



Tuesday 27th April 2021
543/A3/JJA

Ashford Borough Council
Planning & Development Services
Civic Centre
Tannery Lane
Ashford
Kent
TN23 1PL

Via the Planning Portal

Dear Sirs

**Re: Application by Wates Developments Limited
Land between Appledore Road and Woodchurch Road Tenterden, Kent**

I write with reference to the above, and have pleasure in enclosing a hybrid application for:

a) *Outline application for the development of up to 145 residential dwellings (50% affordable) including the creation of access points from Appledore Road (1 x all modes and 1 x emergency, pedestrian, and cycle only) and Woodchurch Road (pedestrian and cycle only), and creation of a network of roads, footways, and cycleways through the site. Provision of open space including children's play areas, community orchard, sustainable drainage systems, landscape buffers and green links all on 12.35 ha of the site. (Matters for approval: Access)*

And

b) *Full planning permission for the change of land use from agricultural land to land to be used as a country park (8.66 ha), and land to be used as formal sports pitches (3.33 ha), together with pavilion to serve the proposal and the surrounding area. Including accesses, ancillary parking, pathways, sustainable drainage systems and associated landscaping.*

This application has been submitted following a detailed review of our previous application (ref 19/01788/AS) which was a hybrid application for:

'a) *Outline application for the development of up to 250 residential dwellings (40% affordable) including the creation of access points from Appledore Road (all modes) and Woodchurch Road (pedestrian and cycle only), and creation of a network of roads, footways, and cycleways through the site. Provision of open space including children's play areas, community orchards, sustainable urban drainage systems, landscape buffers and green links all on 12.35 ha of the site. (Matters for approval: Access)*

b) *Full planning permission for the change of land use from agricultural land to land to be used as a country park (8.66 ha), and land to be used as formal sports pitches (3.33 ha), together with pavilion to serve the proposal and the surrounding area. Including accesses, ancillary parking, pathways, sustainable urban drainage systems and associated landscaping'*

As you will be aware said application was refused for a number of reasons. This application seeks to address those reasons for refusal and is being promoted on the basis of the aims and objectives of policies SP1, SP2 and HOU5 of the ABLP 2019. The former indicates that 1,000 dwellings will need to be delivered through windfall development during the period 2023/24 – 2029/30 to help the council meet its housing needs, whilst the latter provides specific criteria against which windfall developments will be assessed.

At 145 dwellings, with a resultant reduction in the size of the development parcels, more fragmented edge to the development and wider landscape buffers that provide for enhanced biodiversity corridors and vistas towards St Mildred's; together with a revised access strategy, and more detailed

heads of terms for the future management and maintenance of the proposed sports facilities, country park and ancillary informal natural green space within the development site, as well as clarity on the other planning obligations to be included in the Section 106 Agreement to the extent justifiable in planning policy terms, in particular paragraph 56 of the NPPF and regulation 122 of the Community Infrastructure Levy Regulations 2010, this application materially differs from that previously submitted, and we trust you will agree demonstrates a conscious effort on the behalf of Wates to address the reasons for refusal.

The fact this application also looks to provide for 50% affordable housing rather than the policy requirement of 40% demonstrates a conscious effort on the behalf of Wates to help address the compelling need for affordable housing in the borough.

This application also looks at the merits of this application in the light of the councils acknowledged lack of a 5 year housing land supply, and the resultant engagement of the 'tilted balance' and the presumption in favour of sustainable development. Albeit the 'tilted balance' is not in our opinion essential for the planning balance still to rest in favour of granting planning permission in this instance.

We consider the proposed development would help meet the boroughs housing needs in what is a highly sustainable location, on the edge of Tenterden, the second largest town in the borough, at a time when the council have an acknowledged lack of a 5 year housing land supply. Not only would the proposed development comply with the criteria set out in policy HOU5, but facilitate a number of economic, social and environmental benefits, including a new country park and sports pitches that reflect the identified needs of the area as set out in Ashford Borough Council's Playing Pitch Strategy, and affordable housing above and beyond the normal policy requirement. The scale of development relative to that proposed elsewhere within the borough being such that the proposed development respects the spatial strategy set out in policy SP2 of the ABLP, and the strategic objectives set out in policy SP1 of the ABLP.

In the context of the above, we have in this submission also sought to address a number of other issues which are in our opinion material to the determination of this application. These include the nature of the residential accommodation and overall scale of development including the level of affordable provision; the form, layout and design of the proposed development; the landscape and visual impact of the proposed development on the area; the effect of the proposed development on existing landscape features and heritage assets; the effect of the proposed development on areas of ecological interest/protected species; the effect of the proposed development on the privacy and amenity of adjacent residents; the effect of the proposed development in transportation and highway terms; the sites suitability for development in terms of flood risk; the potential effect of the proposed development upon the cultural heritage of the site and surrounding area; the effect of the proposed development in terms of loss of agricultural land; and the effect of the proposed development on local mineral reserves, on energy consumption, foul water drainage, the capacity of the service providers and on local infrastructure.

A considerable amount of information has been submitted with the application as a thorough review of the site has been carried out to ensure that the policies within ABLP and the HOU5 criteria have been met.

If you wish to discuss anything further please do not hesitate to contact me.

Yours sincerely



JUDITH ASHTON
Judith Ashton Associates

cc Rio Daniel - Wates Developments Limited

Encl

Planning Application and forms

NB as a resubmission within 12 months of a refusal no application fee is required.

