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**ISSUE 7/Mr and Mrs T Gotke**

**TENTERDEN AND RURAL SITES DEVELOPMENT PLAN DOCUMENT**

**Statement on behalf of Mr and Mrs T Gotke**

**Appearance with regard to Hamstreet, Tuesday 24<sup>th</sup> June 2010**

**HPPC Ref: 30072**

**Date: May 2010**



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## **1 OVERVIEW AND SUMMARY OF CASE**

- 1.1 This statement is put forward on behalf of Mr and Mrs T Gotke, for discussion at the Issue 7 session, with regard to Hamstreet.
- 1.2 Issue 7 Hamstreet (together with Issue 6 Charing) deals with the issues identified by the Inspector as:  
*“6.1 Are the housing sites CHAR1 and CHAR2, HAM1 and HAM2 the most sustainable locations for development in these villages, including consideration of village form and wildlife?  
6.2 Do they represent the best strategy when considered against reasonable alternatives?”*
- 1.3 This statement addresses these questions, with specific reference to the merits of land at Ashford Road, Hamstreet, in the ownership of Mr and Mrs T Gotke, in the light of competing alternatives.
- 1.4 Proposals for this site have been placed before Ashford Borough Council, during the course of the preparation of the Tenterden and Rural Sites Development Plan Document (henceforth TRSDPD). We attach at Appendix 1 our submissions on behalf of Mr and Mrs T Gotke of July 2007; and at Appendix 2 our submission to the Issue and Options Stage (July 2008) and our letter to Ashford Borough Council of 23<sup>rd</sup> December 2008, setting out further details of the proposals (note: copies of Master Plans omitted as already before this examination).

## 2 ISSUE 7 QUESTIONS: HAMSTREET

2.1 It is the case for our clients, Mr and Mrs T Gotke, that land in their ownership at Ashford Road, Hamstreet is the most sustainable location for development at Hamstreet, rather than either HAM1 or HAM2. (Inspector's questions 6.1 and 6.2).

2.2 The concept for the development at Ashford Road, Hamstreet is a mixed use allocation, combining:

- A residential development (60 dwellings at 35 dwellings per hectare) 1.75 hectares
- Offices (1000m<sup>2</sup>, two storey buildings, 35% site coverage) 0.15 hectares
- Playing fields (for Hamstreet Primary School, or more general use),  
and a play area to serve the new residential development 1.5 hectares
- Car parking/drop off for the primary school 0.1 hectares
- Woodland planting 0.8 hectares

**Total area 4.3 hectares**

2.3 The remaining part of the field in the ownership of Mr and Mrs T Gotke would be retained in agricultural use. (See plan at Appendix 3).

### (a) Sustainability of land at Ashford Road, Hamstreet, for mixed use development

2.4 Hamstreet is identified as a sustainable location for new development, through its identification as a Tier 2 settlement in the Core Strategy (Policy CS6: The Rural Settlement Hierarchy); and confirmed by Ashford Borough Council in the Rural Housing and Employment Background Paper (examination library document 12) at paragraph 3.18.

2.5 We concur with this judgement, having particular regard to the excellent accessibility of Hamstreet to Ashford, and locations beyond, by rail; and the wide range of village facilities, including the primary school, and a wide range of employment opportunities.

2.6 Within Hamstreet itself, the site at Ashford Road, Hamstreet, enjoys particularly good accessibility to both the railway station, and to the primary school; while also being readily accessible to the other village facilities.

### (b) Sustainability Appraisal Tenterden and Rural Sites DPD – Regulation 27 Publication Version

2.7 The land at Ashford Road, Hamstreet, has been considered through the Sustainability Appraisal process; having been identified as site HAM01. We attach at Appendix 4 our comparative table, examining the merits of the land at Ashford Road, Hamstreet (HAM01), and the merits of HAM02/03 (land at Parker Farm, proposed to be allocated as site HAM2); and site HAM07/HAM10/HAM12, now

proposed to be allocated as site HAM1, land north of Lancaster Close.

2.8 In summary, our analysis identifies the key issues for reaching a conclusion on relative merits as:

- Landscape
- Places (Access to Services)
- Land use
- Employment
- Geology and Biodiversity

2.9 In all other respects there are no significant differences between the sites (HAM1, HAM2, and at Ashford Road, Hamstreet); we deal in detail with the relevant considerations under appropriate headings below.

2.10 We conclude that the issue of landscape impact, for the proposed site at Ashford Road, Hamstreet, is of much less significance than indicated in the Sustainability Appraisal; while the benefit to the village of a mixed use development comprising employment, and public open space has been overlooked, in reaching a balanced conclusion.

**(c) Proposed employment uses as part of mixed use development**

2.11 It is proposed to provide land to accommodate up to 1000m<sup>2</sup> of office floor space, on a site of 0.15 hectares. This assumes development of two storeys, with 35% built site coverage, the remaining land being available for car parking and landscaping.

2.12 The site is considered a highly sustainable location for new office development, being located very close to the railway station, with excellent rail services available to Ashford, linking to the high speed domestic rail services to London.

