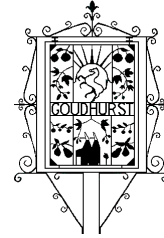


# Goudhurst Parish Council

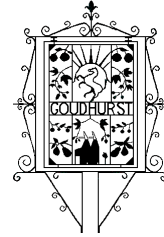


## Planning Committee 13.02.24

MEETING  
13 February 2024 18:30 GMT

PUBLISHED  
7 February 2024

# Goudhurst Parish Council



To: Cllrs Craig Broom (Chairman), Antony Harris, Edward Hodgskin, Suzie Kember, Ed Read-Cutting, Caroline Richards and Paul Wareham. Cllr Phil Kirkby (ex-officio).

I summon you to a Meeting of the Planning Committee on Tuesday 13<sup>th</sup> February 2024 at 6.30 pm, in The Church Rooms, Back Lane, where business detailed on this agenda will be discussed.

**Goudhurst Parish Council recognise that there are continuing risks associated with COVID-19 and are supportive of individuals wearing masks in meetings and maintaining a social distance. We will continue to provide hand sanitiser at the entrance to the Village Hall. In order to keep everyone safe, please do not attend a meeting if you have COVID-19 symptoms or have tested positive for COVID-19 in the past 5 days. We will continue to review the risks and will comply with any future controls recommended or mandated by HM Government.**

**Members of the Public and the Press are welcome to attend this meeting.** At the Chairman's discretion, 15 minutes will be set aside for questions from members of the public each one of whom may be invited to speak for a maximum of 3 minutes in total relating to items on the Agenda or about issues of local concern. Thereafter they have the right, and are welcome, to stay and observe the rest of the Meeting in accordance with the Public Bodies (Admission to Meetings) Act 1960, s1.

Please inform the Assistant Clerk if you intend to film or record the Meeting.



Katrina Hoyle  
Assistant Clerk to Goudhurst Parish Council  
07<sup>th</sup> February 2024

Parish Council Office - The Hop Bine, Ranters Lane, Goudhurst, TN17 1HN  
01580 212552 | [clerk@goudhurst-pc.gov.uk](mailto:clerk@goudhurst-pc.gov.uk) | <https://goudhurst-pc.gov.uk> | 07494 117313

A quorum for Planning Committee is 3 Members.

# Agenda

Location  
The Church Rooms, Back Lane

Date  
13 Feb 2024

Time  
18:30 GMT

	Item	Page
1	Apologies for Absence as reported at the meeting.	-
2	Declarations of Interest.	-
3	Questions from the public and the press	-
4	Planning Applications for consideration	-
4.1	24/00095/LBC Riseden Cottage , Ranters Lane, Goudhurst, Cranbrook, Kent, TN17 1HJ Listed Building Consent -Replacement extension and conservatory with 2 storey extension to rear/side, replacement porch, alterations to dormer with associated landscaping and internal re-configurations	-
4.2	24/00094/FULL Riseden Cottage , Ranters Lane, Goudhurst, Cranbrook, Kent, TN17 1HJ Replacement extension and conservatory with 2storey extension to rear/side, replacement porch,alterations to dormer with associated landscaping	-
4.3	24/00180/SUB May Farm Chicks Lane Kilndown Cranbrook Kent Submission of Details in Relation to Condition 4 - (Landscape scheme) of 23/02881/FULL	-
4.4	24/00048/FULL Bedgebury Cross Stables Bedgebury Road Goudhurst Cranbrook Kent TN17 2RD Conversion and extension of existing stable building into a single dwellinghouse, with associated garden land, parking, landscaping and biodiversity enhancement	-
4.5	Impact of Planning Application 23/00078/HYBRID on Goudhurst Hybrid application: Full application for the erection of 120 No. dwellings (Use Class C3),including affordable housing, landscaping, public open space, allotments, ecologicalenhancements, SUDs and access. Outline application (with all matters reserved) for 0.25 hectares of land for a new Medical Centre (Use Class E(e)) with associated access, parking andlandscaping.	4
5	Items for Information	-
6	Next meeting Tuesday 27th February 2024, 18.30, the Church Rooms.	-

# Comments for Planning Application 24/00078/HYBRID

## Application Summary

Application Number: 24/00078/HYBRID

Address: Bassetts Farm Goudhurst Road Horsmonden Tonbridge Kent TN12 8AS

Proposal: Hybrid application: Full application for the erection of 120 No. dwellings (Use Class C3), including affordable housing, landscaping, public open space, allotments, ecological enhancements, SUDs and access. Outline application (with all matters reserved) for 0.25 hectares of land for a new Medical Centre (Use Class E(e)) with associated access, parking and landscaping.

Case Officer: Jennifer Begeman

## Customer Details

Name: . Brenchley and Matfield PC .

Address: Matfield Pavilion, The Green, Matfield, Brenchley Tonbridge, Kent TN12 7JU

## Comment Details

Commenter Type: Parish

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Brenchley and Matfield Parish Council (BMPC) objects to this development because it is likely to add substantially to the vehicular traffic coming through Brenchley and Matfield parish, both during construction and once the houses are built.

Several of the assumptions in the Transport Assessment and Travel Plan are questionable.

While BMPC notes the proposed upgrade of footpath WT 341 to enable off-road cycle access from the development to the school, a major travel shift to cycling for other journeys is very unlikely owing to the nature of local roads and the volume and speed of traffic on them. It is now widely acknowledged that the section of National Cycle Route 18 running through Brenchley, Matfield and the southern part of Horsmonden (some distance from the proposed development), which is entirely on-road without any segregation, is unfit for any but the bravest and most experienced cyclists.

A modal shift to public transport is also extremely unlikely to occur, irrespective of whether the new residents are provided with local public transport timetables as proposed in the Travel Plan. There are no buses to Paddock Wood other than the school bus. The remaining buses for the public, to Tunbridge Wells and Tenterden, only go every 1½ to 2 hours and there are no buses after 8pm. This service is clearly not frequent enough to promote modal shift from the private car for the vast majority of journeys.

The Parish Council does not consider that trip generation "calculated based on survey sites outside of London, in England, Scotland and Wales, in 'Suburban Area' locations, omitting surveys within a population area greater than 250,000" is appropriate for this rural village which according to the 2011 census had a total population of less than 2,500. Nor is the assumed modal share of

14% travelling by train appropriate, since any rail travel will require travel by car because there are neither any buses nor any off-road or segregated cycle routes to Paddock Wood or Marden stations, both of which are nearly 6km away along winding, unlit, lanes where in many cases the speed limit is 60mph and the volume of traffic is high.

Most of the vehicular traffic from this development will be going either to the A21 northbound towards Tunbridge Wells, London and the M25, or to Paddock Wood and its railway station. Traffic going to the A21 northbound will generally go through Brenchley and Matfield to avoid the congestion on the undualled section of the A21. Most of the traffic going to Paddock Wood will also run through our parish.

There are existing traffic problems in the village centres of Brenchley and Matfield, where parked cars reduce the roads to single track, with long tailbacks during peak hours. The volume of traffic makes it difficult to find a safe moment to cross the road and there are no controlled road crossing facilities for pedestrians. The traffic from this development will exacerbate these problems.

There are also existing problems at Kippings Cross, where traffic has difficulty entering the roundabout from the B2160 because of the volume of traffic on the A21's southbound lanes. The additional traffic from this development will worsen these problems.

The congestion at peak times on the A21's southbound lanes also already causes very serious problems, with traffic diverting onto totally unsuitable rural lanes in Brenchley and Matfield parish, and this development will add to that rat running traffic.

The historic rural lanes in our parish are an important feature of the High Weald National Landscape (HWNL) which the AONB Management Plan aims to conserve. Tunbridge Wells Borough Council has a new statutory duty not just to have regard to, but actually to further the purpose of conserving and enhancing the natural beauty of the HWNL. The additional traffic on these lanes will erode and damage them.

The Parish Council would like to see evidence that the site allocated for the new Medical Centre will be sufficiently large. Although it is accepted that the precise number and layout of the associated vehicle and cycle parking spaces will be determined at the Reserved Matters stage, an outline application should at least provide a plan that demonstrates that a sufficiently large building together with sufficient parking can be accommodated. TWBC and the NHS Kent and Medway Clinical Commissioning Group have indicated that the new health centre would also be designed to serve Matfield and Brenchley. The infrequency of bus services and the unsuitability for cyclists of the Brenchley to Horsmonden road mean that all patients from Matfield and Brenchley would need to drive to it, whereas those in Brenchley village can walk to the Brenchley surgery at present.

If, despite the above-mentioned concerns, TWBC proposes to approve the application, BMPC recommends that this should be subject to conditions requiring

- A Construction Management Plan that will ensure that construction HGV traffic will not be routed through Brenchley and Matfield
- A financial contribution to road safety measures / road crossing facilities in Brenchley and Matfield
- A contribution to increased bus services
- A contribution to assist in the creation of non-motorised user route on or close to the disused Hop

Pickers' railway line, to enable off-road cycle access to Paddock Wood

- A sufficient number of parking spaces to be provided for the new health centre, if it is to serve Brenchley and Matfield as well as Horsmonden.

