

TENTERDEN AND RURAL SITES DPD
REGULATION 30 SUBMISSION VERSION

FURTHER STATEMENT

June 2010



That the dropping of Challock from the Tier 3 settlements as established in Core Strategy Policy CS6 and the non-allocation for residential development of CHAL 06 (land north west of Clockhouse Farm, Canterbury Road, Challock) is unsound.

1. Introduction

1.1 In addition to our Further Statement submitted on Issue 3 and our original representation, we wish to draw the Inspector's attention to the following points which, it is our contention, undermine the soundness of the distribution of housing sites in the Tenterden and Rural Sites DPD Regulation 30 Version.

2. The failure to allocate site CHAL 06 for housing in the DPD fails to promote the vibrancy and sustainability of the village of Challock (9.4 of the Inspector's Matters)

2.1 The Ashford Core Strategy Policy CS 6 categorises Challock as a Tier 3 settlement, with the same proviso as Rolvenden.

2.2 In the Tenterden and Rural Sites DPD Regulation 30 Version Challock is the only village to have been removed from this Policy, with the exception of Pluckley which specifically requested to be. Paragraph 5.24 of the DPD states that this decision is based solely on the fact that "there are no suitable sites available" in the village.

2.3 This is simply not the case. Two community workshops were held in the village on the 10 March 2008 and a year later on 5 March 2009 (such workshops were restricted to those villages included in CS6 as above (again with the exception of Pluckley)). The results of the first of these workshops is included in the Tenterden and Rural Sites Issues and Options Report. The minutes from the second of these are set out in full in **Appendix A** of this Further Statement. As is clear from both minutes the site CHAL 06 (also referred to as the southern half of CHAL 11) received consistent and widespread support across both workshops from all participants including the planning authority representatives and no objections to its development for a small scale housing development by the owner were raised.

- 2.4 The owner of this site is a long-established, highly respected, award-winning local builder, who was raised in and still lives close to Challock and whose company Cox Restorations was responsible, amongst many high quality restoration and new build small developments across Kent, for the erection and restoration of the Farm Shop and Clockhouse Barn offices opposite CHAL 06 as well as the local needs housing scheme Orchard Lane which lies immediately adjacent. His work has received support from across a wide range of agencies involved in planning in Kent, including a Building Design Award from Ashford Borough Council, and is cited as Best Practice by many organisations **[Appendix B as an example]** and planning authorities including Maidstone Borough Council, alongside the long lasting endorsement of the local community in Challock **[Appendices C and D as examples]**.
- 2.5 It is important to emphasise that the submission promoting the allocation of CHAL 06 is, and has long been, rooted in an awareness of a need and support for the provision of a modest, appropriately scaled development of vernacular cottages in the village of Challock. The proposal is focused in particular on those needing and wanting to move onto the property ladder from the local needs affordable housing at Orchard Lane, adjacent to this site. This work was based on an assessment of the reality that the minimum price of new dwellings in Challock in recent years has been in the region of £350,000.
- 2.6 Challock is a small but currently vibrant and sustainable village with a wide range of businesses, services and facilities. It was Kent Village of the Year in 2004. It has amongst other things a primary school, a village hall, shops and post office, many businesses, including one housed immediately to the rear of CHAL 06, a farmers market twice a month and a particularly strong sense of community spirit as revealed in its long list of clubs and societies and its annual Goose Fair.
- 2.7 Challock needs a modest organic increase in its housing stock. Challock wants a modest organic increase in its housing stock. The non-allocation of CHAL 06, the site that received highest support in both Community Workshops, would result merely in a reliance on windfalls, infill and exceptions sites and a position where the forms and tenures of additions to the village's range of housing cannot be planned or controlled leaving a small village such as Challock particularly vulnerable. Such an approach is not compatible with the need for and responsibility of the planning authority to promote vibrant and sustainable rural communities.
- 2.8 CHAL 06 is eminently suited for development. This is endorsed in the minutes of both Community Workshops. It has an existing vehicular access onto the main road through the village acceptable to the Highways Authority which is currently used also by the manufacturing business to the rear of the site. The Sustainability Appraisal concludes that it is "well located to the central point of the village and has good access to services". A planning application was refused on appeal in 2006 on the grounds that the site was not in the confines of the village, a view rejected by the village itself and now contrary to the conclusions of the planning authority at the March 2009 workshop. No objections to the development of this site have ever been received.

