

Thursday 31<sup>st</sup> August 2017

543/A3/JJA

Planning Policy  
Ashford Borough Council  
Civic Centre  
Tannery Lane  
Ashford  
Kent  
TN23 1PL

**By Email Only**

Dear Sirs

**Re: Ashford Local Plan – Main Changes – Public Consultation July 2017**

I write with reference to the above. I act for Wates Developments Limited who have an interest in land at Appledore Road/ Woodchurch Road Tenterden (SHELAA ref TS3 and TS11).

Having reviewed the Ashford Local Plan – Main Changes – Public Consultation July 2017 (The ALPMC), and associated supporting documents; these representations seek to comment upon the main changes to the proposed housing strategy being promoted in the ALP, in particular the level of housing growth proposed by Main Change 4 and the associated changes to policy SP2 given the housing needs and demands of the area, the level of housing supply referred to in table 1, policy SP2 and the housing trajectory (Main Change 84), and the spatial strategy being promoted by policy SP2, especially in Tenterden;. In doing so these reps also comment upon Main Change 29 and the increased number of dwellings proposed on TENT1B, and the proposed new housing allocation in Tenterden (policy S60 – Main Change 103), together with Main Changes 50, 51, 52 and 71 the merits of policies HOU5, HOU6 and ENV 3a and 3b.

- 1 The level of housing growth proposed in Policy SP2 of the ALPMC
  - 1.1 Policy SP2 of the ALPMC sets the overall housing requirement at 16,120 dwellings over the plan period (2011- 2030) - an average of 848 dwellings per annum (dpa).
  - 1.2 The 2017 SHMA update explains that using the 2014-based Sub-National Population Projections (SNPP) the demographic-led housing need in Ashford is 786 dwellings per annum. This represents the demographic starting point for considering OAN, and is 68 dwellings per annum higher than the 2012-based SNPP. The 2017 SHMA goes on to suggest that whilst no further uplift is required to meet economic needs, affordability remains an issue in Ashford and that an affordability uplift of 5% (39dpa) is appropriate in Ashford. This results in an OAN of 825 dwellings per annum (786+39), and is 47 dwellings per annum higher than the OAN promoted in the Reg 19 ABLP of June 2016, and the associated 2015 SHMA, which was based upon the 2012 SNPP and encompassed uplifts to provide for potential employment growth and to help accommodate the effects of outward migration from London. Neither of which are advocated in the 2017 SHMA; albeit appendix A suggests that a 5% increase on the demographic starting point is required to address the needs of London.
  - 1.3 Given the level of growth proposed in policy SP2 as set out in the Main Changes, Wates have asked Lichfields to undertake a peer review of 2017 SHMA. Lichfields report accompanies these submissions and suggest that the 2017 SHMA has under estimated the scale of housing need in Ashford as:

*'a It does not take into account **additional growth from London**, which would increase the starting point from 786 to 828 dwellings per annum. This alone brings housing needs to a level above the current OAN of 825 dpa;*

*b It does **not test employment-led scenarios** based on higher job growth (as done so in the June 2015 SHMA). The forecasts underpinning the Ashford Update and the June 2015 SHMA are now some six years out-of-date being from 2011, and there is no more recent evidence to suggest that these forecasts remain suitable and robust figures for assessing future employment growth and housing need;*

*c It **significantly under-estimates affordable housing need** because it draws upon a zero net migration scenario produced in 2014 (using 2011-based projections). The Ashford Update purports to consider the implications of the 2014-based population projections, yet it does not re-assess affordable housing needs using them. Affordable housing needs also do not appear to have the 'important influence' on OAN as established in Kings Lynn; and*

*d It **limits the scale of uplift** (for market signals and affordable housing) to a level no higher than past trends in housing growth at 1.6%. This is **contrary to the NPPF** which requires local authorities to 'boost significantly the supply of housing', and there is evidence of areas with adopted housing targets in excess of this (up to 1.82%) with more likely to follow. There is no evidence to show that delivery in excess of 1.6% in Ashford is undeliverable, as asserted in the Ashford Update.'*

- 1.4 Having regard to the above the Lichfields review of the 2017 SHMA suggests that the true OAN is 910 dpa rather than the 825 dpa suggested in the ABLPMC. The comparison between the ABLPMC and Lichfields assessment as set out in table 4.1 of the Lichfields report is reproduced below for ease.

	Ashford Update	Alternative Assessment
The starting point	<b>786</b> dpa DCLG 2014-based projections	<b>786</b> dpa DCLG 2014-based Projections
Demographic-led needs	No uplift for headship rates London sensitivity – <b>828</b> dpa	<b>786-828</b> dpa London sensitivity applied
Employment-led needs	No uplift required to support Baseline Economic Scenarios	Potential uplift required if Enhanced Performance Economic scenario adopted in Plan
Market signals	5% uplift based on comparison with past delivery rates 786 + 5% = <b>825</b> dpa (5-10% uplift tested)	10% uplift 786 + 10% = <b>865</b> dpa 828 + 10% = <b>911</b> dpa Alternatively 44% uplift on past delivery rate – <b>970</b> dpa
Affordable housing need	<b>920 - 1,840</b> dpa	<b>1,226 - 1,472</b> dpa
OAN	<b>825</b> dpa	Circa. <b>910</b> dpa

- 1.5 Having regard to the findings of the Lichfields report we believe the level of housing growth proposed in Policy SP2 of the ALPMC has **not been justified** and the ALPMC is therefore **unsound**.
- 1.6 In the content of the above, Lichfield's commentary on the scale of the uplift adopted in the Ashford SHMA <sup>1</sup> clearly demonstrate the limitations of some of the benchmarks put forward

<sup>1</sup> Paras 3.24 -3.28 refer

in the Ashford SHMA Update and used to justify the 5% uplift. Not only are some of the examples referred to in the Ashford SHMA relatively old, such that they do not necessarily reflect conclusions that might be reached in those areas today, but more recent Inspector's findings, in areas of similar or worse affordability pressures than Ashford, have advocated a 20% uplift, including Canterbury. I also note that Lichfield's suggest that '*Given Ashford's slightly better position in terms of affordability than Canterbury, a 15% uplift could be appropriate, giving a range of 904-952 dwellings per annum*' in Ashford.

