

**Culture, Tourism and Leisure**  
**Comments regarding proposed development**

**Application 21/00790/AS**

Outline application for up to 145 dwellings

Full application for Country Park 8.66ha, sports pitches 3.33ha, pavilion, access points  
 Appledore Road, Tenterden

**Requirements for Cultural Services provision**

**Public Open Space contributions**

1.1. Off site provision of public open space:

<b>S106 SUMMARY: CULTURE CONTRIBUTIONS:</b>				
<b>PUBLIC OPEN SPACE:</b>	<b>Off-site capital provision:</b>		<b>Commuted maintenance sum</b>	
	<b>£/dwelling</b>	<b>Total</b>	<b>£/dwelling</b>	<b>Total</b>
Allotments	258.00	37,410.00	66.00	9,570.00
Strategic Parks	146.00	21,170.00	47.00	6,815.00
Cemeteries	284.00	41,180.00	176.00	25,520.00
<b>CULTURAL PROVISION:</b>	<b>£/dwelling</b>	<b>Total</b>		
Arts Sector	338.40	49,068.00	N/A	
Voluntary Sector	87.00	12,615.00	N/A	

1.2. Potential projects for off-site contributions:

**Allotments:** Local provision with investment within Tenterden.

**Strategic Parks:** When funding is available, the investment will be towards a Strategic Park site as identified in the Local Plan 2030, COM2. To be either a contribution towards provision of Conningbrook Lakes Country Park, to include fees, infrastructure works and management and maintenance of CLCP. Alternatively, contribution towards provision of Discovery Park, to include fees, infrastructure works (including land purchase) and management and maintenance of Discovery Park.

**Cemeteries:** Local provision with investment within Tenterden

**Arts sector:** Local provision with investment within Tenterden. This will be the St Mildred’s Church project, as requested for application 19/01788/AS.

**Voluntary sector:** Local provision with investment within Tenterden. This will be the St Mildred’s Church project, as requested for application 19/01788/AS.

1.3. The above comments on the level of contributions for open space should not be taken to indicate that Cultural Services will approve the scheme.

1.4. Note that all the sums detailed will require indexation:

- Open space typologies from 2012
- Voluntary sector from 2018
- Public Art from 2016

1.5. On-site provision is discussed in detail below.

## Culture, Tourism and Leisure

### Comments regarding proposed development

#### Sports provision

1.6. Sport is to be provided on site. This will be a combination of replacement provision for the existing 11 x 11 adult pitch, provision as required by the size of the development, and provision in excess of this requirement. Provision includes pitches, a building and necessary infrastructure. It is noted the scheme does not include lighting.

1.7. The Sport England calculation for indoor and outdoor sport related to 145 dwellings calculates:

Outdoor Sport	Capital contribution		Pitch maintenance 10 yrs	
	£/dwelling	Total	£/dwelling	Total
Changing room		72,541.00		
Pitches		51,885.00		
<b>Totals outdoor sport</b>	858.11	<b>124,426.00</b>	512.55	74,320.00

Indoor sport	Capital contribution	
	£/dwelling	Total
Artificial pitches		10,635.00
Sports halls		65,111.00
<b>Total indoor sport</b>	522.39	<b>75,746.00</b>

1.8. The summary in the Sports and Open Space Supporting Statement details a proposed capital investment of more than £1.2 million, including fees. The statement document also details maintenance over ten years of approximately £368k.

1.9. We note the statement in the application that the building has been designed to FA standards. It must also be compliant in terms of changing facilities for all and fully accessible.

1.10. We note Sport England comments and lack of objection.

1.11. The proposed development involves the loss of existing provision; the planning condition must allow the compensatory provision to be available for use, with suitable vehicle access, before the loss of existing provision, to avoid the loss of sports provision at any time.

