

## RESPONSE TO MATTER 7 - HAMSTREET

- **Are the housing sites HAM1 and HAM2 the most sustainable locations for development in these villages, including consideration of village form and wildlife?**
- **Do they represent the best strategy when considered against reasonable alternatives?**

- 1 The Core Strategy identified Hamstreet as a tier 2 settlement on the basis of its position in the sustainability matrix, which was confirmed in the 2009 review. Hamstreet scored highly in the matrix due to the range of facilities available, train station, and school in the village. However, the sustainability appraisals **(CD 2a)** carried out by ABC concluded that there are only two suitable sites for development in Hamstreet and these are HAM1 and HAM2. (Originally HAM07/10/12 and HAM02/03)
- 2 The Hamstreet Village Design Statement (VDS) (available on the Council's website) describes the village as having *'a compact, village atmosphere which is enhanced by a good network of footpaths'* which is achieved by placing the development *'south of the railway, with all houses within walking distance of the High Street shops, the surgery and the school'*. HAM1 will continue the built form of the area and join the existing residential area of Lancaster Close with the houses north of the railway line in St Mary's Close, and will create new footpaths to allow easier access to the railway station, therefore complying with the aims of the VDS. HAM2 will also be within easy walking distance to all the village services.
- 3 The proposed allocations of HAM1 and HAM2 are both natural extensions to previous Borough Local Plan (BLP) 2000 sites that have been implemented. Both sites were specifically mentioned in the BLP Inspector's report **(CD29)** with a view to be assessed in the future plan period. The HAM1 boundary was included within the previous Borough Local Plan Proposals Map and future development of the majority of this site is referred to on pages 2 and 3 of the Village Design Statement as if it had already been allocated. Both sites have received support from residents and the Parish Council. They have capacity to deliver 70 dwellings between them and will provide contributions to the public open space and play areas in the village.
- 4 HAM1 is centrally located in the village and but does not lie in the Conservation area, it is adjacent to the train station and in walking distance of all the village services. It is well contained visually and bounded, in large part, by the railway line and existing development. It is considered to

represent the most suitable site for a continuation of the built form of the village.

- 5 The allocation of HAM1 has received objections from Kent Wildlife Trust (TPV211 and TRSC85) and Mrs Emily Neighbour (TPV163) relating to the biodiversity value of the site. KWT believe that the site falls within the UK BAP definition of a 'Traditional orchard' and contains priority species adopted under section s41 of NERC<sup>1</sup>.
- 6 Complete Land Management on behalf of the landowners, have undertaken ecological scoping of HAM1 and this can be found at **Appendix 1 of this statement**. The site was previously an orchard but has been unmanaged for some time and now does not fall within the definition of a 'traditional orchard' on the UK BAP protected habitat list. As part of the scoping process, the Kent and Medway Biological Records Centre were consulted and they also do not record the site as a 'traditional orchard'. There is also no evidence from KWT that the site contains any of the species listed on the UK BAP priority species list.
- 7 The recent publication of a new draft PPS 'Planning for a Natural & Healthy Environment' of March 2010 contains a number of proposed development management policies. Policy NE8.4 states:  
*'Planning permission should be refused for development that would result in the loss or deterioration of species and habitats of principal importance, ancient woodland or aged or 'veteran' trees found outside ancient woodland, unless the need for, and benefits of, the development in that location outweigh their loss. Local planning authorities should consider the retention of veteran trees and other trees of amenity value as part of development proposals, and where appropriate, use tree preservation orders to protect them in the longer term'*.
- 8 This draft guidance defines a veteran tree as *'a tree, which because of its great age, size or condition is of exceptional value culturally, in the landscape or for wildlife'*. There are a number of old cherry trees on the site, which are a remnant of the former orchard, but these are not of a great age, are not of a size that renders them of exceptional importance in the wider landscape nor are they of principal importance for wildlife, although they may have some value for roosting birds and bats as shown in the

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<sup>1</sup> The UK Biodiversity Action Plan (UK BAP), published in 1994 (reviewed in 2007) sets out a programme for conserving biodiversity in the UK. The UK BAP has published lists of species and habitats that are conservation priorities which are under threat because of their rarity and rate of decline. These have been published under Section 41 of the Natural Environment and Communities Act 2006.

scoping report. Fruit trees have a short life span and therefore tree preservation orders would not be appropriate for these trees.