# Comments for Planning Application 24/00078/HYBRID

## Application Summary

Application Number: 24/00078/HYBRID

Address: Bassetts Farm Goudhurst Road Horsmonden Tonbridge Kent TN12 8AS

Proposal: Hybrid application: Full application for the erection of 120 No. dwellings (Use Class C3), including affordable housing, landscaping, public open space, allotments, ecological enhancements, SUDs and access. Outline application (with all matters reserved) for 0.25 hectares of land for a new Medical Centre (Use Class E(e)) with associated access, parking and landscaping.

Case Officer: Jennifer Begeman

## Customer Details

Name: Bassetts Farm Forum. (See covering letter)

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

## Comments:

### Summary of Representations and Objections to 24/00078/HYBRID (The Application).

Reasoning and evidence is given for the following representations and objections:

- There is no reason to presume sustainable development for this application.
- The Application is not sustainable economically, socially, or environmentally.
- Only part of The Application site is designated for residential use and a doctors' surgery/medical centre within the Limit of Build Development (LBD) defined by the TWBC Submission Local Plan (SLP) and the Horsmonden Neighbourhood Plan (HNP).
- The most recent overall housing allocations covered by the SLP for Horsmonden is shown as 230 to 290 dwellings. This figure does not reflect the latest situation and this needs to be revised to 215 to 259 dwellings. [reference PC SLP Consultation?]
- Within this revised allocation for Horsmonden, The Application does not cover the whole of the site included by SLP allocation policy AL/HO3. The Application site relates to an allocation according to SLP methodologies of 89 +/- 15 dwellings.
- The Application assumes the 65m AOD contour as its building limit without consideration of the body of evidence used by TWBC in establishing the LBD. The 65m contour as a building limit guide is not relevant. The site must be considered on its own merits with its wooded backdrop of the mature trees which line the old Hop Pickers' Line
- By extending the built form beyond the LBD to the northwest the ecology corridor linking the Hop Pickers' Line wooded area to The Application site open space, and the countryside beyond, is cut off.
- Views from the AONB in Goudhurst to the southeast, as well as views from the south/southwest, are substantially more harmfully impacted by The Application layout than that defined by the well informed SLP and HNP LBD. The Application views are not representative.
- It is contested that The Application LVIA assessment "is finer grain" and evidence suggests that it is biased. At best all the landscape and visual evidence gathered over the last 7 years must be considered equally and as such the evidence in favour of the

LBD defined by the SLP policy PSTR/HO 1 for the AL/HO3 site to the West of PROW 340A is strong and the LBD must not be breached.

- To accept The Application would cause much greater harm to the surrounding landscape including the setting of the AONB, than a development which is within the areas designated for building by the SLP and the made HNP.
- By limiting The Application development within the LBD, including land for the doctors' surgery, at housing densities which would allow more green space to be integrated within the development and cars to be parked beside houses, this would give a new development with a sense of place as a transition from the village to the countryside.
- Such a scheme within the LBD would yield 80 houses for The Application which would be fully consistent with the SLP allocation target range.
- Even after adjustments to The Application, Horsmonden would still be making a substantial contribution to Borough housing needs and the village population will still expand by about 40% due to the SLP allocations, all of which are being actively developed in the near term.
- There is a serious misalignment between the SLP and the TWBC Infrastructure Delivery Plan (IDP) not only regarding inadequate medical services, but also all other infrastructure which will be impacted by this timing change, including: education, water supply, sewer and sewerage capacity, power supply, and highways issues. These are addressed further below.
- **It would be irrational to recommend or grant this application which seeks to ignore many policies in the SLP and HNP and does not provide a robust Infrastructure Delivery proposal.**

## 1.0 Submission Local Plan Allocation Policy AL/HO3 – Land East of Horsmonden.

### 1.1 Housing Allocations for Horsmonden including AL/HO3.

1. TWBC Updated Local Plan Housing Trajectory December 2023 states:

*“3. In short, the previously proposed plan period (to 2038) would result in a shortfall of 1,073 dwellings (12,006-10,933 dwellings). The 10-year period, to the end of March 2035, would result in a surplus of 275 dwellings. The updated position would also achieve a five-year housing land supply on adoption (assumed to be the end of 2024, so taking the figure for the coming five years from 1 April 2025) of 6.13 years”.* **Therefore, given that the Submission Local Plan is argued as having significant weight by The Application, it is also safe to assume that TWBC does have more than a 5 year housing land supply and the NPPF presumption in favour of sustainable development does not apply** i.e. that planning permission should be granted only if The Application meets all relevant planning policies. **The Application does not propose a sustainable development as required by the NPPF, neither economically, with inadequate provision and certainty on the delivery of supporting infrastructure; nor socially, with no consideration given to how such a large relative population increase can be integrated into a small village with very limited transport connections to near by towns; nor environmentally, with ecology links between wildlife areas severed, missed opportunities to design in even more energy efficiency, and significant harm to surrounding landscape and protected views.**



2. The Local Plan Development Strategy Topic Paper – Addendum. December 2023, paragraph 13.1, refers to housing allocations for Horsmonden and states:

*“Table 4 of the SLP, which sets out the proposed allocations, can also be updated. In doing so, attention is drawn to the following:*

*[Bullet 4] “The slightly lower figure for Horsmonden relates to the capacity of a site which was agreed by the Council to be somewhat lower than in the SLP, as discussed at the relevant hearing session last year, and following the submission and consideration of planning application reference 22/00296/outline for village hall and a residential development of up to 68 dwellings and associated infrastructure (which members of the Council’s planning committee have resolved to grant, subject to completion of a S106 legal agreement)”*

3. **Table 1** below shows the breakdown of the SLP allocations for Horsmonden and the adjustment as referenced in the Development Strategy Topic Paper – Addendum.

<b>Table 1. Horsmonden Housing Allocation - Submission Local Plan Revisions:</b>				
<b>1. Submission Local Plan:</b>				
	SLP Low	SLP Mid	SLP High	
AL/HO1 - Land adjact to Gibbet Lane	45	50	55	
AL/HO2 - Land South of Brenchley Road	80	90	100	
AL/HO3 - Land East of Horsmomnden	115	140	165	
<b>Total Allocation for Horsmonden</b>	<b>240</b>	<b>280</b>	<b>320</b>	SLP Table 4 - Distribution of Housing Allocations
<b>2. Summary of Proposed Modifications to the Development Strategy, following Inspector’s Initial Findings Letter. January 2024</b>				
	SLP Low	SLP Mid	SLP High	
AL/HO1 - Land adjact to Gibbet Lane	45	50	55	Local Plan Development Strategy Topic Paper – Addendum. 13.0 Updated housing land supply 13.1 Bullet 4.
AL/HO2 - Land South of Brenchley Road	70	70	70	
AL/HO3 - Land East of Horsmomnden	115	140	165	
<b>Proposad Total Allocation for Horsmonden</b>	<b>230</b>	<b>260</b>	<b>290</b>	SLP Table 4 - Distribution of Housing Allocations Revised

4. However, details for each of the 3 allocated sites have progressed over time, and the proposed revision to SLP Table 4 does not acknowledge or reflect these correctly. [refer to PC SLP representation?]

**AL/HO1 – Land adjacent to Gibbet Lane:**

Development of this site has been completed with 49 houses.

**AL/HO2 – Land South of Brenchley Road:**

As stated in the Development Strategy Topic Paper – Addendum, this development has been granted outline planning permission for 68 houses, not 70.

**AL/HO3 – Land East of Horsmonden:**

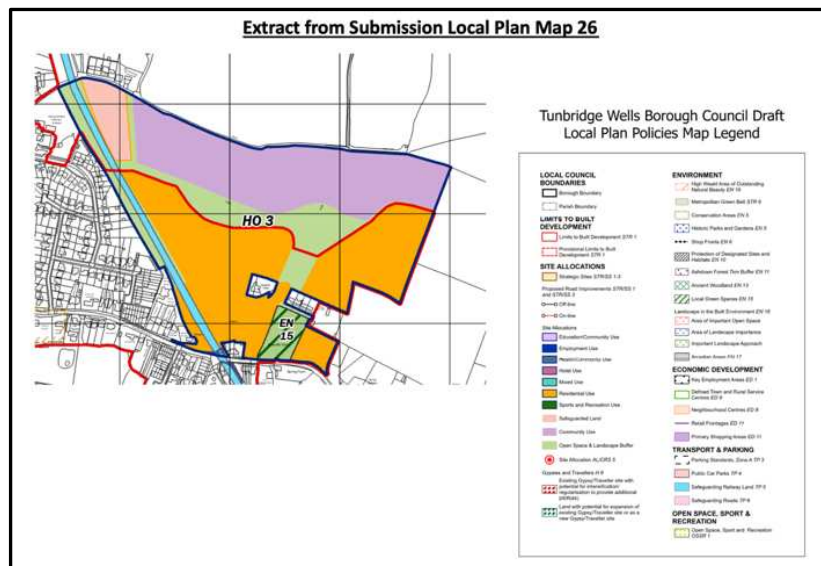
The following statements are based on an evidence report (**Evidence Report**) adopted by the Horsmonden Parish Council on 19-December 2023. This report summarises evidence relating to SLP Allocation Policy AL/HO3 as at November 2023. **The Evidence Report is attached and should be read in conjunction with this objection** noting that some more recent information has emerged, including a revision to the NPPF, but none of the issues raised have changed.

