight as a “made” Local Plan. It contains policies which are relevant for all aspects of a major new development in the village as follows:
- 2.1 Walkable Village:**
“Development proposals for new housing that are situated within the limits of development shown on Figure 5 and which are located within safe, walkable distances of the village services and facilities, will be supported”.

This policy and HNP Figure 5 (page 26) determine the Submission Local Plan LBD (see Appendix 3) as the limitation to where residential and other facilities may be situated. In his report on the HNP prior to its adoption (A Report to Tunbridge Wells Borough Council on the Examination of the Horsmonden Neighbourhood Plan – 28 November 2022), the examiner stated:

“53. ... 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.” See below Figure 2 – HNP Figure 5 Strategy Map.

Figure 2 – Horsmonden Neighbourhood Plan Figure 5 Strategy Map



- 2.2 Minimising traffic speeds.
- 2.3 **Enhancing public rights of way.**
- 2.4 **Adequate pavements.**
- 2.5 New parking.
- 2.6 Charging points
- 3.2 Broadband.
- 3.5 Mobile phone and data transmission.
- 4.1 **New medical facilities.**
- 4.2 Allotments.
- 4.3 Facilities for children and young people.
- 4.4 New village hall.
- 5.1 **Design of new development:**

New development will be expected to **demonstrably apply the Horsmonden Design Guidelines** and will be supported in principle where it:

- **Is designed to a high quality that responds positively to the heritage and distinctive character of Horsmonden as identified in the Character Analysis;**

- **Respects the scale, external appearance, height, form, layout/orientation and density of its parish context**;
 - Utilises good quality durable materials, locally sourced where possible, and adopts detailing and appearance that complements those characteristically used within Horsmonden;
 - **Respects the boundary treatments and landscape features of the site and its context**;
 - **Minimises the impact on the residential amenity of existing neighbouring properties**;
 - Is designed to meet Lifetime Homes Standards (or successor schemes);
 - **Has regard to the High Weald AONB Housing Design guide where appropriate**
- The HNP Design Guide states: *“Landscaping and public realm should be interconnected to create a network of green infrastructure both within any site and to connect to wider routes and places”*.

6.1 Meeting housing need.

6.3 Provision of sheltered housing.

7.1 **Local Green Spaces**

7.2 **Protecting important views:**

Development must not cause any loss or diminution of historical or significant views (in HNP Figure 35) within and into and out of settlements.

Views 6 (from the top of the site southwards), View 7 (from the bottom of the site northwards) and View 13 (from the south side of the valley northwards towards the site) are particularly relevant to AL/HO3. (See Appendix 5)

7.3 **Biodiversity net gain**

7.4 **Trees and hedgerows**

7.5 **New open spaces**

Major residential development should be designed to **provide new open amenity spaces**, reflecting and expanding the existing network of accessible open space in the parish

7.7 **Light pollution**

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.**

7.9 **Development adjacent to the AONB**

Where development is proposed outside of the AONB it should seek to **avoid or minimise damage to the environment, character and landscape setting of the AONB.**

Submission Local Plan Examination:

39. The Submission Local Plan Examination took place between March and July 2022 and the Inspector wrote with his initial findings to TWBC in November 2022.
40. The examination covered Horsmonden in June 2022 which was reported as: Matter 7: Residential Site Allocations Issue 13: Horsmonden.
41. In its response to the Inspector’s Question 6: How has the proposed area of residential development been established? What is it based on and is it justified? TWBC state: *“47. There is now one site promoter promoting the whole of the area included within Policy AL/HO3, and this promoter has confirmed that the consented site (as detailed above) and the remaining areas within the allocated site will be brought forward together and promoted as one complete site. This is confirmed by the representation made to the Regulation 19 consultation by the site promoters, Persimmon Homes South East, Rep PSLP 2014. The red line site area for Policy AL/HO3 includes the consented site area.” This*

is not correct as there is no evidence that Persimmon have any intention of promoting SHELAA sites 108 or 324 (see Figure 1 above and Appendix 2).

42. TWBC goes on to state:

*“49. The area identified for residential development in the Indicative Site Layout Plan Map 62, together with other uses, **reflects the outcome of the assessment of the site’s opportunities and constraints, including landscape and topographical considerations, and the detailed discussions carried out with the Council’s specialist Landscape and Biodiversity Officer and the local community. A particular concern identified when the site was suggested and at the first site visit by officers was the rising ground and the potential effect on views from the south and AONB. This is the principal reason that development on the high ground to the north was not proposed.**”*

*“51. The Landscape Sensitivity Assessment of additional settlements in Tunbridge Wells: Paddock Wood, Horsmonden, Hawkhurst, Cranbrook [CD 3.40c] provide an assessment of the extent to which the character and quality of the landscape around Horsmonden is, in principle, susceptible to change as a result of introducing particular types of development. **The assessment found that all land around Horsmonden had a high sensitivity to all scales of development**”.*

*“53. This work highlighted the importance of retaining the railway land and the associated vegetation **and the positive contribution to landscape character made by the orchard** both of which the Council has sought to respect through the allocation”.*

*“55. The AONB Setting Analysis Report concludes at paragraph 4.3.17 that “site HO3 lies furthest from the AONB boundary and the predicted effects of the proposed development on the setting to the AONB would be limited to perceptual effects resulting from changes to views into or out of the AONB. The site is visible within distant views from the high ground within the AONB at Goudhurst. Within these views the development of the site would form a noticeable, if distant expansion to Horsmonden. **The prescriptions for the proposed Open Space and Landscape Buffer within the draft local plan policy AL/HO3, would reduce the extent to which the development would (be) appear to expand beyond the existing settlement edge**”.*

*“56. The proposed area identified for residential development 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 AONB. This includes the promotion of a landscape-led approach to master planning that **creates a structure to contain the allocation site area which is consistent with the character of the adjacent High Weald AONB** (reference: criterion (6) of Policy AL/HO3), which should include testing of any impact of proposed development within site AL/HO3 from prominent viewpoint locations at Goudhurst. **Any masterplan should adhere to relevant guidance, including the National Design Guide, and should take inspiration from the High Weald Design Guide and High Weald AONB Management Plan. Additionally, careful consideration is to be given to the setting of listed buildings and other heritage assets** (reference: criteria (10) and (11) of Policy AL/HO3)”*

43. TWBC then address Heritage Assets:

“58. The Council has given very careful consideration to the impact of allocation on designated heritage assets. In broad terms the Council’s response to Matter 5, Issue 1 (Site Selection Methodology), Question 3 explains how the Council has taken account of heritage assets in the plan-making process. That response sets the context to the more site-specific response that follows.”

“60. The assessment of possible locations and types of development to inform the proposed areas for development took account of the heritage assets adjacent, and

within close proximity to, the site. The map set out at Appendix 1 indicates the location of New Bassetts Cottages, Bassetts Villas, Old Bassetts Cottages, listed buildings located opposite the site, and the route of the Hop Pickers Line through the site. Each of these heritage assets is considered below.”

“62. Bassetts Villas, located to the west of New Bassetts [Cottages] and to the west of PRoW WT340a, are Victorian properties originally used as the office for the surrounding apple farm and accommodation for the farm workers. They are not listed buildings, but as non-designated heritage assets would be protected by the requirements of Policy EN 5: Heritage Assets. They are not included within the site red line area”.

44. TWBC’s Summary and Conclusion to Question 6 is as follows:
*“68. The above response explains how the Council has established the areas proposed for residential use within site AL/HO3, taking account of site constraints, **evidence base work including landscape and heritage assessments, discussion with specialist officers as well as giving consideration to Local Plan consultation responses. The Council is confident that effects on heritage assets can be dealt with adequately through a planning application and that the site specific policy and supporting map give added confidence that the effects, which are likely to be limited can be minimised to an acceptable level”.***
45. **TWBC made it clear to the Inspector that detailed consideration has been given to multiple landscape and visual impact assessments in determining the extent of the allocation for residential development including a doctor’s surgery.**
46. The Inspector also requested a written note from TWBC on: **Densities of allocated residential sites in the Submission Local Plan** which was published in June 2022. This contains the allocated number of houses divided by total site area for each allocated site. In the case of AL/HO3 **this is of little value due to the inclusion of the areas allocated for community use which is inconsistent with TWBC’s methodology See paragraph 6 above.**
47. TWBC Response to the Inspectors Initial Findings Letter on The Local Plan were published to the Council in November 2023. This includes Local Plan Development Strategy Topic Paper – Addendum which notes that the total Local Plan allocated housing for Horsmonden has reduced to 230 to 290 dwellings following the grant of outline permission for AL/HO2 at Brenchley Road for 68 houses. No reference was made to AL/HO3 Land East of Horsmonden in either the Inspectors letter, nor TWBC’s planned response, and accordingly TWBC maintain (stated verbally by the Head of Planning) that the Local Plan for Horsmonden is nearly complete. The last edits to the Local Plan will be subject to consultation under “Main Modifications” some time in 2024.

Persimmon Planning Application to Develop AL/HO3 January 2023:

48. In January 2023 Persimmon made an application for planning permission to build 163 houses on Land East of Horsmonden - Ref 23/00044/HYBRID.
49. This hybrid application included the consented brownfield development for 20 dwellings (15/505340/OUT and 19/03657/REM).
50. This application received over 250 objections registered on the TWBC planning portal.
51. The application included a Landscape and Visual Impact Assessment (LVIA) dated December 2022. This assessment takes a very structured approach and included many points where the site is simply not visible. **It does not focus on critical areas of impacted landscape and places where the new development is visible.**
52. **No consideration** is given to the impact on the AONB from Goudhurst as identified in TWBC’s AONB Setting Analysis, which even as “distant views” carries “great weight”.

