

**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 Mr. M Hankinson, Hopes Grove Nurseries, Hopes Grove,
Smallhythe Road, 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 land
to be allocated is re-appraised, the existing successful rural business (Hopes Grove
Nurseries), providing sixteen permanent rural jobs and contributing in excess of £1.5
million directly into the rural economy, will be at risk.

Although the impact of new housing developments alongside Hopes Grove Nurseries
will initially have a gradual 'trickling' impact in terms of detriment to the management
and business operation at Hopes Grove (as it will be buffered until 2016 by Phase B),
the cumulative impact year on year, as phases of development are completed, will be
significant. These will erode the stability of the business through the consequential
losses and associated problems that will inevitably occur, in addition to compounding
the problems currently experienced.

Investing in nursery business infrastructure involves a high capital and stock costs. If
a move to another location is the only feasible alternative, if TENT1 proceeds as
currently planned, a move will require considerable forward planning. Some hedging
plants take seven to eight years to grown before being sold. Planting must be
carefully planned for future production, to ensure adequate supply and to be able to
sell at the optimum growth stage.

Therefore, in terms of vision and objectives, TENT1 will not 'ensure the economic
and social well-being of rural residents and workers', as it has failed in properly
addressing existing economic and social well-being. Implementation of TENT1 as set
out, will erode the stability and viability of a significant and important rural business.

The policy is therefore not effective, and cannot be justified in its current format.

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.

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 so allocated.

We are not aware that the LPA has taken any of the very real threats to Hopes Grove Nurseries into account within this DPD, and that when issues have been raised, what consideration has been given to these points, as we have not had any formal response to matters identified that are of concern. Further, no amendment to the DPD was made with regard to matters concerning Hopes Grove when the LPA had opportunity to do so.

New development on both sides of the Hopes Grove Nursery land, as proposed in TENT1 will exacerbate existing problems encountered, and give rise to new problems.

Where is the comprehensive proof that the scheme is deliverable in terms of landowner pledges, and where is the evidence to support the deliverability in terms of infrastructure providers and clear consultation with landowners bordering development proposals?

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 that there is an excessive demand being placed upon the land allocated for development in terms of all that is required for development. This is being concentrated into a relatively small area and the expectation that housing, schools, medical centres, employment opportunities, roads, play areas, green spaces, and wildlife corridors are achievable within the area defined without detriment to the wider area, environment and character of the town is unrealistic. Land provision is lacking in terms of infrastructure, particularly rain and storm water management, access between areas of the town, and traffic and highway implications given existing unresolved problems experienced.

The Council have reduced the planned area of development within this DPD from that which was originally put forward. This has further concentrated the requirements within one site. This places significant reliance on one principal site, and does not provide the town with a 'comfortable cushion' in the event that problems arise in respect of ecological implications, statutory undertakers, dispute between landowners and developers, and ensuring social improvements (providing a larger medical centre for example). Also, is it realistic that social improvement plans will proceed early on, as housing development will need to take precedent over other

requirements, in order for the funding to be released to provide the social infrastructure.

However, inclusion of other adjacent land to TENT1 such as Hopes Grove, will support the DPD in its current format, and ensure the success of the planned developments. Such land has, until now, been allocated as 'white land' within the Local Plan 2000, and therefore previously been considered suitable for supporting the growing needs of the town.

In order that Hopes Grove Nurseries can properly plan its restructuring and likely relocation within the rural area if TENT1 goes ahead in its current format, the remedy to these issues and problems is to further allocate all or part of Hopes Grove land at this stage of the DPD process. This will allow the business to plan ahead and protect staff positions. This would also spread the reliance on one site over a greater area, and thus reduce risk.

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 allocated? Insufficient land area is currently allocated for all that 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 development land as allocated in TENT1, will reduce reliance on private transport for those living within the immediate town. The DPD fails to address how existing transport networks and traffic problems will be resolved and improved upon, and which we contend will be exacerbated by increasing the volume of development within the areas as currently planned.

The DPD has not effectively addressed circulation in and around the town and how this could, and should be improved at this stage of the process, to ensure the realistic delivery of the plan. The link between Smallhythe and Appledore Roads, which has been identified by the Town Council and a number of other parties and stakeholders, has been compromised, and effectively 'dropped'

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 effectively become planted woodland edges, and in which it appears there will also be public access. Apart from the fact that human activity will prejudice wildlife interests in these areas, the new

planting will result in additional management and access problems for Hopes Grove Nurseries, as previously submitted.

Currently, as wildlife corridors, the existing hedgerows and woodland networks function well. Increasing human activities in the immediate area will be detrimental to many species.

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

It is contended that TENT1 will only provide the best strategy when considered against reasonable alternatives if the social, economic and business requirements of Hopes Grove Nurseries are properly considered and accommodated in the DPD, through the allocation of some or all of that land ownership in addition to TENT1. Otherwise, TENT1 policy fails to address existing issues and matters that occur, provides no consideration to established, important rural businesses, or to the social and economic requirements of that business and its staff.

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 covered in documents submitted on behalf of Mr. Hankinson, as well as above. However, 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 the current congestion and traffic flow problems within the town, without in-depth analysis of the environmental consequences of allocating insufficient land area and then expecting it to provide more than is realistically possible for the town, and without considering existing economic needs and the impact upon neighbours.

These major concerns will directly impact upon how Hopes Grove Nurseries manages its land and business, and whether it will be capable of continuing to effectively and productively produce nursery stock, and remain viable. As previously submitted, access within the land area cultivated and managed will be physically impaired, and supervision of land further prejudiced.

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.