

IA 1 - Benenden Neighbourhood Development Plan issued on  
23 February 2019  
Summary of feedback received from stakeholders

The first rough draft of Benenden’s Neighbourhood Development Plan (NDP) was published on 23 February 2019 as an informal consultation document. As such it does not contain all the detailed analysis used to devise the plan but does outline key aspects such as an indication of the housing numbers outlined by TWBC, Benenden’s intention to allocate sites within the plan and details of those sites.

The NDP Steering Group have received feedback from around 30 individuals as well as a petition with some 130 signatures. These inputs will be published in full as part of the consultation process. However, the feedback had some very consistent themes and these have been set out in the table below alongside the NDP Group response arising from each point.

1. Landscape and the Environment	
<b>Feedback</b>	<b>NDP consideration</b>
<i>The NDP fails to state the importance of the Local Wildlife Sites at Benenden Hospital and has ignored the Hospital’s extremely poor record in implementing the Landscape and Ecology Management Plan.</i>	The plan recognises the LWS in the disused hospital grounds and recommends that these sites should be designated in any future development as Important Local Green Space. An assessment in May 2019 by Kent Wildlife Trust and TWBC states that the Hospital is fulfilling its obligations.
<i>Development at East End will increase the flooding risk in Green Lane.</i>	The Strategic Environmental Assessment of the NDP has identified minor flood risks in the south of the parish, between Iden Green and Sandhurst. No flood risk has been identified in Green Lane. If evidence can be provided of flooding in Green Lane this will be taken on board and a policy to reduce flooding from run-off from development will be incorporated into the plan.
<i>Views to preserve include view south from Walkhurst Road towards church (Site 158 lies between the viewpoint and the church)</i>	View to be included from top of Walkhurst road through to village and church.
<i>The Plan should contain a strong locally distinctive countryside/landscape policy which is appropriate and relevant to the parish</i>	This to be addressed through the Landscape Character Assessment undertaken by AECOM.

<p><i>The setting of the conservation areas of Benenden and Iden Green is recorded in Conservation Area documents. The wording of the conservation area documents should be used in the NDP as each will support the other. This setting includes views from the conservation areas to open countryside that should be protected.</i></p>	<p>Conservation Areas have been looked at through the Character Assessment but this can also be considered by AECOM who will be reviewing the Character Assessment and undertaking a Landscape Character Assessment to support the next draft of the Plan.</p>
<p><i>The four Panoramic Views cited in the Benenden and Iden Green Conservation Area Appraisal (page 44) should be included as four of the NDP views to add consistency and add weight to the Appraisal.</i></p>	<p>Will be included.</p>
<p><i>The importance of Local Green Spaces is undisputed. The NDP can designate LGS and this should include existing public amenities such as Benenden village green, Iden Green recreation ground and other public spaces. Do not rely upon the Local Authority Plan. Any private open spaces (e.g. New Pond Corner) should not be designated as a LGS. Rather they should be protected by strong countryside; conservation and heritage views policies.</i></p>	<p>This approach for the example given at New Pond Corner as the public doesn't currently have access to this is accepted. However, as a principle, privately owned open spaces could be designated.</p>
<p><i>Benenden Parish lies almost entirely within the AONB. In which case why prioritise certain views which give weight to development away from these views. Why include this directional policy?</i></p>	<p>The views that are being designated need a rationale and should avoid 'private views'. However, there are key views that need protecting. We will rationalise the views listed to date so that they are demonstrably special.</p>
<p><i>There are 27 views listed as worth protection of which 16 are contained in an area of 6.9km<sup>2</sup> to the South of Benenden village. The remaining 10 being scattered across the Parish. It is not clear what process was used to assess the views or to accept/reject suggestions.</i></p>	<p>We are working on rationalising the views so that they show as fewer views, with a number of viewpoints. The views are typically going to be from ridges. The views have been shared on a number of occasions and we have invited people to submit their own for consideration, to which we have had a small response.</p>