Contrary to what was stated by TWBC to the Inspector (Matter 7. Issue 13. Question 6. Para 47), the whole of this site is not being promoted by a single developer and the following now need to be taken into account by TWBC in their housing and trajectory plans and in consideration of planning application 24/00078/HYBRID:

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- AL/HO3 is a combination of 5 different sites, 4 were offered during the SHELAA process, the other is a southerly plot consented for 20 houses (15/505340/OUT & 19/03657/REM). The construction of these 20 houses is now underway and this site has effectively been separated from the AL/HO3 allocation.
- Based on 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 is divided by a new LBD running West-East (red line) as per SLP Policy STR1. The southerly part includes (orange) areas allocated for residential development and a doctors' surgery/medical centre. The northerly part, and a traditional orchard to the south, are designated as green open space and landscape buffers for community use. There is also open space on either side of the North-South PROW. This is shown in **Figure 1** below, an extract of AL/HO3 from SLP Map 26:

**Figure 1**



- Landscape and Visual Impact evidence used by TWBC in defining the Horsmonden LBD and the development of Allocation Policy AL/HO3 on Land East of Horsmonden, is strong for the West Site. It is however acknowledged in policy AL/HO3 (Condition 8) that further consideration is needed for the East Site, and this was also addressed with the SLP Inspector (Matter 7. Issues 13. Question 10). This evidence includes a **Landscape Sensitivity Assessment** (Cd 3.40c) and an **AONB Setting Analysis** (CD 3.95d) as referenced by TWBC to the SLP Inspector (Matter 7, Issue 13. Question 6).
- The Landscape Sensitivity Assessment was carried out in 2018, and there have been no changes relating to the AL/HO3 landscape. This report concludes that AL/HO3 and its surrounding landscape is "High" – the highest level of sensitivity. (See Evidence Report, Main Report para 8)
- The AONB Setting Analysis was carried out in 2020, and there have been no landscape changes relating this analysis. The analysis is primarily focused on the visibility and impact of any allocated development on the AL/HO3 site **as seen from Goudhurst within the ANOB to the South East**. Figure 2 and 3 below are used by this Setting Analysis to define the most sensitive areas on the AL/HO3 site. The orange areas on this map indicate areas of medium sensitivity which may cause harm to the setting of the AONB without mitigation.

Figure 2

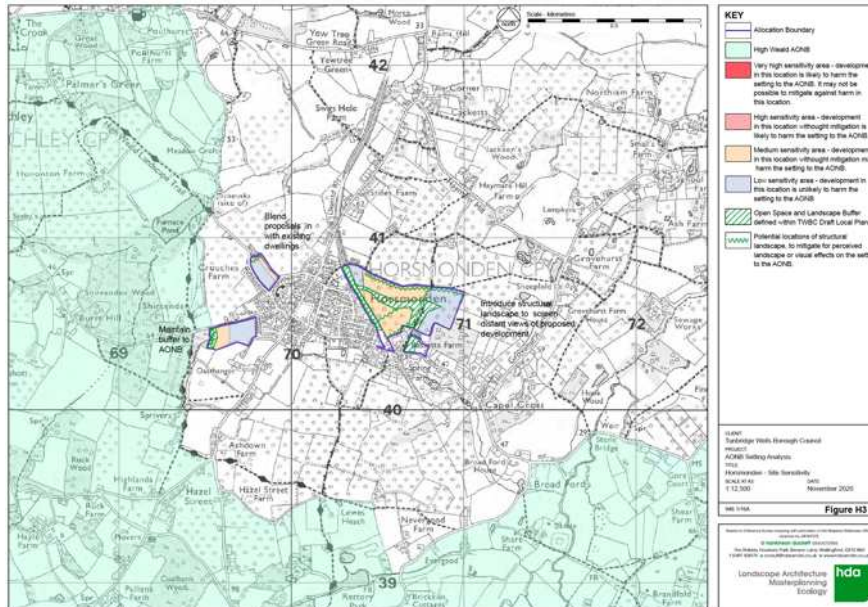
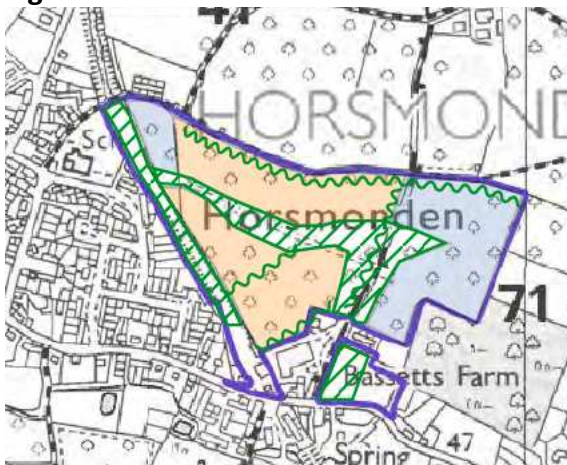


Figure 3



10. As stated in the Evidence Report Page 9 para 21. For AL/HO3 the AONB Setting Report 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.**”

11. The adopted Horsmonden Neighbourhood Plan (HNP) specifies the same LBD as the SLP and the HNP has adopted this LBD as its acceptable development limit (**HNP Policy 2.1 and Figure 5**). The fixing of a new LBD in the HNP ahead of the adoption of a new Local Plan was questioned by and then confirmed by the HNP Examiner. This point was also confirmed by TWBC officers in a discussion with Parish Councilors which took place after the successful HNP referendum.

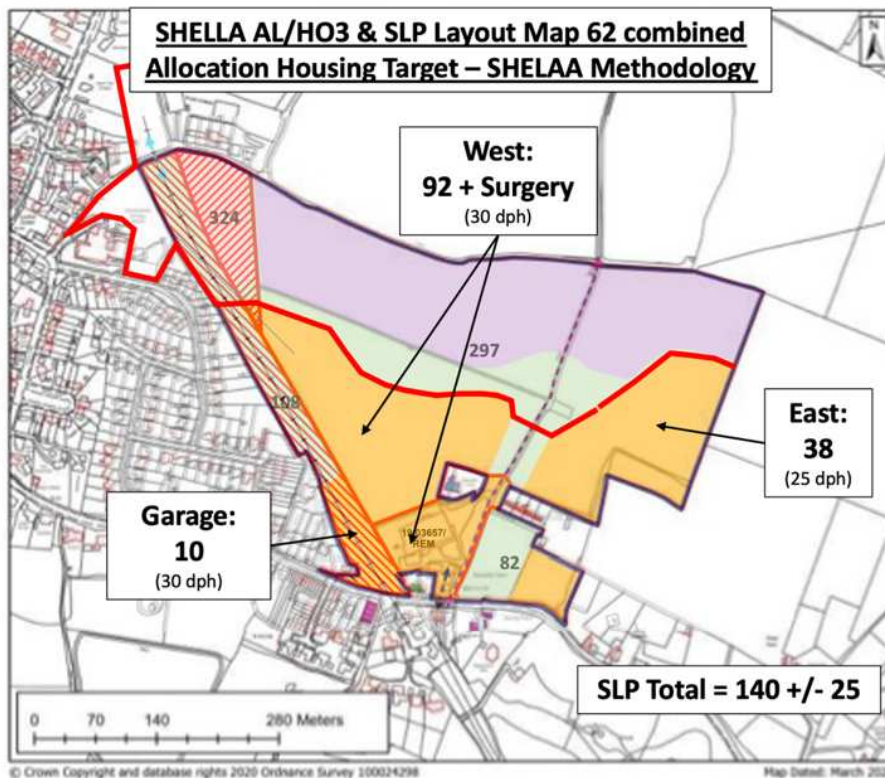
12. The Application Covering Letter states several times, as below, that The Application site is within the SLP LBD. **This is not correct, only part of the site is designated for residential use and a doctors’ surgery/medical centre within the revised LBD.** Covering Letter page 3: “Furthermore, the site [is] included within the LBD for Horsmonden in the Submission Local Plan (October 2021) and Horsmonden Neighbourhood Plan (as Made on the 5 July 2023).”