- 1.7 Given the issue of the affordability gap, the fact not all the effects of outward migration from London have been met, and the potential imbalance between employment growth and housing growth, as well as the lack of any evidence on the DTC, we believe that in order to be seen to be **positively prepared, justified and effective** the ALPMC should be looking to promote an overall housing requirement of circa 17,290 dwellings over the plan period (910 dpa); 85 dpa more than proposed in the ALPMC.
- 1.8 In the context of the above we note that Section 3.6 of the 2016 SA looked at 4 options when considering 'The number of homes to be developed':  
Alternative 2.1 - Meeting Objectively Assessed Need: 13,799 dwellings for the borough between 2011 and 30 (727dpa);  
Alternative 2.2 - Meeting Objectively Assessed Need with some additional housing to help accommodate migration from London: 14,858 dwellings for the borough between 2011 and 30 (782dpa);  
Alternative 2.3 - Meeting Objectively Assessed Need with an uplift to achieve planned job growth: 13,965 dwellings for the borough between 2011 and 30 (735dpa);  
Alternative 2.4 - Meeting the housing need of the Enhanced Performance/ Productivity Employment Scenarios: 16,855 dwellings for the borough between 2011 and 30 (887dpa).
- 1.9 At para 3.6.31 the 2016 SA states:-  
*'For the reasons set out above the preferred alternative for the Local Plan is a housing provision of 14,680 dwellings over the Plan period (773 dpa) made up of 13,813 dwellings supporting objectively assessed need, 152 dwellings uplift to support employment and 715 dwellings uplift to help accommodate London migration'*
- 1.10 The 2017 Addendum advises on page 13 that; *'The revised housing requirement closely matches the level of housing development already assessed under Alternative 2.4 in the SA and therefore a further appraisal is not required'*
- 1.11 This is in our opinion a somewhat odd approach to adopt as the 2016 SA had clearly found in favour of option 2.3 not option 2.4. The SA should therefore have been revisited in the light of the changed circumstances (namely the 2014 SNPP), and at the same time the merits of an option that addressed the needs of London in combination with the planned job growth or went further to try and bridge the affordability issues in the borough, or looked to address the unmet needs of adjacent boroughs (if necessary) should have been tested. In our opinion a reasonable alternative of circa 910dpa should have been tested. In this respect it is in our opinion unclear as to whether providing for anything over and above 773dpa as advocated in the 2016 SA is 'the tipping point' in sustainability terms between acceptability and unacceptability when weighing up whether the positive impacts on the social and economic objectives of the plan outweigh any negative impacts on the environmental objectives of the plan. Clearly ABC consider a higher figure of 825dpa to be acceptable now – which begs the question would an even higher number be equally as acceptable - if tested.
- 1.12 In the context of the above it has to be pointed out that ABC's capacity to accommodate 910 dpa is a different matter to its assessment of what is its OAHN. The SA should be identifying the need and then assessing whether the authority have the capacity to accommodate it

given the findings of the SHELAA etc. not determining the OAHN based upon their alleged capacity to accommodate it.

- 1.13 Having regard to the above we note that the 2017 SHELAA suggests that there are sites capable of accommodating some 27,317 dwellings (26,308 Assessed Sites (not allocated or permitted) and 1,009 Windfall Assumption (Future)) are not currently in the planning process and are suitable available and deliverable<sup>2</sup>. It is therefore clear that the Borough Council could, given the findings of the SHELAA, look to accommodate more of their objectively assessed need on sites that have been identified as suitable if they so choose. The fact is ABC have decided against this without any clear rationale as to why they have adopted the approach they have, leads us to conclude that the plan **has not been positively prepared, has not been justified** and as such will not be **consistent with National Policy**, and is thus **unsound**.
- 2 Has the level of housing supply referred to in policy SP2 of the ALPMC been accurately calculated having regard to the deliverability of existing commitments?
- 2.1 Table 1 of the ALPMC indicates that the overall housing requirement for the Borough comprises:-
- 3,177 Completions since 2011
  - 2,870 Extant commitments (previously allocated sites)
  - 649 Extant windfall commitments
  - 2,500 Chilmington Green
  - 900 Future windfalls without planning permission; and
  - 7,110 Proposed allocations
- 2.2 Unfortunately none of the documentation produced in support of the ALPMC provides a detailed critique of the existing commitments – it is not in the SHELAA, the SA or the draft plan itself. It is thus unclear whether a detailed review of the commitments has been undertaken, and what appears in Table 1 and is referred to in policy SP2 and at appendix 5 of the ALPMC has been discounted to reflect what is truly deliverable. Whilst appendix 5 (MC84) suggests a 25% discount on extant permission (not yet started) to take account of assumed non delivery, the fact the figures for extant permissions in appendix 5 do not tally with those in table 1 leaves one somewhat puzzled as how any discount is recorded. In this respect a discount for the non-delivery of some of the large sites would not in our opinion be unreasonable; and could result in the need to allocate additional sites.
- 2.3 In addition there is no evidence in the supporting documents to justify the delivery rates anticipated at Chilmington Green, and set out in the trajectory at appendix 5 of the ALPMC (Main Change 84). Without a clear understanding of the number of developers involved in the delivery of this site it is impossible to say with certainty that this site will be delivering in excess of 200dpa year on year from 22/23 to 29/30. Similarly the delivery rate at the Former Power Gen site seems overly optimistic, and the start dates for some of the proposed new

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<sup>2</sup> This is the sum of the figures set out in the housing capacity table on p3 of the 2017 SELAA – which does not in itself provide an overall total supply figure for the plan period.

allocations seems overly optimistic given said sites have not been the subject of independent examination yet, nor planning applications submitted. Without evidence to support the housing trajectory the ALPMC cannot be said to be **positively prepared, justified and effective** such that it will be **inconsistent with National Policy**, and thus **unsound**.

2.4 If, as we believe, delivery rates at Chilmington Green will be less than has been suggested in the trajectory at appendix 5 of the ALPMC; and if, as we also believe, there needs to be a contingency built into the commitments to address the issue of non-delivery, the true level of commitments is in our opinion likely to be significantly less than suggested. As a result, and as we also believe the OAHN to be some 85dpa greater than suggested by ABC, ABC need to identify additional strategic sites if they are to meet their housing requirement / provide for any flexibility as required by the NPPF. Failure to address this point will lead to a plan that **has not been positively prepared, has not been justified** and is **inconsistent with National Policy**, and thus **unsound**.

### 3 The spatial strategy being promoted by policy SP2 of the ALPMC

3.1 Policy SP2 of the ALPMC identifies the need to allocate land to provide for 7,110 new dwellings. The proposed allocations comprise 5,865<sup>3</sup> new dwellings in Ashford and 1,245 new dwellings in the Rest of the Borough of which 100 are to be in Tenterden – an additional 50 on Tent 1B (policy S24) and 50 at Pope House Farm (policy S60) .

3.2 The 2016 SA explains that the spatial strategy is based upon '*Alternative 4.2 – Focus a large majority of development in and on the periphery of Ashford urban area supported by proportionate growth in Tenterden; the rural service centres and other villages*'. The 2017 SA advises on p14 that '*In identifying additional sites for housing development to meet the increased overall housing requirement for the borough it is desirable to do so in a way which ensures that the overall strategic distribution of development still sits within the parameters of Alternative 4.2.*'

3.3 As drafted policy SP2 of the ALPMC is in effect looking to locate 82.5% of the proposed allocations in/around Ashford and only 17.5% in the rest of the borough. Furthermore it is clear that as only 100 new dwellings are being allocated in Tenterden, the town will, despite its position in the settlement hierarchy (as the second main settlement in the borough), attract just 1.4% of the overall proposed housing allocations/ 8% of that proposed in the Rest of the Borough. This does not in our opinion suggest proportionate growth or a sustainable approach to meeting the housing needs of the borough.

3.4 Pages 9 and 10 of the Main Changes Part 1, in commenting upon development in Tenterden states:  
*'Although only about **one-tenth** the size of Ashford, Tenterden is the **second largest** settlement in the borough and **its only other town**. It plays a **main rural service centre** role for much of the south-western part of the borough. It is an attractive, historic town which is **relatively well served by shops and services** and is an important tourist destination which contributes greatly to the rural economy of the borough.'*

3.5 Pages 9 and 10 of the Main Changes Part 1 go on to refer to the strategic scale development known as TENT 1A which has planning permission for 250 dwellings. TENT 1B is allocated in the Tenterden and the Tenterden & Rural Sites DPD for 175 dwellings, and outline permission was granted on appeal in April 2016 for 100 dwellings on land at Tilden Gill Road.