<i>Why not commission an independent landscape character assessment by a qualified landscape architect to ensure independence?</i>	This will be covered by AECOM in their review of the Character Assessment (including reviewing the views).
<i>The approach to designating green spaces does not follow a coherent methodology. Designated green spaces include private land that have no rights of way, others with rights of way but no parkland. By designating all private land with public rights of way as green space a substantial proportion of the NDP area would qualify for protection. Once again Green Space Allocation need objective criteria and transparent methodology.</i>	Allocation is in line with NPPF and TWBC Local Green Space Designation Methodology. There are subjective choices to be made which is the purpose of having a consultation period. This helps ensure the general consensus of the Parish.
<i>The proposal to record all environmental information gathered by the NDP process is commendable. Be aware the Kent and Medway Biodiversity Records centre already provides similar resource and may offer existing infrastructure to hold any information on an ongoing basis.</i>	This is a reasonable point, and we are not sure of the need to include this as a project. Some feel more strongly about this, and it would encourage more involvement if there were locally led record keeping and sharing.
<i>Please note a required text change. Dogs are only allowed on Hilly Fields if they are on a lead. The land is used as working farmland and the sheep should not be disturbed.</i>	Added to Appendix LEA5.
<i>The views section should include a view from Walkhurst Road south to the Church. This view would be affected if site 158 were developed.</i>	To include view from near top of Walkhurst Road.
<i>Views across site 158 are not currently fully accessible to the public. But site 158 should be added to the Local Green Space allocation for its stunning setting between the conservation area and ancient woodland of the shaw.</i>	This doesn't obviously meet criteria as it needs to be demonstrably special to the local community. It's not easily visible or generally accessible and doesn't have particular wildlife significance.
<i>Iden Green should have more protection in the plan. Views across the orchards could be lost if there is development.</i>	Iden Green has 16 views listed as worthy of protection. The Iden Green development allocation is zero.

## 2. Housing Supply and Site Allocation

<b>Feedback</b>	<b>NDP consideration</b>
<i>Development on the Hospital Site at East End is unsustainable as there is no infrastructure such as shops, schools or community facilities within 2 miles.</i>	The NDP has been careful to weigh all considerations and accepts that East End is not an ideal location from the viewpoint of sustainability. However other considerations, Brownfield land (NPPF Paras 117 and 118) weigh in favour of these sites.
<i>There is a clear departure from established housing policies supporting building in village centres.</i>	The site allocations provide two sites adjacent to Benenden village centre; Uphill and Feoffee. In addition, planning consent has been given to a windfall site on New Pond Road and other sites close to Benenden and Iden Green are in the pre-planning stage. These sites offer development close to the village and in line with NPPF Para 78.
<i>No explanation as to why sites were rejected. For example development on sites 158 and 222 would avoid major traffic issues at East End and be more sustainable.</i>	The plan has balanced development by allocating a maximum of 50 new homes at East End in addition to 44 new homes in Benenden village. Both in addition to existing permissions. Windfall sites for a further 8 homes are in process in Benenden village bringing the total new homes in the village to 50. Concentrating all development into Benenden village will reduce pressure on Goddards Green road and Castleton Oak Crossroads, by increasing pressure on Golford Crossroads and Swattenden Lane.
<i>Benenden NDP Housing policies H8 and H9 argue against development at East End</i>	H8 refers to enhancing the local built environment. The proposal to remove or refurbish existing dilapidated buildings on the former hospital sites at East End will result in an enhanced built environment. H9 refers to market housing being made available for local purchasers in advance of public sale. This policy can apply equally to all sites with market housing.
<i>The plan approves 87 new houses in East End with only 45 in the village, possibly as few as 37</i>	These numbers are incorrect. The plan allocates a maximum of 50 new houses on Brownfield sites outside the AONB at East End. The Plan also allocates a maximum of 44 new houses in the village. Windfall sites in plan for Benenden bring to 52 the new