## DRAFT

Covering Letter page 4: *“In addition, the fact the site is identified for development in the Submission Local Plan pursuant to Policies PSTR/HO1 and AL/HO 3 and is located within the limits of built development of Horsmonden in the Horsmonden Neighbourhood Plan counts in its favour”.*

13. SHELAA sites 108 and 324 are not under the control of the developer. These sites include some of the (orange) land allocated for residential use, and (pink) land allocated for expansion of the school, as per SLP Map 26. Policy AL/HO3 Condition 12 requires the school land to be safeguarded for future school expansion as part of the overall development, **but if this land cannot be guaranteed to be available as and when it is required for expansion of the school, then the infrastructure development provisions for AL/HO3, and indeed the whole allocation strategy for Horsmonden, are compromised.**
14. Policy AL/HO3 Condition 4 states: *“Residential development shall be located on the areas identified for residential **and doctors surgery use** on the site layout plan, with the exact location of the surgery to be determined having regard to accessibility to the main village and services, and landscape impact”.* This condition requires the doctors’ surgery to be located on the (orange) land for residential development within the LBD on SLP Map 26. The inclusion of the doctors’ surgery/medical centre within the orange area on Maps 26/62 is also consistent with the allocation calculations shown in **17. below**. Locating the doctors’ surgery within the LBD is also specified in the HNP (HNP Figure 5).
15. The SLP examination also addressed Heritage Assets including Bassetts Villas which are Non-Designated Heritage Assets surrounded by the AL/HO3 development site (Matter 7. Issue 13. Question 6. Para 62). TWBC concludes (Question 6. Para 68) that: *“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”.*
16. Policy AL/HO3 allocates a housing target range of 115 to 165 dwellings. This is stated in the SHELAA report as 140 dwellings to which a range of +/- 25 has been applied. We have reviewed the TWBC SHELAA methodology for determining this figure of 140 houses. It uses the TWBC standard reference density of 30 dwellings per hectare for the orange residential development areas on SLP Map 26 and AL/HO3 Layout Map 62, allows for buffers, **and land for the doctors’ surgery**, except for the East Site which has a lower density of 25 dph applied. Maps 26 and 62 are the same except Map 62 does not include the new LBD, nor the Hop Pickers’ Line which is protected under AL/HO3 Condition 5 and SLP Policy TP5.
17. The following map, **Figure 4**, combines SLP Maps 26/62 together with the SHELAA sites maps and shows the derivation of the AL/HO3 allocation at 140 houses. **Appendix 1** shows the detailed calculation of the SLP AL/HO3 housing allocation.

Figure 4



18. However, the AL/HO3 allocation (and TWBC Document PS\_062 “Updated Local Plan Housing Trajectory – 1 April 2023 Position”), needs to be revised to take account of the following information:
- Old Station Garage** (10 allocated houses +/- 2), is not currently being promoted and needs to be considered separately. **The allocation of houses on land either side of the protected heritage Hop Picker’s Lane is highly questionable**, and any development is very unlikely to take place in the near term.
  - Concerns about the **East Site** landscape sensitivity as mentioned in **point 7 above** have now been acknowledged by application 24/00078/HYBRID in further Landscape and Visual Impact Assessment (LVIA) work and the area and housing density have been reduced to mitigate these concerns. This East site has been reduced from the SHELAA allocation of 38 to 22 houses. (A reduction of 16 +/- 4).
  - TWBC recently reconfirmed the **Non-Designated Heritage Asset** status of Bassetts Villas which is surrounded by the AL/HO3 site. Allowance needs to be made within the allocation for the setting and amenity of Bassetts Villas and an allowance reduction of 5 houses +/- 1 is included below.
19. The AL/HO3 allocation housing target at TWBC standard reference housing densities is thus:
- AL/HO3 development within the next 10 years:
- Consented Brownfield Site on Goudhurst Road (15/505340/OUT & 19/03657/REM): **20 houses**

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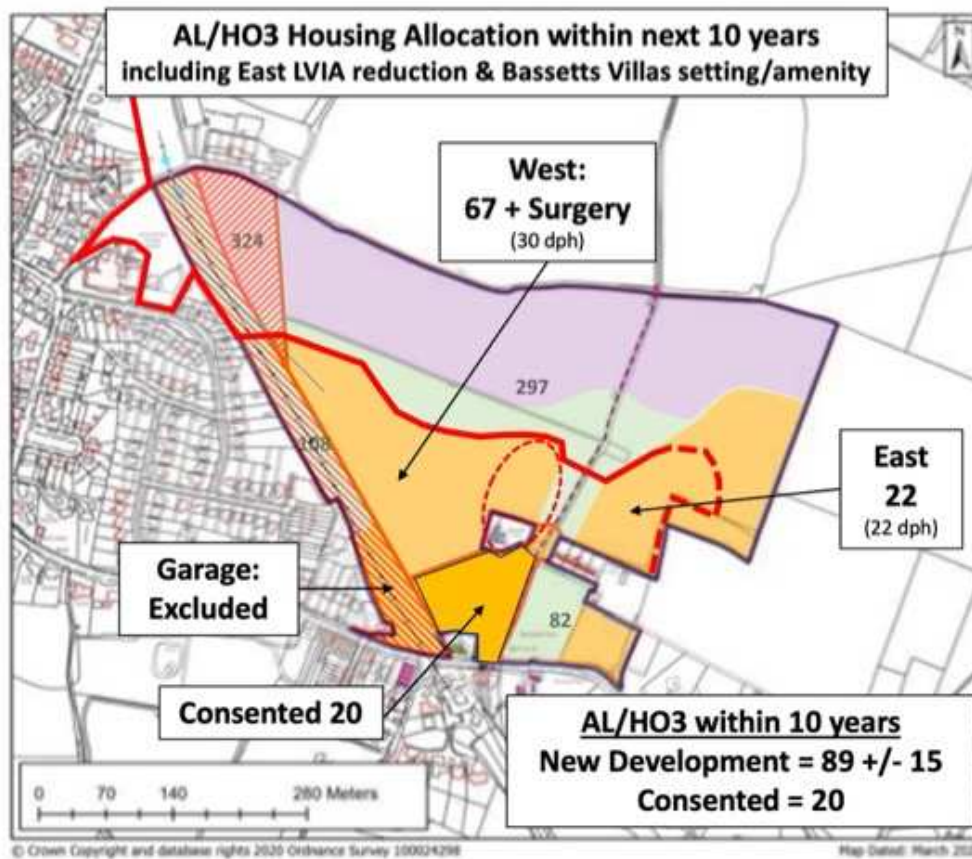
2. New allocated development:	120 reduced by
Old Station Garage part of SHELAA site 108:	(10)
East Site LVIA revision:	(16)
Bassetts Villas NDHA setting allowance:	(5)
<b>New Development on SHELAA sites 297 and 82</b>	<b>89 houses</b>

AL/HO3 development likely to be beyond the next 10 years (subject to Hop Pickers' Line protections):

3. Old Station Garage part of SHELAA site 108:	<b>10 houses</b>
--	------------------

Figure 3 shows the AL/HO3 housing allocation within the next 10 years:

**Figure 3:**



20. **Table 2** below summarises all the above changes that have taken place in relation to the SLP allocations for Horsmonden. It shows that an up-to-date overall housing allocation for Horsmonden in SLP Table 4 should be 215 to 259, and this includes 89 +/-15 dwelling allocated to the part of AL/HO3 site which is covered by this application.

Table 2

Table 2. Further Modifications Required to SLP Table 4.				
	SLP Low	SLP Mid	SLP High	
AL/HO1 - Land adjact to Gibbet Lane	45	50	55	
	4	(1)	(6)	Correction not made in SLP Modifications
	<b>49</b>	<b>49</b>	<b>49</b>	As built
AL/HO2 - Land South of Brenchley Road	70	70	70	
	(2)	(2)	(2)	Outline Planning 22/00296/OUT granted for 68
	<b>68</b>	<b>68</b>	<b>68</b>	As per Updated Local Plan Housing Trajectory, December 2023
AL/HO3 - Land East of Horsmonden	115	140	165	
Persimmon Homes Site Corrections	(8)	(10)	(12)	Remove Old Station Garage
	(16)	(20)	(24)	Remove consented Brownfield site
	(13)	(16)	(19)	Adjust for Eastern LVIA reduction 38 to 22 = (16)
	(4)	(5)	(6)	Adjust for Bassetts Villas NDHA
Persimmon HO3 site target excl brownfield	<b>74</b>	<b>89</b>	<b>104</b>	As per SLP methodology
		** Updated Local Plan Housing Trajectory, December 2023 shows 120. (50 in 26/27 & 70 in 27/28) - Should be 89		
Persimmon consented B'Field site	20	20	20	20 consented houses under construction Jan-24
Total revised target for Persimmon site	<b>94</b>	<b>109</b>	<b>124</b>	
Old Station Garage (part of AL/HO3)	8	10	12	Add back for potential future infill - unlikely in next 10 years
<b>Adjusted Total Allocation for Horsmonden</b>	<b>215</b>	<b>237</b>	<b>259</b>	

