

Independent Examination of Ashford Borough Council Tenterden and Rural Sites Development Plan Document

Response to Matters and Issues for the Examination to Tenterden and Rural Sites DPD

On behalf of R. Sternberg Farms, The Estate Office, Frenchay Farm, Tenterden.

We wish to make the following points in connection with the Matters and Issues for the Examination, which we wish to raise for the Inspectors attention at examination:

Taking the points raised by the Inspector in the order presented -

(1) Vision and Objectives

1.2 ...to ensure that new housing is accompanied by new jobs and all the necessary social and community infrastructure, and....development needed to ensure the economic and social well being of rural residents and workers, and to build sustainable and balanced rural community.

In its current format, the allocation of TENT1 fails to meet this vision; unless the physical area of land for allocation is re-appraised, the resultant environmental impact upon the wider rural area of the town will be colossal. This point relates specifically to the river basin system in which TENT1 is positioned.

Meeting the needs of the economic and social well-being of rural residents and workers to build a sustainable and balanced rural community, surely includes all those who currently live and work in and around the town, and particularly those who live or farm land that lies within the river basin catchment for TENT1.

The scale of development proposed within a relatively small spatial area of TENT1, will significantly impact upon the wider rural area, immediately (adjacent to boundaries), intermediately, and also within a wider context, because of the resulting environmental issues.

As previously submitted, flooding already occurs to land within the river basin, due to rainwater runoff from more recent urban developments within the town and therefore upper catchment areas. The impact of this will be further identified at the Examination/Hearing.

In short, we contend TENT1 in its current format will not support the existing social well-being of rural residents and workers, and the policy will not be effective if adopted in this respect.

Overall Strategy – Housing Distribution

3.3 Are the sites deliverable – has there been sufficient consultation with landowners and infrastructure providers?

We are not aware of any direct consultation between the LPA and landowners that provide conclusive evidence that the sites in TENT1 will be deliverable.

Price Whitehead

Chartered Surveyors & Rural Consultants
Forstal Farm
Tenterden
TN30 7DF

We are not aware that all the land as now allocated was originally put forward for inclusion by all the current landowners whose land has been allocated.

We are not aware that the LPA has fully appraised the environmental implications for those whose land falls within the wider river basin catchment of the Tilder Gill and the consequences of development in TENT1, and subsequent impact upon land farmed and managed there.

Existing problems encountered from urban runoff will significantly increase if TENT1 as proposed in the DPD, is allowed to proceed without proper examination of the causal effects of runoff and flooding, and how this will be properly addressed within the relatively small land area to be allocated for development.

The land allocation requires adjustment to protect others living and working alongside, and further 'a field', from the direct consequences of new development in the town.

Where is the supporting evidence showing that sufficient land has been allocated to suburban urban drainage (SUD's), to allow for runoff and storm water within the development land itself. How has this been calculated, and is it enough to protect the wider rural community, and the environment through which newly created discharge will pass?

Regarding the Specific Issues and Matters Raised by the Inspector for TENT1

5.1 Is reliance on one principal site sufficiently flexible?

It is contended there is currently too great a development demand that is being relied upon within the defined TENT1 area, and which requires a concentration of development that is not consistent with the 'market town' character of Tenterden.

The range of development required from the currently defined area extends to housing, schools, medical centres, roads, play areas, green spaces, wildlife corridors etc. This leaves inadequate (if any) provision for essential rainwater runoff facilities and balancing ponds, which in themselves will require substantial areas, and which will compete with the other social requirements.

The Council have reduced the planned area for development within the Tenterden allocation from that originally established. This has further concentrated the requirements onto one site.

Inclusion of other adjacent land will support the implementation of the DPD in its current format. This land has until now, been allocated as 'white land' within the Local Plan 2000, and therefore previously been considered suitable by the LPA for future inclusion in development and expansion schemes. Retention of this 'white land' would meet the growing needs of the town. This land is that of Hopes Grove and also R. Sternberg Farms.

