

DESIGN and BUILT ENVIRONMENT		
REF.	RESPONDENT	COMMENT
28	Peter Nuttall	General - from the most recent developments that are lessons learnt available and have these been incorporated in our policies? A few pictures of award winning schemes could perhaps give some inspiration.
77	Charlotte & Helen Mortimer	More specific images or details to identify and promote exemplar design etc.
13	TWBC	Page 54, last para: Reference to 2018 NPPF -should be 2019 NPPF.
13	TWBC	Page 55, first para: reference is to "new housing developments", but then policies and subsequent paras discuss all development. Suggest being clear on what development the policies are appropriate to: new build housing, residential extensions etc.
77	Charlotte & Helen Mortimer	HD1 - If the High Weald Design Guide is to be the key guidance, then extracts from this which are judged to be most relevant to Benenden should be reproduced or quoted. More photos required of what is considered local distinctiveness.
13	TWBC	Page 55, Policy HD2/Para 3.2/Policy HD3/Para 3.4/Policy HD4: question whether it would be worth including Supporting Documents HDA3, 4 and 5 as appendices and making specific reference to these in the Policies, or just specific reference to the supporting documents in the Policies (rather than the supporting text).
6	Kent County Council	Policy HD2 The draft policy states that materials should be used that are similar in appearance to those used in Benenden’s historic buildings. The County Council supports this requirement but would note that this may be dependent on such materials being available. KCC recommends that a clause be added to state that development proposals will not be accepted if materials required for their appearance leads to the destruction of natural resources.
77	Charlotte & Helen Mortimer	HD2 - needs to emphasise the need for new developments to be integrated into landscape & urban settings, ie. with points of connection, delineating and enclosing public spaces, shielding private spaces from public areas. Layouts must not be dominated by cars & roads. Too much modern design follows cul-de-sac plans with huge turning heads. The low density character of Benenden is dominated by landscape and all new development needs to create a strong landscape setting, keeping mature features. Be more specific about local sustainable materials. <ol style="list-style-type: none"> 1. Green oak and sustainable timber frame. 2. Clay plain tile and steep roofs with open eaves. 3. Tile hung or mathematical tile upper storeys. 4. Timber windows not upvc. Flush casement or sash. 5. Clay stock bricks orange/red with blue/grey patina.

		<p>If the pallet of materials is controlled designers will work hard to produce original work that fits into the setting. If materials are natural, local and breathable then designs will be sustainable, low carbon and healthy. Policy (e) leaves a door open for incongruous designs that do not contribute to the local character. What is the policy on solar panels?</p>
79	Gladman Developments	<p>Policy HD2 General Appearance - sets out a list of design principles that development proposals will be expected to adhere to. Whilst Gladman recognise the importance of high-quality design, planning policies and documents sitting behind them should not be overly prescriptive and need flexibility in order for schemes to respond to site specifics and the character of the local area. There will not be a "one size fits all" solution in relation to design and sites should be considered on a site by site basis with consideration to various design principles. Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could impact on the viability of proposed residential developments. We suggest that regard should be had to para 126 of the Framework .</p>
77	Charlotte & Helen Mortimer	<p>Fig 1 - These images are poor. They are standard developer boxes and do not reflect the quality of materials or design to which this document aspires. They could be anywhere, with nothing to reflect the character of Benenden, in particular:</p> <ol style="list-style-type: none"> 1. Deep plans resulting in wide gables. 2. Stick on fussy gablets and bays are not integrated. 3. Crude heavy porches and brackets. 4. No base plinths or timber trim to tile hanging. 5. Hard landscape & roads dominate, without space for planting to soften the spaces.
77	Charlotte & Helen Mortimer	<p>HD3 - Developer layouts follow the dictates of Highway standards handed down by County Council, hence the standard width roads, turning heads speed control turns & other features that stop them looking like the rest of the village. Lower density developments have more scope to adapt to local conditions, than high density. Item e) needs to be rewritten as it makes no sense. If public open space is required then parameters need to be set to determine how much. 10% of site area? Is this all development or just sites above a certain size of number of units? It is usually limited to major developments, ie developments with 10 or more houses. If preservation of the AONB is of primary importance to residents of Benenden, then they will have to accept more windfall sites within the existing LBD, with an inevitable intensification of existing sites, by infill development among existing houses.</p>
32	Mary Cruse	<p>Policy HD5 - many references within the document to desirability of dark skies, but no clear indication of what this means and no clear policy by which it should be achieved. HD5 is not a policy but a series of suggestions. It needs far greater clarity. Suggest a clear dark skies policy to include: Use of dark sky meter readings at "Rural Sky" level as being the absolute indicator. Existing</p>

