

**Culture and the Environment**  
**Comments regarding proposed development**

**Application 19/01788/AS**

Outline application for up to 250 dwellings

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

**Response to Wates comments – Notes from 17.06.2020**

**Sports provision**

- 1.1. We understand the approach for the management of the sports 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.
- 1.2. Currently the application appears to provide only assurance from the Land Trust, who are not a suitable organisation to directly manage the sports provision. Given the substantial nature of the proposed works with regards sports provision, the risk is too great to progress without any commitment to the management of sports provision from a suitably experienced organisation.
- 1.3. 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.
- 1.4. We have reviewed the approach to cut and fill, and note that banks appear to be between 1:3 and 1:5 gradient. Our preference is for a shallow gradient, where this can be accommodated without impact on the RPA's of existing trees.

**Informal/natural provision**

- 1.5. Please note that all calculations are based on the current open space SPD, and require indexation.

**Play**

- 1.6. As noted above, all calculations are based on the current open space SPD, and require indexation. The contributions are the minimum expectation for what should be delivered on site, and not the maximum.
- 1.7. We have reviewed the LEMP in terms of management of the play 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.
- 1.8. We also request a condition regarding public consultation that will inform the final design for play and open space. 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.

**Allotments**

- 1.9. The three year time limit to identify local need and a project is not acceptable; ten years is standard and accepted as a timescale for spend of S106 contributions, and will be appropriate.

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#### **Strategic Park**

1.10. Off site contribution now agreed.

#### **Ecology & biodiversity**

1.11. Our comments remain unchanged; we expect a net gain in terms of biodiversity and loss of landscape features. We note that comments from KCC and KWT are contradictory, providing uncertainty on the impact on biodiversity and net loss.

1.12. KWT currently dispute a net gain in biodiversity. This somewhat contradicts the statement in the outline LEMP, p18: '*Wates Developments is committing to an overall gain in net biodiversity across the site. Early discussions with KWT on the proposals and a commitment to biodiversity net gain allowed an agreed set of collaborative principles to be formed between the parties which outlined that biodiversity net gain would be achieved through creation of an agreed ecological enhancement strategy and the Landscape and Ecology Management Plan (LEMP). A series of meetings on site and discussions on the proposals have evolved the enhancements on site and the management proposals which now form part of this submission.*'

#### **Management**

1.13. As discussed the Land Trust have been approached to manage the public open space and sports provision in perpetuity. As previously requested, we need to see more detail on who the Land Trust intend to partner with, both for sports provision but also for the management of open space and community involvement and investment.

1.14. This is part of our requirement of the developer to demonstrate a reasonable level of certainty that the facility will be managed, with agreed maintenance sum committed for ten years.

1.15. We note the example S106 models; please clarify that it will be the Land Trust (or similar suitable organisation) that will be the owner of the site; currently we are not clear on which organisation will have ultimate responsibility for the public open space and sport provision.

1.16. We note the use of the pavilion for cadet use, but what does this actually translate into in practice? There are several conflicting parties who will potentially use the proposed pavilion building and associated open space; we would like to see draft clauses for a Community Use Agreement now, which ensure adequate provision for the local community, Cadet use, and use by a sports club or clubs.

1.17. We have reviewed the possible S106 model. We note that the maintenance calculation for play has not been separated; as an open space typology Play is significantly more costly than informal/natural green space, and therefore requires its own calculation to ensure adequate maintenance budget.

#### **Arts & Voluntary Sector**

1.18. Regarding these requests, please see the following paragraphs for detail on the St Mildred's Church project. Information is also available on line:  
<https://www.mytenterden.co.uk/directory/st-mildreds-the-future-listing-1487.aspx#.XvDBTeRYaUI>

1.19. St Mildred's Church is the largest indoor community space in Tenterden. It currently has realistic plans and ambitions to redevelop the historic church into a twenty-first

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century mix use worship time, community and cultural venue for the residents of Tenterden and beyond. The major project will also ensure that their historic church continues to remain at the heart of the community. It has been evidenced that there is a significant demand for increased access to cultural, arts and music events in Tenterden and this is felt across the community, not in any one specific interest or age group. St Mildred's is a key feature in Tenterden and no one is in any doubt that it should be preserved and developed as a resource for the whole community, not just the congregation.

- 1.20. This s106 request for the arts sector will be directed to fund the arts and cultural capital equipment costs (staging, lighting, sound, box office, and front and back of house systems) needed to realise the space as an open, welcoming and professional venue for all. The voluntary sector contribution is justified towards supporting the operational development to manage their ambitions. This includes development of an arts and cultural programming committee, with a small arts commissioning pot, as well as provide the required training and volunteer development.
- 1.21. Phase 1a of the project is currently underway to deliver this scheme (basic pew removal, floor repairs and purchase of seats for audiences and congregation alike. Phase 1b is as described above, as well as an extension for toilets, plant room and storage.