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<sup>3</sup> We note appendix 5 of the ALPMC (MC84) only provides for 5,194 dwellings in Ashford (existing allocations not started and new urban sites) and 1,273 in the rural area – so does not tally with the figures in policy SP2 of the ALPMC.

Cumulatively these amount to some 525 dwellings – which given the size of town and its associated facilities is not a lot. Furthermore all three form part of the current housing trajectory. As extant commitments/ as carried forward allocations.

- 3.6 As Tenterden's population is a 10th of Ashford's one would expect proportionate growth to mean that at least a 10th of the housing allocation proposed in Ashford should go to Tenterden. As such, if growth is to be proportionate, the plan should be looking to provide for circa 500 dwellings in Tenterden. As the Tenterden and Rural Sites DPD sought to address the housing needs for the period 2006 to 2021 it is in our opinion disingenuous to look to use the allocations in that plan to address the needs for the area in the new plan. Thus the allocation of TENT 1A cannot be counted toward the new ABLP 2030 requirement. Similarly the 100 dwellings allowed on appeal on land at Tilden Gill Road, should as they were permitted because of the lack of a 5 year housing Land supply, not be counted toward the new ABLP 2030 requirement. Thus in looking to provide for circa 500 dwellings in Tenterden the ABLP should in addition to the allocations at TENT 1B (175 (not the 225 suggested by ABC)) and Pope House Farm (50) also be looking to allocate 250 at Appledore Road/ Woodchurch Road Tenterden. The residual requirement on the current ABLP housing requirement would then be 765 dwellings in the other RSC's. This would call into question the need to release some of the sites identified now/ allow a level of flexibility in the supply which does not exist at present.
- 3.7 If as we believe the OAHN is 17,290 dwellings over the plan period (910 dpa) rather than 16,210 (825dpa), ABC will need to find sites for 1,080 dwellings (an extra 85dpa over the remaining plan period). Given the level of growth already proposed in and around Ashford and in the smaller villages, the allocation of 250 dwellings on land at Appledore Road/ Woodchurch Road Tenterden would seem eminently sensible as the site is situated adjacent to the second largest settlement in the borough and is highly sustainable, as well as being suitable, available and deliverable, a matter I will go on to consider in greater detail in section 4 of this letter.
- 3.8 In looking to accommodate more housing in Tenterden the ALP would not only help secure the economic wellbeing of the area, but also help address the issue of affordability in the area – which in many ways is more acute than in Ashford – hence the sliding scale of affordable provision envisaged in policy HOU1. Such a strategy would in our opinion remain within the ambit of the preferred approach (alternative 4.2) advocated in the 2016 SA and supported in the 2017 SA.

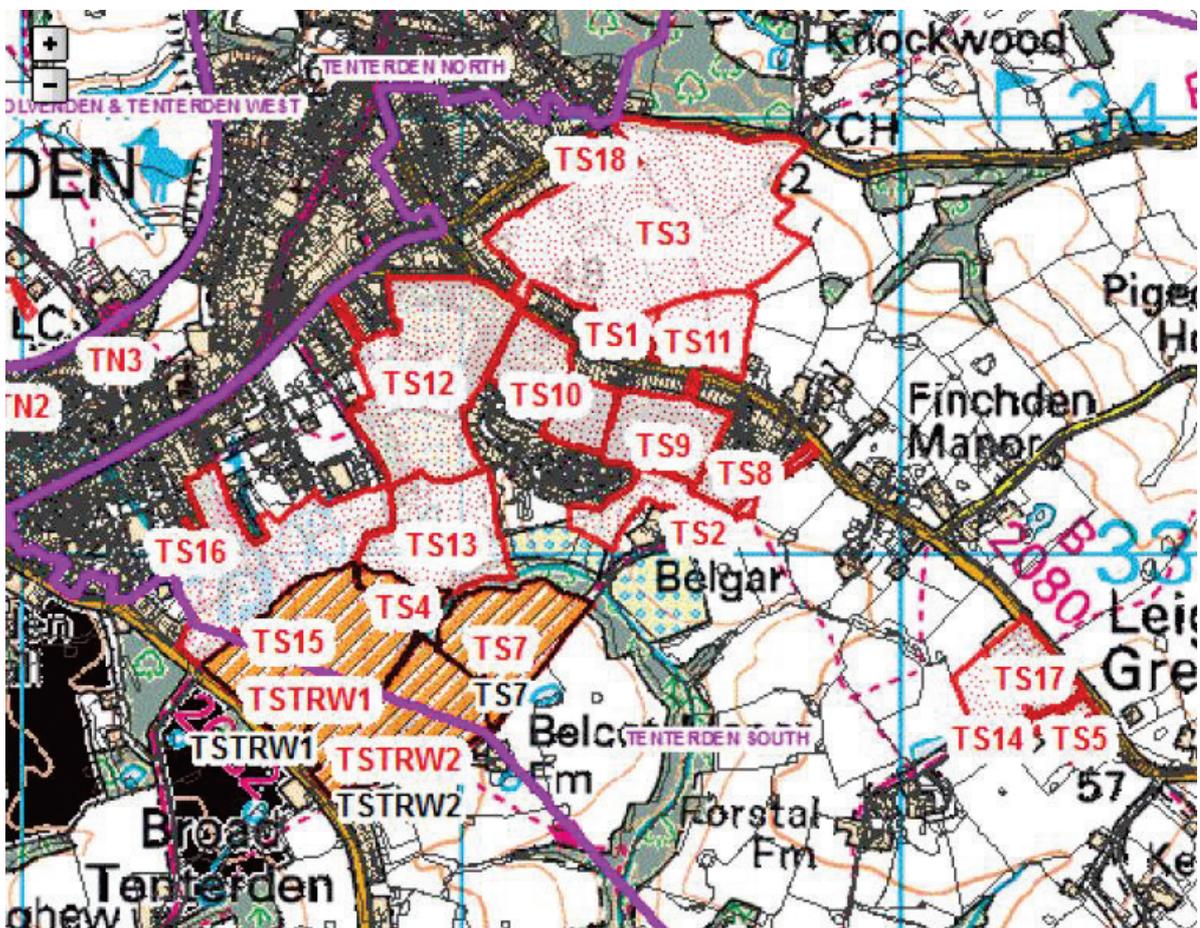
#### 4 The proposed options for growth in Tenterden

- 4.1 The SHLAA demonstrates at appendix 1 that a number of sites have been promoted in and around Tenterden. Most however were filtered out at stage 1 as unavailable or too small to be suitable.
- 4.2 In considering the issue of alternative sites the 2016 SA critiqued 4 sites in Tenterden in appendix 3d and 4. These were:
- TSTRW1 - Phase B TENT1 - Appendix 3d of the SA gives this site a score of '0'
- TS7 - Land Adj to Belcot and Hopes Grove - Appendix 3d of the SA gives this site a score of '4'
- TS2 - Land at Belgar Farm. The Tilden Gill site. Appendix 4 of the SA gives this site a score of '0'

TS3 - Land at Appledore Road/ Woodchurch Road. Appendix 4 of the SA gives this site a score of '3'

