

ABLP Examination - Policy S60 – Sustainability Appraisal

Response from JAA on behalf of Wates Developments Ltd - Represor No RN/547 and RN/10

JAA comparison of ABC Assessment of S60 and that in JAA reps of August 2017 + commentary

		JAA assessment of S60 Land at Pope House Farm August 2017	ABC assessment as circulated June 2018	Commentary
1.1	Is the site located within or adjoining a statutory designated habitat?	No (0)	Site is not within or near to internationally / nationally designated site. (0)	
1.2	Would development of the site be likely to have a significant effect on a Local Wildlife Site (LWS)	Unlikely (0) The nearest part of Knock Wood LWS (Dawbourne Wood) is located approximately 235m to the south. There are additional areas of Ancient Woodland located c 200m to the East (Pavis Wood) and 230m to the north (Hogpat Wood)	Site located 222m north of Knock Wood LWS which is also ancient woodland (0)	
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?	Yes (-1) Hedgerows are likely to have to be breached to affect access into the site/ between the western and eastern fields, and there are a number of mature trees present around the site boundaries and between the two main fields.	No TPOs on site. There is a tree line that segments the site from north to south and so some minor losses could result if developed. (-1)	

		<p>Furthermore, there are at least 8 ponds within c100m of the site, with drains/ditches linking these passing through the site itself. The grassland and hedgerows on site is therefore likely to provide terrestrial habitat for any populations of breeding amphibians that these ponds support</p> <p>Additionally, aerial imagery suggests that there may be some diversity in the grasslands on site – particularly in the western field. A field to the north of the site, on the opposite side of Sicklefield House, has been recorded as being good quality semi-improved grassland currently under Higher Level Stewardship.</p> <p>Data held on the Government’s Multi-Agency Geographic Information for the Countryside (MAGIC) website, suggests that there may be Curlew using habitats in this area, and there are records of a range of bat species using habitats nearby.</p>		
1.4	Would development of the site enable the creation of new habitat and/or components in the habitat network?	<p>Likely (1)</p> <p>There would appear to be some potential to deliver enhancements in the undeveloped part of the site, but this will depend upon the</p>	No (0)	We have been more pragmatic on this point given the residual land available for habitat creation

		existing ecological value of the grasslands in particular. The site is not large, and consequently flexibility to provide new habitat creation would be constrained if compensation was required.		
1.5	Is the site located within or adjoining the green corridor?	No (0)	No Within rural Ashford (0)	
2.1	Is the site within or in the setting of an Area of Outstanding Natural Beauty?	No (1)	No (0)	We have been more pragmatic on this point – the site is not the AONB / its setting so should score more highly to be consistent with the way ABC have scored other sites
2.2	Would development of the site respect the existing character and quality of the landscape/ townscape?	As set out in appendix 5 of the SEALAA <i>'The site is located on the edge of the settlement confines and is a gap on the built frontage of the A28. The access, impacts on the landscape and biodiversity issues need to be considered in more detail through a full appraisal. '</i> Development of this site would extend the built up area and would not respect the existing character and quality of the landscape/ townscape? (-2)	There are currently large single detached dwellings along Ashford Road frontage in this location, and most are set back from the road frontage, but development on the western edge would extend the current built form of this area. The site extends further into the east than current built form and development would have a negative impact upon the rural landscape setting in this part of the site. (-1)	We believe the impact of developing this site on the existing character and quality of the landscape/ townscape to be greater than ABC, whilst possible subjective, the fact land opposite has been identified for a low density, executive housing scheme, suggest the area is not suitable for higher density housing as proposed, esp. adj to a listed building and close to a conservation area.
2.3	Would there be an identifiable and cumulative visual impact from the development?	Yes Development would have a negative impact on the views	The east of the site is more open than the western half of the site and development of this area	

		from adjacent public paths as the development of this site would appear as an extension of the built up area. (-1)	would result in a negative impact which is considered countryside and can be viewed from the wider setting (-1)	
3.1	Is the site within or adjoining an area of archaeology importance or a Conservation Area?	Whilst not within an area of archaeology importance / conservation area, the site is located within 200m of an area of archaeology importance – a roman road (-1)	St. Michaels Conservation Area is located approx. 300m south of the site. (1)	ABC position on this matter is not consistent with other SA assessments – the sites proximity to a CA and area of archaeology importance is such that the scoring cannot be positive
3.2	Does the site contain or does it adjoin a listed building, scheduled monument (SM) or registered Park/garden?*	Yes There is a listed building situated immediately to the south / west of the site (-1)	Pope House Farmhouse (Grade II) is located just to the immediate south of the site but as the site here is currently agricultural buildings - development could have a positive impact upon its setting (1)	The sites proximity to a LB is such that we do not believe a positive score is possible/ consistent with the manner in which the SA has assessed other such sites At best the score should be a (0)
3.3	Will it respect and enhance the character and setting of Ashford's historic and/or cultural assets?	There are views towards the tower and roof of St Michaels Church which could be adversely affected by development on this site (0)	No Affect (0)	
4.1	Is the site wholly or partially in Flood Zone 2 or 3?*	No (0)	Site located in Flood Zone 1 (0)	
4.2	Is the site at risk from Surface Water Flooding: from the 1 in 100-year event and/or from the 1 in 30-year event?	Less than 10% for both (-1)	Site not at risk from Surface Water Flooding from either the 1 in 100-year event or the 1 in 30-year event (0)	ABC is in our opinion overly optimistic. The fact is the risk is less than 10% so the score should be -1
4.3	Is the site suitable to use SuDs infiltration systems?	No – low permeability (0)	Mapping suggests low permeability at this settlement.	