1.12. The Sports Facilities and Open Space Supporting Statement details the facility *'would provide a long-term home for both adult and junior football in Tenterden'*. However the application fails to provide a named team or organisation where agreement, whether informal or formal, has been achieved.

1.13. Policy IMP4 of the Local Plan states:

*'Governance of Public Community Space and Facilities*

*Proposals that will deliver substantial community space and facilities are required to be supported by a governance strategy which will need to be agreed with the Council. This strategy will need to set out what facilities are to be delivered and by when, and how they will be managed over time to an acceptable standard.*

## **Culture, Tourism and Leisure**

### **Comments regarding proposed development**

*Proposals which adopt a community stewardship model of governance will be supported.*

*Should a private management company model be promoted, then it will need to be established and run in a way that is affordable, gives the residents a key governance role and is focused towards the management of the facilities to be delivered by the development.*

*Where the Council takes on an adoption role, financial contributions will be secured from the developer towards the maintenance of facilities for at least a ten year period.'*

- 1.14. We note that the application includes a draft Operator Appointment Plan and draft Community Use Agreement, and that a strategy has been set out; however, there is no detail on who will be responsible.
- 1.15. We cannot see anywhere within the application where engagement has been progressed with any suitable operator, sports club or community organisation.
- 1.16. Given the weight of sport provision for this application, engagement and consultation with local sport clubs (notably football clubs) appears limited. We would like to see the evidence and outcome of engagement with Tenterden Tigers. We note that the adult football team, Tenterden Town Football Club, although listed as a key stakeholder, is not listed at page 22 as part of the summary of stakeholders who have been consulted.
- 1.17. Without the necessary engagement and consultation, what is the evidence of need for the sports provision? Although the Playing Pitch Strategy 2017-30 demonstrates need, this requires testing before any significant investment, to allow for changes in sport requirements and for the possibility of fluctuating club membership.
- 1.18. As such it is not clear what clubs are intending to use the site, and how the sport pitches, pavilion, open space and related infrastructure will be managed. Please can we see evidence of this?
- 1.19. We would also like some clarity on what will be school provision, and what local clubs will use. It is important to clarify this point as the wider community need to benefit from the sports provision, not just the school and closed club usage.
- 1.20. The Statement of Community Involvement is based on previous applications. We cannot see there has been any engagement on the current layout - the timeline stops at September 2019. Please can the applicant provide evidence on community engagement and consultation on this specific application.
- 1.21. The application references the current application for Tenterden Recreation Ground, 21/00724/AS, where there will potentially be a loss of one full size adult grass pitch, and is referenced in the Sports Facilities and Open Space Supporting Statement considered as part of the sports context, paragraphs 3.2.7 – 3.2.10. Application 21/00724/AS has not been determined, and it is noted that Sport England have raised an objection to the proposal.
- 1.22. To be clear, this application, as currently designed, will not provide the replacement provision for the Tenterden Recreation Ground site. This application proposes one adult grass pitch, and this is in lieu of the loss of the existing adult grass pitch at the Appledore Road site. In order to accommodate loss of one adult grass pitch at the Recreation Ground site, the Appledore Road site would need to provide two adult grass pitches as a minimum.

## **Culture, Tourism and Leisure**

### **Comments regarding proposed development**

- 1.23. The Sports Facilities and Open Space Supporting Statement details in the summary at 6.22 on Operation Management, '*The applicant would seek to develop a transparent approach, working in partnership with the Borough Council to identify suitable organisation to manage the Country Park and Sports Hub.*' Given this element of the planning application is for full planning permission, the lack of consultation to date with the council or any suitable body is of concern. At this stage of the application, the council requires more than just a statement that details an approach, as this provides no security on future management.
- 1.24. To confirm, Ashford Borough Council will not be adopting any of the on-site sport provision (or any other open space typology).