- 9 Although HAM1 lies adjacent to SSSI ancient woodland, it will be located further away than existing development in Bournewood and Harts Cottages in Bourne Lane and would not result in any direct impact upon it. The HAM1 policy requires the retention of the existing trees and hedged boundary on Bourne Lane and the inclusion of significant landscaping on the northern boundary, which will limit any impact on the SSSI ancient woodland.
- 10 HAM2 is located in the south west of the village, adjacent to the recent development of Orlestone View (the implemented Borough Local Plan site) and in walking distance of all the services within the village. The site does abut open countryside to the south but the topography of the land means that long views to the south are contained. However the policy does specify that landscaped screening must be provided on the southern boundary to soften the visual impact of the development.
- 11 There has been support for the allocation of the site at Parker Farm but one objection from a resident of Orlestone View regarding the widening of the access road that leads to the site. The road is currently a private single track road that serves Parker Farm and 3 detached properties on the eastern side. There is a large grass area between the track and Orlestone View development and the objector claims this area is used by children as a play area. However, the grassland in question is not designated open space and there is a recreation ground directly behind these properties and 2 play areas in easy walking distance from this site.
- 12 The private road that leads to the farm and other properties mentioned is in the ownership of Parker Farm and therefore is able to be widened as part of the scheme. Access via Orlestone View would not be acceptable as it is a tight knit estate with limited capacity for more vehicles, as indicated by the community workshop feedback (**Para 16.7 CD13**).
- 13 Southern Water had raised objections to the wording of the policy of HAM1 (TRSC41) and policy HAM2 (TPV426) regarding the sewerage systems but the Council has resolved these with the proposed revised wording submitted with the Regulation 30 version of the document, as recommended by Southern Water.
- 14 A number of sites in and around Hamstreet were initially put forward by landowners and some were suggested by local people at the community workshops. Only 10 sites were subject to sustainability appraisal as the remainder were considered to be too far outside the village and were therefore judged to be less sustainable than sites closer to the village centre and thus not suitable for allocation in principle.

- 15 A site opposite the school in Ashford Road (originally HAM01) has been proposed for allocation in addition to, or instead of, one or both of the allocated sites in Hamstreet. It has been submitted as a mixed use development that could provide facilities for the school such as a playing field and drop off/parking area as well as 60 dwellings and employment uses.
- 16 The Council believes that this site is unsuitable for allocation because of the impact on the landscape character of the area. The site is located on one of the main entrances to the village. It acts as a green buffer separating the village from the A2070 and the open countryside and woodland to the north. Development of this site would significantly change the character of this entrance to the village and be far more visually intrusive than either of the allocated sites.
- 17 With regards to the employment benefits this site can offer, the Council's Employment Land Review concluded that there was not a need to allocate employment sites in the rural area and therefore these proposals would be of no recognizable benefit. This is why the employment sections of the sustainability appraisals were not completed. See the housing and employment background paper for further information (**CD12**).
- 18 There is no evidence that the school playing field, parking/drop off area or traffic calming are required or can be delivered from KCC as the education or highways authority. It is unlikely that a small drop off area would resolve the traffic problems that occur at school times on Ashford Road, as it would only serve a limited number of cars, and would be used as a parking area rather than drop off as parents would still need to walk their children across this busy road. It would also not be normal practice for the education authority to support the provision of school playing fields on the opposite side of a busy road from the main school classrooms and it is understood that the school itself does not support this proposal.
- 19 The objection states that the Sustainability Appraisal scoring is incorrect as the Council has scored some greenfield sites as a single negative and others as a double negative. The SA is consistent with its approach and the greenfield sites that were closer to the built confines of the village were scored as single negative and greenfield sites that were on the outskirts of a settlement, moving further into open countryside were scored with double negative. In Hamstreet, sites 08 and 09 were scored with a double negative for the same reason as HAM01 and therefore the SA is consistent. Regardless of this scoring, this site would still score below the two allocated sites if changed to a single negative score due to its low score in the landscape section.

- 20 The promoter of site Other142 has raised an objection to the Hamstreet proposals as their site was not included in the plan. They believe their site could provide affordable housing for young people in the village as it is no longer viable as agricultural land. However, this site falls within Warehorne Parish, is clearly outside the village and is too far removed from any other housing to be considered for allocation. Therefore, it was not subject to a sustainability appraisal. The site is also very small and narrow and has poor access. Local needs housing is dealt with by an 'exception' policy (policy TRS4) in this DPD.
- 21 The results of the community workshop shown in Chapter 16 of **CD13** indicate that the HAM1 Lancaster Close site was the preferred site for development in Hamstreet. The HAM2 Parker Farm site received mixed support but the negative response was largely due to the perceived risk of flooding. The Environment Agency has not objected to the allocation on these grounds so therefore it seems that any flood risk objections are not valid. The indication from some residents was that further housing in Orlestone View could improve the current views for the residents in this location.
- 22 The Hamstreet Village Design Statement was opposed to development spreading out into surrounding fields and wished to keep the village as compact as possible to the centre. This view is re-iterated in the results of the community workshop shown in **paragraphs 16.3 and 16.4 of CD13**. The proposed Ashford Road site therefore is not as suitable as HAM1 or HAM2 for achieving this aim.
- 23 The community workshop results for the opposition site in Ashford Road show that all participants felt that the wooded area to the north of the site should definitely not be developed as it would damage the key entrance to the village. Therefore all other views given applied to the southern portion of the site only. Most participants strongly objected to housing on this site, unless it was for Local needs housing that could fund school and/or road improvements.
- 24 The landowners of the Ashford Road site have also carried out their own community event to promote the site and have used questionnaire results within their submission. These results highlight mixed views towards their proposals and show that although many people support the 'idea' of a school drop off area – they do not agree that the site is suitable for housing. The views expressed here also do not take into account any of the other sites proposed within the village and therefore the results from the Council's community workshops that assessed all the sites together, are much more robust. The objector claims that these workshops were 'private' but residents were invited by the Parish Council and not ABC and the outcomes reported in the Issues and Options report upon which public consultation was carried out.

- 25 In conclusion, the Council considers that, on the basis of all the available evidence, the proposed allocations at HAM1 and HAM2 represent the most sustainable and appropriate locations for new development in Hamstreet and represent the best strategy for the growth of the village.