Hopes Grove Nurseries have raised significant concerns to the DPD in its current format. It is known that if TENT1 were to go ahead Hopes Grove would wish to achieve whole or partial inclusion within this stage of the DPD, to enable the

business there to secure its future. That land adjoins R. Sternberg Farms, and allocating this land in addition to Hopes Grove and TENT1 will ensure the full ambitions of the Council and town can be properly met without giving rise to detrimental environmental impact in the wider rural area. Currently, the reliance upon one area and the expectations of that area are considered unrealistic.

5.2 Have key stakeholders such as landowners and infrastructure providers been sufficiently involved, so that delivery in the timescale proposed is reasonably likely?

Please refer to 3.3 above.

5.4 Is the housing allocation balanced by the provision of jobs and community and social infrastructure?

The DPD refers to all aspects in terms of the policy wording, but as stated in 5.1 above, how will the range of facilities and requirements be met within the land area allocated. Insufficient land has been allocated for what is actually required within the plan.

5.5 Does the strategy for Tenterden promote and support public transport and the limitation of reliance on the private car?

The land as allocated will reduce reliance on private transport for those living within the immediate town.

However, the DPD fails to address how existing transport networks and traffic problems, which will be exacerbated by increasing development within the area planned, will be met.

The Estate (R. Sternberg Farms), has previously put forward suggestions that would alleviate traffic flow pressures currently experienced, and which would also aid the implementation of the DPD as now proposed. This would be to link the Appledore Road with the Smallhythe Road. The Council have missed a key strategic opportunity in preparing this DPD. Although the Town Council discussed a plan to link these two roads, this has been compromised and condensed within the DPD, and will now only provide for a link road between the Smallhythe Road and the Recreation Ground Road. This does not meet current objectives and will fail to provide for existing pressures. It is clear that this proposal does not address the longer term.

R. Sternberg Farms land however, could be used incorporated into the DPD together with other parcels, to provide for this link road. The road would form a defined boundary to the AONB, and 'ring fence' development land for future requirements. A link road as previously proposed would be a significant asset for the town and be of immense benefit to local people in reducing distances travelled, and increasing the accessibility for residents on both sides of the town.

5.7 What are the impacts of TENT1 on wildlife, the historic character of the town and the AONB?

Within TENT1 it is planned that existing hedgerows will become planted woodland edges, in which it appears there will also be public access. Apart from being a complete contradiction if this new planting is intended to promote wildlife, the new

planting will result in additional management and access problems for R. Sternberg Farms, and will increase the prospect of unlawful access over land farmed.

5.8 Is TENT1 the best strategy when considered against reasonable alternatives?

TENT1 can only be considered the best strategy if the social, economic and environmental needs of R. Sternberg Farms and the wider rural community are also properly considered and included within the DPD, where currently, these needs have not been properly addressed, as stated above.

TENT1 could be the best strategy if a greater area of land is allocated to meet ALL that will be required in terms of infrastructure, recreation and development.

Previously mentioned in conjunction with TENT1 and raised under separate cover within the Issues and Matters for Inspection document are:

10.2 Traffic Generation and effect on neighbours

16.3 Has infrastructure and delivery been assessed also in relation to social infrastructure – education, health services – including innovative ways of providing or retaining such services in rural areas in a sustainable manner?

These points have been previously been covered in submissions to the Council and above. It is further contended that neither 10.2 nor 16.3 will be met by the DPD in its current format, without in-depth research into existing highway and traffic problems within the town in terms of traffic flow and congestion (within Recreation Ground Road, and the bottle neck at the East Cross junction). This further research should also encompass rainwater and storm water runoff, and the impact upon the wider river basin catchment system.

Both of these major concerns will directly impact upon how R. Sternberg Farm manages its land and is able to effectively and productively farm crops, and access its land in and around the town. Large areas of land owned by the Estate fall within the river basin system in to which rain and storm water runoff will discharge from the development land proposed.

It is reiterated that the land area within TENT1 is inadequate. The DPD will not meet the greater policy objectives of sustainability unless a larger area of land is included, over which development objectives (including recreational and infrastructure) can be met.

It is therefore maintained that the DPD in its current format is not effective, justified or deliverable without adjustment to proposed development boundaries.

End.