53. **Limited consideration** is given to the visibility of the site from the south side of the valley.
54. **No consideration** is given to the landscape setting and amenity of the non-designated heritage assets at Bassetts Villas.
55. **No consideration** is included about the impact of the site on the very dark night sky of the exiting landscape, which will be visible from the AONB.
56. The high density of the housing, relative to the setting of the site as a transition from the village to the countryside, is **not mentioned**, nor relative to the existing settlement, nor the fact that at such densities, cars will also be visible.
57. **No mention is made of the fact that the development extends into the designated green space outside the LBD defined in the Submission Local Plan and the Horsmonden Neighbourhood Plan which are the result of considerable evidence from multiple sources as identified above.**
58. The LVIA identifies that the site is a tranquil orchard landscape with sense of calm but then makes a generic conclusion that *“the sensitively considered and designed layout, retaining built form to the lower slopes, strategic landscape infrastructure, areas of retained open space and orchard, alongside enhancement of existing vegetation, and new internal development planting will help to visually integrate the development into the surrounding landscape.”* (para 8.5.2) and, *“On balance, the lower slopes of the Site proposed for built development are well contained within the wider landscape and visual effects are localised. In conclusion, in landscape terms there are no overriding landscape or visual effects that should prevent the development of the Site as proposed.”* (Para 8.5.3)

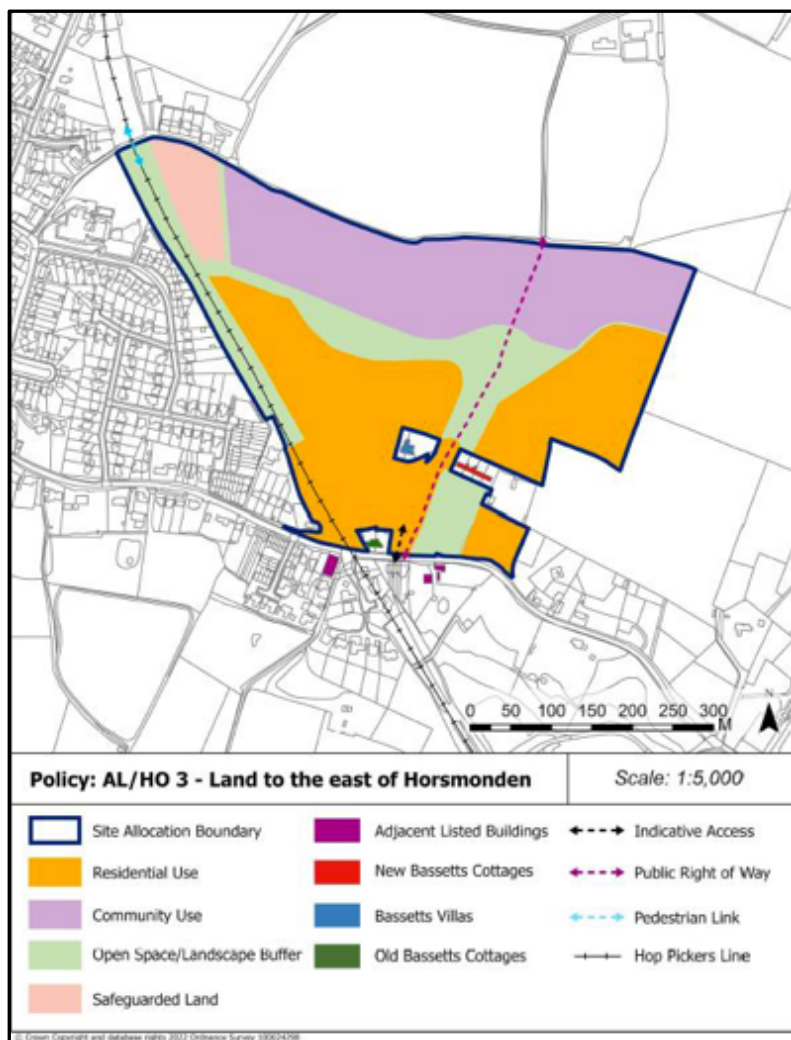
Persimmon Revised Proposal October 2023:

59. In October 2023 Persimmon presented a **Revised Proposal for AL/HO3** to the Horsmonden Parish Council. **Appendix 7a shows the proposed new layout which includes the new Local Plan LBD (blue line).** This Revised Proposal is for 120 dwellings excluding the consented brownfield application for 20 dwellings (15/505340/OUT and 19/03657/REM) which received final approval of all conditions and Persimmon started construction in November 2023. Thus 140 dwellings in total are proposed on Persimmon’s part of AL/HO3.
60. In presenting the Revised Proposal Persimmon **acknowledged that there are some adverse Landscape and Visual Impacts within 23/00044/HYBRID for the eastern part of the site, and so the area to be developed to the East of the site has been reduced to 22 dwellings (from 47) leaving the upper part for community use.**
61. To the West the Revised Proposal now includes the doctor’s surgery situated on land designated by the Post-Examination Local Plan as open space for community use. And the area of residential houses still extends beyond the Local Plan LBD.
62. Persimmon state that they will submit a further LVIA report together with the application which will address these suggested changes to the development boundaries.
63. **The density of housing in the western development of the Revised Proposal is even higher than the HYBRID application** as evidenced by the greater “Development Edge of the Previous Application” marked on the Revised Proposal Layout in Appendix 7a.
64. In response to written questions submitted by Horsmonden Parish Council to Persimmon after the presentation of its Revised Proposal, Persimmon provided a “Plan Showing Housing Density” for selected areas within the village. See **Appendix 7b.** This is considered further in **para. 76 onwards** below.

Review of new Local Plan housing target range for Horsmonden and AL/HO3

65. In the latest version of the new Local Plan, Policies PSTR HO/1 and AL/HO3 set out the specific conditions for the proposed development on the allocated site to the East of Horsmonden at Bassetts Farm.
66. PSTR HO/1 currently defines a target range of 230 to 290 dwellings to be delivered by Horsmonden during the plan period (to 2038) (see Local Plan Development Strategy Topic Paper – Addendum November 2023).
67. Policy AL/HO3 defines an allocation for 115 to 165 dwellings for Land East of Horsmonden. (see **Appendix 6**)
68. AL/HO3 is a combination of several parcels of land (see **para 4**). **Table 1** below shows these components with the SHELAA site reference numbers and the area in hectares as per the SHELAA site sheets (see **Appendix 2**). By referring to the Local Plan Policy AL/HO3 Map 62 Site Layout Plan (page 263) see Figure 3 below, the area designated for residential housing and the doctor's surgery (Map 62 orange area) can be measured by each sub area using google maps. Each developable area is reduced by a percentage to allow for non-housing elements such as some roads, attenuation basins, buffers etc surrounding or within the developments. This gives a net area for housing which, when combined with the SHELAA standard of 30 houses per hectare (**See para 6**), gives a mid-point number of houses for the SLP housing target range. The density used for the eastern part of the site has been reduced to 25 houses per hectare consistent with **para 36** above.

Figure 3. SLP Map 62 Site Layout Plan Policy AL/HO3 (as shown to Inspector during examination Matter 7: Residential Site Allocations Issue 13: Horsmonden Appendix 1)



69. **Table 1** below shows the breakdown of the SLP housing target range for AL/HO3 at 140 plus/minus 25. **This is consistent with the figures stated in the new Local Plan.**

TABLE 1: Breakdown of Allocation for AL/HO3 - Land to the East of Horsmonden (Refer SLP AL/HO3 Site Layout Map 62)				Orange Residential & Surgery Use	Non-housing Roads, SUDs Buffers, Surgery	Housing Net Area (ha)	Housing Density (h/ha)	Houses #	Notes
Description	Reference	Site Area (ha) per Ref.	Gross Area (ha) a)	Allowance b)					
1. School Expansion Land to NW	SHELAA 324	1.82	n/a	n/a	n/a	n/a			
2. Old Station Garage & Hop Pickers Line	SHELAA 108	1.85	0.45	25%	0.34	30	10		
3. Bassetts Farm Brownfield Devt. (approved)	19/03657/REM	0.93	0.93	30%	0.65	30	20		
4. Land to S & SW of HO3	SHELAA 82	1.01	0.39	100%	0.00				
5. Land to East of PROW WT340A	SHELAA 297 }		2.05	25%	1.53	25	38	d)	
6. Land to West of PROW WT340A	SHELAA 297 }	13.79	3.19	25%	2.39	30	72		
7. Land for Doctor's Surgery	SHELAA 297 }		0.22	100%	0.00				
AL/HO3 Overall		19.4	7.23		4.91		Allocation	140	e)
Sites 3 to 7 only		15.73	6.78		4.57		Allocation Low	115	
							Allocation High	165	
Notes:				Summary of Land Use:					
a) By measurement (orange areas)					Residential Use	4.91			
b) Calculated					Doctors' Surgery & School	2.04			
c) As per SHELAA methodology Main Report 3.38					Roads, Buffers, SUDs etc	1.71	} Non-Residential		
d) Lower density per AL/HO3 (5.609). Subject to LVIA					Open Space (incl SW SUDs)	10.74	} Use	55%	
e) Mid range as per methodology						19.40		12.45	64%

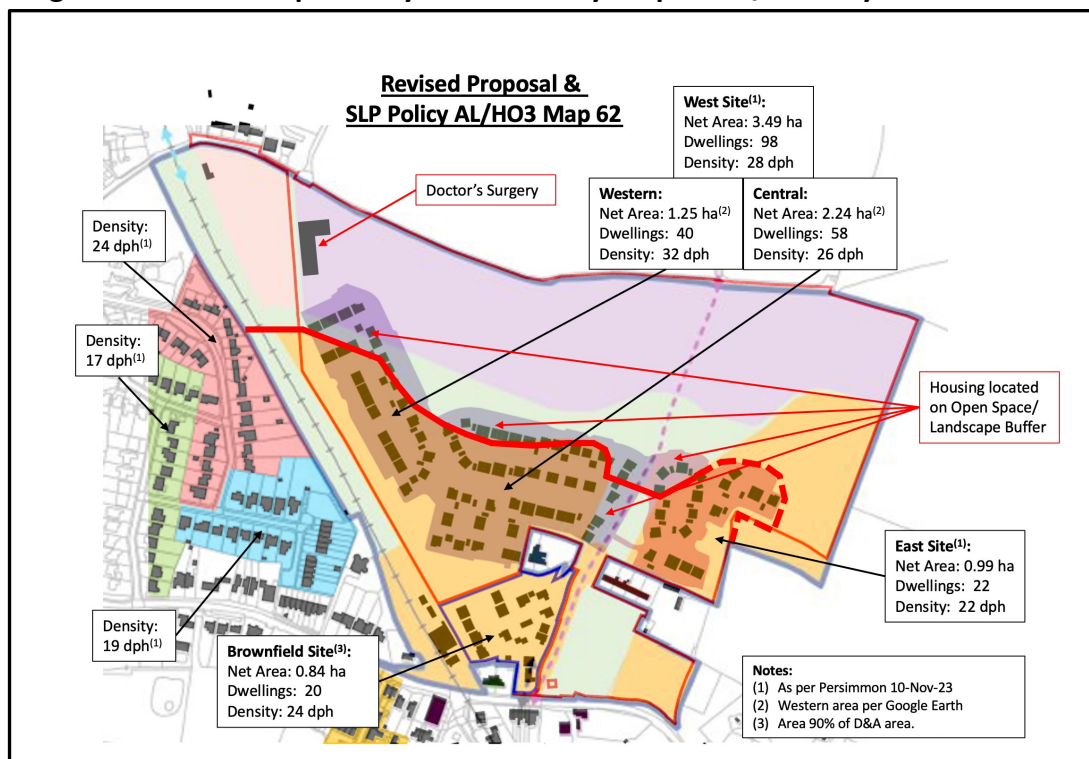
70. As per **para. 59**, Persimmon presented a revised site layout plan to the Parish Council on 17-Oct-23. (**Appendix 7a**) In answer to written questions submitted by the Horsmonden Parish Council after this presentation, Persimmon provided a plan showing housing densities on 10-Nov-23. **See Appendix 7b.**
71. The Persimmon proposal does not include the School Expansion Land (1), nor the allocated building land at Old Station Garage & Hop Pickers Line (2) – both part of the AL/HO3 allocation.
72. **Table 2** shows the breakdown for Persimmon's revised Oct-23 proposal:

