

Good afternoon.

My name is John Crawford, councillor for Tenterden Council South Ward, deputy Mayor, chair of Tenterden Council Planning Committee and member of the climate change taskforce.

In my working career, I was head of global strategy for blue chip financial companies.

Frequently it involved a forensic examination of new propositions, covering viability, benefits, consequences and deliverability.

Having read the appellants documents, I find this proposal:

- speculative
- unsustainable
- and detached from the real world

The appellants surveys are considered to be incomplete or misrepresented. The community feels the appellants evidence is smoke and mirrors, to disguise the true facts of the site.

One common denominator, is the lack of a quality and comprehensive base lines.

The general public objections have spelt out reliable facts, based on decades of local knowledge. In particular the sites characteristics, attributes, use and value.

I hope these facts in the communities objections, will be carefully considered during the inquiry.

The Ashford Local Plan and Tenterden Neighbourhood Plan at Reg 14, allow the community to shape its future, and grow the housing stock, in a controlled sustainable manner.

Key for any planning within Tenterden, is successful engagement with the parish community, to understand their wishes how to grow the town, tourist economy, protection of valued areas, and sustainable healthy living.

The appellant's engagement events were not successful in listening or understanding communities views.

Whereas, the Tenterden Neighbourhood Plan Group engagement has been tremendously successful.

With the agreed community vision for the town, the group gathered the social, economic and environmental evidence to produce the relevant policies.

The main event at St Mildreds Church attracted 600 residents. Endorsement of the proposals by the community was overwhelming, including the proposed local green space designation for Limes Land.

[Please see submitted evidence "Tenterden NP Policy TEN NP2 Local Green Space for Limes Land"]

We are now at Reg 14, where we asked the community and stakeholders, to comment and improve on specific policies. It was not just a 'yes/no' exercise, but a genuine consultation to help frame and refine our plan. As such, we are very pleased with the responses.

[Please see submitted evidence "Tenterden NP Policies"]

Sir, I shall now like cover each of my ten main areas of concern.

1. Not Delivering the Vision.

The Local Plan is evidence based. It has ensured joined up thinking for delivery of both houses and required infrastructure.

The vision confirms specifically for Tenterden, "to conserve and enhance" its historic centre, and accommodate development of a suitable scale, design and character. It has to be emphasised, the examiners supported Ashford, for correct placemaking in Tenterden.

The high quality of Tenterden's landscape setting and its intrinsic historic character, are factors that new development in the town should be limited, phased and very carefully planned.

That does not mean building 145 speculative houses.

The appellants proposal does not comply with the vision, nor comply with strategic policies SP1 and SP2 to deliver the vision.

[Please see at the end of this statement my "Hierarchy of Placemaking" rationale that elucidates further]

2. Poor Placemaking and Sustainability

The appellants proposal says very little about the three pillars of sustainability, and has disregarded the criteria for correct placemaking.

Their application is blinkered, which will harm the town's sustainability, in particular the environment.

The appellant did not undertake a serious baseline profile for the town's needs.

Within their 100 plus documents, they have not provided relevant evidence, how the town will be made socially, economically and environmentally sustainable.

However, objectors have written sustainability profiles, for assessing this development. They show significant harm to sustainability.

The appellants economic arguments have been construction jobs, which are transient and draw skilled labour from across the county, and beyond. This does not benefit the town.

The appellants social claim is creating football pitches, with no quantifiable evidence of the needs or how they will be paid for. There is no viable, enduring and acceptable business plan.

As for their environmental claim, there will be biodiversity species collapse, that cannot be retrieved, let alone create a gain.

Tenterden is known as the 'The Jewel of the Weald' with its Georgian buildings, quaint alleyways, unique attractions and beautiful Wealden countryside. All are magnets for visitors and tourists who come from far and wide, to enjoy the picturesque scenery, country walks, and sample the offering from our shops and hospitality venues.

This is the life blood of Tenterden's economy. The town must not be made unattractive to visit as a consequence of unsustainable housing development. The result would be increased traffic congestion, reduced parking and erosion of our tranquil and beautiful countryside.