2.13 Our statement for the session on Vision and Objectives highlights the importance of rural employment; and the geographical imbalance in provision of additional land and buildings for employment in the rural areas, with particular regard to Hamstreet, and Wye.

2.14 Accordingly, we conclude that there is a pressing case for the allocation of land for employment purposes at Hamstreet.

2.15 We enclose as Appendix 5 the comments of the Hamstreet workshop held on the 26<sup>th</sup> March 2008 (referred to at page 5 of the pre-submission consultation statement February 2010 (examination library document 4a)). This refers at paragraph 16.10 to a small number of workshop and office units being welcomed in the village, which should be located on the outskirts of the settlement, so as not

to increase the traffic through the settlement.

**(d) Public open space/community facilities**

- 2.16 The proposals previously submitted to Ashford Borough Council have included the provision of playing fields for the village primary school; a play area to serve the proposed new residential development of 60 dwellings; and also car parking/drop off area for the primary school, to deal with existing problems at the primary school.
- 2.17 It is considered appropriate to put forward the proposals for public open space in a more general sense, pending a formal confirmation of interest by the primary school.
- 2.18 Discussions have taken place with the primary school, who have previously indicated their interest in the provision of playing fields, to meet the needs of the primary school, which are presently unmet; and a drop off and collection point for children, comprising an area of car parking. These requirements also accord with views expressed at the village workshop (see Appendix 5 as noted above); see the reference to parking outside the school at peak times (paragraph 16.12), and the desirability of supplying the school with a new playing field and parking (see paragraph 16.18). The comment on general themes at 16.2 also refers to the village school as an important community hub for the villagers, and the school is noted as currently undersupplied with playing fields.
- 2.19 The landowners can confirm their willingness to provide an area of 1.5 hectares, to provide a combination of playing fields, and a play area to serve the new residential development, together with car parking/drop off for the primary school.
- 2.20 The provision of these facilities, through the specific wording of a policy, as set out in Appendix 6, would enable the development to make a significant contribution to community provision; which could not be made by either of the other proposed allocations at Hamstreet (HAM1 or HAM2). The provision of appropriate levels of open space, at a recommended standard of 4.4 hectares per 1,000 population, is proposed in the Open Space Audit 2008 (page 48, examination library document 9).

**(e) Ecology and wildlife**

- 2.21 The proposal for mixed use development of Ashford Road, Hamstreet includes provision of 0.8 hectares for woodland planting; this would link the existing woodland to the north, with the railway line adjoining the southern site boundary, thereby providing an additional wildlife corridor. The present value of the land in intensive agricultural use, for ecology, is extremely limited.
- 2.22 It is noted that neither HAM1 nor HAM2 has the opportunity to make such provision; the comments of Kent Wildlife, with regard to HAM1, are noted, this will be a matter for discussion at the forthcoming examination.

**(f) Landscape**

- 2.23 Landscape impact is identified in the council's Sustainability Appraisal (examination library document 2a) as the most significant ground of objection to the proposed allocation of land at Ashford Road, Hamstreet. To fully address this matter, a detailed Visual Impact Assessment has been commissioned from Lloyd Bore Landscape and Ecology (attached at Appendix 7). This is of necessity a detailed document, to meet the guidelines of the Landscape Institute; however, it is possible to summarise its conclusions briefly, and refer in particular to the analysis section of the study.
- 2.24 Only a small number of relevant viewpoints are identified; the only viewpoint of significance, where there is an impact of a magnitude sufficient to require significant mitigation, is the view of the site from the public footpath (view 13 (table 4, page 36)). Woodland planting in this location, and appropriate siting of new buildings within the proposed allocation site (see section 6, pages 37, 38 of the Visual Impact Assessment), would ensure that the proposed development would not have a significant adverse impact.
- 2.25 The relatively low proportion of built development within the site as a whole (2.0 hectares, out of a total of 4.3 hectares, comprising residential development, offices, and car parking/drop off area) is such that built uses can be sited in the least sensitive locations, without difficulty, within the proposed allocation area.
- 2.26 The site frontage enjoys excellent screening, which can be retained as part of the proposed development, having regard to the proposals for vehicular access (see paragraphs 2.31 and 2.32 below).
- 2.27 Appendix 3 to the Visual Impact Assessment examines briefly the prominence in the landscape of sites HAM01 and HAM02, from the key viewpoints identified in the main study; HAM1 is noted to be visible from view 11 (local scale long term and moderate adverse); HAM02 is visible from viewpoint 22 (adjoining the Royal Military Canal, national scale, long term and substantial to moderate adverse); and viewpoint 23 (local scale, long term and moderate to minor adverse).

**(g) Proposed housing – affordability and mix**

- 2.28 The proposals would provide affordable housing at the rate of 35% (20 dwellings), in accordance with the relevant policies of the Core Strategy (Policy CS12).
- 2.29 It is anticipated that the site will accommodate principally family housing, to accord with the local perspective on this issue (see section on public consultation below).