21. Document PS\_062 Updated Local Plan Housing Trajectory (December 2023), shows developments at AL/HO2 and AL/HO3 both taking place between 2026 and 2028 (with the consented 20 houses at AL/HO3 being completed earlier than this). This is a change for AL/HO3 which was projected to take place between 2030 and 2032 in the previous version of the Local Plan Housing Trajectory (February 2021) used in discussions with the SLP Inspector in 2022.
22. The SLP refers to the Infrastructure Development Plan (IDP) (CD\_3.142\_Infrastructure-Delivery-Plan-October-2021) and in response to a question relating to the medical hub from the LP Inspector (Hearing Statement Ref Matter 7, Issue 15), TWBC replied that the NHS/CCG recognises “A strategic assessment linked to the overall growth in the Local Plan will need to be undertaken by the CCG with local practices to inform requirements”. In the following paragraph 83 TWBC go on to say: “It is, however, important to emphasise that a more detailed discussion and assessment is required in this area to define any future requirements; **specifically noting that the majority of housing growth proposed in Horsmonden is expected in the latter part of the plan period**”. This expectation of timing has now changed as highlighted in 21. above, and there is a **serious misalignment between the SLP and the IDP not only regarding inadequate medical services to cater for the allocations for Horsmonden, but also all other infrastructure which will be impacted by this timing change, including education, water supply, sewer and sewerage capacity, power supply, and highways issues.**

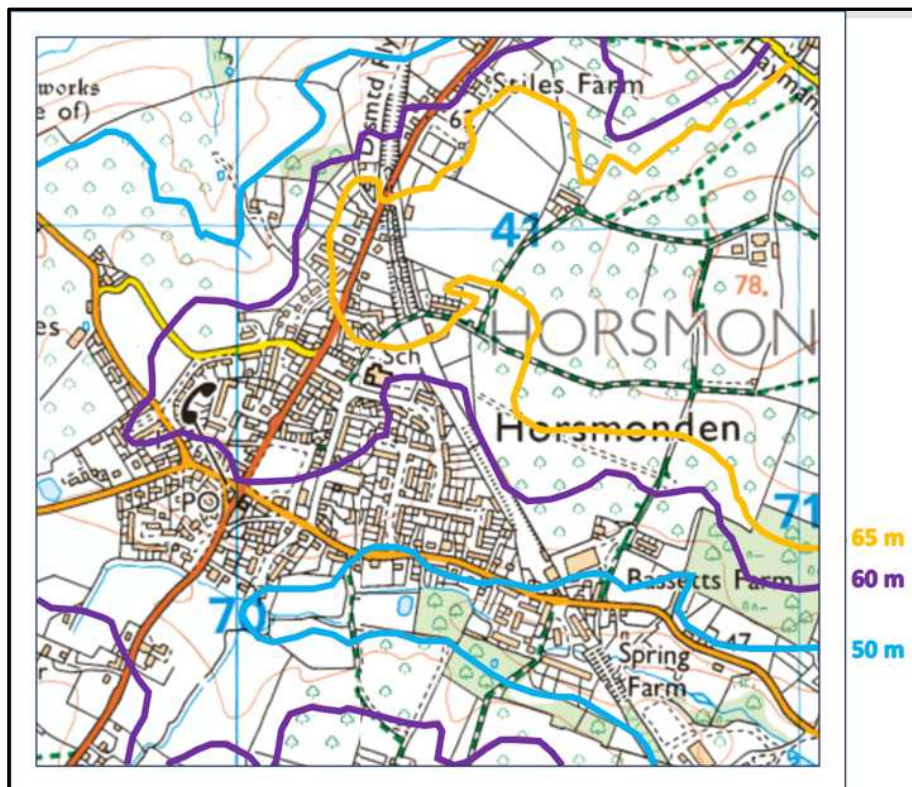
## 2.0 Planning Application 24/0078/HYBRID (The Application)

23. The AL/HO3 site has been the subject of multiple Landscape and Visual Impact Assessments (LVIA) all of which are addressed in the Evidence Report, and The Application presents further thinking in a new LIVA. There has been no material change to the landscape surrounding the site and therefore no one piece of the LIVA evidence can claim to present a better assessment than another purely because it is more recent.
24. There are discrepancies between all the LVIA evidence used to establish the AL/HO3 site LBD, the previous application 23/00044/HYBIRD and this current Application.

**2.1 65m AOD Contour:**

25. In November 2019 Persimmon Homes (the Applicant) submitted a representation to the Draft Local Plan consultation (Regulation 18) in relation to the proposed AL/HO3 LBD (see Evidence Report para 15 to 18). This representation included a Landscape Statement written by James Blake Associates, the same company that has provided The Application LVIA. It states under 6.4 Suitability of the Site for Development: *“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.”*
26. The Application LVIA is now seeking to use the 65m AOD contour as its proposed building limit ignoring the large body of evidence used by TWBC in defining the AL/HO3 LBD as addressed in [section 1.0 above](#) and the Evidence Report.
27. The Application LVIA states: *“8.1.6 Desk study confirms that the existing settlement of Horsmonden extends up to the 65m AOD contour line approximately, refer to Figure 10, therefore it is considered appropriate to utilise this as a starting point in terms of examining how far built development could extend up the slope of the Site and to inform the maximum extents of the built areas of proposed development.”* **The Application then assumes the 65m AOD contour as its building limit without any further consideration of the body of evidence used by TWBC in establishing the LBD.** Figure 10 in The Application LVIA does not even show the 65m contour.
28. Figure 4 below shows the Ordnance Survey Map for Horsmonden with the 50m, 60m, and 65m contours highlighted.

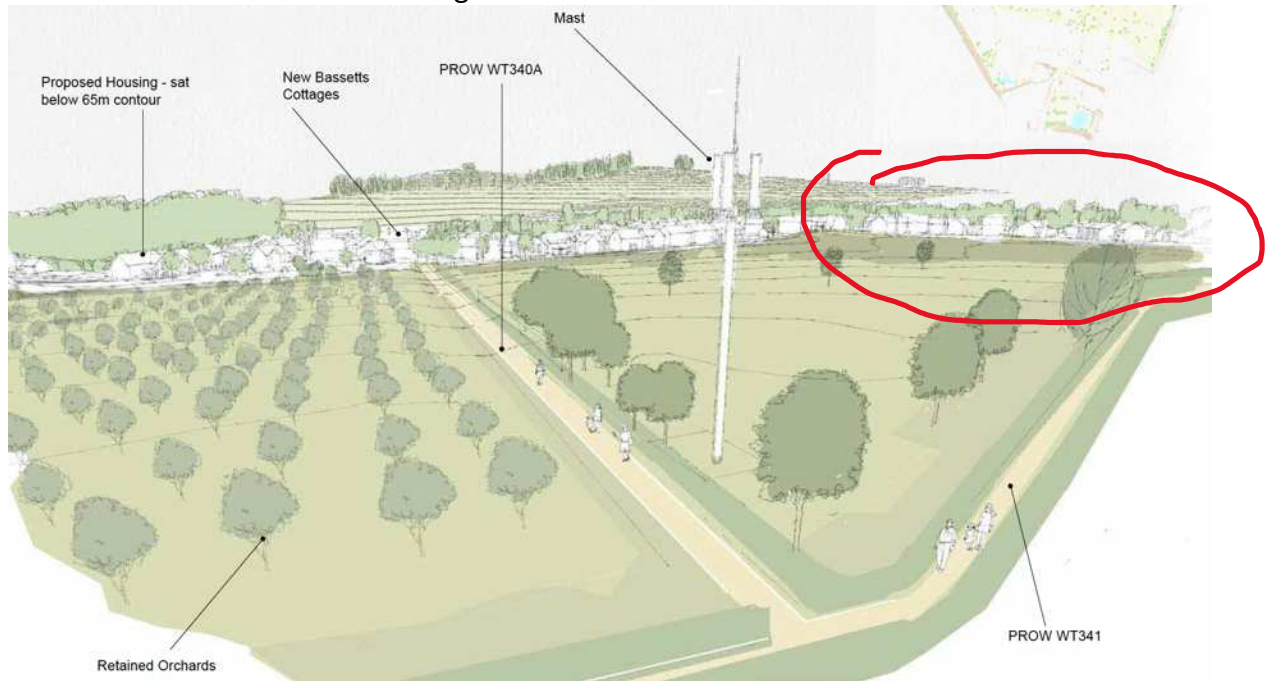
**Figure 4**





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29. The Application Design and Access Statement Page 49 presents an “illustrative view” of the site from the North looking westwards:



30. Photograph 1 below clearly demonstrates that none of the village buildings to the west are visible from The Application site due to the dense screening of the mature trees which line the distinctive route of the old Hop Pickers’ Line.