In 2018, British Airways article placed Tenterden the number one tourist spot of 'UK's Most Charming Small Towns'. The priority is to preserve the qualities that make Tenterden's tourism special.

Central government wish houses to be collocated next to job markets and major infrastructure projects, to improve productivity. If the appellant is keen to build in the borough, it is suggested they look on the strategic M20 junction corridor 10a.

Ashford is the local employment centre, as well as being a commuting town to London and other major centres.

The appellant is attempting to socially reengineer the local demographics. Young families do not move to Tenterden in droves, as there is no significant employment in the town. Where would the economically active new residents work? Not in Tenterden. They will have to commute by car to major employment centres, due to lack of a railway station and poor-quality transport.

Only a tiny fraction of current residents travel by bus due to cost and frequency.

The needs of the town are being provided by new builds at Tilden Gill, Southern Extension and Pope House Farm.

3. Windfall Dwellings

The Local Plan states the best windfalls for Tenterden, are small scale to preserve its attractive heritage and local character.

History shows development evolving in a natural and managed way, is sustainable. It is evident Tenterden's population is growing, and will continue to grow.

Since the adoption of the February 2019 Ashford Local Plan, Tenterden has contributed 147 windfall units, and continues to support small scale developments that can be absorbed.

[Please see the submitted evidence "Windfall Tally"]

Central governments development mantra is to "build in the right place" and this site is not the right place.

Tenterden's allocated sites will provide a considerable number of affordable homes. In addition, the town should be allowed as per the local plan, to grow organically and sustainably through small scale windfall developments.

4. Inappropriate Master Plan

Duloc (DLUHC) promoted "design codes", is one of the guidance tools to ensure sustainability of new development, covering aesthetics, positive blending with the local vernacular and enduring design.

With Locality, our Neighbourhood Plan design code is tailored for new developments, to blend with the town's vernacular, sustainability and beauty. It is noted the Appeal Statement of Case does not assess its design against the Neighbourhood Plan design code.

The proposed masterplan will be a permanent blot on the landscape. It will create a crude and ugly development corrupting our existing wonderful and naturally wild countryside.

The masterplan and design are not "future proofed" to combat climate change. It will severely contribute to the climate change gases, and significantly harm the landscape and biodiversity. We should NOT allow homes to be built, which later have to be retrofitted at an enormous cost to the resident.

We will only achieve net zero, if development is seen through the climate change prism. It should be at the heart of this planning decision.

5. Significant Harm to the Environment

This proposal runs roughshod over safeguards, and shows little interest in preserving the natural environment, in defiance of ALP Policy ENV1 Biodiversity and NPPF section 15. Both are very specific on the protection of the natural environment, geodiversity, biodiversity and habitat.

The evidence submitted to this appeal, shows the actual list of protected and rare species and Biodiversity Action Plan habitats, which have been wilfully ignored by the appellant. I have been advised that there are 790 recorded species on the Kent & Medway Biological Records Centre, which the appellant has largely ignored.

It has to be remembered we are in a biodiversity emergency, with a major loss of native species. This should not be allowed continue.

This application is not a subtle change to the environment, but a massive urban encroachment devastating the site's rich ecosystems, valuable wildlife and destroying vast quantities of carbon storage in the ground, flora, hedges and trees.

Each development proposal can either contribute towards carbon capture, or contribute towards climate change acceleration.

This proposal is the latter, contribute towards climate change acceleration and has given lip service towards net zero target.

6. Significant Harm to the Landscape and Historic Natural Features

The appellants site description devalues the actual historic Wealden Countryside features.

This locally valued wild parkland, unspoilt for centuries will be lost for ever, with a carbuncle of unsightly elevated homes, flats and pavilion.

It would eradicate the subtle transition between ribbon settlements and the countryside, irrespective of mitigation with buffers and boundary planting.

It would be an unsympathetic intrusion into the rural landscape.