3. The non-allocation of CHAL 06 does not represent the best strategy when considered against reasonable alternatives

- 3.1 The villages of Challock and Rolvenden are both included in Core Strategy Policy CS6. However, whilst Challock has received no housing allocation a large site in Rolvenden has been identified. The selection of this site, ROLV1, at the seeming expense of the village of Challock is at odds with the findings of the Sustainability Appraisal of the DPD. The Inspector's attention is drawn to the Site Appraisal of CHAL 06 (pages 254-255) and ROLV 04 (as it then was numbered) (pages 280 -281)
- 3.2 When examined in parallel it is very clear that CHAL 06 performs better. Of the 20 headings under which each site is assessed, the sites receive equal assessments on 16. On three, Places (7), Access to Services (11) and Transport (20) Site CHAL 06 scores higher, being well located to the central area of the village and within walking distance of a bus stop. On Landscape (4) however the assessments diverge, revealing an approach that is far from robust and instead is highly subjective and appears to reflect a decision taken, as our Further Statement on Issue 1 makes clear, some years previously that Challock should not receive a housing site and was not therefore, unlike all other CS 6 villages, included in the rural capacity studies.
- 3.3 Both ROLV 1 (formerly ROLV 04) and CHAL 06 lie in an AONB. ROLV 1 is an existing football pitch and can only be developed if an alternative site is found. The inspector's attention is drawn to its description in Landscape (4) as a
- "site bounded by development on both sides of its frontage to the A28 and on the opposite side of the A28. The site adjoins open countryside to the north but is relatively well contained".*
- 3.4 It is our contention that such a description could equally apply, substituting the A252 for the A28, to CHAL 06 with the exception that CHAL 06 has the benefit of adjoining an existing long established small industrial site and not open countryside.
- 3.5 We also would like to contest the Appraisal of both these sites under Air Quality (3) which we argue reveal that the allocation of CHAL 06 in the Inspector's Report in place of the alternative ROLV 1 is clearly a better strategy. Under CHAL 06 the Sustainability Appraisal states that
- "Housing development would generate more car trips with an impact on air quality. This is likely to be exacerbated through the removal of trees on this site".*
- 3.6 No trees exist on the CHAL 06 site however, beyond a number on the frontage and these would not be removed, or need to be removed, as the planning authority is very aware given the previous planning application on the site.
- 3.7 Under ROLV 01 (04 as previously numbered) it states

“Housing development would generate more car trips with an impact on air quality but the likely scale of development possible would not make this significant”.

- 3.8 The inspector is reminded that 40 houses are indicated for ROLV 1; an indicative capacity of 8-10 houses for CHAL 06 (though CHAL 06 is directly comparable to ROLV 1 as it can be considered to be part of a larger site CHAL 11 if scale is at issue.)
- 3.9 Finally, CHAL 06 can be delivered immediately, unlike ROLV 1 which requires the relocation of a popular football pitch. An acceptable alternative site for the football pitch is not identified in the DPD.
- 3.10 Such inconsistencies in the Appraisal and approach to the allocation of both sites is unacceptable, and draws into question the robustness and impartiality of this work and leads to the strong conclusion that the decision not to allocate CHAL 06 does not represent the best strategy on housing site distribution when considered against the reasonable alternative of ROLV 1 (04)

4. Conclusion

Challock is a village which has grown organically and incrementally over the years. As a result today it is a small, vibrant settlement with a wide range of facilities.

CHAL 06 is eminently suited for development. This is supported across the community and endorsed in the minutes of both Community Workshops. The provision of housing here has had the long standing support of the community, the parish council and local businesses. The Sustainability Appraisal considers that CHAL 06 is “well located to the central point of the village and has good access to services”. It performs significantly better than ROLV 1 in the Sustainability Appraisal of the Tenterden and Rural Sites DPD.

We therefore request that the Inspector review the identification of in particular ROLV 1 when considered against the alternative of the allocation of CHAL 06 including the clear sustainability, support for and deliverability of the CHAL 06 site and the benefits that such a housing allocation here would bring to the small village of Challock.