**Photograph 1.**



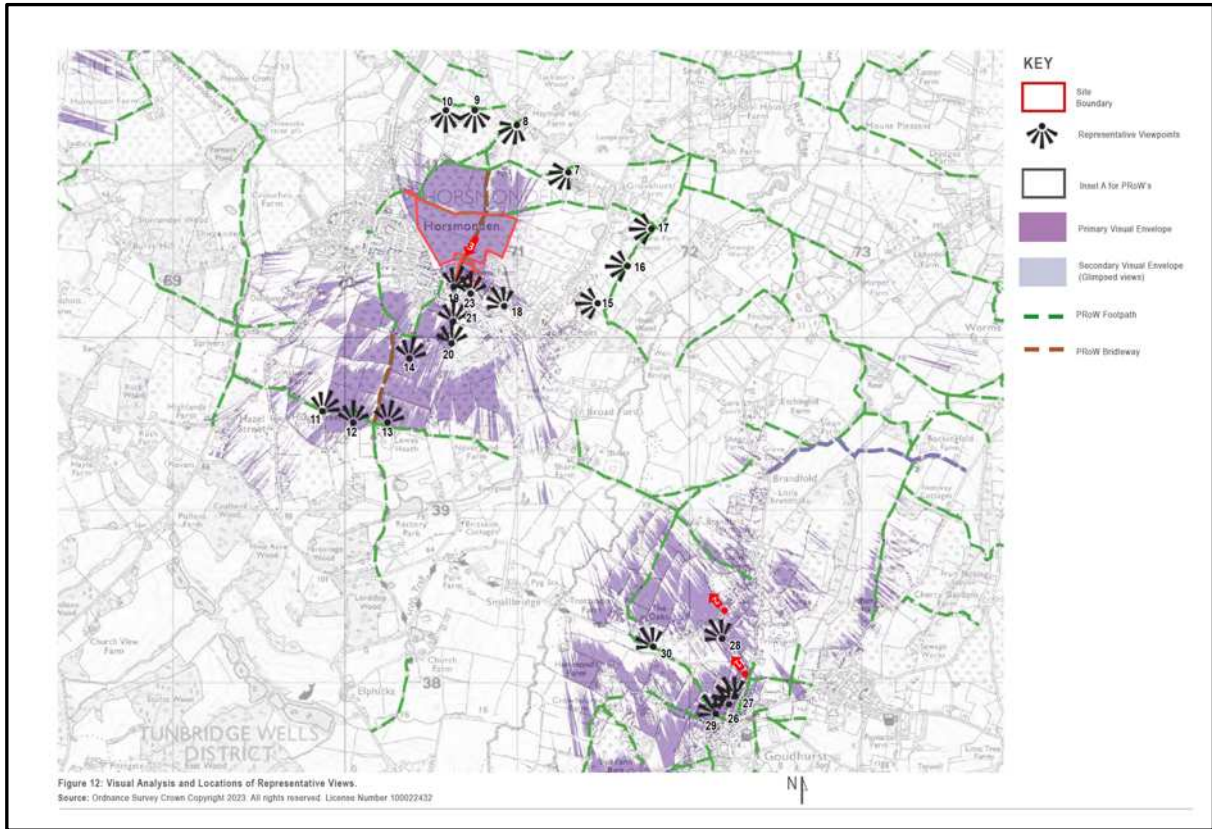
## DRAFT

31. With regard to the Hop Pickers' Line, the 2018 Landscape Sensitivity Analysis, referenced in [paragraph 8 above](#), states:  
*"Were development to take place to the east of the former railway line, it would be important to minimise any loss of integrity of the tree corridor that marks its route, which has value as an ecological and potentially a recreational resource, **and which contributes to the wooded backdrop of the village in views from the north and west**"* (see also The Application LVIA 5.7.4)
32. Thus, contrary to The Application desk top observation that Horsmonden village lies up to the 65m AoD contour, all of this built form is to the west of the village "behind" the wooded backdrop of the AL/HO3 site and **therefore using this 65m contour as a building limit guide is not relevant. The site must be considered on its own merits with its wooded backdrop of the mature trees which line the old Hop Pickers' Line**, which needs careful preservation [as per 31 above](#). Many of the trees along the Hop Pickers' Line are subject to Tree Preservation Orders.
33. By extending the built form beyond the SLP LBD to the northwest the ecology corridor which exists in the SLP layout is cut off leaving **no open space linkage between the Hop Pickers' Line wooded area, the open scape on the The Application site, and the countryside beyond.**

## 2.2 Visual Impact

34. The LVIA suggests that visual effects of The Application on the development site and its surroundings will be limited to the site and its immediate surroundings with some medium/long distant views being affected:  
*"6.5.6 The Zone of Theoretical Visibility, or Influence (ZTV), the area from within which the proposed development may have an effect, is relatively contained to the Site and immediate surrounds, and does not extend across middle or long distances, with the exception of the areas to the south west and far south east of the Site, where views are afforded across the tributary valley. Located within an undulating landscape with well vegetated boundaries, views are restricted to near distances in the majority."*  
*"6.5.3 Due to the undulating topography and existing dwellings and vegetation, the majority of middle and long distance views are screened, although some longer distance views are afforded into the Site from the south and south west along the edge of the AONB in particular". **We contest these conclusions. Whilst middle and long distance views are screened from a number of angles, it is not relevant to consider "the majority" but ensure that there is no harmful visual impact of a development on its surroundings. We give evidence below that views from the AONB in Goudhurst to the southeast, as well as views from the south/southwest, are substantially more harmfully impacted by The Application layout than that defined by the SLP and HNP LBD.***
35. Figure 5 is a copy of LVIA Figure 12 Visual Analysis and Locations of Representative Views. Three additional locations have been added to this map as follows:  
Point 1. Photos 2 and 3, Goudhurst AONB, North Road near to junction with Blind Lane. Looking Northwest towards AL/HO3. (what3words location [///flashback.activates.dressings](#))  
Point 2. Photo 4, Goudhurst AONB, Lidwells Lane. Looking Northwest towards AL/HO3. (what3words location [///opposites.huddling.refers.](#))  
Point 3. Photo 5, PROW 340A on The Application site looking South. ([see 43 below](#)).

Figure 5



36. Photograph 2 below shows that the AL/HO3 site is clearly visible from the AONB in Goudhurst. Photograph 3 is an enlarged version of Photo. 2 to demonstrate just how visible the site is and that **the positioning of the LBD is very well informed.**

Photo. 2.



Photo. 3.



37. Photo. 4 is from Point 2 on a slightly lower elevation but the site is also clearly visible.

Photo. 4



38. These photographs demonstrate that the AL/HO3 site is clearly visible from the AONB in Goudhurst as referenced in the TWBC AONB Setting Analysis. Development on AL/HO3 will have **at least a Moderate Adverse Visual Effect even in 15 years time** on this very rural view, especially as the view is from North Road with frequent pedestrians AND many dwellings which enjoy this unspoilt view both by day and night. At night any new lighting on The Application site will be very visible from this significant area in Goudhurst. With

the primary access road to the doctors' surgery/medical centre routed well outside the LBD car lights will be seen flashing on and off across the valley from Goudhurst, and if security lighting is included on the doctors' surgery/medical centre which has been placed above the LBD in The Application in full view from Goudhurst, then this will have a **Major Adverse Visual Effect** on the current very dark landscape which only has the occasional visible light in it today. **This evidence further supports the Evidence Report and the need for development to the West of PROW 340A on AL/HO3 to be limited to the prescribed orange areas within the LBD as shown on SLP Map 26.**

39. The LVIA Report states:

*"6.6.4 A series of views from Goudhurst itself, to the south east of Horsmonden were also reviewed, and the Site was not visible due to intervening existing settlement, undulating topography and woodland blocks"*

*"6.6.7 It is considered therefore that any harm to views out from the AONB, brought about by the proposed development would be minimal and limited in extent."*  
**We dispute these conclusions as above and contest that LVIA views 26, 27, 28 and 29 as shown on LVIA Figure 12 are not representative.**

40. The Application LVIA 8.3.10 states: *"This may therefore differ slightly from the Local Plan Limit of Built Development due to the fact that this assessment provides a finer grain of detail and includes desk top study and field study of the Site and surrounds."* **It is contested that this LVIA assessment "is finer grain", and this objection gives evidence this opinion is biased. At best all the landscape and visual evidence gathered over the last 7 years must be considered equally and as such the evidence in favour of the LBD defined by the SLP policy PSTR/HO 1 for the AL/HO3 site to the West of PROW 340A is strong and the LBD must not be breached.**

41. It is noted that in their dialogue with the SLP Inspector TWBC Officers refer to AL/HO3 Layout Map 62 as *"Indicative Site Layout Plan Map 62"*. However, the SLP does not show Inset Map 26, nor Layout Map 62 as indicative. In fact, SLP Policy STR 1 clarifies that it *"Looks to focus new development within the Limits of Built Development of settlements, as defined on the Policies Map"*. In Matter 3. Question 3. Issue 1 of the SLP examination TWBC state that the purpose of the LBD designation/policy approach is to *"provide both certainty and clarity to residents, landowners, developers, and other interested parties"*. And in Matter 3. Issue 3. Question 4. Paragraph 25. TWBC state *"The deliverable areas and landscape buffers shown on the maps are based on an initial assessment of the site and its relationship with its surroundings so they are approximate, and it is anticipated that these may be amended slightly at the review of the Local Plan once a development scheme has been drawn up in more detail"*. (emphasis added).