TABLE 2: Breakdown of Persimmon Revised Proposal for HO3 (Reference Persimmon revised layout Oct-23)				Residential & Surgery	Non-housing Roads, SUDs Buffers, Surgery	Housing Net Area (ha)	Housing Density (h/ha)	Houses #	Notes
Description	Reference	Site Area (ha) per Ref.	Gross Area (ha) a)	Allowance b)					
3. Bassetts Farm Brownfield Devt. (approved)	19/03657/REM	0.93	0.93	10%	0.84	24	20	c)	
4. Land to S & SW of HO3	SHELAA 82	1.01	0.39	100%	0.00				
5. Land to East of PROW WT340A	Pers Exhibition }		1.36	27%	0.99	22	22	d)	
6. Land to West of PROW WT340A	Pers Exhibition }	14.34	4.41	21%	3.49	28	98	e)	
7. Land for Doctor's Surgery	Pers Exhibition }		0.22	100%	0.00			f)	
Revised Application Overall	Pers Exhibition	16.28	7.31		5.32		Proposed	140	
Notes:				Summary of Land Use:					
a) By measurement					Residential Use	5.32			
b) Calculated					Doctors' Surgery	0.22			
c) As per application D&A. 90% area for housing 10% access road.					Roads, Buffers, SUDs etc	1.38	} Non-Residential		
d) Houses/Area/Density per email to PC 10-Nov-23. Area reduced after LVIA					Open Space (incl SW SUDs)	9.36	} Use	57%	
e) Houses/Area/Density per email to PC 10-Nov-23. Area extends beyond LBD						16.28		10.74	66%
f) Doctors' Surgery located outside SLP allocated area and outside LBD									Ref Pers exhibition 11.33 ha (69.59%)

73. Persimmon's Revised Proposal takes account of new Landscape and Visual Impact considerations for the eastern part of the HO3 site, and, as a result of this, housing has been reduced in this eastern area to limit the visibility of the housing from the southern side of the valley. **The LVIA reduction to 22 houses on the eastern part of the site must also be applied to the Local Plan target range, to make it consistent with its own conditions (from 38 to 22 houses).**
74. However, this **Revised Proposal extends the built area beyond the new Local Plan LBD on the site to the West of the PROW (WT340A).** 1.22 ha more land is used for residential properties.

75. Table 1 takes account of the new Local Plan requirement to include a doctor's surgery within the allocated residential area (orange area Map 62 and AL/HO3 condition 4), **but the Revised Proposal uses a further 0.22-0.25 hectares for the doctors' surgery outside the area allocated for residential use.** It is thus outside the LBD on the area designated as public Open Space.
76. If the new Local Plan AL/HO3 Site Layout Plan Map 62 (see **Figure 3 above**) is compared with the Revised Proposal Layout as shown in Persimmon's House Density Plan (**Appendix 7b**), breaches of the new Local Plan prescribed orange development area can be clearly seen. **Figure 4** shows Figure 3 and Appendix 7b combined:

Figure 4 Revised Proposal Layout and Policy Map 62 AL/HO3 Layout Combined



77. **Figure 4 also clearly shows that 5 houses have been placed on land designated by the new Local Plan as "Open Space/Landscape Buffer" immediately to the west of the public right of way.**
78. In addition to the breaches in paras. 74, 75 and 77, the Revised Proposal fails to take account of the setting and amenity of Bassetts Villas (See **para 43 & 44** above). **To provide some setting and amenity space around Bassetts Villas and give views up the slope northwards as it enjoys today, at least the 5 houses identified in para 77 above need to be removed, if not more. (see Appendix 5 photographs 3, 4, 6 & 7)**
79. **Overall, at least 31 more houses are being proposed on the western part of AL/HO3 in the Revised Proposal than are expected by the new Local Plan allocation methodology.**
80. The Local Plan allocation for AL/HO3 which is applicable to the Persimmon proposals can be summarised as:
- Current AL/HO3 allocation: 140
 - less Old Station Garage allocation: (10)
 - less eastern LVIA correction: (16)
 - less provision for BV setting/amenity (5)
 - SLP Allocation for Persimmon: **109**
(A range of 90 to 128 pro-rata)

81. **Table 3** shows a Local Plan compliant version of Persimmons Revised Plan. This reduces the development area back to the Local Plan level and brings the Doctor's Surgery back into the residential area.
82. **To conform to the Local Plan requirements Persimmons Revised Plan needs to be reduced to 88 dwellings from 120, excluding the consented brownfield development.**

TABLE 3: SLP Compliant Breakdown for Persimmon Revised Proposal (Reference Map 62 & Persimmon revised layout Oct-23)				Residential & Surgery	Non-housing Roads, SUDs	Housing	Housing	Houses	Notes
Description	Reference	Site Area (ha) per Ref.	Gross Area (ha) a)	Allowance b)	Net Area (ha)	Density (h/ha)	#		
3. Bassetts Farm Brownfield Devt. (approved)	19/03657/REM	0.93	0.93	10%	0.84	24	20	c)	
4. Land to S & SW of HO3	SHELAA 82	1.01	0.39	100%	0.00				
5. Land to East of PROW WT340A	Pers Exhibition }		1.36	27%	0.99	22	22	d)	
6. Land to West of PROW WT340A	Pers Exhibition }	14.34	3.19	21%	2.53	28	71	e)	
7. Land for Doctor's Surgery	Pers Exhibition }		0.22	100%	0.00			f)	
Revised Application Overall		Pers Exhibition	16.28	6.09	4.36		108		g)
					less setting/amenity of Bassetts Villas NDHA				
Notes:					Summary of Land Use:				
a)	By measurement				Residential Use	4.36			
b)	Calculated				Doctors' Surgery	0.22			
c)	As per application D&A. 90% area for housing 10% access road.				Roads, Buffers, SUDs etc	1.12			
d)	Houses/Area/Density per email to PC 10-Nov-23. Area reduced after LVIA				Open Space (incl SW SUDs)	10.58			
e)	Density per email to PC 10-Nov-23. Area as per SLP.					16.28			
f)	Doctors' Surgery located inside SLP allocated area, inside LBD					11.70			
g)	Removes houses from Open Space and allows for Bassetts Villas Non-Designated Heritage Asset setting and amenity.					72%			

83. At this level of development on AL/HO3, **Horsmonden's contribution to Borough housing needs is well within the range stated in PSTR HO/1 after the necessary adjustments outlined in this paper (213 to 265).** 235 new houses would be delivered compared to a mid-point target of 239. (see Table 4 below)

Table 4. Overall Horsmonden Housing delivery for new Local Plan:					
	SLP Low	SLP Mid	SLP High	Actual/Proposed	
Gibbet Lane (AL/HO1)	45	50	55	49	As built
Brenchley Road (AL/HO2)	80 (10)	90 (20)	100 (30)	68	50-70 per June 2022 statement to Inspector LP Dev Strategy Topic Paper different adjustment Outline Planning Granted 22/00296/OUT with conditions
Bassetts Farm (AL/HO3)	115 (8) (13) (4)	140 (10) (16) (5)	165 (12) (19) (6)	108	Adjust to remove Old Station Garage Adjust for Eastern LVIA reduction 38 to 22 =(-16) Adjust for setting/amenity of Bassetts Villas NDHA Modified Persimmon Plan
Persimmon site delivery target	90	109	128	108	
Old Station Garage (part of AL/HO3)	8	10	12	10	Add back for potential future infill.
Horsmonden Total Adjusted Target	213	239	265	235	
of which Affordable Housing	85	96	106	94	
LP allocation level without HO3 adjustment	230	260	290		{ Per Local Plan Development Strategy Topic Paper
of which Affordable Housing	92	104	116		{ - Addendum. Para 13.1 November 2023

84. However, the Revised Proposal for the site to the west of the PROW (WT340A) is stated by Persimmon in its 10-November response to the Parish Council as having a housing density of 28 dwellings per hectare. **Figure 4** above shows that this West site is in fact made up of a western and a central area. The central area has a housing density of 26 dw/ha and **the western area has a much higher density of 32 dw/ha.**
85. The central and western area also project beyond the LBD as defined by the new Local Plan and, together with the misplaced doctor's surgery, these additions would be very visible from Goudhurst and the AONB. (See **appendix 5 photographs 1 and 2**). **As the highest density part of the Revised Proposal the western area and the doctor's surgery will not give a sense of transition as the village merges into the countryside. Also the higher the density the more likely the impact of harmful light pollution to the current dark skies.**

86. NPPF Section 7: Requiring Good Design, sets out that **good quality and inclusive design** is a key aspect of sustainable development. As such all new developments should ‘function well and add to the overall quality of the area..;’ ‘establish a strong sense of place...;’ ‘optimise the potential of the site to accommodate development, creating and sustaining an appropriate mix of uses (including green and other public space);’ ‘**respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;**’ and ‘be visually attractive as a result of good architecture and landscaping’. These principles are supported by NNPG 26: Design.
87. This is reflected in new Local Plan Policies STR 1, STR 8 and H2 (**Para. 6 and Para. 27**) **all of which recognise that it is critical to address the setting of the development** and Policy H2 regarding housing density states: “...it is recognised that when some sites are considered in more **detail a higher density may not always be appropriate**. The policy takes a flexible approach to density, allowing the context of the site and the characteristics of the surrounding area to be taken into account on a case-by-case basis.”
88. AONB Setting Analysis for AK/HO3 carried out for TWBC concludes:
 4.3.17 “.....The prescriptions for the proposed Open Space and Landscape Buffer within.... the draft local plan policy AL/HO3, **would reduce the extent to which the development would be appear to expand beyond the existing settlement edge.**”
 4.3.19 “Design measures that would reduce the predicted effects on the setting to the AONB include:
 Site HO3 – in addition to conforming to the Green Infrastructure provision set out within the draft policy, test the visibility of proposed development within site HO3 from prominent viewpoint locations at Goudhurst (e.g. photograph H6), using wireframes or photomontages in order to fully assess the potential effects on the setting to the AONB.
 - Promote a landscape led approach to masterplanning **that creates a structure to contain the allocation sites which is consistent with the character of the adjacent High Weald. Any masterplan should adhere to relevant guidance including the National Design Guide and should take inspiration from the High Weald Design Guide and Management Plan.**”
89. **The landscape and visual harm that a development at AL/HO3 will cause if it is not well designed and contained with the new LBD, particularly when viewed from within the site as a transition development between the rest of the village and the countryside, the southern side of the valley looking northwards, and from Goudhurst in the AONB, can be greatly mitigated by:**
- **Lower density housing distributed within plenty of on-site green space and ecology corridors;**
 - **Containing western site development within the areas defined by the LBD;**
 - **Adopting the reduced eastern development as per the Persimmon Revised Proposal;**
 - **Keeping all external lighting to a minimum to reduce its clear visual impact on the existing site and AONB dark skies.**