It would not maintain the site's intrinsic character, alluring beauty, the amazing interconnected mosaic landform structures of established trees, ancient hedgerows, watercourses and ponds.

The appellant has under estimated the landscape sensitivity of the site and over estimated the mitigating effects of additional planting.

The actual harm caused, can never be recovered.

Ashford's local character assessment LCA 23 recommends this location, should be "conserved and reinforced". This proposal will create an unacceptable level of harm to the character and appearance.

We must not forget Appledore Road is a significant valued, and beautiful tree lined artery into Tenterden. This is part of the town's historic setting. It should not be spoilt with the loss of magnificent trees and unsightly calming measures.

Regarding historic features, the appellant has attempted to undermine the recorded assets on Kent's Historic Environment Record Database such as Gallows Green. This historic site is recognised and valued by the community.

7. Flooding

The appellant has down played the actual surface water flooding.

They know the site is impermeable.

They know the government flooding website shows high risk of flooding on the southern side.

Yet they ignore the realities.

They continue to use discredited past 100 years flooding statistics, which have no bearing on today's' extreme weather conditions, due to climate change. My photographic evidence submitted, shows that flooding occurs.

[Please see submitted evidence "Surface Water Flooding Map Extract from Government Website"]

The proposed SuDs solution will be hampered with the extensive hard surfaces, causing fast run offs and damaging the immediate area.

We need to remember the geology is impermeable.

The recent Whitehaven appeal [APP/Z0923/W/21/3277409] with similar characteristics to this site, was rejected due to surface water flooding in a zone 1 flooding area.

[Please see submitted evidence “Whitehaven Appeal APP/Z0923/W/21/3277409”]

8. Misapplication of TRICS

The comparison towns selected by i-Transport to calculate traffic movements for this site, are totally inappropriate. They are mostly urban locations, with high quality transportation with no relevant correlation with Tenterden.

This site will create a car dependent community. There will be a significant increase in traffic movement, causing amplified pollution, congestion and gridlock in and around the town.

[Please see submitted evidence “Correlation of Tenterden with Appellants Selected Towns for Calculating Traffic Movement”]

9. Creation of a Car Dependent Development

The NPPF Planning Guidance is very clear. It says to facilitate access to high quality public transport, something Tenterden does not have. The appellants promotion of a new bus stop will achieve very little, if anything. It is window dressing.

Any significant housing windfall in our rural town would be a major mistake. Limited job opportunities would create car dependent commuting, of long distances to employment centres. This is not sustainable, and would cause substantial harm.

20% of Tenterden residents work locally and of those, half travel by car.

It must be remembered, that 80% of the residents travel further afield, mainly to Ashford.

With poor accessibility to local jobs, transportation will be dominated by the car due to convenience, cost, and speed.

10. Deliverability

There are a number of major issues that cannot be addressed by conditions.

First. There is no evidence that the SoS for Education will allow disposal of Homewood School playing fields, for housing development.

Second. There is no evidence that Natural England will give accreditation of the Country Park under the 1968 Countryside Act.

Third. Despite the appellant working on S106 for the last two years, there is no proposed future ownership, maintenance and perpetuity funding for the SuDs, country park, football pitches, etc.

Fourth. There is no evidence that Southern Water and South East Water will commit to sewage and water upgrades in the relevant timescale.

There is a strong view the construction industry is not taking social and environmental responsibilities seriously.

It can be deduced that central government is coming to the same conclusion.

Ministers have made major announcements to cajole developers to become responsible corporate companies.

1. Former Secretary of State Robert Jenrick issued a written statement to direct homes to be built in urban areas with a quality transport system, and not built on greenfield sites.

[Please see submitted evidence “SoS MHCLG Written Statement for Placemaking”]

2. Duloc (DLUHC) SoS Michael Gove, is looking to make it harder for wealthy housebuilders, with large balance sheets to escape section 106 commitments.
3. Michael Gove and Christopher Pincher say that brownfield sites should be built on first, and will be heart for delivering new homes. Greenfield sites to have more protection.
4. Boris Johnson has committed to legislate new homes, to have electric vehicle charging points installed from 2022. These are already standard for the new Tilden Gill homes.
5. Oliver Dowden says that we need to set out in law, measures to: protect our towns, villages and precious countryside from being spoiled by ugly development.
6. The new Environment Bill stipulates a minimum of 10% biodiversity net gain

As can be seen, the planning backdrop has changed over the last few years.