42. **Given the strength and consistency of the landscape and visual impact evidence assembled in establishing the LBD for AL/HO3 West Site and the fact that the Horsmonden LBD has been set by the made HNP which carries full weight, there is no reason given in the SLP nor the HNP for any development to be permitted outside the LBD on the AL/HO3 site. To accept The Application would cause much greater harm to the surrounding landscape including the setting of the AONB, than a development which is within the areas designated for building by the SLP and the HNP.**

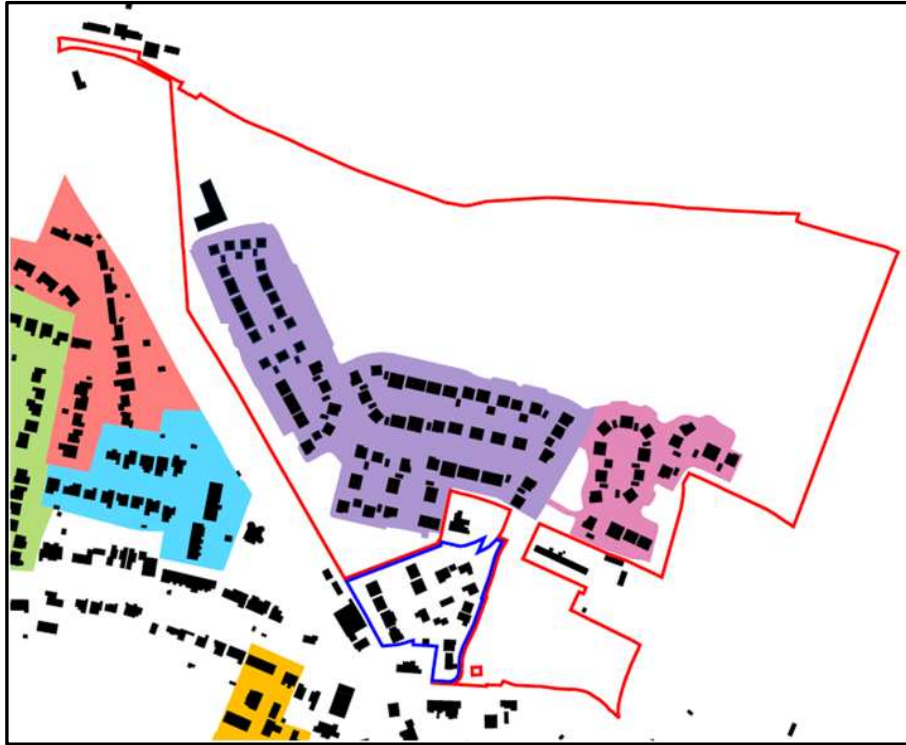
43. Photograph 5 below shows the view from PROW 340A central to The Application site looking South (as per 35 above). This view represents LVIA View H and HNP View 6.

Photograph 5



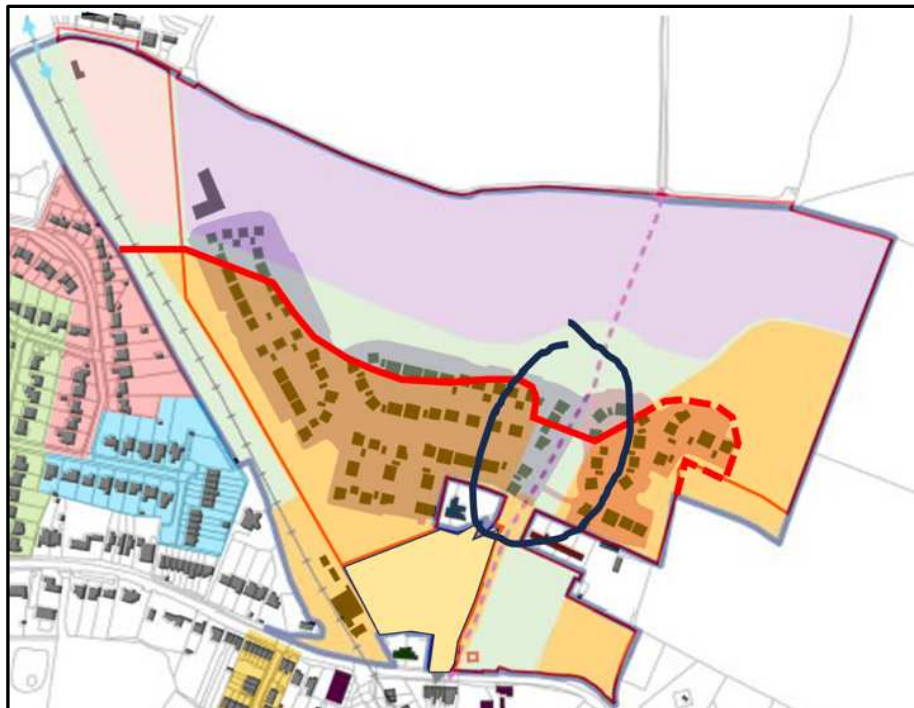
44. This view is recognised as important by all observers and has been preserved by SLP policies PSTR/HO 1 and AL/HO3 by specifying orange areas for residential development including the doctors' surgery/medical centre and green areas for landscape buffers as per SLP Map 26 and 62 (see Figure 1 above).
45. Evidence Report Appendix 7b includes a grain diagram of Horsmonden village provided by the Applicant to Horsmonden Parish Council (HPC) in October 2023. It is noted that The Application layout is slightly different to this in the most westerly area, all other areas are the same, as are the number of dwellings. Information in The Application has been used to update this grain diagram and this is shown in Figure 6 below:

Figure 6:



46. Figure 7 combines SLP Map 26 (Figure 1 above) and The Application grain diagram (Figure 6).

Figure 7.

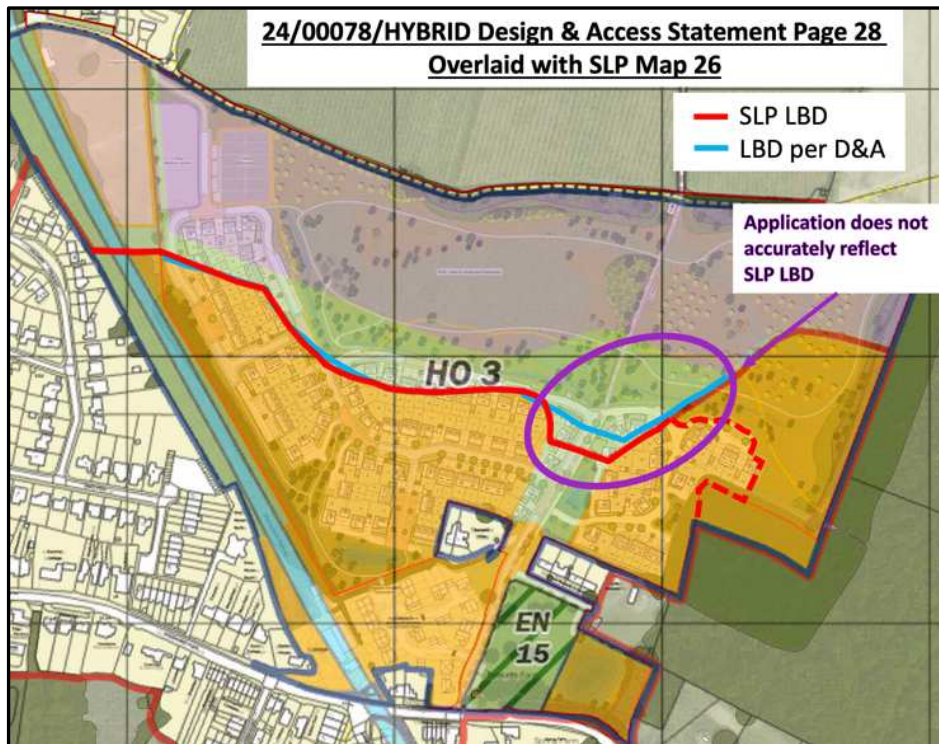


47. Figure 7 clearly shows that **The Application does not respect the green area allocated as “Open Space & Landscape Buffer”** in SLP Policy Map 26 with 5 houses placed on this area to the West of PROW 340A and 3 more to the East of it. **This layout does not adequately preserve HNP View 6 looking from the site across the valley to the South, and the addition of these houses on this open space and landscape buffer also impacts on the settling and amenity of the Non-Designated Heritage Assets, Bassetts Villas.**