	houses in the village. These numbers are allocated within the Benenden NDP in addition to existing planning permissions in both East End and Benenden.
<i>The separation of two sites at East End with the same ownership is disingenuous.</i>	The sites are separate and were offered as such by the landowner. They have separate site designators within TWBC documents.
<i>Once planning permission is given the developers will object to conditions made by the NDP and may argue they are unlawful – anticipated infrastructure will not be delivered by Section 106 or CIL as a result.</i>	Previous government guidelines did allow some back sliding by developers on affordable housing levels and infrastructure contributions. The Feb 2019 NPPF has strengthened guidelines to ensure that site specific policies requiring development contributions will be delivered. Paras 34, 54, 55, 56 and 57 of the NPPF refer.
<i>The NDP reasoned justification about East End sites starts by noting the sites are in a relatively unsustainable location.</i>	The NDP has been careful to weigh all considerations and accepts that East End is not an ideal location from the viewpoint of sustainability. However other considerations, Brownfield land (NPPF Paras 84, 117 and 118) weigh in favour of these sites.
<i>The fact that the hospital sites are partly Brownfield is not of itself a justification for disregarding other more relevant housing policies.</i>	These policies are not specified but assumed to be concerning sustainability of location. NPPF Paras 84 and 117 asks Local Planning Authorities to make as much use as possible of previously developed land. All proposed development at East End is on previously developed land.
<i>Extension of East End will lead to a closing of the gap between East End and Benenden merging the two settlements.</i>	The two Brownfield Sites outside the AONB at East End are to the east of the settlement, Benenden village lies to the south west of East End. The proposed allocations will not close the gap between the two settlements.  Benenden NDP have agreed re-drawn Limits to Built Development for Benenden and the removal of LBD for Iden Green which are published as part of the TWBC Local Plan. The revised LBD will ensure no coalescence between Benenden, Iden Green or East End.
<i>The centre of Benenden is a safe place to</i>	The CPRE recommend build density of

<p><i>build. Estates built in remote locations are prone to criminal and anti-social behaviour. Density at East End should be reduced and more building should take place in Benenden village.</i></p>	<p>more than 30 dph. The NPPF asks LPAs to make efficient use of land to reduce the demand for green field development. The NDP is conscious that East End is a small settlement and that once the 350 plus employees of the hospital have finished work it becomes a peaceful location. In recognition, the NDP has proposed a lower build density of 22 dph.</p>
<p><i>Why has site 222 been rejected? It is a point where natural 'ribbon development' of the village should take place.</i></p>	<p>Benenden Crossroads represents the gateway to the village and site 222 offers panoramic views from the conservation area across the High Weald. Part of the site lies within the conservation area and part of the site has listed archaeological remains.</p>
<p><i>The two sites at East End are Brownfield Sites. Why are no other Brownfield Sites considered?</i></p>	<p>Three of the sites allocated by the NDP are Brownfield and the one Greenfield site is for Almshouses. Uphill is previously developed land at the edge of Benenden village. It has also been allocated for development.</p>
<p><i>Proposed density on Hospital sites is too dense and could create slum conditions. We are charged with protecting an area of outstanding natural beauty in our midst. Do our best for the next generation by spreading development across all suitable sites. Negotiate a lower density of each development so each site can cope with new demands.</i></p>	<p>NPPF Para 123(c) instructs Local Authorities to make the most efficient use of land. The Campaign for the Protection of Rural England recommend housing densities should be increased to protect green fields (CPRE State of Brownfield 2018 section 3.2) and finally the East End sites are outside the AONB.</p>
<p><i>We support use of Brownfield Sites. We hope the hospital sites can become a viable settlement in its own right.</i></p>	<p>NPPF prioritises use of previously developed land.</p>
<p><i>Why must windfall sites be within or adjacent to the village?</i></p>	<p>NPPF Para 79 suggests development of isolated homes should be avoided. We have assumed this relates to small groups of homes, say 1 – 4 units where there is little chance of appropriate infrastructure or community enhancements. However, we do want to encourage some scattered very small developments on previously developed land such as farmsteads.</p>
<p><i>Windfall allocation has been set at 20%, why not more?</i></p>	<p>NPPF Para 68 states a minimum of 10% of homes should be planned on sites less than</p>

	<p>1 hectare. NPPF Para 70 says any Windfall Allocation must have compelling evidence on the level of supply.</p> <p>TWBC are willing to accept a reduction in planned development and 30% windfall allocation if adequate evidence is supplied by the NDP that windfall development will be delivered and if the consequent reduction in units on planned sites does not adversely impact on site viability.</p>
<p><i>Planning policy that excludes delivering the allocation through small scattered sites (e.g. 10 sites each with 10 properties) should be challenged.</i></p>	<p>NPPF is consistent in expecting financially viable sites. Small sites are less economic to build and often result in developers arguing to minimise Section 106 or Community Infrastructure Levies. As a result infrastructure is not upgraded and affordable housing levels are minimised. Of the 20 sites offered all but two can accommodate in excess of 15 units (some up to 500 units). Part development of 10 sites will not meet our needs for affordable housing or infrastructure support, will open up land to potential future development in and will fail to meet initial economic viability criteria.</p>
<p><i>Elimination of 10 x small sites based on a statement 'The impact on the AONB would be much greater' is rather blithe and not accurate. Explain further or remove the statements from the plan.</i></p>	<p>The TWBC Call for Sites process identified 20 sites within the parish. Only two of these 20 sites could be classed as small (suitable for 10 or fewer houses). All other sites offer scope for 15 – 500 houses. Plan text will be amended to explain further the rationale for selecting fewer medium sized sites.</p> <p>The NDP allocates 3 brownfield sites (two of which are outside the AONB) and one greenfield site for development of Almshouses. Of the remaining 16 sites only one is brownfield currently providing employment opportunities. The remaining 15 sites are inside the AONB and greenfield so offer less justification for development</p>