		residents encourage to subscribe to Dark Sky policy with aim being to reduce existing light pollution.....we need a parish commitment to reducing light pollution (see Cranborne Chase for example of how this can be achieved).
32	Mary Cruse	Policy HD5 - no street lighting of any sort including low level (page 58 Policy HD5 D. of policy refers to this as being acceptable. Policy to have very clear guidelines as to exactly what external lighting is acceptable in the parish. See Cranborne Chase for examples).
33	Russell Cruse	Policy HD5 - Again, as throughout, replace all conditional words with stated requirements. The Dark Skies policy is one that is very important to parishioners. Para e) should be changed to say that the Plan makes no provision for any floodlighting of any kind. There can be no possibility of Benenden being a Dark Skies area if any extraneous lighting is allowed to impinge on the environment. Indeed, many of us have seen our skies take on a suburban character over the years and a great deal needs to be done (as mentioned in the last sentence of this policy statement) to recover what we have already lost.
13	TWBC	Page 59, Policy HD6, para 3.6: Will need to make specific reference to the parking requirements (i.e spaces to bedrooms) in the policy, not just the supporting text; Residential parking policy for rural areas in the TWBC DLP (Policy TP3 Parking Standards, page 392) is proposed to be markedly different from the current Development Plan (Local Plan 2006), which relies on country wide "maximum standards". The levels indicated in para 3.6 of the NDP will be greater than those in the TWBC DLP, which is based on 2011 Census data. It may be that the NDP can evidence the specific need through specific data which is more up-to-date than the 2011 Census data? May wish to discount garaging as parking spaces, as they are rarely used as such.
77	Charlotte & Helen Mortimer	HD6 - Benenden is relatively isolated, resulting in high levels of dependence on cars for residents. This makes the level of car ownership per dwelling higher than better connected locations, resulting in parking stress if adequate off road parking is not provided. This can lead to developments that are dominated by cars and roads. If the character and quality of the environment are to be maintained, new development must provide sufficient space on each plot, not only for the necessary cars, but also to enable them to be screened from view. Electric cars policy required.
77	Charlotte & Helen Mortimer	HD7 - County Highways need to be in agreement
13	TWBC	Page 59, Policy HD8: Policies EN2 - EN5 (pages 370-375) of the TWBC DLP propose a raft of new policies around sustainable design and construction: It may be that the wording to Policy HD8 makes reference to developers being expected to refer to " ...and subsequent update, or policy in the emerging/adopted TWBC Local Plan " in order to future proof the NDP.
77	Charlotte & Helen Mortimer	HD8 - With so many existing buildings either listed heritage assets, or in Conservation Areas, is there a danger that the appearance and character of these may be damaged by adding solar panels to buildings.

11	South East Water	HD8 - materials & technology? South East Water is keen to know which water efficiency measures will be part of this plan in order to preserve water.
13	TWBC	Page 60, Policy HD9: Whilst TWBC very much welcomes this policy, as a general rule planning legislation should not overlap with other legislation, and this would be the case here. It may be more appropriate that this is changed to supporting text.
32	Mary Cruse	Projects Page 60 - I note commitment made to have active and regular liaison with major light polluters in the parish - Benenden Girls School and Benenden Hospital - has it happened? NDP needs assertive liaison to ensure that any developments at these major sites are light pollution compliant.