- 4.3 As TSTRW1 - Phase B TENT1 has been taken forward as the formal allocation, and as TS2 - Land at Belgar Farm now has planning permission, the only 2 options assessed in the SA that could potential accommodate the additional requirements we have identified in Tenterden are TS7 - Land Adj to Belcot and Hopes Grove and TS3 - Land at Appledore Road/ Woodchurch Road. The former is, according to appendix 5 of the SHLAA circa 6ha in area and able to yield 120 dwellings. As is clear from the plans at appendix 9 of the 2016 SHELAA (reproduced below) the site is quite removed from the town centre and situated beyond the development proposed on TSTRW1. To this end it would not realistically be able to deliver until TENT 1B is built out. Furthermore we note that appendix 5 of the SHLAA in assessing this site states:

*'Potentially major impact on the rural character of the area including the AONB but remains in for further assessment'*



- 4.4 TS3 - Land at Appledore Road/ Woodchurch Road is said to be 11ha and has been promoted on the basis that it can yield circa 250 dwellings.<sup>4</sup> As now promoted the site is 24.32 ha. We note that the reason the Appledore Road site was screened out at stage 2 of the SHELAA is, as set out on pages 38 and 39 of app 3 of the 2016 SHELAA:

*'The site is relatively peripheral to the town centre. Development here could have a significant impact on the existing rural character of this part of Tenterden and the AONB. Access to the site is limited with potentially a major impact on the character of Appledore Road. However, a full assessment is required of these issues.'*

<sup>4</sup>That originally promoted was in fact 20.94ha, and that added (and formally site TS11) is 3.38ha.

- 4.5 Appendix 5 of the 2017 SHELAA reiterates the findings of the 2016 SHELLA, and in addition suggests the sites achievability is unknown, which given the discussions I and my client have had with ABC these past 4 years is rather perplexing. In commenting upon the land at Popes House Farm (WC19) (which was not assessed for housing purpose in the former SHELAA) Appendix 5 of the 2017 SHELAA states: *'The site is located on the edge of the settlement confines and is a gap in the built frontage of the A28. It is available and achievable. However the site is on a main road and the access, impacts on the landscape and biodiversity issues need to be considered in more detail through a full appraisal.'* The SA addendum (July 2017) states on p25: *'This site is in close proximity to the main services and amenities in St. Michaels, in particular to bus routes, primary school and local shops, with excellent access to the primary settlement of Tenterden Town. The site is relatively open in a countryside setting but does adjoin the built form of development along Ashford Road and development would therefore form a natural extension to the settlement confines. Development of the site also presents an opportunity to enhance the setting of the listed building and associated buildings.'*
- 4.6 Whilst we would question the rational of this final point, we note that unlike the other new sites being promoted in the ALPMC no 'New site appraisal' was undertaken of the land at Pope House Farm in appendix 2 of the 2017 addendum SA. We also note that the only other sites, bar the Land at Appledore Road/ Woodchurch Road and Popes House Farm referred to in appendix 5 of the 2017 SHELLA in Tenterden as 'Housing Sites remaining for Land Supply' are:-  
 SM8 Little Orchards, Ashford Road, St Michaels – 10 units – extant PP  
 TS15 Tenterden Southern Extension Policy TENT1a– 250 units – extant PP  
 TS19 Danemore, Beachy Path, Tenterden– 10 units – extant PP  
 TS2 Land at Belgar Farm, Appledore Road - 100 units – extant PP  
 TS20 Land North West of Smallhythe House, Longfield, Tenterden, Kent- 36 units – extant PP  
 TSTRW1 Phase B of TENT1 allocation (TENT1b) land adjoining Smallhythe Road - Allocated in Tenterden & Rural Sites DPD
- 4.7 As is clear from the above the land at Appledore Road/ Woodchurch Road is the only site that has remained unallocated!
- 4.8 Having undertaken a comparison of the proposed allocations of TENT 1B and land at Pope House Farm against the land at Appledore Road/ Woodchurch Road, using the assessment criteria set out in the 2016 SA, it appears to us that the land at Appledore Road/ Woodchurch Road performs better than those sites that have been allocated. In addition it also appears that the scoring awarded to TS3 (Land at Appledore Road/ Woodchurch Road), on matters 1.3, 1.4, 2.3 and 7.2 in the 2016 SA was unnecessarily harsh when considered against that awarded to the other sites. Taking each point in turn:  
 1.3 *Would development of the site result in the loss of key components in the habitat network, such as woodland, trees/hedgerows, wetland, ponds, streams and ditches or other features supporting protected species or biodiversity?*  
 The SA assessment of TS3 states:  
 Yes. Site dotted with mature trees. TPOs along southern boundary and one in centre  
 The site is therefore awards a score of -2.  
 Site TS2 which also encompasses TPO trees only scores -1 though, and no consideration has been given as to how, through the design process the development of TS3 could look to protect and make a feature of these TPO trees.  
 In our opinion the score for TS3 should be amended to -1.
- 1.4 *Would development of the site enable the creation of new habitat and/or components in the habitat network?*  
 The SA assessment of TS3 states: 'No'.

The site is therefore awarded a score of 0.

Site TSTRW1 however scores 1 on the basis it is large enough to have the potential to design and create habitat networks as part of any proposals; and that such networks could offer an enhancement to the biodiversity in the area.

As TS3 is also a large site and thus capable of encompassing new/ enhanced habitat networks and thus enhancing the biodiversity of the area, it should in our opinion also score 1. Albeit the level enhancement shown on the proposed plans is such that we believe the site should in fact score 2.

### 2.3 *Would there be an identifiable and cumulative visual impact from the development?*

The SA assessment of TS3 states:

*'The site, despite its size, is largely hidden from view by dint of built form at the west of the site. However there would be a substantial sprawl of development to the east, with views inevitable from Woodchurch Road in particular and from PROWS.'*

The site is therefore awarded a score of -2.

Site TSTRW1 however scores -1 despite the fact that it too would have a visual impact, as the assessor considers there to be opportunities through the design process to enhance a number of key features of the town, such as views of the church. The same could be said of the development of the TS3 site such that it should in our opinion also score -1. Albeit, as set out on the attached assessment, we believe it should in fact score '0' as the impact of development here is less visually intrusive than that associated with any development on Tent 1B (TSTRW1) or land at Popes House Farm.

### 7.2 *Is the site located within close proximity of an equipped play area?*

The SA assessment of TS3 states:

*'Yes – Tenterden recreation ground around 600m'*

The site is therefore awarded a score of 0.

All the other sites are however awarded a score of 1. There is no justification provided as to why the TS3 site has been awarded a different score. It should in our opinion score the same as the other sites. In addition, if as now proposed the site includes TS11 (the Homewood School sports pitches), and provides for the replacement of the existing pitches as well as additional playing field provision including new changing rooms, car parking and ancillary facilities; the site should in our opinion score '2'.

4.9 Cumulatively these, and other changes set out in the attached appraisal would result in TS3/TS11 scoring +18 rather than the +3 awarded in the 2016 SA, and thus being by far the best scoring site in Tenterden, and thus in our opinion the most suitable housing allocation in Tenterden. As a result, having regard to our comments above we believe that in providing for a more proportionate level of housing growth in Tenterden the Borough Council should be looking to allocate both TSTRW1 and TS3. The former for 175 dwellings as per the Tenterden and Rural Sites DPD (2010), rather than the 225 dwellings suggested in the main changes, and the latter for circa 250 dwellings with associated facilities as set out below.