<p><i>Almshouses will not provide homes for young adults and so do not meet the housing needs survey results.</i></p>	<p>Almshouses are not restricted to older people and the Benenden Alms House Charities is planning to offer almshouses to families and older people.</p> <p>The 2018 TWBC Housing Needs Survey identified a need to build 6 affordable homes per annum (30 homes over 5 years). Of these, 4 per annum were required by the elderly and 2 by other families. To offer a 7 – 10 year supply we need around 50 affordable homes of which around 33 will be needed by older people.</p>
<p><i>The claimed requirement for 12 market homes to support almshouse building is contested. The Almshouse Charities has a plan to sell existing almshouses and we will not see the level of almshouses as presented in the plan.</i></p>	<p>The Almshouse Charities have confirmed their intention is to retain all existing properties, although the process of modernisation at the original Feoffee Cottages may result in the current 6 units being converted to 4 larger units. The Feoffee development will provide funds for renovation and modernisation of the 9 existing almshouses (potentially reducing to 7 units) plus an addition of 12- 14 new almshouses.</p>
<p><i>There is a bias in the plan towards almshouse development on an assumption the whole village supports almshouse development. This is far from true.</i></p>	<p>Feedback from each NDP workshop was clear, those who attended are keen to see sufficient truly affordable houses available to local people in perpetuity.</p>
<p><i>Feoffee is outside the LBD and within the AONB, with statutory protection of section 85 of the Countryside and Rights of Way Act 2000. Feoffee fails Para 115 of the NPPF and Local Plan Policy EN1(2). Why is this not mentioned?</i></p>	<p>EN1(2) says development should not cause significant harm to residential amenities in terms of daylight, sunlight and privacy. The plan has single storey development behind an existing hedgerow and will not impact on these amenities.</p> <p>This refers to the 2012 NPPF Para 115 which sets out a high level of protection to AONB. Over 95% of Benenden Parish falls within the High Weald AONB so some development within the AONB is almost unavoidable. The plan balances differing pressures by allocating some development inside and some outside the AONB.</p>
<p><i>Houses opposite the Feoffee development should be acknowledged. There will be a detriment on residential amenities. Local Plan EN1(2) states a proposal should not cause significant harm to the residential amenities of adjoining occupiers.</i></p>	<p>EN1(2) says development should not cause significant harm to residential amenities in terms of daylight, sunlight and privacy. The plan has single storey development behind an existing hedgerow and will not impact on these amenities.</p>

<i>Almshouse proposals are to sell 9 existing almshouses. So provision of 12 new ones only offers a net gain of 3 Alms-houses and so plan should be rejected.</i>	Almshouse Charities are seeking to refurbish 3 almshouses in Iden Green, refurbish 6 almshouses in the old Feoffee building (including a possible reduction from 6 to 4 larger units) plus build 12 new alms houses. The NDP recognises the loss of 2 almshouses under this plan but still a net gain of 10. And the entire plan, including modernising the existing stock is dependent on a new build in Feoffee field.
<i>Site 277, reference is made to views from Hortons Close.</i>	Agreed, error in document change to Harmsworth Court.
<i>The draft plan is excellent in every way. On the critical issue of housing supply the NDP has got the balance absolutely right.</i>	Thanks!
<i>Development of Brownfield sites should always take priority in preference to unspoilt sites put forward.</i>	The NDP has allocated 3 brownfield sites based on guidance in NPPF Paras 84 and 117. There is a balance to be struck in making the best use of brownfield sites and developing more sustainable sites.
<i>The NDP can allocate sites and draw new boundaries such as Limits to Built Development. There is an absence of reference to village/settlement boundaries and this should be corrected.</i>	This plan does allocate sites – we will amend text to ensure this is clear.  Benenden NDP have agreed re-drawn Limits to Built Development for Benenden village and the removal of LBD from Iden Green which are published as part of the TWBC Local Plan. The revised LBDs will ensure no coalescence between Benenden, Iden Green or East End.
<i>The statement 'In order to protect more of the AONB, some sites nearer to built up areas could be developed at a greater density' is inappropriate. It downplays the wording of the Iden Green conservation area document so greater density should not apply to landscape at the edge of Iden Green.</i>	CPRE recommends rural development to be in excess of 30 dph. The NPPF Para 123(c) sets out the need for efficient use of land to protect green fields from encroachment. Both Benenden and Iden Green Conservation Areas will be treated the same – taking note of planning policy and ensuring any development is sympathetic to both the Conservation Area and adjacent development densities.
<i>Housing allocation is unclear within the plan. A table is required to set out clearly the elements expected to contribute to housing supply would be helpful.</i>	The table used at the launch of the Rough Draft NDP will be included in the plan to clarify how we will meet our Housing Supply Allocation.
<i>Is this Neighbourhood Plan allocating</i>	Yes.