These mitigations are fully consistent with the National Design Guide, the Horsmonden Neighbourhood Plan Design Guide and the High Weald Design Guide. The High Weald Design Guide references areas within the setting of the AONB which includes AL/HO3. It seeks to “..**ensure that the housing developments are truly ‘of the place’, a genuine and integrated part of the existing settlement, rather than a generic ‘added on’ estate**”. And goes on to state that: “**...new development should be good enough to be seen, not justified on the basis that existing or proposed planting will screen it from view**”. And: “**High Weald settlements are characteristically very ‘green’ places, with**

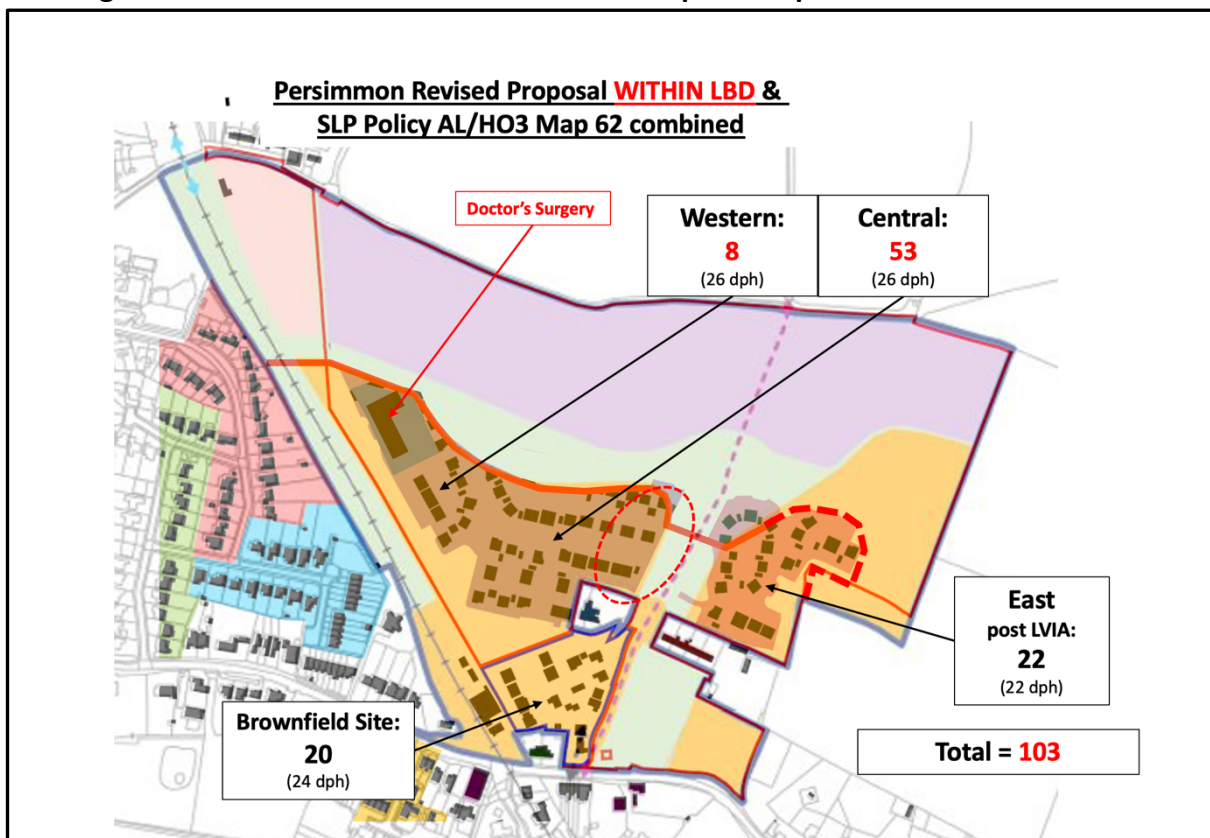
substantial soft landscaping; grass verges, lush hedgerows and full tree canopies breaking up the built form in all but the tightest-knit built core of villages and towns”

90. Table 5 & 5a and Figure 5 show the effect of reducing the housing density of the western site at AL/HO3 whilst containing the development, including the doctor’s surgery, within the orange area prescribed by the new Local Plan in Map 62 (Figure 3)

TABLE 5: Modified Persimmon Revised Proposal on SLP area with reduced eastern site and lower density.			Residential & Surgery	Non-housing Roads, SUDs	Housing	Housing	Houses	Notes
(Reference Map 26 & Persimmon revised layout Oct-23)			Gross Area (ha)	Allowance	Net Area (ha)	Density (h/ha)	#	
Description	Reference	Site Area (ha)	a)	b)				
3. Bassetts Farm Brownfield Devt. (approved)	19/03657/REM	0.93	0.93	10%	0.84	24	20	c)
4. Land to S & SW of HO3	SHELAA 82	1.01	0.39	100%	0.00			
5. Land to East of PROW WT340A	Pers Exhibition	14.34	1.36	27%	0.99	22	22	d)
6. Land to West of PROW WT340A	Pers Exhibition		3.19	21%	2.53	26	66	e)
7. Land for Doctor’s Surgery	Pers Exhibition		0.22	100%	0.00			f)
Revised Application Overall	Pers Exhibition	16.28	6.09		4.36	Proposed	103	g)
Notes:				Summary of Land Use:				
a) By measurement				Residential Use	4.36			
b) Calculated				Doctors' Surgery	0.22			
c) As per application D&A. 90% area for housing 10% access road.				Roads, Buffers, SUDs etc	1.12			
d) Houses/Area/Density per email to PC 10-Nov-23. Area reduced after LVIA				Open Space (incl SW SUDs)	10.58			
e) Density reduced see text. Area as per SLP					16.28	11.70	72%	
f) Doctors' Surgery located inside SLP allocated area and inside LBD								
g) Removes houses from Open Space and allows for Bassetts Villas Non-Designated Heritage Asset setting and amenity.								

Table 5a: Breakdown of AL/HO3 West Site within LBD				Gross Area ha	Buffer, OS etc	Net Area ha	Density h/ha	Houses #
6	Land to West of PROW WT338 within LBD	6	Total West	3.19	27%	2.33	26	61
6a	Western area within LBD excl. Surgery	6a	West	0.34	15%	0.29	26	8
6b	Central Area within LBD	6b	Central	2.85	28%	2.04	26	53
Reference: Persimmon Housing Density Plan to PC 10/11/23. Open space within LBD not included in 6 & 6b								

Figure 5 – A Modified Persimmon Revised Proposal as per Table 5 & 5a



91. **This level of development would yield 103 dwellings on the Persimmon part of AL/HO3.** Of which 20 would be on the consented brownfield site, 22 would be to the east of the PROW (WT340A) and 61, plus the doctor's surgery, would be to the west of the PROW (WT340A).
92. **Overall Horsmonden would contribute 230 dwellings through the allocation process compared to a revised allocation range of 213 to 265. See Table 6 below:**

Table 6. Overall Horsmonden Housing delivery for new Local Plan:					
	SLP Low	SLP Mid	SLP High	Actual/Proposed	
Gibbet Lane (AL/HO1)	45	50	55	49	As built
Brenchley Road (AL/HO2)	80	90	100		50-70 per June 2022 statement to Inspector
	(10)	(20)	(30)		LP Dev Strategy Topic Paper different adjustment
	70	70	70	68	Outline Planning Granted 22/00296/OUT with conditions
Bassetts Farm (AL/HO3)	115	140	165		
	(8)	(10)	(12)		Adjust to remove Old Station Garage
	(13)	(16)	(19)		Adjust for Eastern LVIA reduction 38 to 22 =(16)
	(4)	(5)	(6)		Adjust for setting/amenity of Bassetts Villas NDHA
Persimmon site delivery target	90	109	128	103	Modified Persimmon Plan including western area reduced density
Old Station Garage (part of AL/HO3)	8	10	12	10	Add back for potential future infill.
Horsmonden Total Adjusted Target	213	239	265	230	
of which Affordable Housing	85	96	106	92	
LP allocation level without HO3 adjustment	230	260	290		{ Per Local Plan Development Strategy Topic Paper
of which Affordable Housing	92	104	116		{ - Addendum. Para 13.1 November 2023

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Appendix 1.

Timeline of key publications and events for the TWBC Local Plan and Planning Applications for AL/HO3

Timeline for TWBC Local Plan & Applications for AL/HO3				
Publication Dates		Local Plan Publication Title	Document Ref.	Planning Applications at AL/HO3
Jul	2015			15/505340/OUT Outline for 30 dwellings on brownfield site
Feb	2016	First SHELAA Call for Sites	CD 3.22	
May	2017	Second SHELAA Call For Sites	CD 3.22	
Jul	2018	Landscape Sensitivity Assessment for Horsmonden	CD 3.40c	
Aug	2019	Limits of Built Development Topic Paper	CD 3.21	
Sep	2019	Distribution of Developemnt Paper	CD 3.16	
Sep	2019	Draft Local Plan	CD 3.9	
Sep	2019	Regulation 18 Consultation	CD 3.2	Persimmon issue AL/HO3 LVIA with representations.
Nov	2019			19/03657/REM for 20 dwellings on brownfield site
Nov	2020	AONB Setting Analysis - Horsmonden	CD 3.95d	
Jan	2021	Revised SHELAA Main Report	CD 3.77a & j	
Feb	2021	Updated version of Limits of Built Development Paper	CD 3.82	
Mar	2021	Considerations of Reg 18 consultation by TWBC	CD 3.69 part 2	
Mar	2021	Pre-Submission Local Plan	CD 3.58	
Jun	2021	Regulation 19 Consultation	CD 3.3/69/125	
Nov	2021	Submission Local Plan to Inspector	CD 3.128/129m	
Mar-Jul	2022	Examination of Submission Local Plan	TWBC website	
Nov	2022	Inspectors letter of intitla findings to TWBC	TWBC website	
Jan	2023			TW/23/00044/HYBRID for 163 dwellings incl brownfield
July	2023	Horsmonden Neighbourhood Plan is made	TWBC website	
Oct	2023			Revised layout for 140 dwellings incl 20 on brownfield
Nov	2023	TWBC Response to Inspector's letter	TWBC website	
Nov	2023	Local Plan Development Strategy Topic Paper – Addendum	TWBC website	
Nov	2023			All conditions for 20 dwellings on brownfield granted
Nov	2023			Construction starts on brownfield site.