### 2.3 The Application Layout

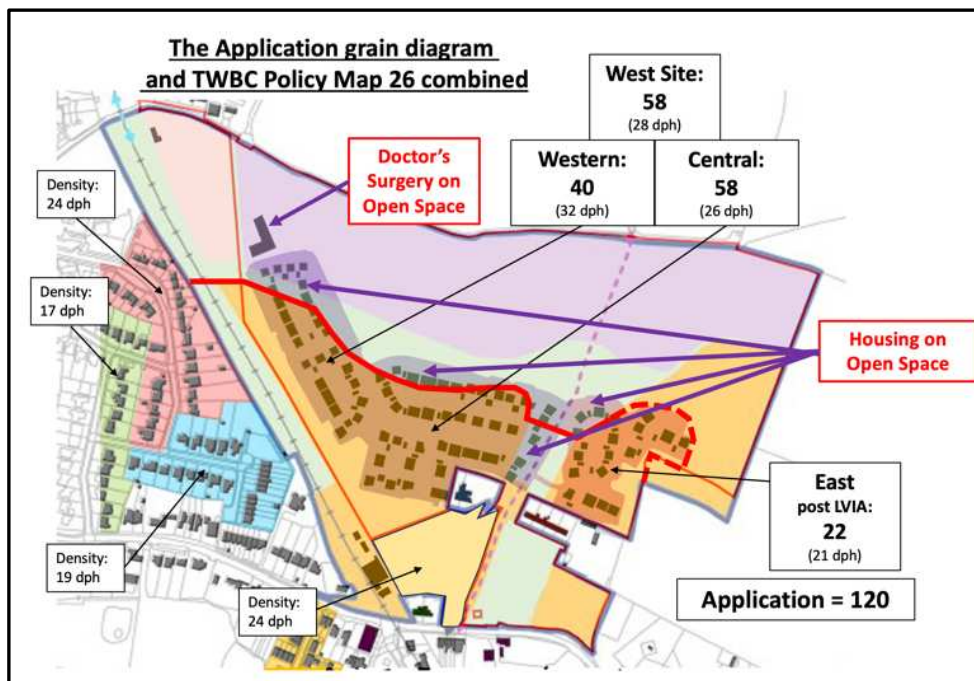
48. Figure 8 below combines The Application layout (as per D&A Statement) with SLP Map 26. This clearly shows that The Application blue line does not accurately reflect the SLP LBD red line.

Figure 8



49. Figure 9 below shows the combination of SLP Map 26 and The Application grain diagram as per Figure 7 annotated with the number of houses for each area within The Application site and the housing densities for each of these areas along with the densities of nearby housing as provided in The Application.

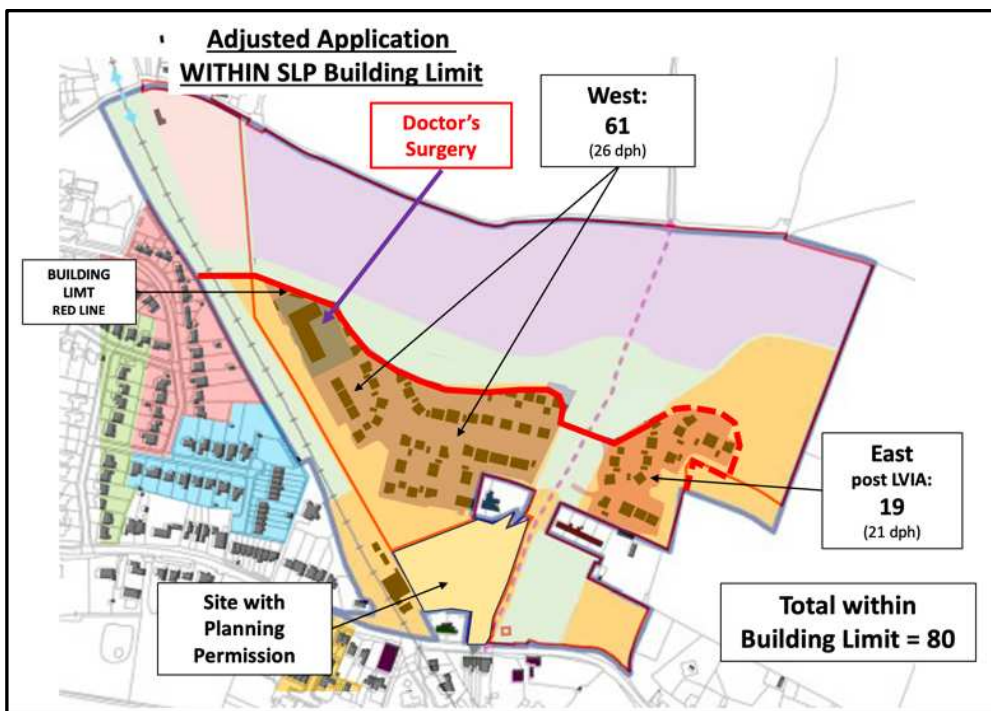
Figure 9





50. SLP Policy H2 further qualifies that the density of a development must be carefully considered: “...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.” The Evidence Report considers the densities of the various parts of The Application site and shows that **by limiting The Application development within the LBD, including land for the doctors’ surgery, at housing densities which would allow more green space to be integrated within the development and cars to be parked beside houses, this would give a new development with a sense of place as a transition from the village to the countryside.**
51. Such a scheme within the LBD would yield 80 houses for The Application. This would be fully consistent with the allocation target range shown in **para. 19 above**. Figure 10 below show the combination of SLP Map 26 and adjustments to The Application bringing it within the SLP LBD. (The Evidence Report provides further details)

Figure 10



52. Even after the adjustments to The Application, Horsmonden would still be making a substantial contribution to Borough housing needs and **the village population will still expand by about 40% due to the SLP allocations**, all of which are being actively developed in the near term.

**2.3 Infrastructure to support The Application:**

53. To respond to such a material short term change to the village infrastructure and society, other issues connected to any development on Land East of Horsmonden will also need to be fully addressed, these include:
- a. Truly beautiful house design following the design guides.

- b. Ensuring the doctors' surgery is built at the same time as the housing. This is provided for in SLP policy AL/HO3 Condition 14: *"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"*. **The legal agreement for the medical centre/doctors' surgery must make it clear that no development can take place until it has been granted full planning permission, that no more than 25% of the houses can be built until its construction has begun, and no more than 50% of the houses can be developed before it is complete. There are many legal precedents for this type of agreement.**
- c. Ensuring that the public open spaces are fully recognized as Green Open Spaces under SLP policy EN 15.
- d. Clarifying how the public open spaces will be managed through terms in an s106 agreement and a Landscape and Ecology Management Plan.
- e. Clearly stating how the school expansion land availability will be guaranteed when it is required.
- f. Protecting the site's dark skies and biodiversity by minimizing all outside lighting.
- g. Guarantees that there will be no adverse impact on utilities and services supplies to the village.
- h. Full delivery of village wide traffic calming.
- i. Improvement to the Goudhurst Road footway (as per AL/HO3 Condition 2)
- j. Financial support to help the village form and implement a social integration plan for the change to its population, including the construction of a new village hall.

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**Appendix 1**

<b>Breakdown of Allocation for AL/HO3 - Land to the East of Horsmonden</b>				<b>Orange</b>	<b>Non-housing</b>				
(Refer SLP AL/HO3 Site Layout Maps 26/62)				<b>Residential &amp;</b>	<b>Roads, SUDs</b>				
<b>Description</b>	<b>Reference</b>	<b>Site Area (ha)</b>	<b>Orange</b>	<b>Surgey Use</b>	<b>Buffers. Surgery</b>	<b>Housing</b>	<b>Housing</b>	<b>Houses</b>	<b>Notes</b>
		per Ref.	<b>Gross Area (ha)</b>		<b>Allowance</b>	<b>Net Area (ha)</b>	<b>Density (h/ha)</b>	<b>#</b>	
			a)		b)		c)		
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. (granted)	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			
<b>AL/HO3 Overall</b>		<b>19.4</b>	<b>7.23</b>			<b>4.91</b>	<b>Allocation</b>	<b>140</b>	e)
Notes:									
a) By measurement (orange areas Map 26)					<b>Summary of Land Use:</b>				
b) Calculated					Residential Use	4.91			
c) As per SHELAA methodology Main Report 3.38. (SLP range is +/- 5 h/ha on density)					Doctors' Surgery & School	2.04			
d) Lower density per AL/HO3 (5.609). Subject to LVIA					Roads, Buffers, SUDs etc	1.71	} Non-Residential		
e) Mid range as per methodology					Open Space (incl SW SUDs)	10.74	} Use	55%	
						<b>19.40</b>		12.45	64%