Developers need to acknowledge we now live in a new paradigm, where society is a major stakeholder. The appellant should not be allowed to dodge sustainability responsibilities by focusing purely on shareholder reward.

I should now like to share a few obvious questions with you to gauge the harm this proposal will make:

(pause)

1. Does the proposal conform with the ALP vision and strategic policies?

No. The proposal does not conform with the vision for Tenterden. Only small scale and absorbable windfalls should be considered.

2. Does the proposal follow placemaking guidelines?

No. Placemaking should be on brownfield sites, ideally in urban areas. Access to sustainable quality transport hubs is essential. Greenfields sites should be avoided.

3. Does the proposal make positive actions to achieve net zero for climate change?

No. It will destroy the carbon sequestration environment. The dwellings are reliant on gas boilers with locked in soaring energy bills, resulting in costly future retro fitting. There is no usage of energy efficient technology such as: heat pumps and solar panels.

4. Does it adopt passive designs for keeping homes warm in the winter and cool in the summer?

No. Designs are not future proof for climate change.

[Please submitted evidence "Passivhaus Standard Extract from BRE Group Website"]

5. Does the proposal achieve biodiversity net gain?

No. There will be considerable natural environment biodiversity loss of flora and fauna, including protected and rare species. KWT have stated that Biodiversity net Gain is not possible.

6. Does the proposal improve the landscape flora and physical features?

No. The existing landscape has evolved over centuries. It will be significantly harmed, due to the removal of existing trees and ancient hedgerows. Iconic views will be lost. It is in direct contravention of Landscape Character Area 23.

7. Will the proposal protect the amenity value, privacy and views from the PROW?

No. The irreplaceable amenity valued by the community will be lost.

8. Does the proposal lessen the existing annual surface flooding issues?

No. Potentially making it worse as the appellant has not produced a comprehensive baseline of today's hydrology. There are serious doubts on the practicality of the proposed SuDs.

9. Does the proposal provide access to sustainable transport?

No. There is very little local transport, just misleading claims by i-transport for using buses. .

10. Does the proposed country park provide benefits?

No. A small manicured plot can never replace large natural wild countryside and environment.

In summary, the development is not needed and would harm the town at an economic, social and environmental level. The adverse consequences have either been ignored or poorly covered.

Over the last 50 years and more, planning has been rejected for this site. There are no measurable benefits for the community, only actual harm. This is the worse site to be considered for development.

[Please see submitted evidence "Appellant and TTC Diverged Views Level of Harm"]

I would therefore ask you to reject this appeal.

Note to the Inspector

Please see my objections which explains in more detail my main concerns.

There are a number of evidence documents that have been submitted and should be referenced to understand my arguments. These are:

1. Evidence - SoS MHCLG Written Statement for Placemaking
2. Evidence – History of Appeal Site
3. Evidence - Appellant and TTC Diverged Views Level of Harm
4. Evidence - Tenterden NP Policies
5. Evidence - Tenterden NP Policy TEN NP2 Local Green Space for Limes Land
6. Evidence - Passivhaus Standard Extract from BRE Group Website
7. Evidence – Windfall Tally
8. Evidence - Correlation of Tenterden with Appellants Selected Towns for Calculating Traffic Movement
9. Evidence - Surface Water Flooding Map Extract from Government Website

Hierarchy of Placemaking

The Local Planning Authorities (LPA) will meet its housing and employment needs, through the provision of new high-quality development forming attractive places, with the necessary supporting infrastructure and services (infrastructure development plan), and in sustainable and accessible locations that take account of the Borough's environmental constraints.