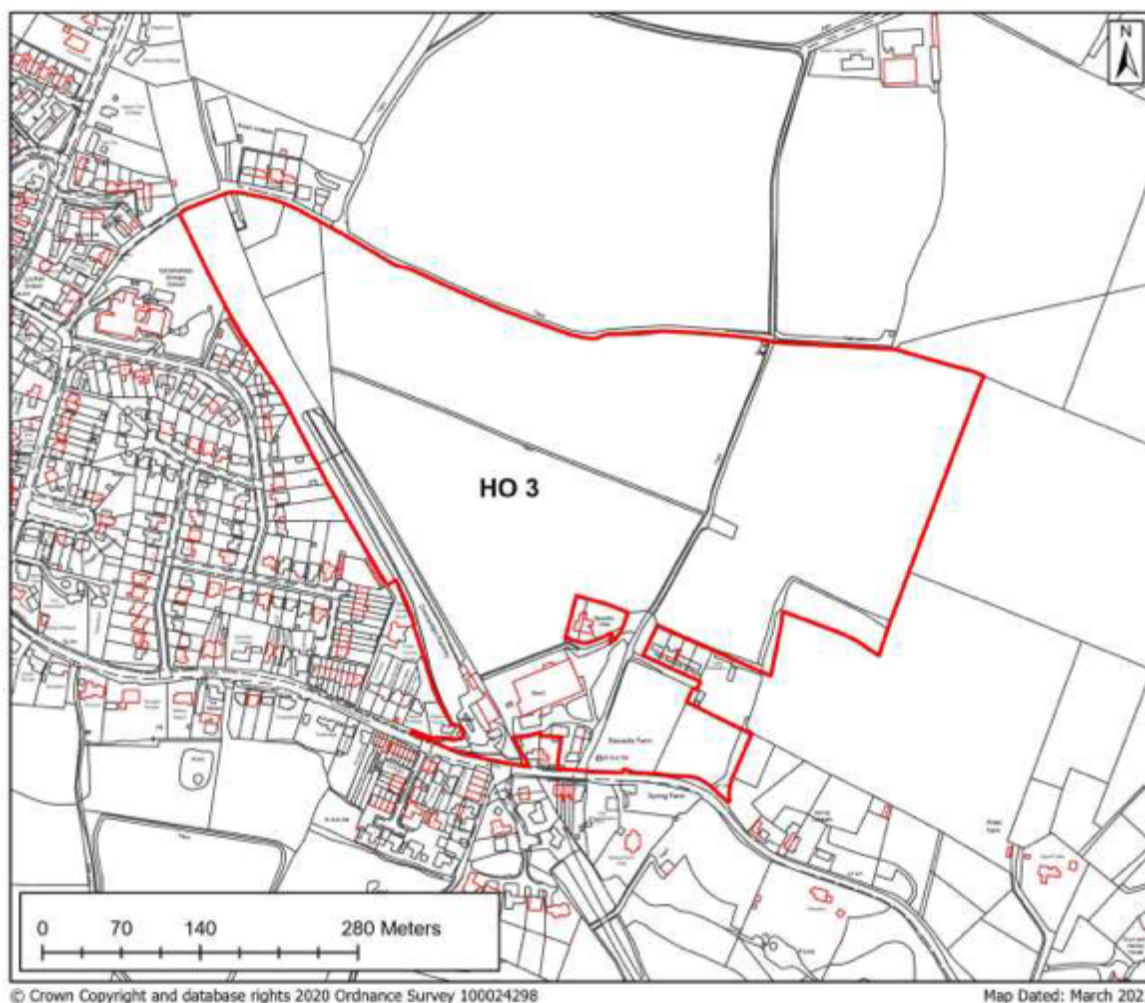
Appendix 2.

Copies of SHELAA Site Assessments for Sites included in Local Plan Allocation AL/HO3

Reference: Site Assessment Sheets for Horsmonden Parish.
Strategic Housing and Economic Land Availability Assessment for Pre-Submission Local Plan. January 2021

Site Reference: Local Plan Allocation AL/HO 3, including sites 82, 108, 297, and 324

Site Address: Land to the east of Horsmonden



Parish:	Horsmonden
Settlement:	Horsmonden
Gross area (ha):	19.0
Developable area (ha):	19.0
Site type:	Mainly undeveloped, including orchards, with some disused farm buildings (that have most recently been used for commercial uses), a car repair garage, and a portion of a disused (dismantled) railway line, and an electricity sub-station.
Potential site use:	Residential and community/educational uses
Potential yield if residential:	115 – 165 residential dwellings and community/educational uses
Issues to consider:	Ecology: TPO; Transport Infrastructure: PRow, Safeguarded Railways; 2016 Landscape Designation; HLC Period: Early modern, Early 20th century; Contaminated Land; APA: Dismantled railway the hop pickers line; ALC: GRADE 2;

Site Description:	LCA: Fruit Belt Mainly undeveloped site adjacent to the eastern edge of the village. Part of the site is planted to orchard. There is some built development with some disused farm buildings (that have most recently been used for commercial uses), a car repair garage, and a portion of a disused (dismantled) railway line, and an electricity sub-station. Site boundaries include trees and fencing. There are trees in the northern part of the site that are protected by a TPO and this part of the site includes ancient woodland. The site rises gently towards the north and west. There are number of existing vehicular and pedestrian access points into the site from the Goudhurst Road and a PROW that runs north-south through the site. Services provided in the village can be accessed from the site utilising the existing footway network. There are listed buildings to the south-west of the site and opposite the site.
Suitability:	Suitable. Site is adjacent to the LBD and is relatively close to the centre of the village and services that can be accessed by pedestrians using the existing footway network. The site is visible within distant views from the high ground within the AONB at Goudhurst.
Availability:	Available. Single ownership
Achievability:	This site, is considered a suitable site subject to landscape considerations. It is available and in single ownership. It is considered that the site could be delivered in the Local Plan period.
Sustainability Assessment:	Scale of this site is out of keeping with the existing settlement and causes negative scores for landscape and heritage especially with regard to short term adverse impacts on the AONB setting. Existing public transport services are unlikely to deter travel by private car and the poor range of services and facilities contributes to this effect. However, the site would contribute positively to the housing objective and the existing schools are likely to have adequate capacity.
Conclusion:	This site is considered suitable as a potential site allocation.
Reason:	Site is adjacent to the LBD and is in proximity to the centre of Horsmonden. The site is likely to be sustainable in this context. This site would form a logical extension to the LBD.

Site Reference: 82 (Local Plan Allocation AL/HO 3 (site is part of larger allocation)) in conjunction with site numbers 108, 297 and 324

Site Address: Land adjacent to Bassetts Farm, Goudhurst Road, Horsmonden, TN12 8AS



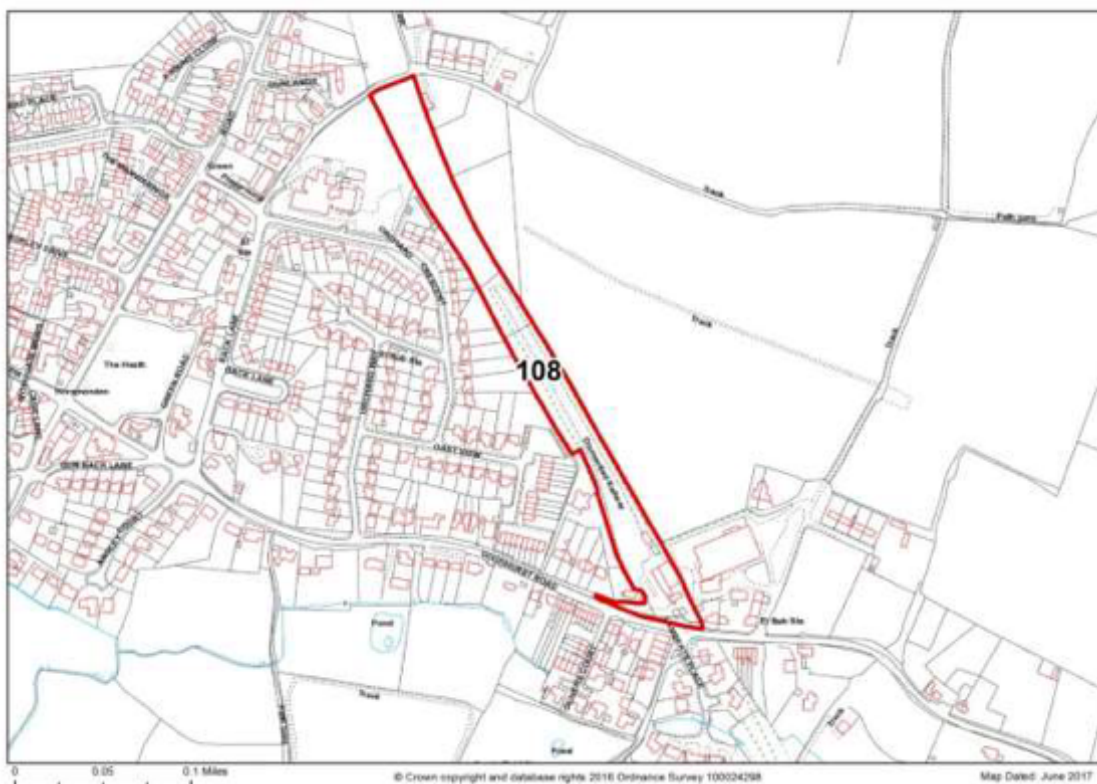
Parish:	Horsmonden
Settlement:	Horsmonden
Gross area (ha):	1.01
Developable area (ha):	1.01
Site type:	Greenfield site in proximity to LBD
Potential site use:	Site has been assessed for development potential, notably for a mix of residential, education and community facility
Potential yield if residential:	100-150 in conjunction with other sites forming wider site allocation
Issues to consider:	HLC Period: Late 20th century; APA: General background archaeological potential; ALC: GRADE 2; LCA: Fruit Belt; Highway matters;
Issues to consider:	Heritage: Adjacent to farmsteads and Listed Buildings; Land contamination (deport / dispensing of automotive) HLC Period: Late 20th century; APA: General background archaeological potential; ALC: GRADE 2; LCA: Fruit Belt;

Highway matters;

Site Description:	The site comprises an orchard that is possibly still in use and there is a sub station on the site. There are no existing buildings on the site. The site is adjoined by a collection of disused farm buildings, residential properties and orchard. Site boundaries include a low fence around the site with some trees to Goudhurst Road. There is a track along the western boundary of the site serving neighbouring residential properties. There is a lack of pavement along this stretch of Goudhurst Road. Adjacent to the western boundary of the site is a Restricted Byway. The topography of the site is fairly flat but it rises northwards. There is a public view of the site from Goudhurst Road and from the adjacent Restricted Byway.
Suitability:	Suitable: Site is in proximity to the LBD and has pedestrian access to the centre of Horsmonden. The site is likely to be sustainable in this context. It would form a logical extension to the LBD
Availability:	Available Single ownership
Achievability:	This site is considered a suitable site subject to landscape considerations. It is available and in single ownership. It is considered that the site could be delivered in the Local Plan period.
Sustainability Assessment:	Scale of this site is out of keeping with the existing settlement and causes negative scores for landscape and heritage especially with regard to short term adverse impacts on the AONB setting. Existing public transport services are unlikely to deter travel by private car and the poor range of services and facilities contributes to this effect. However, the site would contribute positively to the housing objective and the existing schools are likely to have adequate capacity.
Conclusion:	Site is suitable as a potential Local Plan allocation.
Reason:	Site is in proximity to the LBD and has pedestrian access to the centre of Horsmonden. It would form a logical extension to the LBD

Site Reference: 108 (Local Plan Allocation AL/HO 3 (site is part of larger allocation)) in conjunction with site numbers 82, 297 and 324