### **Informal/natural provision**

- 1.1. At 145 dwellings, informal/natural public open space is required as on site provision. This development triggers a requirement of 0.70 ha, with a minimal capital investment of £52,490, and subsequent minimum maintenance value of £47,125 over ten years index linked.
- 1.2. Informal open space provided as part of the development must be integrated within the built development, entirely overlooked, genuinely useable and fully accessible all year round, and within 400m walking distance of all properties.
- 1.3. The public open space must include all the necessary infrastructure and planting to create a quality landscape scheme. The following locations will not count towards the area of required informal public open space:
- Flood zone areas
  - Necessary drainage features such as attenuation ponds
  - Landscape required as ecological mitigation
  - Amenity space – verges, buffers etc
- 1.4. The minimum size of informal public open space must be 0.25ha, as detailed in the adopted Public Green Spaces & Water Environment SPD. The Sport & Open Space Statement lists at 1.3.9:
- *Country Park (8.66 ha)*
  - *Equipped Play Space (0.17 ha)*
  - *Amenity Green Space in and around the proposed housing development (6.93 ha).*
- 1.5. The 'Country Park' element at 8.66 ha can feasibly be considered to be public open space, however the majority of amenity space in and around the development is unlikely to comply. Given that 0.70ha is required on site, the 'Country Park' element would appear to provide the necessary quantum of informal/natural public open space.
- 1.6. It is difficult to comment on the design for the Country Park, as the Country Park Masterplan is not clear enough on what is existing and proposed provision. The proposal appears to be very light touch, with a minimal amount of paths, planting and site infrastructure. The park is immediately adjacent to the High Weald AONB, and

## Culture, Tourism and Leisure

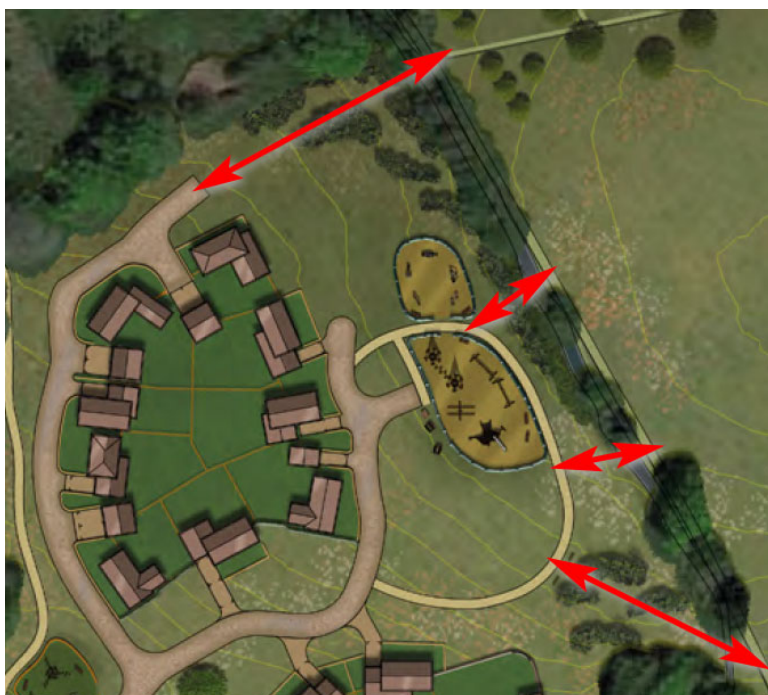
### Comments regarding proposed development

therefore the landscape of the park, and the built development, must be mindful of this character and integrate with it.

- 1.7. The western part of the site provides limited level of detail regarding landscape and open space. We can see that there are potentially new hedgerows proposed, which will improve the green infrastructure and provide ecological corridors throughout the site.
- 1.8. Our preference is always for open space to be overlooked; the current design has some examples of rear/side property boundaries adjacent to open space, which represents poor design. The image below is an extract from the centre of the site, and demonstrates a long garden boundary adjacent to a central block of open space, which includes a play feature.