<i>housing sites?</i>	
<i>Why does the plan offer Site Specific Policies to sites which are not being allocated within the plan? Doing so gives unwarranted planning status to all submitted sites by attributing policies to them. This opens the door for negotiation and eventual development.</i>	The NDP will not provide site specific policies for those sites which are not allocated for development.
<i>Iden Green has no shops, no transport links to Benenden village, no Post Office or Primary School. It is not a sustainable location for housing allocations.</i>	There are no sites allocated for development in Iden Green. However, NPPF Para 84 allows for development in rural locations which do not have shops or public transport, particularly if the level of development exploits any opportunities to make the location more sustainable. In addition, the recent announcement of a Hopper bus service from Iden Green to Tenterden via Benenden and East End will increase the sustainability of the settlement.
<i>Sites south of The Street have not been selected. This should be reconsidered.</i>	The Plan allocates 4 sites from 20 offered by local landowners. 3 of the 4 sites are Brownfield and, of these, two are outside the AONB. One site is Greenfield, inside the AONB, but will be used to provide Almshouses. Of the remaining 16 sites only one is Brownfield currently providing employment opportunities. The remaining 15 sites are inside the AONB and Greenfield so offer less justification for development.
<i>A policy to prevent coalescence between Benenden and Iden Green should be included.</i>	Benenden NDP have agreed re-drawn Limits to Built Development for Benenden village and the removal of LBD from Iden Green which are published as part of the TWBC Local Plan. The revised LBD will ensure no coalescence between Benenden, Iden Green or East End.
<i>Policy H12 in the draft plan should be clarified. It states a landowner would be required to 'cash in' a larger site but you have also stated you do not want parts of large sites developed. H12 needs a redraft.</i>	This policy has been withdrawn.
<i>All locally written SHELAAs and associated comments by Merit Thornton consultants must be published to enable residents to compare site assessments.</i>	The NDP individual site assessments will be published as an annex to the final plan.

3. Design and the Built Environment	
<b>Feedback</b>	<b>NDP consideration</b>
<i>No feedback received!</i>	

4. Economy and Business	
<b>Feedback</b>	<b>NDP consideration</b>
<i>There is no reference in the Business and Economy Chapter to Farming and Forestry. A strange oversight.</i>	We will review the chapter and strengthen the text concerning Farming and Forestry.
<i>Live/Work units are a problematic concept in planning terms. They are often abused by occupants who lead to abuse of the planning system and potential planning harm.</i>	We are reviewing plan text on live/work units to place emphasis on using redundant farm buildings or windfall sites for live/work options rather than any new builds.
<i>Mobile phone signals are poor throughout the Parish. Building of unsightly mobile phone masts are problematic and do not always improve coverage. The plan should look to leap frog this technology by seeking improved Broadband speed and connectivity, promoting use of land lines and internet tele-connectivity.</i>	During the workshops held as part of the NDP process a clear and consistent theme was the lack of mobile phone coverage in parts of the parish. Benenden village centre is particularly poor. Use of land-lines and internet connectivity are only a partial solution as text messaging is becoming a major tool for Government, banks and other service providers to connect with customers. Masts are unsightly and problematic but we cannot ignore the need and have to find workable solutions.