Site Address: Old Station Garage, Goudhurst Road, Horsmonden, TN12 8AD

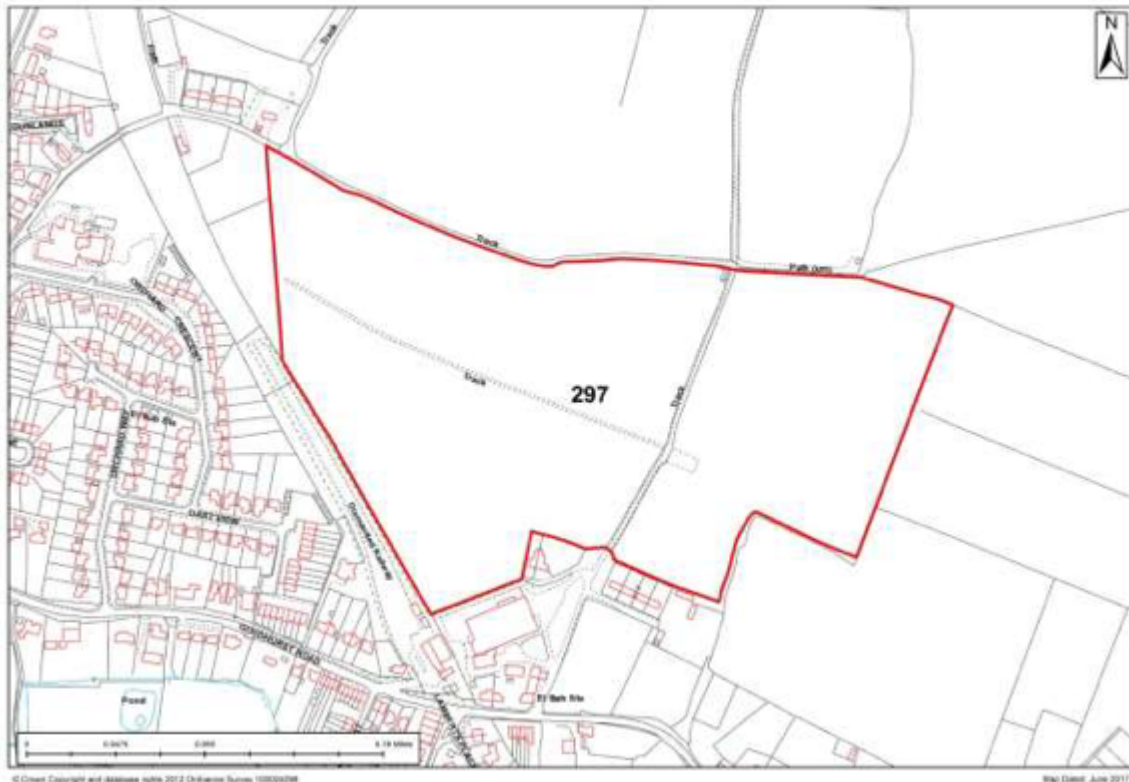


Parish:	Horsmonden
Settlement:	Horsmonden
Gross area (ha):	1.85
Developable area (ha):	1.85
Site type:	Part PDL site adjacent to LBD
Potential site use:	Site has been assessed for development potential, notably for a mix of residential, education and community facility
Potential yield if residential:	100-150 in conjunction with other sites forming wider site allocation
Issues to consider:	Ecology: TPO (at northern end / adjacent to site); Transport Infrastructure: Safeguarded Railways; 2016 Landscape Designation; HLC Period: Early modern; APA: Dismantled railway the hop pickers line; ALC: GRADE 2; LCA: Fruit Belt; Heritage: Adjacent to Listed Building / site includes Hop pickers Line; Highway matters; Potential level differences between the site and adjacent land;

Site Description:	<p>Mostly adjacent to existing Limits to Built Development / part within existing Limits to Built Development at southern end; Land contamination (landfill site, Railway Land (medium risk, tracks, siding), depot, repairs and sales of motor vehicles)</p> <p>The site mostly comprises a dismantled railway. The southern end of the site is in commercial use including car related uses. There are several buildings at the southern end of the site. There are trees on the site. The site is adjoined by residential properties and commercial uses. The boundaries of the site comprise a mix of treatments and there is overgrown vegetation.</p> <p>There is existing vehicular access at the southern end of the site directly off Goudhurst Road. This currently serves the commercial uses at the southern end of the site. There is pavement along this stretch of Goudhurst Road. There is a Public Right of Way adjacent to the northern boundary of the site. There is a further Public Right of Way opposite the southern end of the site. The site is mostly flat with a slope down at the southern end to Goudhurst Road. Public views of the site are restricted. These are largely screened by adjacent development. The southern end of the site is seen from the access along Goudhurst Road.</p>
Suitability:	Suitable: Site is in proximity to the LBD and has pedestrian access to the centre of Horsmonden. The site is likely to be sustainable in this context. It would form a logical extension to the LBD
Availability:	Available Single ownership
Achievability:	This site is considered suitable. It is available and in single ownership. It is considered that this site could be delivered in the Local Plan period.
Sustainability Assessment:	Scale of this site is out of keeping with the existing settlement and causes negative scores for landscape and heritage especially with regard to short term adverse impacts on the AONB setting. Existing public transport services are unlikely to deter travel by private car and the poor range of services and facilities contributes to this effect. However, the site would contribute positively to the housing objective and the existing schools are likely to have adequate capacity.
Conclusion:	Site is suitable as a potential Local Plan allocation.
Reason:	This site is part within, mostly adjacent to the LBD and is likely to be sustainable in this context.

Site Reference: 297 (Site is part of Local Plan Allocation AL/HO 3) in conjunction with site numbers 82, 108 and 324

Site Address: Bassetts Farm, Goudhurst Road, Horsmonden, Kent



Parish:	Horsmonden
Settlement:	Horsmonden
Gross area (ha):	13.79
Developable area (ha):	13.79
Site type:	Greenfield site adjacent to LBD
Potential site use:	Site has been assessed for development potential, notably for a mix of residential, education and community facility
Potential yield if residential:	100-150 in conjunction with other sites forming wider site allocation
Issues to consider:	Transport Infrastructure: PRoW; HLC Period: Early 20th century, Late 20th century; APA: Dismantled railway the hop pickers line; ALC: GRADE 2; LCA: Fruit Belt; Heritage: impact on Conservation Area; adjacent to Hop Picker's Railway Line; Land contamination (landfill site, depot, Railway Land); Highways issues
Site Description:	Site comprises largely orchard land on which there are no existing buildings. The site is adjoined by a paddock and residential properties and the former Hop Pickers railway line as well as further orchards and some commercial use. Site boundaries consist of hedging and trees mostly. Back Lane a track road adjoins the site to the north. This has a lack of pavement. The topography of the site rises to the north and west. There are longer range views from wider area.
Suitability:	Suitable: Site is adjacent to the LBD and is relatively close to the centre of the village and services that can be accessed by pedestrians using the existing footway

network. There is concern about landscape sensitivity in parts, which could be addressed by site layout and design.

Availability:

Available
Single ownership

Achievability:

This site is considered a suitable site. It is in single ownership and is available. It is considered that this site could be delivered in the Local Plan period.

Sustainability Assessment:

Scale of this site is out of keeping with the existing settlement and causes negative scores for landscape and heritage especially with regard to short term adverse impacts on the AONB setting. Existing public transport services are unlikely to deter travel by private car and the poor range of services and facilities contributes to this effect. However, the site would contribute positively to the housing objective and the existing schools are likely to have adequate capacity.

Conclusion:

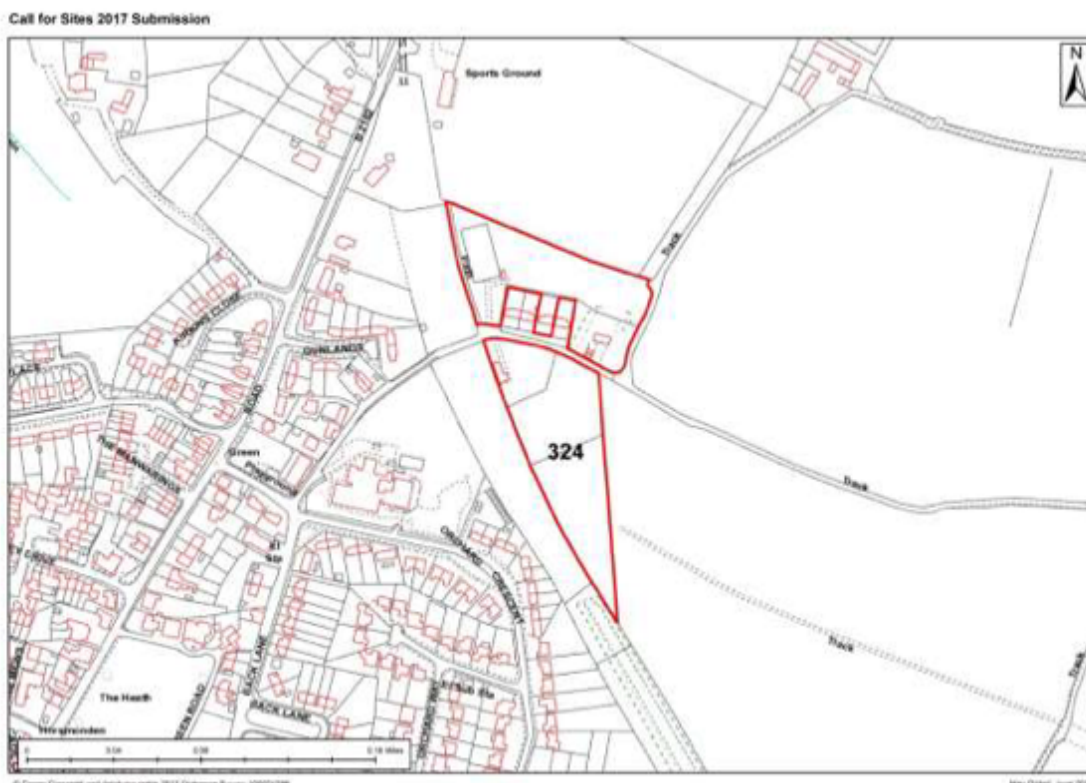
Site is suitable as a potential Local Plan allocation.

Reason:

The site lies adjacent to the LBD and is likely to be sustainable in this context. It would form a logical extension to the LBD / existing built form.