- 1.9. The connections between the residential development and the 'Country Park' are poor; the layout and pedestrian movement of both sites needs to be considered as one.



## Culture, Tourism and Leisure

### Comments regarding proposed development

- 1.10. On site informal/natural open space will require further detail as part of a planning condition, to ensure high quality is achieved. As well as detail on the hard and soft landscaping, we expect to see a detailed Design and Access Statement, and the methodology behind the approach to landscape character and how this will both mitigate for the impact on the adjacent AONB, and contribute towards the necessary net gain in biodiversity.
- 1.11. We also expect community engagement as part of the design process for the proposed new park. Therefore we request a condition regarding public consultation that will inform the final design for open space and play. Given the extensive nature of the open space being put forward, and to ensure it reflects community need, consultation is required both to gauge on-site requirements but also as part of the process of embedding this potential park into the local community.
- 1.12. We note the quantity of SUDS proposed; these features will need to complement the existing waterbodies and provide positive landscape features. The approach to the design of SUDS should be as part of the landscape infrastructure, and must not be designed and delivered as highly engineered features. The Sustainable Drainage SPD provides further detail. SUDS can not be considered as part of useable public open space.
- 1.13. The drainage strategy appears to impact on the Heritage Asset ridge & furrow feature in the north-west of the site. A negative impact on this asset is not acceptable.



- 1.14. Given the impact on the local landscape and adjacent AONB, the quality of the landscape proposed here will need to be very high. The 'detailed area' drawings provide limited details, and do not cover the whole area for the full planning permission element of the submission. The drawings typically do not detail levels, materials, suppliers etc; any planning conditions will need to ensure we receive sufficient detail to allow us to provide informed comments.
- 1.15. Please note that we do not consider the Country Park as named by the applicant to be a country park, or of strategic value. It is a local piece of open space, and lacks the required infrastructure to be considered strategic. Country Parks are large-scale destination spaces, which typically provide a wide range of recreation opportunities, with a destination play space, toilets, refreshment facilities and dedicated parking.

## **Culture, Tourism and Leisure**

### **Comments regarding proposed development**

1.16. To confirm, Ashford Borough Council will not be adopting any of the on-site public open space.

### **Play**

- 1.17. Consultation is required with Tenterden Town Council to agree public open space provision on-site, as existing and planned provision for Tenterden impacts on what should be provided at this location.
- 1.18. Typically for a development of this size, the only public open space to be provided on site would be Informal public open space. However the location of this site raises the possibility of the Play space typology at this location; the nearest off site play space is greater than the current walking threshold of 400m as detailed in the Open Space SPD.
- 1.19. Play could feasibly be provided at this location. The play space calculates as 0.17 ha, with a minimum capital investment of £78,445, and subsequent minimum maintenance value of £96,135 over ten years.
- 1.20. A development of this scale will only generate one play space on site; this should be integrated into the development and well overlooked, to provide natural surveillance. There should also be clear linkages between the play space and the rest of the development to demonstrate it will be easily and readily accessible. Consideration should be given to the provision of accessible play equipment for children with limited mobility and/or learning difficulties.
- 1.21. The current proposal of three play spaces is not required, although we do expect informal open space throughout the development to be playable and accessible. The Sport & Open Space Statement lists at 5.3.2:
- Two Local Areas for Play (LAP)
  - One Locally Equipped Area for Play (LEAP)
  - An outdoor gym (co-located with the LEAP)
- 1.22. At least one play space must be a minimum of 0.17 ha and must include a 30m buffer, as detailed in the PGS&WE SPD. We require confirmation of this provision. The current design for play is very standard and demonstrates limited play value. On site play will require further detail as part of a planning condition, to ensure high quality is achieved.
- 1.23. Play space must be formal and 'equipped play'; natural features will not contribute towards play space provision. The LAPS detailed in the application will not count towards required play provision - this is not a designation the council uses or recognises.
- 1.24. The current location for play is not ideal, and could be better integrated within the centre of the development and not pushed to the edge, where natural surveillance will be limited.
- 1.25. If Play is provided off site then Tenterden Town Council will need to advise on a suitable site. The capital contribution will be a minimum £94,105, and commuted maintenance sum as based on the open space SPD.