			(0)	
4.4	Is the site within a groundwater source protection zone?	No (1)	No (1)	
5.1	Does the site's size and proposed use meet the threshold for the provision of affordable housing? (currently over 15 units/ site area in excess of 0.5 ha)	Yes (1)	Yes (1)	
6.1	Will development of the site result in the loss or gain of onsite services and/ or facilities?	No (0)	No (0)	
6.2	Is the site located in close proximity to a Local Centre/ Shop?	No Whilst circa 600m from the centre of St Michaels, St Michaels contains a limited number of convenience stores/ facilities. Tenterden town centre with all its facilities and amenities is circa 2km from the site (-1)	Located approx. 520m from local store within St. Michaels (0)	As there are only limited facilities in St Michaels we believe ABC have over scored the site in this regard and not been consistent with other SA site assessments
6.3	Is the site located in close proximity to a GP Surgery?	No Ivy Court Surgery is circa 2km from the site (-1)	Ivy Court doctors surgery is approx. 2.5km away in Tenterden (-2)	We have been slightly generous in this regard, and in hindsight agree -2 is probable more realistic
6.4	Is the site located in close proximity to a Primary school?	Yes 350m from St Michaels CofE Primary school (1)	Approx. 380m away from St. Michaels Primary School (1)	
7.1	Is the site located in close proximity to public green open space? (could include informal open space, accessible by the public)	No St Michaels recreation ground is circa 700m from the site Tenterden recreation ground is circa 2km from the site	St. Michaels recreation ground is approx. 620m to the south of the site (0)	

		(0)		
7.2	Is the site located within close proximity of an equipped play area?	No St Michaels recreation ground is circa 700m from the site Tenterden recreation ground is circa 2km from the site (0)	St. Michaels recreation ground is approx. 620m to the south of the site, and includes an equipped play area (0)	
7.3	Does the site have direct access to a footway (PROW or pedestrian pavement)?	Yes It directly abuts the Popes House Lane PROW bridleway, allowing direct access for pedestrians and cyclists, which then joins the eastern footway of the A28 which starts where Popes House Lane joins the A28. (1)	Footpath connections on Ashford Road. A PROW runs along Pope House Lane which adjoins the site to the south (1)	
7.4	Would development result in the loss or gain of local and/ or strategic open space?	No (0)	No loss or gain of open space (0)	
7.5	Is the site close to land use/s which may affect health and amenity?	No (0)	Not close to any (0)	
7.6	Is the site situated in an area which is in the 20% most deprived nationally when measured against the Index of Multiple Deprivation 2010?	No (0)	Weald Central is not within most deprived 20% nationally (0)	
8.1	Is there direct access to the site from the public highway?	Yes (1)	Yes, access to The Oast and Pope House Farm. However, a new access may need to be created if development of the whole site. (1)	

8.2	Is the site within 1.6km of an existing designated cycleway?	Yes (1)	Route 18 Canterbury – Royal Tunbridge Wells is located approx. 600m north of the site (1)	
8.3	Is the site within 400m of a Railway station or bus stop that provides an hourly or more frequent bus service?	Yes Bus stops in St Michaels are circa 200m from the site and provide an hourly service to Tenterden and/ or Ashford (1)	The bus stop for Service 2 Tenterden – Ashford and 2 other routes is located less than 100m away (1)	
9.1	Is the site reliant on the delivery of large scale/significant infrastructure to make it deliverable?	No (0)	No (0)	
9.2	Is the nearest GP surgery currently accepting new patients?	Yes (1)	Yes (1)	
10.1	Is the site on previously developed land?	No (-1)	Site is mainly greenfield (-1)	
10.2	Would development involve the reuse or redevelopment of derelict buildings?	No (0)	Potential to redevelop Pope house farm buildings, but not within the site (0)	
11.1	Is the site located on existing, known mineral reserves?	No (0)	No (0)	
11.2	Is the site designated as a Regionally Important Geological site (RIGS)?	No (0)	No (0)	
11.3	Is the site on high quality grade agricultural land (1,2,3)	Grade 3 (0)	Grade 3 (0)	
12.1	Is the site being promoted for greater or less business/ employment space?	No (0)	(0)	

12.2	If the site is being promoted for business uses, does it have access to broadband?	N/a (0)	N/a (0)	
12.3	Does the proposal include an educational component/ learning opportunities?	- (0)	(0)	
12.4	Would it help support sustainable tourism?	No (0)	No (0)	
13.1	Is the site within 400m of the nearest district centre?	No Tenterden town centre is circa 2km from the site (-1)	Approx. 400m from St. Michaels which adjoins the primary settlement of Tenterden. (1)	ABC have in our opinion been overly optimistic in their assessment here There are only limited facilities in St Michaels and ABC's scoring is in our opinion inconsistent with other SA site assessments
13.2	Would the site contribute to the regeneration and revitalisation of Ashford town centre?	No (0)	No (0)	
13.3	Would the site result in the loss of shops/services?	No (0)	No (0)	
Overall score		-1	+5	ABC have been overly generous in some of their scoring, some of which is not consistent with the manner in which other sites have been scored in the SA assessments. We believe the score for S60 to be less than that proposed by ABC, and to be less than that we have attributed to the Wates site at Appledore Road (+3) in our submission of August 2017.