



**TENTERDEN AND RURAL SITES DEVELOPMENT PLAN DOCUMENT**

**Statement on behalf of Mr G Crabtree**

**Appearance with regard to Bethersden, Wednesday 30<sup>th</sup> June 2010**

**HPPC Ref: 30420**

**Date: May 2010**



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## 1 OVERVIEW AND SUMMARY OF CASE

- 1.1 This statement is put forward on behalf of Mr G Crabtree, for discussion at the Issue 9 session, with regard to Bethersden.
- 1.2 Issue 9 Bethersden (together with the other Tier 3 settlements, and other settlements which may be considered suitable for development) deals with the issues identified by the Inspector as:  
*“Do the sites identified in the DPD represent the best strategy when considered against reasonable alternatives, which particular reference to:*
- 9.1 Village form*
  - 9.2 Number of dwellings in relation to local needs and the sustainability credentials of the settlement as well as site availability*
  - 9.3 The best balance between the development of Greenfield sites and previously developed land*
  - 9.4 The promotion of vibrant and sustainable rural communities*
  - 9.5 Effect on wildlife particularly at ALD1 and BID1”.*
- 1.3 This statement addresses these questions, with specific reference to the merits of land at Church Hill, Bethersden, in the light of competing alternatives.
- 1.4 Proposals for this site have been placed before Ashford Borough Council in response to the publication of the proposed changes to the Regulation 27 document, with regard to proposed change 22, concerning land considered suitable for residential development at Bethersden.
- 1.5 It was not possible for representations to be submitted at an earlier stage, as our first instructions came in October 2009, after the publication of the Regulation 27 document. Situations such as this will inevitably rise, as proposals will arrive at stages not directly related to timetable for the relevant statutory plans to be prepared.
- 1.6 However, in this instance the site (or at least the frontage part of it) had already been the subject of both the Sustainability Appraisal, and public consultation, and accordingly we do not consider that it would be inappropriate for full and proper consideration to be given to its merits, in comparison to competing alternatives at Bethersden, at the forthcoming examination.

## **2 ISSUE 9 QUESTIONS: BETHERSDEN**

- 2.1 This statement addresses the case on behalf Mr G Crabtree, with regard to the specific merits of the site at Church Hill, Bethersden, with regard to the Inspector's questions, as outlined in section 1 above.
- 2.2 Our submissions made in January 2010, with regard to proposed change 22 at Bethersden, contained our detailed analysis of the Sustainability Appraisal carried out by Ashford Borough Council, with regard to the competing merits of sites at Bethersden (section 3); our own appraisal of the competing merits of the land at Church Hill, in comparison to other potential sites at Bethersden (section 4); and an initial evaluation of alternative configurations for residential development of the land at Church Hill, Bethersden (section 5).
- 2.3 This statement summarises relevant information, in response to the Inspector's questions, together with other comments where considered appropriate; more detailed consideration has been given to potential configurations of development, and these are considered in relation to the first question, relating to village form.

### **Question 9.1 Village Form**

- 2.4 We consider that the site at Church Hill, Bethersden is the best related to the built form of Bethersden, in comparison with either land at Mill Road (BETH1A), or land at BETH09, land at Forge Hill. (Formerly proposed allocation BETH1).
- 2.5 Our detailed description of its characteristics is set out at paragraphs 4.1 to 4.4 of our statement of January 2010; we would highlight in particular:
- Site includes previously developed land on the frontage part.
  - The land is free of any physical constraints to development.
  - Relationship to surrounding residential development and local services gives a strong feeling of being very much part of the established settlement.
- 2.6 We further note that the site is within a very short distance of established local village services, and conclude that the site is appropriate for residential development, in a manner which would further enhance the viability of local services and bring "new life" to the village, whilst respecting the design characteristics of the Conservation Area.
- 2.7 Our earlier statement set out three alternative levels of development, which might be considered appropriate for this site (see paragraphs 5.1 to 5.6 inclusive). Detailed drawings have now been prepared illustrating how development at the alternative scales might be configured, taking full

account of the location of the site within the Conservation Area.