## **Culture, Tourism and Leisure**

### **Comments regarding proposed development**

#### **Ecology & biodiversity**

- 1.26. Regarding the open space on site and impact to the landscape, we expect a net gain in terms of biodiversity and loss of landscape features, particularly loss of water bodies/features, hedgerow and trees. Replacement of an existing water feature with a SuDS feature will not automatically be considered as suitable replacement.
- 1.27. Clarity is also required on the involvement of Kent Wildlife Trust. They are mentioned several times in the Statement of Community Involvement, but this appears to be in relation to a previous application for this site. What is their involvement now, and have they had any input into the LEMP?
- 1.28. We note comments from KWT, disputing a net gain in biodiversity.

#### **Management of Facilities**

- 1.29. Planning Statement p51 6.2.101 - *Country Park facilities have been designed with the ABLP preference for Community Stewardship in mind; that the applicant would seek to work in partnership with the Borough Council to identify suitable organisations to manage the Country Park and Sports Hub; and that this approach is proposed to offer compliance with preferred Community Stewardship model set out in Policy IMP4. A draft Operator Appointment plan is included at Appendix 10 of the Sports Facilities Supporting Statement.*
- 1.30. We understand the approach for the management of the sports and community provision, however we need to see assurance from an actual club or organisation who will be committed to take on the role of managing the sport provision, and what the delivery model will be. Regarding the management of the sport provision we would be looking for a club that is registered with the Football Association (Kent FA), and has the required FA Charter Standard status to be able to offer youth provision and integrates disability team or teams within the club.
- 1.31. We also need assurance from a management body regarding the long-term management of open space, particularly the 'Country Park' element of the scheme, and the financial mechanism for this.
- 1.32. Our requirement of the developer is to demonstrate a reasonable level of certainty that the facility will be managed, with agreed maintenance sum committed for ten years.
- 1.33. We also need clarity on who will be the owner of the site; currently there is no detail on which organisation will have ultimate responsibility for the public open space and sport provision.
- 1.34. We require more detail on how the local community will benefit from the facilities, beyond any identified club as prime user.
- 1.35. We have reviewed the LEMP in terms of management of open space; the outline prescriptions appear reasonable and practical but at this stage are high level. We expect to see more detail as part of a planning condition regarding management of all open space.



## **Culture, Tourism and Leisure**

### **Comments regarding proposed development**

#### **Summary**

- 1.36. We require evidence of need for sport facilities, and evidence of engagement and consultation with relevant clubs.
  - 1.37. We require evidence of engagement and consultation with the community.
  - 1.38. We require a proposal for how the building will be of benefit to the community, and what will be available for community use. Consideration needs to be given as to how users of the Country Park will be accommodated.
  - 1.39. We require evidence of engagement and consultation with management organisations, with regards the operational needs for both the sport facilities and 'Country Park'.
  - 1.40. We require a S106 trigger whereby the governance, management and maintenance of the open space and sports provision, has been contractually agreed in writing with a suitable organisation and any sub-operator(s), prior to first occupation.
  - 1.41. The proposal for all open space typologies is currently of low quality and will require more investment and detail.
  - 1.42. To confirm, Ashford Borough Council will not be adopting any of the on-site open space or facilities.
- 

This response was submitted following consideration of the following documents:

*Planning Statement*  
*Sports Facilities and Open Space Supporting Statement*  
*Design and Access Statement*  
*Landscape Area Plan*  
*Detailed Design Outdoor Play*  
*Country Park Masterplan*  
*Statement of Community Involvement*  
*Landscape and Ecological Management Plan*