## 5. Transport and Infrastructure

<b>Feedback</b>	<b>NDP consideration</b>
<p><i>Castleton Oak Crossroads is an accident blackspot. Blind bends make it difficult to use and the increase in traffic resulting from any development at East End will worsen the situation. KCC is already concerned by the impact of 24 additional houses, increasing this to 87 houses is unacceptable.</i></p>	<p>The figure of 87 new homes in East End is incorrect. Castleton Oak Crossroads is an accident blackspot and KCC have expressed concerns over the impact of development at East End. KCC have also recently undertaken safety works at the crossroads although even more should be done. Golford Crossroads has exactly the same issue, a blind bend when crossing the same Cranbrook – Tenterden Road. Any increase in traffic at Golford crossroads has a similar effect.</p> <p>In addition; HGV traffic from Friday’s Farm (5<sup>th</sup> largest producer of eggs in the UK and largest consumer of wheat grain in SE England), Hams Coaches and Shotcrete cement works provide an ongoing hazard along Swattenden Lane.</p> <p>The sites at Uphill and Feoffee will result in additional traffic at Golford crossroads and along Swattenden Lane.</p> <p>The plan identifies our road infrastructure as a major issue wherever development takes place in the parish. The Plan takes a wider view and has spread the impact on traffic movements along all three routes.</p>
<p><i>Requirement to drive into the village of Benenden from East End will add to traffic congestion and pollution.</i></p>	<p>All increases in house numbers will result in an increase in road traffic. Benenden is a rural parish, residents have on average 1.8 cars per household (Census 2011). In practice almost all journeys for shopping, services or doctors will require travel to Hawkhurst, Cranbrook or Tenterden. AECOM’s Environmental Audit of the Draft Plan concludes that additional housing will have no impact on pollution levels which are regarded as very low.</p>
<p><i>Goddards Green Road is narrow and dangerous and cannot take additional traffic.</i></p>	<p>The NDP proposals and policies recognise that all roads leading into and out of the parish are narrow and that traffic growth is a major issue. The crossroads at Castleton</p>

	<p>Oak, Golford and Benenden village are all under pressure. Swattenden Lane is used for access by HGVs up to 32 tonnes for Shotcrete and Friday's Farm and by Hams Coaches and Buses. New Pond Road involves crossing to the Cranbrook/Tenterden Road at Golford and then joining the A274 at Sissinghurst. Concentrating all building in any one settlement will reduce pressure on some roads by adding pressure to others.</p>
<p><i>The Parish Council is considering making Walkhurst Road a one-way street. Such a major change should be considered before, not after building 87 homes at East End.</i></p>	<p>The figure of 87 new homes in East End is incorrect. Walkhurst Road is narrow and difficult to use. The NDP is recommending a number of options be considered because of the planned housing growth in Walkhurst Road both by the allocation of Site 277 and the existing permission for 12 new houses on the Rydon Homes site.</p>
<p><i>Walkhurst Road is a narrow country lane which is used as a cut through. It has a 6' 6" restriction and is only 14' wide in places. Additional houses are planned at the Rydon homes site. Yet more houses at Feoffee will add to congestion and be a danger as there are no footpaths. The traffic calming measures proposed are all unacceptable.</i></p>	<p>A footpath will be provided to facilitate walking from the new Feoffee site to the village centre. Additional traffic will result from the developments but these are at the southern end of Walkhurst Road just before it joins the B2086.</p>
<p><i>There is insufficient parking in Rothermere Close (Hortons Close is wrong) and the Rydon Homes site plans for insufficient parking. The Feoffee development will add to the existing parking problems and there will be on street parking in Walkhurst Road.</i></p>	<p>NDP Policy HD6 will ensure the new almshouses have sufficient parking. The poor parking facilities offered in Rothermere Close is not a result of the Neighbourhood Plan but a pre-existing issue. The development at Feoffee will not worsen the situation.</p>
<p><i>The transport chapter should have an objective to minimise traffic by ensuring building only in sustainable locations, ensuring new development is supported by sustainable transport and footpath/safe cycle links. Rural lanes should be protected.</i></p>	<p>The plan recognises that traffic growth is a major issue. Around 50% of the allocated development will be within walking distance of the shop and butchers. However NPPF Para 84 allows for development in rural locations which do not have shops or public transport, particularly if the level of development exploits any opportunities to make the location more sustainable.</p>