- 2.8 Site plan 19c (Appendix 1) shows development on the site frontage, corresponding to the area shown as BETH19 in the Sustainability Appraisal, together with redevelopment of the house and stables to the east. Our previous statement suggested an approximate capacity of 15 dwellings, thereby meeting the indicative requirement for a site for residential development in the village; the illustrative site layout shows 14 dwellings, comprising a mix use of detached, semi-detached and terraced homes, with a single point of access, and retaining a green amenity area on the site frontage.
- 2.9 We consider that this scale of development, and layout, would be appropriate to the location of the site within the Conservation Area; the design and materials of the proposed dwellings would be traditional, reflecting the guidance in the Bethersden Village Design Statement.
- 2.10 Site plan 19a (Appendix 2) shows a development on a larger area, totalling 0.948 hectares (2.33 acres); our earlier representation indicated a potential capacity for 33 dwellings, the illustrative site layout plan shows a total of 36 dwellings.
- 2.11 Our earlier statement noted that this area would be comparable to the gross site area of both the current proposed site allocation (BETH1A), and the earlier site proposal BETH1. We noted that the indicative capacities of 15 dwellings for each site are considerably lower than would actually be likely to be achieved, in the event that either were to be allocated, in the adopted version of the TRSDPD.
- 2.12 On the basis that this site is of comparable area to the proposed original allocation, and proposed replacement allocation, we consider that there is merit in considering the allocation of this site, as an alternative. The proposed layout shows a larger green area on the site frontage; again, a traditional approach would be adopted to architecture and design, with a mix of family houses, including, on the illustrative layout, mainly terraced houses, but with the addition of several detached and semi detached houses.
- 2.13 We do not consider that development on this scale would result in any adverse impacts, with regard to either character and appearance of the Conservation Area; traffic; or impact on the landscape setting of the village.
- 2.14 The third layout plan, at Appendix 3 (site plan 19b) shows development of the whole of the land potentially available for development in this location, and subject to our original representation. The total of 54 dwellings are shown to be accommodated, again comprising a mix of terraced, semi detached and detached homes; with an enlarged village green on the site frontage. It is appreciated that the scale of development for the whole site would be larger than presently envisaged in the council's proposals for Bethersden, it would of course be possible to phase development of the site

over a period, either within the present plan period, or potentially by giving an indication that further land might be released in the next review of the TRSDPD.

- 2.15 In conclusion, we consider that the site at Church Hill is better, in terms of village form, than either the site at Mill Road, Bethersden, or the earlier proposed allocation, now deleted, at Forge Hill; having regard to accessibility to local services; transport considerations; it will have a lesser landscape impact than either of the alternatives; and a suitable form of development can be put forward, to compliment its location within the Conservation Area, as illustrated on the three alternative configurations for development of differing site areas.
- 2.16 Our proposed policy wording, covering the three alternatives, is attached at Appendix 4.

**Question 9.2 Number of Dwellings in Relation to Local Needs and the Sustainability Credentials of the Settlement as well as Site Availability**

- 2.17 The appropriateness of Bethersden as a Tier 3 settlement has been confirmed in the review of the Sustainability Matrix (ranked 7 in 2009, 8 in 2006); the wide range of village facilities available is noted in the Rural Housing and Employment Background Paper (examination library document 12).
- 2.18 The total number of dwellings proposed to be allocated to Bethersden is presently 20; we do not consider that development of a greater number of dwellings would be inappropriate, given its sustainability credentials, and in the context of the overall allocation for settlements falling within Tier 3. Development is 36 dwellings, as proposed on the plan at Appendix 2, for the land at Church Hill would not, in our view, lead to an oversupply of dwellings, for the plan period. If it was agreed to be desirable to allocate the whole of the site potentially available, then we would propose that the additional area of land, capable of accommodating approximately an additional 18 dwellings, could be reserved for a future phase of development, after the present plan period.
- 2.19 Allocation of a greater number of dwellings, as suggested, would also be consistent with our broader parts concerning the housing strategy for the rural areas, and that total numbers of dwellings required to address what would otherwise be a decline in population over the plan period, in our statement covering Issues 1, 2, 3 and 4.

**Question 9.3 The Best Balance between the Development of Greenfield Sites and Previously Developed Land**

- 2.20 The site which we propose at Church Hill, Bethersden is, in part, previously developed land; accordingly, we consider that preference should be given to this site, over other alternatives within the village.

#### **Question 9.4 The Promotion of Vibrant and Sustainable Rural Communities**

- 2.21 We consider that the provision of additional housing at Bethersden will assist with the promotion of vibrant and sustainable rural communities. With regard to the specific issue of employment, and the balance between employment and population in the rural areas, we note that Bethersden achieves the highest ranking of any of the Tier 2 and Tier 3 settlements for number of businesses in parish (90+ businesses, giving 4 points); of the Tier 2 settlements, Wye has a similar ranking, while Charing and Hamstreet (Orlestone Parish) both achieve lower point scores.
- 2.22 Accordingly, we consider that, in achieving the appropriate balance, additional housing in Bethersden is supported by this strong local employment factor.

#### **Question 9.5 Effect on Wildlife particularly at ALD1 and BID1**

- 2.23 We do not consider that the site proposal which we put forward for land at Church Hill, Bethersden would have any adverse impact on wildlife; there is the opportunity within a proposed residential allocation for planting and inclusion of sustainable urban drainage systems/ponds to achieve an enhancement of ecological interest/biodiversity. The larger the site allocation, the greater the scope for such enhancement.