**(h) Energy efficiency**

2.30 It is considered that the proposed allocation site, combining dwellings and business uses offers the opportunity to be an exemplar village scheme. Residential development of this size offers the opportunity, for example, either for ground source heat pumps, or possibly solar energy generation, given the southern orientation of the site.

2.31 The illustrative Master Plan (see 2.34 below) indicates the scope for water areas, as part of a sustainable urban drainage system; it is further anticipated that the proposed new dwellings, and office units, would offer the opportunity for rain water recycling, to reduce impact on water supply.

**(i) Transport**

2.32 The site is considered to be in a highly sustainable location given its proximity to the railway station; in addition, regular bus services pass the site frontage, to Ashford to the north, and New Romney and intervening villages to the south, the site is also well placed in relation to existing village facilities, including the village school, and other services, as noted in the Sustainability Matrix (see Housing and Background Paper, examination library document 12).

2.33 With regard to vehicular access, a short statement (with Technical Appendices) has been commissioned from Peter Brett Associates (Appendix 8); this concludes that appropriate vehicular access can be achieved, through the provision of a priority junction, with right turn lane into the site from Ashford Road; this should include the provision of pedestrian crossing facilities. The statement also notes that, despite the 30mph speed limit, recorded vehicle speeds are higher at approximately 41 – 43mph, confirming the desirability of traffic calming measures in this location.

**(j) Layout and Master Plan considerations**

2.34 The alternative Master Plan layouts previously submitted at the Regulation 27 stage give an indication of a potential disposition of land uses within the site; as noted at paragraph 2.25 above, there is considerable flexibility, given the relatively low ratio of built uses to open uses of land. The Visual Impact Assessment sets out criteria against which the relative locations of land uses could be determined; our proposed policy wording, and explanatory text, proposes that development of the site should be subject to preparation of a Master Plan, prior to submission of a planning application. (Appendix 6). A further updated version of the Master Plan is attached at Appendix 9. (Option 3).

**(k) Deliverability**

2.35 The proposed allocation site is in a single ownership; the owners are committed to bringing it forward

for development, as evidenced by the representations submitted over the period from July 2007, to the present date.

2.36 Initial discussions have taken place with a potential developer of the site, to ensure that the site concept (mixed uses), and location were considered to be attractive from a private developer perspective. The letter confirming these matters from ourselves to Mr Tony Hillier, of Hillreed Homes, is attached at Appendix 10 to this statement.

**(l) Public consultation**

2.37 A public consultation event was held on behalf of the site owners, in May 2009; a copy of the poster advertising the consultation event, at the Victory Hall, is attached at Appendix 11. Our letter of 20<sup>th</sup> May 2009, to Mr D Carter of the Planning Department, enclosed a summary of the representations received. This is attached at Appendix 12. (Please note that the plans referred to are not attached at this appendix, as these are already before the examination).

2.38 I would highlight the following key results:

- Preferred housing type was 2 and 3 bed homes, and housing for the elderly; 6 persons commented that they did not wish to see any houses provided.
- Affordable housing was supported by the majority of respondents.
- Small office suites were the preferred form of local employment.
- Proposal for new drop off and parking area for the school supported by the majority of respondents.
- Proposal for traffic calming favoured by the majority of respondents.
- Proposal for a playing field for the primary school and public open space supported by a majority.

2.39 The public consultation event was, in part, a response to what we consider to be a rather incomplete process of consultation by Ashford Borough Council. The village workshops held in 2008 and 2009 (see pre-submission consultation statement – February 2010 (examination library document 4a)) was carried out by a restricted, and self-selecting group, headed by the relevant parish council, rather than being a genuinely open process of consultation, with the wider public, being invited to attend and view the proposals, as the plan emerged. Accordingly, we consider that the further consultation carried out on behalf of Mr and Mrs T Gotke makes a significant contribution to the process of public consultation concerning proposals for new development at Hamstreet.

**(m) Balance of merits of proposed site at Ashford Road, Hamstreet, and sites HAM1 and HAM2**

2.40 Our representations submitted at the Regulation 27 publication stage did not seek, as their primary

objective, to replace either of the proposed allocations of land at HAM1 or HAM2, with the site at Ashford Road, Hamstreet. We consider that there is merit in considering the allocation of all three sites. However, we consider that, were it to be considered appropriate for this site to be substituted for one (or even both) of the sites currently proposed to be allocated, then there would be merit in so doing, having particular regard to:

- Merits of mixed use allocation, including employment and social and community provision.
- Limited landscape impact, capable of effective mitigation.
- Benefits to ecology and biodiversity.
- Ashford Road, Hamstreet site has the most sustainable location, with a particular regard to accessibility to the railway station and primary school.

**(n) Phasing of development**

2.41 The proposed allocation of land at Ashford Road, Hamstreet would bring forward significant benefits, through the provision of social and community facilities, and new employment floor space. For this reason, it is considered that the site would be most appropriately allocated for the first phase of the Tenterden and Rural Sites DPD.