4.10 In the context of the above it should be noted that the area being promoted at Appledore Road/ Woodchurch Road has increased to 24ha, such that it encompasses areas TS3 and TS11 (the Homewood School sports pitches) which was filtered out as a potential housing allocation at stage 1 of the SHELAA. Appendix 2 of the 2016 SHELAA suggests the site is 'Not Available and therefore not Suitable or Achievable'. The same is said of site TS11 in Appendix 2 of the 2017. This is in our opinion odd as officers of ABC are well aware of the fact Wates have been in consultation with the school about including their land within the proposed development of the land at Appledore Road/ Woodchurch Road. Including the school land provides an opportunity to provide a replacement for the existing pitch as well as additional playing field provision including new changing rooms, car parking and ancillary facilities. The wider site will deliver an increased quantity of pitch provision of a higher quality, thereby continuing to meet school needs as well as serving the needs of local sports clubs

such as Tenterden Town FC outside of school hours. Thus, the development would meet a significant proportion of the unmet demand identified in the Draft Ashford Borough Playing Pitch Strategy 2017 -2030 (May 2017).

- 4.11 Attached is a constraints plan and an associated opportunities plan. These show the main constraints on the TS3/TS11 site, and how the site could be masterplanned to address these and provide for circa 250 dwellings with associated facilities, including new sports pitches and associated facilities, new areas of both formal and informal play space that would create a permanent buffer to the edge of the town and keep any development away from the more steeply sloping parts of the site. It also shows how the TPO trees could be retained and integrated into the development, how areas of ecological enhancement could be provided and how an appropriate SuDs strategy could evolve.
- 4.12 Having regard to the above not only do we believe the Land at Appledore Road/ Woodchurch Road (TS3 and TS11), is the best placed site to meet the additional needs of Tenterden, and should be allocated accordingly, but that the fact the ALPMC does not allocate this site suggests the plan has not been **positively prepared**, that the spatial strategy is **not justified**, and that the plan **will not be effective**, such that it will be **inconsistent with National Policy**, and thus **unsound**.

5 The implications of previous levels of undersupply

- 5.1 We note that the ALPMC and associated documents make no mention of how the Borough Council have sought to address the issue of the shortfall in housing supply against the SEP for the period 2006 - 2013. It appears that whilst the SEP requirement of 1,135 dpa would have generated the need to deliver 7,945 dwellings during the 7 year period 2006/7-2012/13, only 3,434 dwellings were completed – a shortfall of 4,511 dwellings

Year	Housing Requirement	Completions	Shortfall	Cumulative Shortfall
2006/7	1,135	359	-776	-776
2007/8	1,135	566	-569	-1345
2008/9	1,135	536	-599	-1944
2009/10	1,135	501	-634	-2578
2010/11	1,135	555	-580	-3158
2011/12	1,135	633	-502	-3660
2012/13	1,135*	284	-851	-4511
2013/14	825	137	-688	-5199
2014/15	825	405	-420	-5619
2015/16	825	1022	+197	-5422
2016/17	825	696	-129	-5551
Total	11,245	5,694		-5551

\* Until 2013/14 the housing requirement was established by the South East Plan. Following its revocation in 2013, and in advance of the adoption of a sound housing requirement through a new Local Plan, the NPPF requires (as confirmed by the Hunston Court of Appeal decision) that housing delivery should be assessed against the objectively assessed need (OAN) for housing. The OAN figures identified in the above table are those advanced in the 2015 SHMA and Reg 19 ALP / the main changes to the Reg 19 plan.

- 5.2 As ABC have, with the exception of 2015/16 failed to achieve its annual housing requirement in every year since 2006 we believe it is appropriate to apply the 20% buffer to the 5 year HLS having regard to the provisions of paragraph 47 of the Framework. We also believe, given the advice in the Planning Practice Guidance (PPG) that any shortfall should be dealt with in the first 5 years of the plan period (the 'Sedgefield' method). On the basis of the above the 5 year HLS situation is we believe thus:-

	ALPMC OAN	Wates OAN
ALP Housing Requirement 2011 - 2030 (19 years)	16,120 (848/annum)	17,290 (910/ annum)
Completions April 2011 - March 2017 (6 years)	3,177 (530/annum)	3,177 (530/annum)
Shortfall 2011-2017	-1,911 (848x6 (5088) -3177)	-2,283 (910x6 (5460) -3177)
Five Year Requirement 2017-2021	4,240 (848 annum)	4,550 (910 annum)
Plus 20% buffer required by NPPF	848	910
Plus shortfall 2006-2015	1,911	2,283
Total Five Year Requirement 2017/18-2021/22	6,999 (1,399/annum)	7,743 (1,548/annum)
Commitments at 1 April 2017 <sup>5</sup>	6,019	6,019
Surplus/ shortfall	-980	-1,724
No. Years supply	4.3 Years	3.8 Years

5.3 Given the above there is clearly a 5 year housing land supply deficit that needs to be addressed to enable the plan to move forward. The only way this can be addressed is via additional allocations.

5.4 In addition, we do not believe any sound reason has been provided to justify a delay in the Borough Council's response to the acute housing needs of the borough. Para 47 of the NPPF is clear in the need to boost significantly the supply of housing, and the PPG is also clear that any shortfall should be dealt with in the first 5 years of the plan period. The scale of the shortfall is in part why the affordability ratio is so acute. The lack of a 5 year housing land supply is in our opinion a justifiable reason to look to allocate some additional small Greenfield sites (up to circa 250 dwellings each). These type of sites have shorter lead in times and could, if allocated, help address the 5 year housing land supply situation. In addition said allocations will also help provide a contingency for any potential under delivery/ flexibility that would allow the Borough Council to react to any change in circumstances. The ALP's failure to try and address this issue and instead look to address the shortfall over the long term suggests to us a plan that has not been **positively prepared**. The SHLAA has demonstrated that other sites are available, suitable and deliverable to meet a higher housing requirement, and we have demonstrated above that of the sites assessed through the SA of the ALP, the Land at Appledore Road/ Woodchurch Road (TS3/TS11), is the best placed site to meet the additional needs of Tenterden. As indicated above, the fact the ALP does not allocate this site suggests the plan has not been **positively prepared**, that the spatial strategy is **not justified**, and that the plan **will not be effective**, such that it will be **inconsistent with National Policy**, and is thus **unsound**.

6 Could the shortfall we have identified be addressed through further strategic allocations?

6.1 We believe the ALP and associated SA needs to review the merits of the SHLAA sites, especially those that abut Ashford and Tenterden, with a view to making further site specific allocations in the Local Plan. Sites such as Land at Appledore Road/ Woodchurch Road (TS3/TS11) could provide circa 250 dwellings with associated facilities, including new sports pitches and associated facilities, and new areas of both formal and informal play space; and should be allocated. The issues raised in respect of TS3 and TS11 in the SHLAA and SA are fully capable of being addressed, and that if it were assessed on a consistent basis with the other sites being promoted in and around Tenterden TS3 and TS11 would be the most

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<sup>5</sup> This figure is taken from table 1 of the ALP MC. Normally one would expect a 10% discount for non-delivery – taking this figure to 4,092 and the exacerbating the deficit still further.

suitable site for further residential development. To this end please find attached a detailed report on the merits of the land at Appledore Road/ Woodchurch Road.