Reports

The Planning Statement produced by Judith Ashton Associates;
The Design and Access Statement produced by Re-Format LLP
The Appledore Road Avenue Study; produced by Re-Format LLP;
The Local Affordable Housing Needs produced by Lichfields;
Five Year Housing Land Supply Assessment produced by Lichfields;
The Tenterden Growth and Community Services Assessment produced by Lichfields;
The Sports Facilities Supporting Statement produced by Consult QRD Ltd
The Transport Assessment produced by iTransport;
The Travel Plan Statement produced by iTransport;
The Flood Risk Assessment & Surface Water Drainage Strategy produced by RSK;
The Foul Drainage & Utilities Assessment produced by RSK;
The Landscape and Visual Assessment produced by SLR;
The Arboricultural Implications Report prepared Simon Jones Associates Limited;
The Landscape and Ecological Management Plan produced by SLR in consultation with Ecology Solutions, RSK and Simon Jones Associates Limited;
The Ecological Assessment produced by Ecology Solutions;
The Heritage Statement produced by Pegasus Group (Heritage);
The Desk Based Archaeological Assessment produced by RPS;
The Historic Landscape Assessment produced by RPS;
The Sustainability and Energy Statement by Bluesky Unlimited;
The Ground Appraisal Report produced by Geo-Environmental Services Limited;
The Air Quality Assessment produced by Fichtner Consulting Engineers Ltd
The Minerals Assessment produced by Barton Willmore;
The Agricultural Impact Statement produced by Reading Agriculture;
The Statement of Community Involvement produced by Cratus;
The Affordable Housing Statement produced by Judith Ashton Associates; and
The Draft Heads of Terms of S106 Agreement produced by Judith Ashton Associates.

Drawings for approval:

21037- RFT - 00 - 00 - DR - A – 0100 rev P02 - Site Location Plan

403.06269.00058.landscape1	Landscape masterplan for the whole development
403.06269.00058.landscape2	Landscape masterplan for the country park and sports facilities
403.06269.00058.landscape3	Landscape masterplan for the pavilion area
403.06269.00058.landscape4	Landscape masterplan for the orchard

TGMS1044.18-1 rev 8 Proposed and Existing Levels – Fields F10 and F14
 7657 03 01 rev D Block Plan - Proposed Clubhouse Building - Land at Appledore Road
 Tenterden
 7657 03 02 rev F Floor Plan - Proposed Clubhouse Building - Land at Appledore Road
 Tenterden
 7657 03 03 rev F Elevations - Proposed Clubhouse Building - Land at Appledore Road
 Tenterden

ITL9289-GA-100 Proposed site access arrangement, pedestrian, cycle and emergency access
 at land adjacent to number 13 Appledore Road
 ITL9289-GA-102¹ Proposed site access arrangement, school land
 ITL9289-GA-105 Appledore Road, proposed extension of 30mph speed limit and location of
 traffic calming measures
 ITL9289-GA-106 Appledore Road, proposed extension of 30mph speed limit and location of
 traffic calming measures (Detail 1 of 3)
 ITL9289-GA-107 Appledore Road, proposed extension of 30mph speed limit and location of
 traffic calming measures (Detail 2 of 3)
 ITL9289-GA-108 Appledore Road, proposed extension of 30mph speed limit and location of
 traffic calming measures (Detail 3 of 3)
 ITL9289-GA-113 Proposed site access arrangement, pedestrian and cycle access from
 Woodchurch Road
 ITL9289-GA-114 Proposed internal street design towards sport pitches

RSK-C-ALL-05-03-01² Proposed Surface Water General Arrangement
 (Sheet 1 of 2)
 RSK-C-ALL-05-03-02 Proposed Surface Water General Arrangement
 (Sheet 1 of 2)
 RSK-C-ALL-05-05-01 Proposed SuDS Features & Overland Flow Routes
 RSK-C-ALL-05-07-01 Critical Hydrological Features
 RSK-C-ALL-01-02-01 Existing ditch, ponds & drainage features
 RSK-C-ALL-01-03-01 Existing Overland Flow Routes and Catchment Areas

Drawings for Information

21037 - RFT- 00 – 00 - DR - A – 0121 rev P02 – Site Plan
 21037 - RFT - 00 - ZZ - DR - A – 2500 rev P03 – Landscape Area Plan

403.06269.00058.landscape5 Play area landscape detail

ITL9289-GA-101 Proposed site access arrangement, land adjacent to number 13 Appledore
 Road
 Swept path analysis – pumping appliance
 ITL9289-GA-103 Proposed site access arrangement, school land
 Swept path analysis – large refuse vehicle
 ITL9289-GA-104 Proposed site access arrangement, school land
 Swept path analysis – pumping appliance
 ITL9289-GA-109 Entry / exit existing driveways on Appledore Road (Plan 1 of 4)
 ITL9289-GA-110 Entry / exit existing driveways on Appledore Road (Plan 2 of 4)

¹ All highway plans are contained within the TA

² All drainage plans are contained within the FRA

ITL9289-GA-111	Entry / exit existing driveways on Appledore Road (Plan 3 of 4)
ITL9289-GA-112	Entry / exit existing driveways on Appledore Road (Plan 4 of 4)
ITL9289-GA-115	Proposed internal street design towards sport pitches, forward and junction visibility
ITL9289-GA-116	Limit of highway to be offered for adoption
ITL9289-GA-117	Proposed internal street design towards sport pitches Swept path analysis – large refuse vehicle
ITL9289-GA-118	Proposed internal street design towards sport pitches Swept path analysis – fire tender
ITL9289-GA-119	Site layout swept path analysis – large refuse vehicle
ITL9289-GA-120	Site layout swept path analysis – fire tender

RSK-C-ALL-05-04-01rev P04³ Proposed Foul Water General Arrangement

³ Foul drainage plans are in the Foul Drainage & Utilities Assessment