The hierarchy for placemaking is in the order of:

- The vision;
- Ashford Site Polices (allocated sites);
- SP1;
- SP2;

Vision

The vision provides the spatial strategy and overarching strategic placemaking, taking into account implications of economic, social and environmental change and identifies opportunities for development. It has specific statements for the development in the rural town of Tenterden which has to be taken into account.

The vision is very well-defined on its aim and the relevance of development across the borough taking a holistic view of factors that would, and would not, make a location sustainable and meet the needs of the Local Planning Authority.

The vision is extremely clear about Tenterden. It says:

- a) To conserve and enhance its historic centre and accommodate development of a suitable scale, design and character.
- b) The identity and attractive character of the Borough's rural area, with its range of attractive settlements, wealth of heritage assets and its expansive countryside, including the Kent Downs AONB to the north and the High Weald AONB to the south, will be conserved and enhanced. This includes Tenterden.
- c) Development within all the rural settlements must conserve and enhance the historic centres and heritage and natural assets. This includes Tenterden.
- d) Para 2.38 provides guidance that growth should be focused towards Ashford and its immediate surroundings whilst applying a policy of limited growth to Tenterden.
- e) Para 2.43 states "As the Borough's principal settlement, Ashford represents the most sustainable location within the borough and therefore where most development should be located."
- f) Para 2.51 says the high quality of Tenterden's landscape setting and its intrinsic historic character are factors that suggest new development in the town should be limited, phased and very carefully planned
- g) Para 2.64 - the Borough's rural area is much more sensitive, too much housing growth would quickly lead to an unsustainable model of housing development overall
- h) Para 2.80 states "The SHELAA shows that there is very little scope to deliver new housing growth within the confines of rural settlements.

- i) Para 2.85 states "These respective priorities should be used as a guide by the developer and decision maker as to the way in which the Local Plan approach should be applied; namely there should not be significant substitutions of housing numbers away from Ashford and its periphery to the rural parts of the Borough

The Ashford site polices for Tenterden include Tent 1A, Tent 1B and Tilden Gill.

SP1

SP1 objective is to deliver the 'Vision', a number of strategic objectives have been identified. They form the basis of this Local Plan's policy framework, as well as providing the core principles that planning applications are expected to adhere to.

Without quoting the whole of SP1 policy, in summary it focuses on:

1. Makes best use of brownfield sites
2. Conserve and enhance the natural environment, designated landscape character areas
3. Promote green infrastructure network
4. Plays a role in managing flooding
5. Delivers net gains in biodiversity
6. Conserve and enhance non-designated heritage assets
7. Creates sustainable highest quality design
8. Encourage non-car based transport
9. Provide a range of employment opportunities to the needs of the local business and attract inward investment
10. Development that is resilient to and mitigates against effects of climate change

These are particularly relevant to this appeal.

SP2

SP2 states, "Windfall housing development will be permitted where it is consistent with the spatial strategy outlined above and is consistent with other policies of this Local Plan, in order to ensure that sustainable development is delivered." The phrase "spatial strategy" is to build houses in the right place. For significant size windfalls this does not apply for Tenterden. Not complying would cause serious sustainability and absorbability issues.

Without quoting the whole of SP2 policy, in summary it focuses on:

1. Housing targets met through a combination of site allocations and suitable windfall proposals
2. Windfall development consistent with sustainability
3. Majority of housing will be at Ashford
4. Suitable locations with access to places of employment
5. Access to transport hubs

The SP2 policy puts this in context by saying, “The high quality of Tenterden’s landscape setting and its intrinsic historic character are factors that suggest new development in the town should be limited, phased and very carefully planned”. Therefore, no more major new development is planned in Tenterden itself, apart from the completion of the master planned southern extension to the town and the permitted extension to housing at Tilden Gill Road on the Shrubcote estate. Combined, these can fulfil the town’s development needs over the Plan period without adversely affecting the character of the town.

There is no identified need for additional housing over and above those in the local plan and the approved windfalls sites.

The strategic direction is very clear and unambiguous for placemaking in Tenterden. The Vision and supporting strategic policies show this application should be refused.