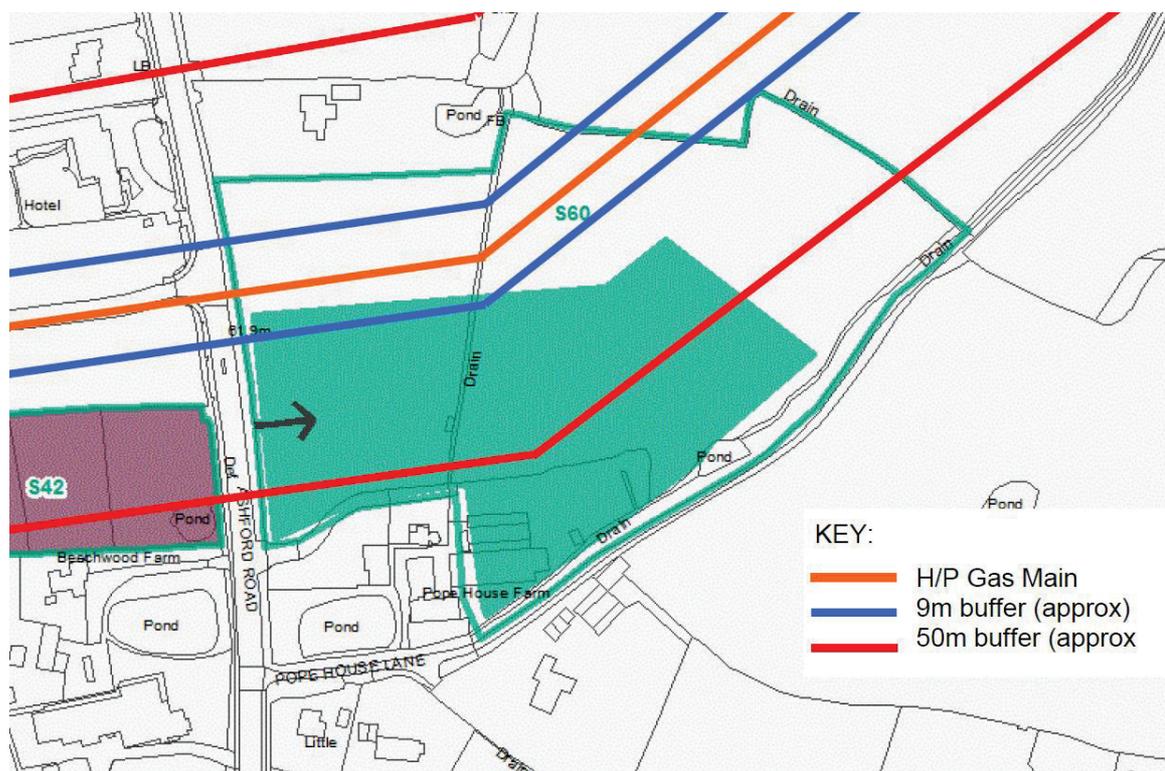
6.2 Having regard to the above we consider the fact the ALP fails to allocate any additional site to that proposed on TENT 1 and at Pope House Farm in Tenterden means it does not provide for any flexibility, and is not a sound document as it is not **positively prepared, is not justified, is not effective, and is not consistent with national policy.**

7 The merits of Policy S24 – The Tenterden Southern Extension Phase B and Policy S60 – The land at Pope House Farm Tenterden

7.1 Policy S24 indicates that the proposed allocation to the south of TENT 1A shall *'not be occupied until the TENT1A development has been completed.'* Appendix 5 of the ALP suggests that TENT 1A will not be completed until 2021/22, thus TENT 1B will not be able to commence delivery until 2021/22 at the earliest. Whilst works have commenced on Tent 1A, and delivery is anticipate by the end of 2021, we understand that a covenant existing on the TENT 1B land means that any development pre 2028 carries with it significant overage payments which would make the sites release in 2021/22 as suggested in appendix 5 of the ALPMC totally unrealistic. Tenterden Town Council have raised this concern numerous times as one of the landowners at phase A and to ignore the site's questionable deliverability within this plan period renders the allocation and therefor the plan unsound. It is also noteworthy that there appears to be a widespread misconception locally that if TENT 1B is not built out over the plan period, ABC will not look to make up the shortfall in Tenterden – but will look elsewhere. In reality Tenterden has to take its fair share of the Boroughs housing requirement. To do anything else would be unjustified and unsustainable, and lead to a plan that conflicts with national government guidance, and is not positively prepared. It would also disadvantage those in Tenterden desperate for a new home, especially an affordable home and for anyone seeking to enjoy open space and sports facilities.

7.2 In addition to the above we believe the proposed increase in the level of development proposed on Tent IB from 175 to 225 dwellings – as proposed in MC 29 to be unjustified and to have the potential to result in development that would not meet ABC's design aspirations for the area. Put simple TENT 1B is an edge of town location. It sits close to the AONB and is located on an important entrance to the town. To seek to increase the density of development here could result in a stark and wholly inappropriate form of development that will do nothing for Tenterden. The level of development proposed here should remain circa 175 dwellings. Not 225. In addition the assessment of the site in the SA should be updated to reflect the implications of these additional units. As set out on our assessment this could reduce the sites score still further.

7.3 Turning to the land at Pope House Farm (MC103), this site is located circa 2km from Tenterden town centre, and whilst close to St Michaels, and does not benefit from the same level of amenities that the land at Appledore Road/ Woodchurch Road does given its proximity to Tenterden town centre. In addition we note that this site is in fact in the parish of High Halden, so should arguable be said to be addressing their needs rather than those of Tenterden, and that development is constrained by a high pressure gas main that lies to the immediate north of the area identified for development. The HSE normally require a minimum 9m buffer to such gas mains, but in some cases 50m. The implications of a 9 and 50m buffers are set out below. Clearly this needs to be resolved if this site is to be deemed **deliverable** and this policy **effective.**



Source – JNP for Wates Developments

- 7.4 Given the scale of past undersupply, and the BC's inability to meet its current 5 year housing land supply requirement HLS, it is in our opinion foolhardy to look to rely on TENT 1B and the land at Pope House Farm to meet Tenterden's housing requirement. TENT 1B may not be able to deliver until the latter part of the plan period, and the deliverability of Pope House Farm is open to debate. Thus whilst TENT 1A and the land at Belgar Farm may be delivering, (if the accessing issues identified at the Belgar Farm appeal can be overcome), the fact remains that Tenterden as the second main settlement in the borough has the capability to accommodate more and to do so in accordance with the ALP's aspirations for proportionate growth. As such we believe there to be sound reasons why an additional site – that at Appledore Road/ Woodchurch Road should be allocated to help address the housing land supply shortfall and provide additional dwellings in tandem with those on TENT 1A and the land at Pope House Farm, and in advance of TENT1B.
- 7.5 In the context of the above we note that Tenterden Town Council/ Tenterden Town Council Planning Committee have twice sought to support the allocation of the land at Appledore Road/ Woodchurch Road, only to have their recommendations ignored. The Town Council have we believe supported this sites allocation because it is the only site capable of offering the much need sports facilities identified as needed in in both the Tenterden Town Council Sports Facilities Strategy (2014) and the draft Ashford Borough Council Playing Pitch Strategy 2017-2030 (May 2017).
- 7.6 The latter document, prepared in consultation with Sport England and Sport's National Governing Bodies, provides a comprehensive assessment of the sufficiency of playing field provision. Priorities for the Tenterden area include more junior grass pitches, a 3G ATP and improved changing room facilities.
- 7.7 Whilst we are disappointed to note that despite the recommendation of the Tenterden TC Planning Committee on the 14<sup>th</sup> August to support the allocation of the Wates site was rejected by a meeting of the full Town Council on the 29<sup>th</sup> August, in we believe the light of local opposition. We also note that Tenterden Town Council's position is now one of rejecting

Main Change 29 and 103 (i.e. increased housing at TENT1B and the allocation of Pope House Farm) such that in effect they are saying Tenterden, the second largest settlement in Ashford does not want any more housing. Such a position is in our opinion totally unrealistic and unsustainable in the light of the housing needs of the borough. A copy of the minutes of the Tenterden Town Council Planning Committee Meeting of the 14<sup>th</sup> August and the Tenterden Town Council Meeting of the 29<sup>th</sup> August are both attached for reference.

