

EGERTON NEIGHBOURHOOD PLAN

COMMENTARY ON A PETITION CIRCULATED TO SOME, BUT NOT ALL, EGERTON RESIDENTS IN JULY 2021 – HEADED 'SAY NO To a Housing Development at Gale Field, Crocken Hill' (see attached)

The petition text contains a number of factual errors which are repeated, sometimes verbatim, in the Regulation 16 objections to the *Neighbourhood Plan* proposal for affordable housing at Gale Field.

Summary Paragraph

The summary is inaccurate in the following details:

- Policy D4 mentions 6-8 properties and not 'upwards of 11';
- the proposed development, rather than 'destroy a greenfield site which is rich in flora and fauna', will use about a third of the site for housing for the local community, with another third being set aside for community open space and enhancement of its natural environment, and the remaining third to continue in agricultural use.;
- the proposed development of 6-8 dwellings includes a mix of 1, 2 and 3 bedroom dwellings. This represents an approximate 30% increase rather than 'an overwhelming increase of over 60% in the size of the Crockenhill settlement' which currently comprises 20 dwellings with 2, 3 and 4 bedrooms in the immediate vicinity of Gale Field;
- the possibility of noise and light pollution from the proposed development is overstated, because the site is at a lower ground level than the existing neighbouring housing by some 7 metres, and separated by some 80 metres. Additionally, the site is secluded by existing mature trees, and would be separated by a green corridor from the nearest properties, and therefore is less likely to be a source of nuisance to existing homes than the closer properties already opposite and adjacent to them;
- Gale Field is categorized by Natural England (Agricultural Land Classification) as Grade 3b, Moderate to Poor agricultural land, suitable only for occasional grazing and fodder;
- If the Gale Field site was progressed as an exception site through the emerging *Neighbourhood Plan*, then it would not 'set a precedent for other such developments' in the locality, and the remainder of the site would be safeguarded by the donation of a third of the site to the village as community open space with the remainder in continued agricultural use.

Specific Points:

'Traffic increase and congestion' - whilst this is a genuine concern, the extra vehicle movements associated with the new housing would be only a modest increase, capable of being absorbed by the existing road capacity. This is likely to be the case for any site developed in the parish.

'Highway safety' - the proposed development would have its own off-road parking, and a safe access point with better sight lines than existing accesses in the locality. The generous provision for parking spaces could also alleviate the congestion caused by the existing roadside parking, with a beneficial rather than detrimental effect on road safety.

'The destruction of an open greenfield site & endangerment of ancient English oak trees' - no trees would be removed as part of the proposed development, and the new homes would be no closer to the oak trees mentioned than the existing adjacent houses. A new green space would be created for the benefit of wildlife and the neighbouring community, who have been pressing for open space in the locality for some time.

'Destruction of wildlife habitats...' - Gale Field has no particular nature conservation status accorded to it, compared to other more precious habitats in the Egerton area. It is unlikely that the range of species listed are present on the site since many of these are natural predators of each other. The proposed

development specifically includes an extensive area for the protection of wildlife habitat, together with the creation of new habitat, representing a greater diversity of wildlife being accommodated than would be possible when used exclusively for livestock grazing or fodder.

'Overwhelming of the main sewage systems....' - an understandable concern recognized in the *Neighbourhood Plan*, any proposed new development would be required to provide its own foul drainage system without overloading the existing sewer network. Any substantial investment in improving the overall sewerage capacity for Egerton is more likely to be achieved as and when more development is accommodated, which is acknowledged in the response from Southern Water.

'Additional pressure on other utilities...' - similarly, any new development would be required to address its own implications for services and utilities, in order to achieve any planning consent, so would not cause undue further pressure on current provision.

'Loss of drainage in an area which regularly floods due to run off from Egerton Hill' - the existing localised flooding at Gale Field would be removed if the site was developed, because a proper drainage system would be introduced, including some sustainable drainage with the creation of a pond to store excess rainwater, as well as to create aquatic habitat for wildlife.

'Lack of amenities , including no local shop' - this concern relates to any housing site put forward in the parish, because Egerton overall is physically remote from the shops and services that support it, so a reliance on transport is inevitable.

'Loss of prime agricultural land' - all agricultural land is officially graded as to its soil quality, scarcity and value for farming use. There are five grades from One (Very Good) to Five (Very Poor). Gale Field is classified as Grade Three (b), and is used for pasture and animal fodder because it is unsuitable for more productive farming activity. The best and most versatile farmland in the parish (used for arable crops, fruit trees, etc), is the Grade Two land on the higher Greensand Ridge.

Precedent for further development - the development of Gale Field would be progressed as an exception site, and would be no more vulnerable to being expanded, or setting a 'precedent for other such developments', than the recent local affordable housing at Chantlers Meadow in Egerton Forstal has been.

'Community safeguarding issues' - pedestrian links are a valid concern, which is why the *Neighbourhood Plan* is promoting the creation of an upgraded all-weather footpath, to shorten the distance to the school and Millennium Hall and to avoid the narrowest parts of Crockenhill and Rock Hill Road. The existence of a footpath adjacent to the proposed development provides an opportunity for safer and more environmentally friendly access than can be found from the rest of Egerton's outlying communities. The distance via the footpath to the Millennium Hall (which is the school drop-off point, the pop-up post office (there is currently no village shop), and the focus of village social, recreation and sporting activity) is 0.84 miles or a 1.68 mile round trip rather than the 2.4 miles stated in the petition. The climb 'of over 100 metres' is approximately 60 metres.

Reliance on car transport - as mentioned above, this is likely to be the case for any site developed in the parish, given the dearth of shops and services, and the remoteness from wider employment opportunities, medical facilities, entertainment facilities, etc, most of which are outside of the parish.

Comparison with Forstal Road site - there are significant differences between Gale Field and the Forstal Road site (some 250 metres away). That latter site was put forward for inclusion in the *Neighbourhood Plan*, with 3 different configurations. It could not be promoted for various reasons but primarily because it was not promoting the type of housing identified in the *Housing Needs Survey*. What the *Neighbourhood Plan* seeks to address is the need for local affordable housing (whether for rent or assisted purchase), and for it to be available locally in perpetuity at an affordable rate. What is proposed at Forstal Road fails to comply with either of the requirements in the Plan, since it offers open market housing at a discounted

rate of 80% which the *Housing Needs Survey* determined was beyond the means of those requiring local accommodation, and would subsequently be sold as open market unless managed by a Trust or Housing Association.

The landowners opted to pursue a planning application outside of the *Neighbourhood Plan* process which was refused by Ashford Borough Council in the light of current *Borough Local Plan* policies. That proposal was also starkly different from that proposed for Gale Field in that it would impact severely on neighbouring houses, being less than 3 metres from the wall of an existing bungalow. Additionally, the Forstal Road application attracted refusal on other grounds, such as layout, building design, landscape impact, biodiversity impact which the Gale Field proposal specifically seeks to address.

Concluding Paragraph

The reason why the Neighbourhood Plan Steering Group has included the Gale Field site is simply because it is the only site offered up through the Plan process that meets the requirements identified in the *Housing Needs Survey*. All those offering up sites for housing were invited in writing to adjust their proposals to accord with the published requirements of the *Housing Needs Survey*, before a final selection was made. No other landowner responded to the local needs requirement at a price which would allow for genuinely affordable development, opting either to withdraw their proposal or to take their chances separately through the planning application process.

***Egerton Neighbourhood Plan Steering Group
August 2021.***