Site Reference: 324 (Local Plan Allocation AL/HO 3 (part site is part of larger allocation)) in conjunction with site numbers 82, 108 and 297

Site Address: Land at Bramley Cottage, Back Lane, Horsmonden, Kent



Parish:	Horsmonden
Settlement:	Horsmonden
Gross area (ha):	1.82
Developable area (ha):	1.82
Site type:	Mostly greenfield site with some PDL in close proximity to LBD
Potential site use:	Site has been assessed for development potential, notably for a mix of residential, education and community facility
Potential yield if residential:	100-150 in conjunction with other sites forming wider site allocation
Issues to consider:	Ecology: TPO; Transport Infrastructure: Safeguarded Railways; HLC Period: Late 20th century, Early 20th century; APA: Dismantled railway the hop pickers line; ALC: GRADE 2; LCA: Fruit Belt; Land contamination (landfill site and Unknown Filled Ground); Heritage: adjacent to/partly includes Hop Picker's Railway Line; Highways (means of access)

Site Description:	Site is currently part green parcel, part stable, and includes a paddock and a sand School. There is also a dwelling and barn used as car port. Adjoining uses include a recreation ground, woodland, and residential. Boundaries are predominantly hedging, trees, and a chain-link fence. Vehicle access from Back Lane along frontage of site. Lack of pavement along this part of Back Lane. Public Rights of Way adjacent to site. Site is generally flat. Public view from sports ground, and partly from Back Lane and from footpaths. Site is enclosed (screened by boundary treatment).
Suitability:	Suitable in part: This site as a whole has restricted vehicular access. It is considered however that the southern part of the site could be considered for allocation in conjunction with other site submissions. The northern part of the site is not considered suitable due to the nature of Back Lane, unlikely to provide an appropriate means of access.
Availability:	Available Multiple ownership
Achievability:	Most of this site is suitable. It is available and it is considered that this site could come forward in the period of the Local Plan
Sustainability Assessment:	Scale of this site is out of keeping with the existing settlement and causes negative scores for landscape and heritage especially with regard to short term adverse impacts on the AONB setting. Existing public transport services are unlikely to deter travel by private car and the poor range of services and facilities contributes to this effect. However, the site would contribute positively to the housing objective and the existing schools are likely to have adequate capacity.
Conclusion:	This site is considered unsuitable as a potential site allocation in part, with the remaining part of the site (southern parcel) being considered suitable in conjunction with other site submissions.
Reason:	The southern part of the site could be considered for allocation in conjunction with other adjacent site submissions.

Appendix 3.

Horsmonden Policies Maps:




1. Limits to Built Development Topic Paper - Figure 11 (Aug 2019)
2. Draft Local Plan - Map 25 (Sep 2019)
3. Submission Local Plan - Map 26 (Nov 2021)

Limits to Built Development Topic Paper - Figure 11





Tunbridge Wells Borough Council Draft Local Plan Policies Map Legend

LOCAL PLAN CONTEXT

-  Local Plan Boundary
-  Parish Boundaries
-  Neighbouring Authorities







STRATEGIC


-  Metropolitan Green Belt *STR 4*
-  Proposed Limits to Built Development *STR 10*


SITE ALLOCATIONS


-  Site Allocation Boundary
-  Community Use Buffer
-  Open Space and Landscape Buffer
-  Safeguarded Land Buffer
-  Site Allocation Policy Point


ENVIRONMENT

-  Heritage Asset; Ancient Woodland *EN 7*
-  Heritage Asset; Conservation Areas *EN 7*
-  Heritage Asset; Historic Parks Gardens *EN 7*
-  Shop Fronts *EN 8*
-  Protection of Designated Sites and Habitats *EN 12*
-  Ashdown Forest 7km Buffer *EN 13*