- 7.8 In the context of the above we also note that Tenterden & District Residents' Association (TDRA) made it clear at the Tenterden Town Council Meeting on the 29<sup>th</sup> August 2017 that they accept that the Wates site accords with the criteria they established in 2007 for appropriate development in the town, unlike the land at Pope House Farm (which they believe is too isolated) and the increased number of houses at TENT 1B, which they believe will result in too dense a development, such that both should they believe be rejected. Whilst the TDRA have not gone as far as to support the Wates site they have made it clear that it should be given proper consideration and be the subject of detailed public consultation and a similar masterplanning process to that which took place n TENT1A, a strategy that Wates support.
- 7.9 Whilst others have suggested that the Wates site be designated as Local Green Space (LGS) for local residents to enjoy, we note that for land to be designated as LGS it must meet all of three tests set out in paragraph 77 of the NPPF and 'should only be used in the following circumstances':
- a) The green space is in reasonably close proximity to the community it serves;
  - b) The green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
  - c) The green area concerned is local in character and is not an extensive tract of land.
- 7.10 Whilst the Wates site is reasonably close proximity to the community it serves, insufficient evidence has been put forward to demonstrate that the site is demonstrably special to the local community and holds a particular local significance. The Land is private, with public access limited to the one public right of way that crosses the site. Because the land is not publicly accessible there will be no audit of either the demand or value of this land as public open space or its contribution to open space provision in Tenterden. The evidence of extensive usage, and value is purely anecdotal without appropriate audits and comprehensive consultation across the town to establish any special value attached to the land.
- 7.11 In addition to the above, the extent of the proposed LGS being promoted by others on et Wates land seems to impose an entirely arbitrary boundary on the site with no reference to historic/cultural, topographical or any other landscape features and also does not seem to include the main landscape features such as the most significant trees, ponds or hedgerows. In this regard we note that an extensive tract of land is proposed to be designated – circa 10ha, which in our opinion is 'extensive' and therefore unlikely to meet the local open space criterion set out in the NPPF. In this regard we note that the draft Sedlescombe Neighbourhood Plan (Rother District) sought to designate land measuring approximately 4.5ha as LGS but the examiner observed that "it stretches across an area of open land which I consider can only be described as extensive" and concluded that "there is no substantive evidence to demonstrate that Street Farm is not an extensive tract of land". The examiner's report of the draft Alrewas Neighbourhood Plan (Lichfield District) concluded that two sites of 2.4ha and 3.7ha respectively comprised extensive tracts of land in relation to the size of the village.

- 7.12 Having regard to the above it should be noted that nearly two thirds of the 24ha of land being promoted by Wates would deliver a Country Park, open space and sports facilities i.e. a meaningful area of public open space. It is also worth noting that the site at present is not being actively managed and is a landscape in decline, which is also reducing biodiversity value - for example, the sheep are causing overgrazing resulting in reduction in diversity of grassland species; the hedgerows are in decline and are becoming gappy, ponds are being choked with non-native species, and traditional management practices, such as coppicing have been abandoned. The land being promoted by Wates will contribute to the public realm, provide formal recreation opportunities, such as sports pitches, provide connected footpath networks, introduce an effective management regime, create and conserve wildlife habitat and natural corridors, provide flexible play space, contribute to local amenity such as setting and outlook, provide for SUDs and create opportunities for other features such as community orchards.
- 7.13 The extensive landscape network proposed by Wates could fulfil a considerable number of possible open space functions in an interlinked open space network, which is likely to benefit a much wider audience of existing and new communities. The connected open space network would in particular help link the community to the existing PRoW (to which there are currently no links from the town) and to the proposed Country Park. The Wates proposal will also be carefully designed to capture the valued views of the Church from higher parts of the site. The formalised public access and open space provision achieved by this proposal will benefit a much larger community than a few informal users at present. Importantly the Wates proposal would also bring with it a mechanism for long term landscape management. This would allow the landscape structure, and biodiversity to be enhanced, and recreational opportunities, both formal and informal, optimised. This will secure the future of large proportion of this attractive but declining site, for the enjoyment, health and wellbeing of the whole community, as well as delivering environmental benefits, secured for the long term.

## 8 Other material considerations

- 8.1 Given our concerns about the OAHN and the associated scale of the housing land supply, we welcome the introduction of policy HOU5 and the main changes set out at MC50 and MC51 as a means to provide for sustainable urban extensions. However policies such as HOU5 are no substitute for a formal site allocation, which brings with it certainty for both local residents and developers, and in addition allows infrastructure providers to plan positively for an area's needs.
- 8.2 Likewise we do not believe that allocation of the land at Appledore Road/ Woodchurch Road would prejudice the separation of settlements and policy SP7 (Main Change 85), as is evident from the attached Landscape Led Masterplan report prepared by Robert Rummey Design. The site is contained by Appledore Road/ Woodchurch Road and does not extent the area of built development in such a way that would cause any form of coalescence.
- 8.2 We are concerned about the implications of the proposed change to policy HOU6 - Self and Custom Built Development (Main Change 52) and the requirement that 5% of dwellings on sites of 40 (+) dwellings within and on the edge of Ashford and Tenterden encompass plots for sale to self or custom builders. Whilst the responsibility for keeping a self-build and custom housebuilding register falls to "relevant authorities" as set out in section 1 of the Self-build and Custom Housebuilding Act 2015, there is nothing in the act that requires LPA's to place a requirement through the plan making process on sites over a certain size to provide for self or custom built units. The SHMA has not identified a specific need in this area. Indeed para 5.71 of the 2016 SHMA makes it clear that '*The establishment of a Right to Build Register and evidence gained from future SHELAAAs and SHMAAs will help inform the level of need for Self-Build.*' Likewise ABC have not published a list of those wishing to be placed on the self-build and custom housebuilding register so as to demonstrate the demand in the area/

identified what may be delivered via this policy. There can as a result be **no justification** for the requirement that 5% of dwellings on sites of 40 (+) dwellings within and on the edge of Ashford and Tenterden encompass plots for sale to self or custom builders.

8.3 Whilst not objecting per say to Main Change 71 and Policy ENV 3a and 3b, we do think that there are a couple of statements that are contained within Main Change 71 that are very generalised and likely made without robust evidence/understanding:

a) The statement that '*generally the settings of AONBs within the borough are of high scenic quality, areas of importance for rarity, tranquillity*'..... etc. is a sweeping generalisation.

