

PLUCKLEY PARISH COUNCIL

PLUCKLEY NEIGHBOURHOOD PLAN SUBMISSION CONSULTATION

OBJECTION ACCOMPANYING COMPLETED REPRESENTATION FORM ON BEHALF OF A. KIRK ESQ., IN RESPECT OF THE FORMER COAL YARD SITE, PLUCKLEY ROAD, PLUCKLEY, TN27 0RU, COMPLETED BY IDE PLANNING.

OBJECTION.

Objection is made to the omission of the former coal yard, south of Pluckley station, as a development site in its own right in the emerging Neighbourhood Plan (NP). The former coal yard is a brownfield site. Its development for residential, or a mixed use scheme including residential, would assist in meeting other NP policies and aspirations including the provision of additional station car parking in anticipation of an increasing demand for parking space.

REASONING

The station area is identified on Map 1 as one of three main settlement areas. The NP explains the problems created by through traffic, particularly HGVs, including those using Station Road (policy E8 refers). Residents also emphasise the value that is attached to the rail service (Project CE1) where, it is stated in the NP, residents urge that 'every effort be made to...maintain the current level of service'. An important part of that is to ensure that the station works as efficiently as possible as a transport hub. The demand for station parking is expected to rise in the NP period. The former coal yard is previously developed land. It provides an opportunity not only to provide for a modest residential/mixed use scheme, but also for additional car parking.

This should be seen against the background of –

1. The borough council does not have a current 5 year supply of deliverable housing land
2. The Housing and Planning Act, 2016 proposes brownfield site registers upon which housing development will (subject to publication of the relevant regulations) be prioritised, and
3. A December 2015 dated CLG consultation on proposed changes to national planning policy introduced the idea of increasing residential density around commuter hubs. This is further explored in a CPRE paper (No. 6) 'Making The Link' (July 2016). Whilst that paper looked more at larger settlements, this idea of joint land use and transportation planning – or 'public transport oriented development' - is an evolving one.

For all these reasons, the former coal yard merits a more prominent place in the emerging NP. Its potential role is understated. At present, it falls under part 10 and the future of the site is not dealt with adequately either in the NP or the Development Plan.

The NP period extends to 2031.

The amendment sought is –

- a. Whilst the site lies on the southern side of main rail line, the NP should recognise that the site does have potential for enabling housing/mixed use development that could assist in providing for access etc. improvements that could also serve new station parking.
- b. That the former coal yard be identified as an 'opportunity site' in the main body of the NP i.e. outside part 10, in recognition of the potential of the site itself and in the way its

development could help achieve other NP policies, as well as objectives in the emerging Ashford Local Plan.

- c. The NP should indicate that it will seek to explore ways of bringing this site forward for sustainable development in the future. This to include promoting measures that would improve pedestrian access from the site to the village.

BACKGROUND

The Neighbourhood Area is defined in Map 1, which I take to be the NP area. Part 10 of the NP is entitled Community Projects Management Plan which 'does not form part of the PNP proposal'. It is explained the projects are 'aspirations', some of which are planning related and covered by the Development Plan, whilst others are not. The former coal yard was allocated in an earlier plan (Annex A refers). The site clearly has development potential that should be recognised in the NP – it does not appear to be identified as such in the emerging Ashford Local Plan.

Under NP Project CC4, for the 'Old Coal Yard Site' (p.52), it is stated it is intended to seek to alleviate station parking. Development as a managed car park is supported if access can be resolved. The NP is however silent as to how this may be achieved. It is acknowledged that this initiative would facilitate use of the rail service and so would link with Project E1.

In Appendix 3, the Site Allocations Document, consideration is given to the former coal yard as a housing site (ref. 9). Of 23 criteria, the site scores highly with a mark of 49 but it misses the cut with the following sites allocated –

1. Thorne Yard - 4 units, brownfield, ex builders yard, former employment site but has not been used as such for at least 20 years.
2. Lambden Road - greenfield, 4 units
3. Old Brickworks - brownfield, cited as a special case; residential preferred to employment; unused for employment for c25 years; permission granted March 2016 –the application was made outside the plan period. The permission counts as an existing commitment.

Parsonage Cottage was greenfield but discounted on highway grounds.

The commentary on the former coal yard (p.11) says that a (previous) agent for the owner suggested using the site as a car park for station users with the possibility of housing for the future but, the Appendix comments, 'at this stage, no proposals were to hand as to the type of housing'. It further comments that whilst the site had a number of advantages, and was brownfield, it scored poorly in terms of –

- i. Impact on woodland
- ii. Access
- iii. Access to amenities
- iv. Loss of employment site.

The Appendix concludes that i-iii above 'renders the site unsupportable for housing'.

IDE Planning

I have only recently been instructed by Mr Kirk to promote the site. The first task has been to respond to the NP consultation by the deadline. I shall next look to see how the development of this site may be taken forward.

Nick Ide MRTPI

Director

IDE Planning.

24 October 2016.

ANNEX A

EXTRACT FROM EARLIER LOCAL PLAN (believed to be that for the Rural Area dated c 1993).

Policy PLU 3 refers.

3

6.14 **PLUCKLEY**

PLUCKLEY STATION BRICKWORKS

6.14.1 Because of the long term future of the works there is likely to be a need for further development on the site and the following policy will apply:-

PLU1 FAVOURABLE CONSIDERATION WILL BE GIVEN TO PROPOSALS FOR FURTHER EMPLOYMENT GENERATING DEVELOPMENT AT THE BRICKWORKS PROVIDED SUCH DEVELOPMENT IS RELATED TO THE FUTURE NEEDS OF THE WORKS AND IS ON LAND IMMEDIATELY ADJOINING THE EXISTING PLANT. IN ADDITION, SUCH DEVELOPMENT SHOULD BE IN ACCORDANCE WITH POLICIES E1-3. THE BOROUGH COUNCIL WILL SUPPORT THE REMOVAL OF THE LIQUID PETROLEUM GAS TANKS AND WELCOME THE USE OF AN ACCEPTABLE ALTERNATIVE FUEL.

BRICKWORK COTTAGES SITE - PLUCKLEY STATION

6.14.2 Land on the site of the old Brickwork Cottages is proposed for employment generating development. Dependent on the type of development, survey work has suggested a direct connection to the sewage pumping station may be required. Accordingly, the following policy will apply:

PLU2 FAVOURABLE CONSIDERATION WILL BE GIVEN TO THE DEVELOPMENT OF THE OLD BRICKWORK COTTAGES SITE FOR EMPLOYMENT GENERATING USES SUBJECT TO THE REQUIREMENTS OF POLICIES E1-3 BEING MET AND THE PROVISION OF A DIRECT CONNECTION TO THE SEWAGE PUMPING STATION IF NECESSARY.

OLD GOODS YARD, PLUCKLEY STATION

6.14.3 Land at the Old Goods Yard has planning permission for an oil storage depot and is shown on the Proposals Map. The adjacent land is also proposed for employment-generating development. However, because of access constraints development will only be acceptable if it results in a low level of traffic generation and provides for the improvement of the existing access. Accordingly, the following policy will apply:

PLU3 FAVOURABLE CONSIDERATION WILL BE GIVEN TO EMPLOYMENT GENERATING DEVELOPMENT ON LAND AT THE OLD GOODS YARD PROVIDED PROPOSALS RESULT IN A LOW LEVEL OF ADDITIONAL TRAFFIC GENERATION AND PROVIDE FOR IMPROVED ACCESS ONTO THE BETHERSDEN ROAD.