-  Local Green Space *EN 17*


-  Landscape within the Built Environment *EN 18*


-  Arcadian Areas *EN 19*

-  High Weald Area of Outstanding Natural Beauty *EN 21*


ECONOMIC DEVELOPMENT

-  Key Employment Area; *ED 1*


-  Town and Rural Service Centre Boundaries *ED 9*


-  Primary Shopping *ED 11*


-  Retail Frontage *ED 11*


-  Neighbourhood Centres *ED 12*


TRANSPORT AND PARKING

-  Parking Standards; Parking Zone A *TP 3*


-  Car Parks *TP 4*

-  Safeguarded Railways *TP 5*

-  Safeguarded Route *TP 6*

-  Proposed Link Route *TP 6*

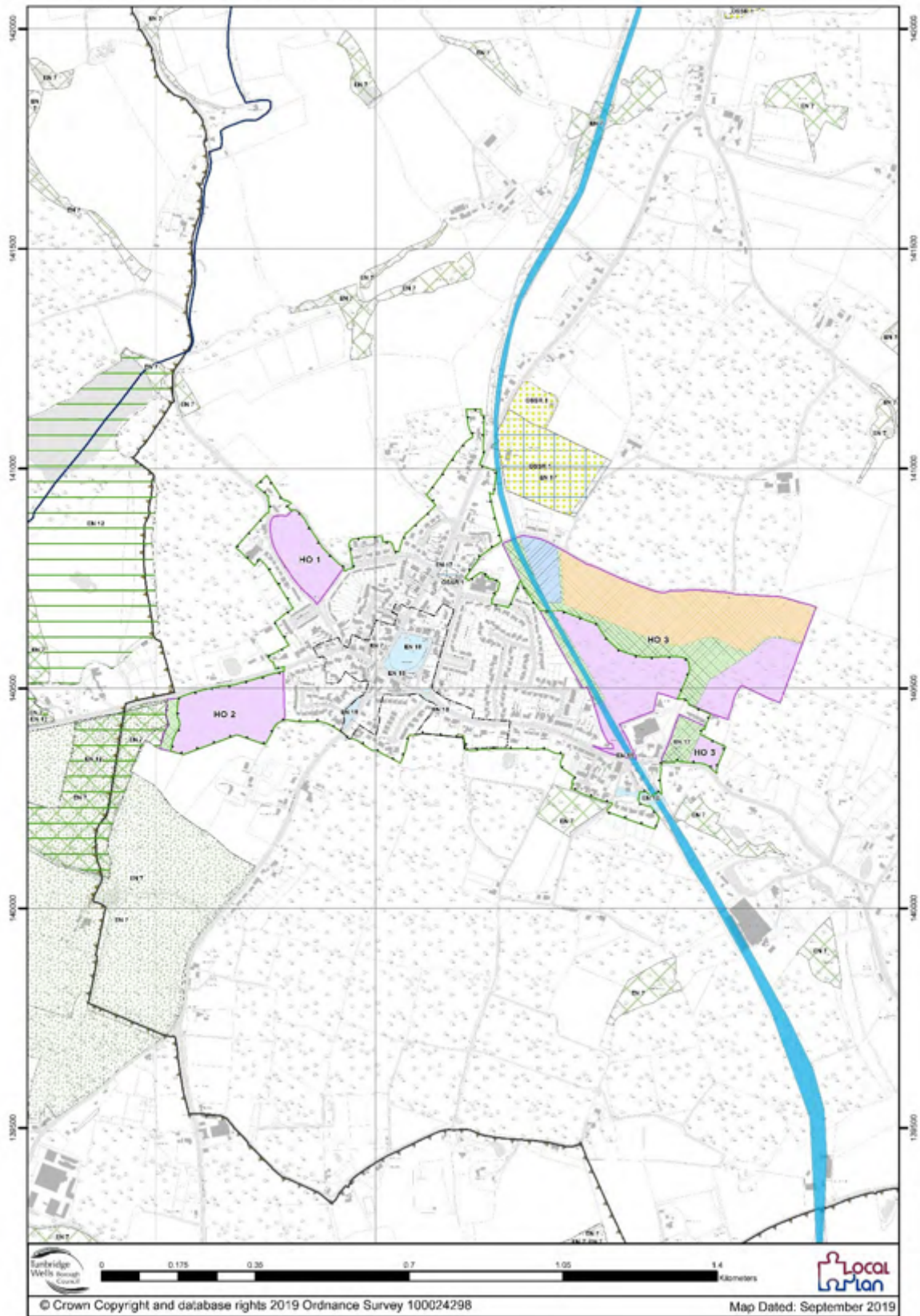
OPEN SPACE, SPORT AND RECREATION

-  Open Space, Sport and Recreation *OSSR 1*



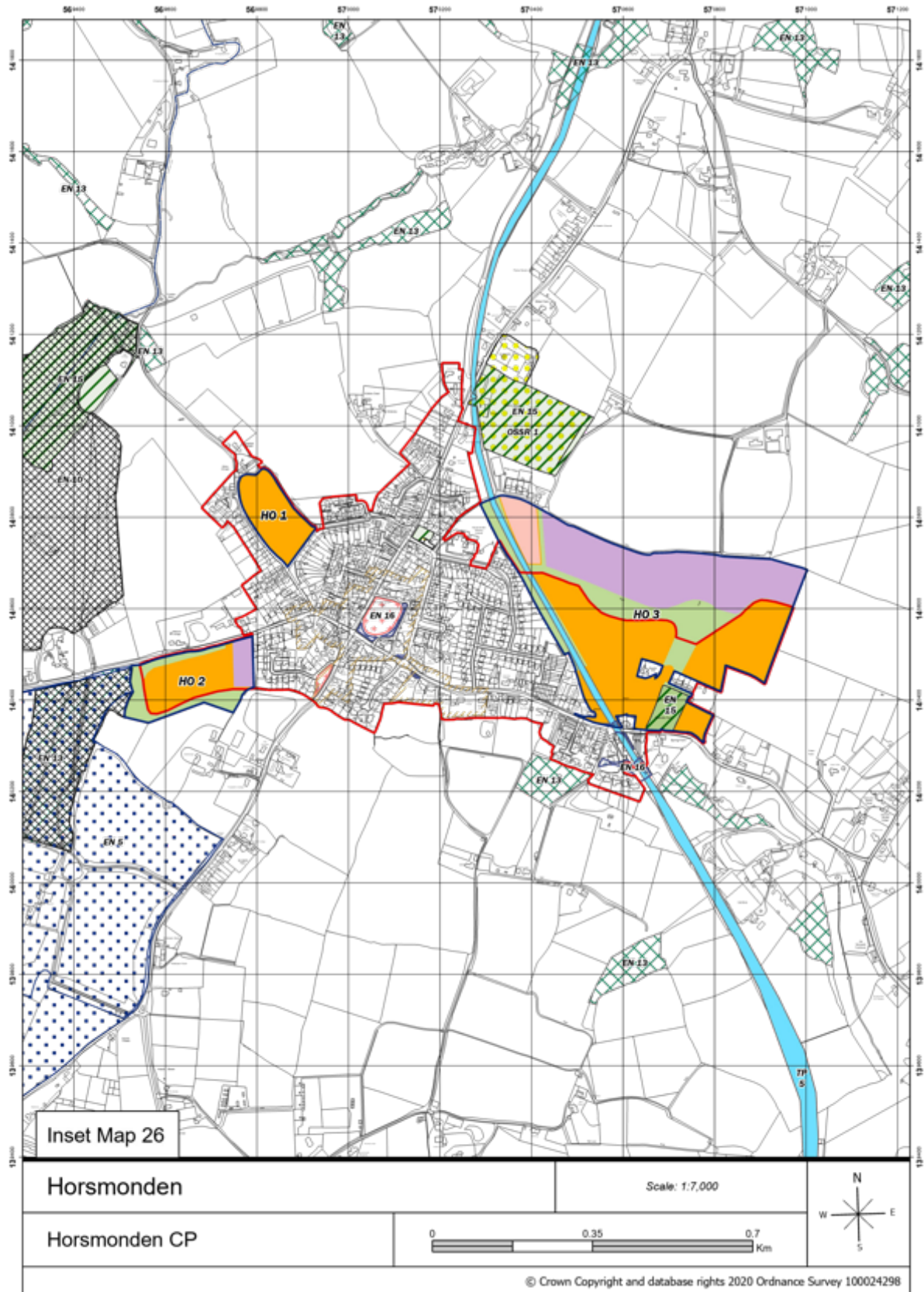
Draft Local Plan – Horsmonden Map 25

Horsmonden Draft Policies Map - Inset Map 25



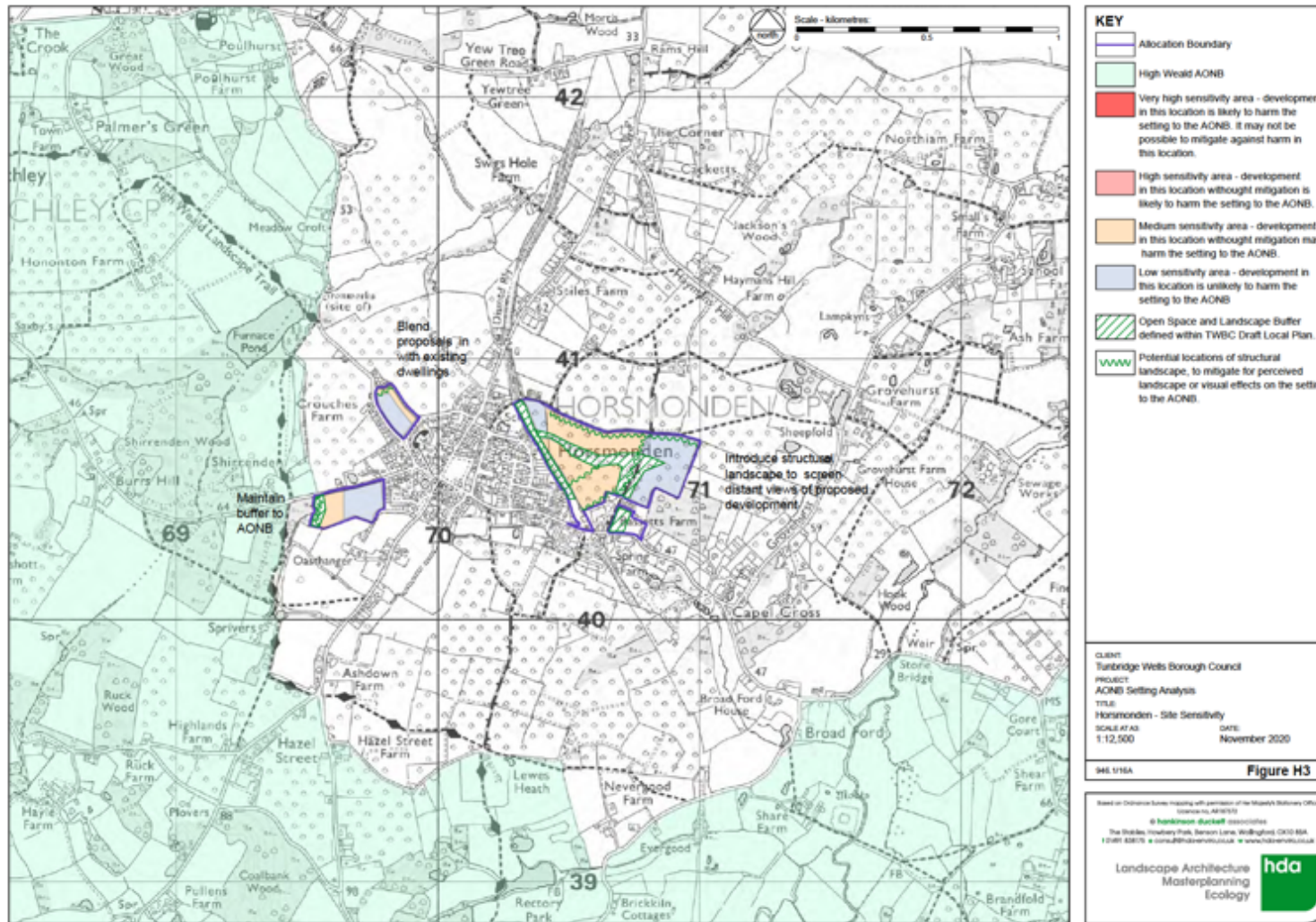
Submission Local Plan – Horsmonden Map 26

(LBD shown in red)



Appendix 4.

AONB Setting Analysis Report – Horsmonden Site Sensitivity Map



Appendix 5 – Photograph 1.



View of Bassetts Farm from Goudhurst AONB

Appendix 5 – Photograph 2.



Expanded View of Bassetts Farm from Goudhurst AONB

Appendix 5
– Photograph 3.

**View looking South
within Bassetts Farm
(HNP View 6)**



Appendix 5 – Photograph 4.



View looking North within Bassetts Farm (HNP View 7)

Appendix 5 – Photograph 5.



View looking North towards Bassetts Farm (HNP View 13)

Appendix 5 – Photographs 6 & 7.



**The current setting and amenity of
Bassetts Villas**



Appendix 6.

Comparison of Draft, Pre-Submission, Submission and Post-Examination Local Plan Policy AL/HO3

Local Plan Version:	Draft (Reg 18)	Pre-Submission (Reg 19)	Submission	Post-Examination
Date Published	September 2019	March 2021	November 2021	June 2022
Dwellings	100 - 150	115 - 165	115-165	115 - 165
Conditions (order per SLP)				
1. Vehicular Access	A highways assessment will inform the location of vehicular access into the site allocation area (see criterion 5 of Policies EN 1: Design and other development management criteria and TP 2: Transport Design and Accessibility)	The number and location of vehicular accesses to be informed by a highways assessment	As Pre-Submission Local Plan	As Submission Local Plan
2. Pedestrian links	Provision of pedestrian links into the village centre, including improvement of footway located on the north side of Goudhurst Road 3. Provision of pedestrian links between western part of site and Bassetts Farm to be explored	Provision of pedestrian links into the village centre, including improvement of the footway located on the north side of Goudhurst Road	As Pre-Submission Local Plan	As Submission Local Plan
3. PROW	Provision of link to, and preserve amenity of, Public Rights of Way WT340a and WT341 (see criterion 4 of Policy TP 2: Transport Design and Accessibility)	Provision of link to, and preserve amenity of, Public Rights of Way WT340a and WT341, as shown on the site layout plan;	As Pre-Submission Local Plan	As Submission Local Plan

4. Residential development and surgery		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;	As Pre-Submission Local Plan	As Submission Local Plan
5. Hop Pickers Line	No built development on the route of the Hop Pickers' Line unless it can be demonstrated that the route can be maintained (see Policy TP 5: Safeguarding Railway Land)	No built development on the route of the Hop Pickers Line, as shown on the site layout plan, unless it can be demonstrated that the route can be maintained;	As Pre-Submission Local Plan	As Submission Local Plan
6. AONB		The layout and design of the scheme to give full consideration to any impact upon the setting of the High Weald Area of Outstanding Natural Beauty and to provide a scheme that has been fully informed by landscape appraisals in order to provide development proposals that respond positively to views out of the High Weald Area of Outstanding Natural Beauty	As Pre-Submission Local Plan	The layout and design of the scheme to give full consideration to any impact upon the setting of the High Weald Area of Outstanding Natural Beauty and to provide a scheme that has been fully informed by Landscape and Visual Impact Assessment (LVIA) landscape appraisals in order to provide development proposals that respond positively to views out of the High Weald Area of Outstanding Natural Beauty
7. Hedgerows		Regard shall be given to existing hedgerows and mature trees on site, with the layout	As Pre-Submission Local Plan	As Submission Local Plan

		and design of the development protecting those of most amenity value, as informed by an arboricultural survey and landscape and visual impact assessment, with the existing hedgerows to the Bassets Farm development (subject to planning approval 15/505340/OUT) to be retained and buffered to protect a dormice habitat;		
8. Eastern Area	Built development on the eastern area of the site to be a lower density informed by a landscape assessment (see Policies EN 1: Design and other development management criteria and Policy EN 20: Rural Landscape);	Built development on the eastern area of the site to be at a lower density and informed by a landscape and visual impact assessment	As Pre-Submission Local Plan	Built development on the eastern area of the site to be at a lower density and informed by a landscape and visual impact assessment
9. Archaeology	Archaeological assessment required (see Policy EN 7: Heritage Assets Demonstration through the submission of relevant and proportionate archaeological investigations (as part of any planning application) that the proposal will not cause a materially harmful impact on the archaeological environment (see Policy EN 7: Heritage Assets)	The provision of an archaeological assessment as part of any planning application	As Pre-Submission Local Plan	As Submission Local Plan

10. Setting of NBC	Scheme to take account of, and respect, the setting of New Bassetts cottages	The scheme to take account of, and respect, the setting of New Bassetts cottages;	As Pre-Submission Local Plan	As Submission Local Plan
11. Listed Buildings		The scheme to take account of, and respect, the character and appearance of nearby listed buildings	As Pre-Submission Local Plan	As Submission Local Plan
12. School Land	Safeguarding of land to north for future school expansion, as defined on the site allocations plan;	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	As Pre-Submission Local Plan	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
13. Green Space, Play areas, Allotments	Provision of on-site amenity/natural green space and children's play space and improvements to existing allotments, parks and recreation grounds and youth play space in accordance with the requirements of Policy OSSR 2: Provision of publicly accessible open space and recreation. To include the provision of a community orchard	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	As Pre-Submission Local Plan	Provide on-site amenity/natural green space and children's and youth play space, and a community orchard with allotments that will be managed and maintained for this use

14. Health Centre		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	As Pre-Submission Local Plan	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, legal agreement to be finalised at planning application stage to be agreed at the planning application stage
15. Contributions		Contributions are to be provided to mitigate the impact of the development, in accordance with Policy PSTR/HO 1	As Pre-Submission Local Plan	As Submission Local Plan
In addition to the criteria in the above Policy, the relevant Policies that should be referred to in the Local Plan include:		EN 1: Sustainable Design ; EN 4: Historic Environment; EN 5: Heritage Assets; EN 18: Rural Landscape; EN 19: The High Weald Area of Outstanding Natural Beauty; TP 1: Transport Assessments, Travel Plans, and Mitigation; TP 2: Transport Design and Accessibility; TP 5: Safeguarding Railway Land; OSSR 2: The Provision of Publicly Accessible Open Space and Recreation	EN 1: Sustainable Design ; EN 4: Historic Environment; EN 5: Heritage Assets; EN 18: Rural Landscape; EN 18: Rural Landscape EN 19: The High Weald Area of Outstanding Natural Beauty; TP 1: Transport Assessments, Travel Plans, and Mitigation; TP 2: Transport Design and Accessibility; TP 5: Safeguarding Railway Land; OSSR 2: The Provision of Publicly Accessible Open Space and Recreation	As Submission Local Plan

Appendix 7a.

Revised Proposal Layout presented by Persimmon to the Horsmonden Parish Council on 17-October 2023



Appendix 7b.

Revised Proposal: Plan Showing Housing Density (Persimmon reply to Parish Council 10-Nov 2023)