Defining the setting of AONBs or other designated landscapes, requires detailed studies at an appropriate scale to consider whether the adjacent landscape exhibits similar characteristics to that of the designated landscape and the intactness and quality of the features and characteristics, including historic, ecological and visual considerations, and whether these characteristics contribute to the reasons for designation of that landscape or its statutory purposes. We am not aware of any detailed landscape assessments that have been undertaken to define the setting of the AONBs or to assess the quality of the setting of the AONBs within the Borough.

b) In the penultimate paragraph ABC make a statement that '*generally, the further away a development is from the AONB boundary, the less impact on this designation.*' This again is a sweeping generalisation and would entirely depend on the nature of any proposal and its location in relation to views from the AONB in particular, which will be the main criteria with distance. LVIA guidelines are clear that in assessing impacts that these need to be specific to the type of proposal as even nationally designated landscapes will not automatically have high susceptibility to all types of change and certain proposals may not compromise the value attached to that landscape. There is a complex relationship between the value attached to landscape receptors and their susceptibility to change which cannot be expressed in generalised statements.

## 9 Summary and Conclusions

9.1 We do not believe the level of housing growth proposed in Policy SP2 (MC4) of the ALPMC necessarily reflects the true OAHN of the area as it does not fully take into account all the effects of outward migration from London, does not address the issue of the affordability gap, does not address the potential imbalance between employment growth and housing. And does not explain how the unmet needs of adjacent borough have been met – if this is necessary, As a result the aims and objectives of policy SP2 have not been **justified** and the plan does not appear to have been **positively prepared** in accordance with the requirements of Para 182 of the NPPF.

9.2 We do not believe the level of existing commitments identified in table 1 and referred to in policy SP2 are all deliverable – this needs to be tested and the results shared with consultees or a contingency provided for non-delivery.

9.3 Similarly, we do not believe the delivery rates being suggested for the main strategic allocation at Chilmington Green in appendix 5 of the ALP to be realistic or justified. The housing trajectory set out in appendix 5 of the ALP needs to be tested and the results shared with consultees or a contingency provided for within the plan to take account of the possibility of slower rates of delivery at Chilmington Green. Similarly the delivery rates at the Former Power Gen site in Ashford are in our opinion overly optimistic and have not been justified.

9.4 Given 9.2 and 9.3 above additional sites need to be identified to meet the potential shortfall in the housing supply if the plan is to be **positively prepared**.

- 9.5 We do not believe the spatial strategy advocated in policy SP2 reflects the strategy chosen in the SA. It is too Ashford centric and the level of development directed to Tenterden is not proportionate to its size and status in the settlement hierarchy. The level of development proposed in Tenterden has not been **justified** and suggests a plan that has not been **positively prepared**. Additional growth should be provided for in Tenterden if the plan is to be **positively prepared**.
- 9.6 We do not believe a consistent approach was adopted towards the assessment of the sites promoted through the SHELAA in Tenterden. Having regard to our comments in section 4 above we believe that the land Appledore Road/ Woodchurch Road (TS3/TS11) should have achieved a higher score and is a prime contender if additional land is to be allocated in Tenterden. In this context we would question the ability of the land at TENT 1B to deliver before 2028, or to accommodate the scale of growth now proposed on the site. Similarly we would question the deliverability of the proposed allocation at Pope House Farm. Cumulatively this points to a plan that has not be **positively prepared**, and in **unjustified** in its approach.
- 9.7 We are concerned that the plan does not take account of under performance against the former SEP (-4,511 dwellings between 2006/7 – 2012/13). Past undersupply suggests the 5 year housing land supply should encompass a 20% buffer and be based upon Sedgfield methodology, such that ABC currently have a 5 year housing land supply deficit and need to look to allocate new sites if the plan is to progress to examination. If this approach is not adopted and addition sites not found the ALP will not in our opinion be **positively prepared, effective, justified or consistent with the NPPF**.
- 9.8 We are concerned that the plan provides no flexibility – some flexibility needs to be incorporated into the plan to ensure it is **effective** and accords with the aims and objectives of **national** government guidance; and to ensure delivery.
- 9.9 Given our position on the housing requirement and existing levels of supply/ the need to address past rates of undersupply, we believe additional land needs to be identified to meet this need – such as that under Wates control on land Appledore Road/ Woodchurch Road (TS3/TS11).
- 9.10 We believe the requirements of Policy HOU6 - Self and Custom Built Development have not been **justified** and that said policy is inconsistent with national policy.
- 9.11 The ALPMC document is thus **unsound** and should not proceed to examination.
- 10 What changes are necessary to make the ABLP legally compliant/ sound?
- 10.1 We suggest, having regard to the above that:-
- a) MC4 - Policy SP2 needs to identify a higher housing requirement of circa 17,290 dwellings over the plan period (910dpa); and provide for additional strategic developments to those identified, including additional sites in Tenterden – such as the land Appledore Road/ Woodchurch Road (TS3/TS11). The potential wording of such a policy is set out below
  - b) MC 29 should be deleted and TENT1B revert to 175 dwellings
  - c) MC103 should be deleted/ taken to address High Halden's needs – not those of Tenterden.
  - d) The SA and housing trajectory needs to be revisited in the light of our comments above.
  - e) Policy HOU6 (MC52) should be deleted

We would be happy to meet with officer to discuss any of the above further if this would be of assistance.

Yours sincerely

**JUDITH ASHTON**  
**Judith Ashton Associates**

cc Emma Gruenbaum - Wates Developments Limited

Enclosures:-

OS Red Line Boundary of Wates site.

Land at Appledore Road Tenterden - a landscape-led masterplan prepared by Rummey Design

JAA Comparison of Proposed Allocations in Tenterden and the Wates Site

Lichfields Review of the Ashford SHMA (2017)

Lichfields Review of the Ashford SHMA (2016)

Minutes of Tenterden Town Council Planning Committee – 14<sup>th</sup> August 2017

Minutes of Tenterden Town Council – 29<sup>th</sup> August 2017

### **Proposed wording for new Policy S24a - Land Appledore Road/ Woodchurch Road Tenterden**

Land to the north of Appledore Road/ south of Woodchurch Road is proposed for residential development. It is suitable for the provision of circa 250 dwellings with associated facilities, including a new sports pitches, changing room and parking area, a Country Park and new areas of both formal and informal play space.

Development of this site shall be in accordance with a masterplan / development brief that has been submitted to and approved by the Borough Council. The masterplan / development brief shall identify the timing of the provision of a substantial landscape /open space buffer to the north of the built development area within this site and define the extent, location and phasing of community infrastructure to be delivered both on and off- site.

Vehicular access to the site shall be from Appledore Road with additional pedestrian and cycle links provided both to Appledore Road and through the site to Woodchurch Road.

Acceptable forms of development on this site shall also achieve the following:

- a) The retention and enhancement of existing hedges, field boundary features and significant ponds on the site as far as is practically possible and the provision of biodiversity benefits where possible;
- b) The retention of trees with high landscape, amenity or biodiversity value, in particular where these are covered by a TPO;
- c) The enhancement of existing public rights of way both on and off-site and creation of additional rights of way to enhance connectivity between the site and surrounding area;
- d) A layout that enables the retention of views towards St Mildred's Church tower, and views towards the AONB from the eastern part of the site;
- e) Provision of off-site highway improvements identified as being necessary through the masterplanning process;
- f) The creation of public open space comprising both formal and informal play space, and allotments/ a community orchard within this site's boundary, including, to the east of the existing ridgeline that runs north south through the site, a new Country Park to protect and enhance the landscape setting of the town; and
- g) The creation of replacement sports pitches as well as additional sports pitches, together with ancillary facilities such as changing rooms and an adequate car parking area to serve these replacement and additional sports pitches and thus enhance their usability.